

Recirculated Draft Environmental Impact Report  
*SCH No. 2020040325*

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**Stoneridge Commerce Center**  
Riverside County, California

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**Lead Agency**  
Riverside County  
Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

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**Lead Agency**

Riverside County  
Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

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**Lead Agency Discretionary Permits**

General Plan Amendment (GPA 190008)  
Amendment No. 1 to Specific Plan No. 239 (SP 239A1)  
Change of Zone (CZ 1900024)



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## **ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE**

<u><b>Acronym</b></u>	<u><b>Definition</b></u>
§	Section
°F	Fahrenheit
µg/m <sup>3</sup>	Micrograms per Cubic Meter
A-1	“Light Agriculture” Riverside County zoning designation
A-1-10	“Light Agriculture – 10 Acres” Riverside County zoning designation
A-2	“Heavy Agriculture” Riverside County zoning designation
A-D	“Agriculture-Dairy” Riverside County zoning designation
A-P	“Light Agriculture with Poultry” Riverside County zoning designation
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
AB	Assembly Bill
AB 16	Assembly Bill 16
AB 32	California Global Warming Solutions Act of (2006)
AB 52	Native Americans: California Environmental Quality Act
AB 341	Mandatory Commercial Recycling Program
AB 939	California Solid Waste Integrated Waste Management Act
AB 1327	Waste Reuse and Recycling Act
AB 1358	Complete Streets Act
AB 1493	Pavely Fuel Efficiency Standards
AB 2185	Assembly Bill 2185
AB 3030	Assembly Bill 3030
ABAU	Adjusted Business As Usual
ACM	Alternative Calculation Method
ACOE	Army Corps of Engineers
ACS	American Community Survey
ADOE	Archaeological Determinations of Eligibility
ADT	Average Daily Traffic
ADT	Average Daily Trips
af	Acre-feet
af/yr	Acre Feet per Year
AG	Agriculture
AIA	Airport Influence Area
AICP	American Institute of Certified Planners
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	Above Mean Sea Level
APS	Alternative Planning Strategy



<u>Acronym</u>	<u>Definition</u>
APN	Assessor Parcel Number
AQA	Air Quality & Greenhouse Gas Assessment
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Society of Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BACM	Best Available Control MeasureBMPs Best Management Practices
BLM	Bureau of Land Management
BP	Business Park
BP	Before Present
BSC	Building Standards Code
BTU	British Thermal Unit
C/V	“Citrus/Vineyard” Riverside County zoning designation
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAB	California Architects Board
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalEnviroScreen	California Communities Environmental Health Screening Tool Version 3.0
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CBSC	California Building Standards Code
CBSC	California Building Standards Commission
CC	Community Center
CCR	California Code of Regulations
CCAA	California Clear Air Act
C&D	Construction and Demolition
CDC	California Department of Conservation
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDPR	California Department of Pesticide Regulation
CEC	California Energy Commission



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CETAP	Community Environmental Transportation Acceptability Process
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CFS	Cubic Feet per Second
CGC	California Government Code
CH <sub>4</sub>	Methane
CDFW	California Department of Fish and Wildlife
CHL	California Historic Landmarks
CIWMB	California Integrated Waste Management Board
CIWMP	Riverside Countywide Integrated Waste Management Plan
CLCA	California Land Conservation Act
CMP	Congestion Management Program
CMUTD	California Manual on Uniform Traffic Control Devices
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
COA	Conditions of Approval
COG	Council of Governments
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2e</sub>	Carbon Dioxide Equivalent
COP	Conference of the Parties
COP	Community Oriented Policing
COPPS	Community Oriented and Policing Problem Solving
CPEP	Clean Power and Electrification Pathway
CPHI	California Points of Historical Interest
CPUC	California Public Utilities Commission
CR	Commercial Retail
CRA	Cultural Resources Assessment
CRA	Colorado River Aqueduct
CRHR	California Register of Historic Places
CSA	Community Service Area
CTC	California Transportation Commission
CTR	California Toxic Rule
CUP	Conditional Use Permit
CWA	Clean Water Act
CWC	California Water Code
c.y.	cubic yards
CZ	Change of Zone
CZ 1900024	Change of Zone 1900024
dB	Decibel



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
dBa	A-weighted Decibels
DBESP	Determination of Biological Equivalent or Superior Preservation
DBF	deposit-based fee
DC/TP	discovery clause/treatment plan
DEH	Department of Environmental Health
DIF	Development Impact Fee
DMA	Drainage Management Areas
DMV	Department of Motor Vehicles
DOE	Determination of Eligibility
DOF	California Department of Finance
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
du/ac	Dwelling Units per Acre
DWR	Riverside County Department of Waste Resources
DWR	Riverside County Department of Water Resources
EA	Environmental Assessment
EAP	Existing Plus Ambient Plus Project
EAPC	Existing Plus Ambient Plus Cumulative Plus Project
e.g.	for example
EDR	Environmental Data Resources, Inc.
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMFAC	EMission FAcTtor model
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-To-Know Act
EPS	Emission Performance Standard
ESA	Environmental Site Assessment
ETW	Equivalent Test Weight
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA-RD-77-108	FHWA Highway Traffic Noise Prediction Model
FHWA	Federal Highway Administration
FIMA	Federal Insurance and Mitigation Administration
FIRM	Flood Insurance Rate Map





<u>Acronym</u>	<u>Definition</u>
FMMP	Farmland Mapping and Monitoring Program
FMZ	Fuel Modification Zone
FPP	Fire Protection Plan
FPEIR	Final Program Environmental Impact Report
FRAP	Resource Assessment Program
FTA	Federal Transit Administration
FYI	for your information
GBN	Ground-Based Noise
GBV	Ground-Based Vibration
GHG	Greenhouse Gas
GLO	General Land Office
GMP	Groundwater Basin
GMZ	Groundwater Management Zone
GOBiz	Governor’s Office of Business and Economic Development
gpd	Gallons per Day
GPA	General Plan Amendment
GPA 190008	General Plan Amendment No. 190008
GPCD	Gallons per Capita per Day
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GVWR	Gross Vehicle Weight Rating
GWH	Gigawatt Hours
Ha	High Sensitivity A
Hb	High Sensitivity B
HAPs	Hazardous Air Pollutants
HBW	Home Based Work
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HD	heavy-duty
HHD	Heavy-Heavy Duty Trucks
HI	Hazard Index
HMBEP	Hazardous Materials Business Emergency Plan
HMTA	Hazardous Materials Transportation Act
HMTAUSA	Hazardous Materials Transportation Uniform Safety Act
HOV	High-Occupancy Vehicle
HPDF	Historic Property Data File
HPS	High Pressure Sodium
HRA	Health Risk Assessment
HSC	Health and Safety Code
HSWA	Federal Hazardous and Solid Waste Amendments
HUD	Department of Housing and Urban Development



<u>Acronym</u>	<u>Definition</u>
HWCL	Hazardous Waste Control Law
I	Interstate
I-215	Interstate 215
I-15	Interstate 15
i.e.	that is
IA	Implementing Agreement
ICAO	International Civil Aviation Organization
IEPR	Integrative Energy Policy Report
In/sec	Inches Per Second
IRP	Integrated Resource Planning
ISO	Independent Service Operator
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
ITIP	Interregional Transportation Improvement Plan
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
JPA	Joint Powers Authority
LACM	Museum of Los Angeles County
LBNL	Lawrence Berkeley National Laboratory
LDA	light-duty auto
LCFS	low carbon fuel standard
LDT1	Light-Duty Trucks with an ETW of less than or equal to 3,750 pounds
LDT2	Light-Duty Trucks with an ETW between 3,751 and 5,750 pounds
LEA	Lead Enforcement Agency
Leq	equivalent continuous sound level
LI	“Light Industrial” SP 293 land use designation
Lmax	maximum noise level
LNAP	Lakeview/Nuevo Area Plan
LOS	Level of Service
LRA	Local Responsibility Areas
LSEs	Load-Serving Entities
LSTs	Localized Significance Thresholds
LTF	Local Transportation Fund
LTOs	Licensed Timber Operators
LUST	Leaking Underground Storage Tank
MARB	March Air Reserve Base
MCY	Motorcycles
MCP	Mid-County Parkway
MD	medium-duty
MDP	Master Drainage Plan
MDR	“Medium Density Residential” SP 293 land use designation



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
MDV	Medium-Duty Trucks
MGD	million gallons per day
MHDR	“Medium High Density Residential” SP 293 land use designation
MHDT	Medium-Heavy Duty Trucks
MICR	Maximum Individual Cancer Risk
MLD	Most Likely Descendent
MMTs	million metric tons
MMTCO <sub>2e</sub>	million metric tons of carbon dioxide equivalent
MMTCO <sub>2e</sub> /yr	million metric tons of carbon dioxide equivalent per year
Mph	Miles Per Hour
MPO	Metropolitan Planning Organization
MRZ-3	Mineral Resource Zone 3
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MSR	million solar roofs
MVTS	Moreno Valley Transfer Station
MWD	Metropolitan Water District
NAHC	Native American Heritage Commission
NAGPRA	National American Graves Protection and Reparation Act
NAAQS	National Ambient Air Quality Standards
NDA	No Development Alternative
NDC	nationally determined contributions
NEPSSA	Narrow Endemic Plant Species Survey Area
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHLs	National Historic Landmarks
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
N <sub>2</sub> O	Nitrous Oxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NPA	No Project Alternative
NPDES	National Pollutant Discharge Elimination System
NPRM	Notice of Proposed Rule Making
NPS	National Park Service
NPS	non-point source
NRHP	National Register of Historic Places
NTR	National Toxic Rule
NUSD	Nuview Union School District



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
NVIA	Noise and Vibration Impact Assessment
O <sub>3</sub>	Ozone
OAG	Office of Attorney General
OAL	Office of Administrative Law
OBUS	Other Buses
OEHHA	Office of Environmental Health Hazard Assessment
Off-Site CRA	Off-site impact areas
OHP	Office of Historic Preservation
OIH	Office of Industrial Hygiene
OPR	Office of Planning and Research
OS-C	“Open-Space Conservation” SP-293 land use designation
OS-CH	Open Space – Conservation Habitat
OS-R	“Open-Space Recreation” SP 293 land use designation
OS-W	“Open-Space Water” SP 293 land use designation
OSHA	Occupational Safety and Health Assessment
PA	Public Address
PCBs	Polychlorinated biphenyls
PCEs	Passenger Car Equivalents
PeMS	Caltrans’ Performance System Website
PF	“Public Facilities” SP 293 land use designation
PG&E	Pacific Gas and Electric
PHF	peak hour factor
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	Particulate Matter
PM <sub>2.5</sub>	Fine Particulate Matter (2.5 microns or smaller)
PM <sub>10</sub>	Fine Particulate Matter (10 microns or smaller)
POUs	Publicly-Owned Electric Utilities
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PRPA	Paleontological Resources Preservation Act
PUC	Public Utilities Code
PUHSD	Perris Union High School District
PVRWRF	Perris Valley Regional Water Reclamation Facility
PWQMP	Preliminary Water Quality Management Plan
Qvof	Quaternary Very Old Fan Deposits
R-A-5	Residential Agricultural, 5-acre Minimum Lot Size
R-R	“Rural Residential” Riverside County Zoning Designation
RC-LDR	Rural Community – Low Density Residential
RCA	Western Riverside County Regional Conservation Authority



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
RCALUC	Riverside County Airport Land Use Commission
RCCDR	Riverside County Center for Demographic Research
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCSD	Riverside County Sheriff’s Department
RCIT	Riverside County Information Technology
RCPG	Regional Comprehensive Plan and Guide
RCPLS	Riverside County Public Library System
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
RCWD	Rancho California Water District
REC	Recognized environmental Concerns
REL	Reference Exposure Level
RHNA	Regional Housing Needs Assessment
RivTAM	Riverside Transportation Analysis Model
RMM	Riverside Municipal Museum
RMS	root mean square
ROGs	Reactive Organic Gasses
ROW	Right-of-Way
RPFs	Registered Professional Foresters
RPS	Renewable Portfolio Standards
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SF/s.f.	square foot or square feet
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB 18	Senate Bill 18
SB 1	Road Repair and Accountability Act of 2017
SB 32	Statewide for California to reduce GHG emissions
SB 50	Senate Bill 50
SB 221	Senate Bill 221
SB 325	Transportation Development Act (Mills-Alquist-Deddeh Act)
SB 375	Senate Bill 375



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
SB 350	Clean Energy and Pollution Reduction Act of 2015
SB 610	Senate Bill 610
SB 743	Senate Bill 743, Transportation Impacts
SB 1000	Senate Bill 1000
SB 1368	CPUC adopt a GHG emission performance standard
SB 1078	California Renewables Portfolio Standard Program
SBCM	San Bernardino County Museum
SCAB	South Coast Air Basin
SCAG	Sothern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas and Electric
SDNHM	San Diego Natural History Museum
SDWA	Safe Drinking Water Act
SED	Socio-Economic Data
SFP	School Facilities Program
SGC	Strategic Growth Council
SGMA	Sustainable groundwater management act
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Officers
SHRC	State Historical Resources Commission
SHS	State Highway System
SHWS	State Hazardous Waste Sites
SIPs	State Implementation Plans
SJVAPCD	San Joaquin Valley Air Pollution Control District
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLPS	short-lived climate pollutant strategy
SMARA	Surface Mining and Reclamation Act of 1975
SNUR	Significant New Use Rule
SoCalGas	Southern California Gas
SOC	Statement of Overriding Conditions
SoCAB	South Coast Air Basin
SO <sub>2</sub>	Sulfur Dioxide
SO <sub>x</sub>	Sulfur Oxide
SP	Specific Plan
SP Zone	Specific Plan Zone
SP 239	Stoneridge Specific Plan No. 239
SP 239A1	Stoneridge Specific Plan No. 239 Amendment No. 1
SP 246	McCanna Hills Specific Plan No. 246



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
SP 293	Winchester Hills Specific Plan No. 293
SR	State Route
SR-74	State Route 74
SR-79	State Route 79
SRA	Source Receptor Area
SRA	State Responsibility Areas
SRRE	Source Reduction and Recycling Elements
STA	State Transit Assistance
STC	Sound Transmission Class
STIP	Statewide Transportation Improvement Program
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TAZ	traffic analysis zones
TCL	Traditional Cultural Landscape
TDA	Transportation Development Act
TDM	Transportation Demand Management
THP	Timber Harvesting Plan
TIA	Traffic Impact Analysis
TPA	Transit Priority Area
TPD	Tons per Day
TPY	Tons per Year
TTM	Tentative Tract Map
TUMF	Transportation Uniform Mitigation Fee
UCR	University of California, Riverside
UNFCCC	United Nations Framework Convention on Climate Change
U.S.	United States
USDA	United States Department of Agriculture
USEPA	United States of Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
UWMP-MWD	MWD’s 2015 Urban Water Management Plan
VHDR	“Very High Density Residential” SP 293 land use designation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VVUSD	Val Verde Unified School District
W-1	Watercourse, Watershed & Conservation Areas
W-2	Controlled Development Areas



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
WDR	Water discharge report/ requirements
WMI	Watershed Management Initiative
WMIE	Waste Management Inc. of the Inland Empire
WQMP	Water Quality Management Plan
WRP	Waste Recycling Plan
WRRRA	Waste Reuse and Recycling Act
WRCOG	Western Riverside Council of Governments
WSA	Water Supply Assessment
WSC	Western Science Center
WSCP	Water Shortage Contingency Plan
WSP	High-cube Warehouse Trip Generation Study
WUI	Wildland-Urban Interface
ZE/NZE	zero- and near-zero emission
ZORI	Zones of Required Investigation





## R.0 RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

### R.1 INTRODUCTION TO THE RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

This Recirculated Draft Environmental Impact Report (RDEIR) for the Stoneridge Commerce Center project (hereafter, the “Project” or “proposed Project”) has been prepared to inform the public of changes to the document since the Draft Environmental Impact Report (DEIR) was initially distributed for public review from April 8, 2022 through May 23, 2022. During the public review period for the DEIR, Riverside County received a total of 16 comment letters, inclusive of letters received after the close of the public review period, and postponed preparation of the Final EIR (FEIR) until it could evaluate comments set forth in the letters. Based on the volume and nature of the comments, the County directed the preparation of this RDEIR. The Project as originally proposed by the Project Applicant and described in the previously-circulated DEIR remains the “proposed Project” for purposes of review in this RDEIR, with exception of a reduction to the maximum amount of building area allowed on site, a change in the use types for the light industrial component of the Project, and the introduction of several Alternative Truck Routes, as summarized in Subsection R.3, below.

This RDEIR has been prepared in accordance with the California Environmental Quality Act, Public Resources Code § 21000, et seq. (CEQA) and the State CEQA Guidelines, California Code of Regulations, Title 14, § 15000, et seq. (State CEQA Guidelines). This RDEIR will be used by Riverside County and other interested parties to identify the significant environmental impacts associated with the proposed Project. This RDEIR includes all sections of the DEIR, because the DEIR is being recirculated for public review in its entirety. This RDEIR, along with any comment letters received by Riverside County during the RDEIR’s public review period and written responses thereto, will comprise the Final EIR, which will be considered for certification by the Riverside County Board of Supervisors.

This RDEIR section: (i) sets forth the legal requirements for recirculation of a DEIR; (ii) outlines the environmental review and comment process for the RDEIR; (iii) describes the content, format, and summary of the RDEIR; (iv) summarizes revisions made to the Project since the public review period for the DEIR concluded on May 23, 2022; and (v) includes responses to comments received during the 45-day public review period for the DEIR.

### R.2 LEGAL AUTHORITY

#### R.2.1 REQUIREMENTS FOR RECIRCULATION UNDER CEQA

Under CEQA, recirculation of a DEIR must occur when significant new information is added to the EIR after notice is given of the availability of the DEIR for public review, but before the EIR is certified. Pursuant to State CEQA Guidelines § 15088.5(a):

*New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*



State CEQA Guidelines Sections 15088.5(a)(1) through 15088.5(a)(4) provides the following four examples of “significant new information” that triggers recirculation:

- a. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- b. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- c. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it; and
- d. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Under CEQA, the Lead Agency has the option to recirculate only a portion of the DEIR if the revisions were limited to a few chapters; in such a case, the Lead Agency need only recirculate the chapters or portions that have been modified (State CEQA Guidelines § 15088.5(c)). However, the Lead Agency also may recirculate the DEIR in its entirety.

## **R.2.2 PUBLIC NOTICING AND PUBLIC REVIEW REQUIREMENTS**

Notice of the RDEIR must be given in the same manner as notice of the previously circulated DEIR (State CEQA Guidelines § 15088.5[d]). Accordingly, notice of this RDEIR will be provided to all organizations and individuals who previously requested notice and by making available copies of the RDEIR on the Riverside County Planning Department’s web site (<https://planning.rctlma.org/>). Additionally, the Lead Agency will provide notice to every agency, person, or organization that commented on the original DEIR, and will re-notice all surrounding property owners and Responsible and Trustee Agencies who were notified during the initial public review period for the DEIR.

The 45-day public review period for this RDEIR is set forth by CEQA Guidelines § 15088.5(d), which requires that the public review period for a DEIR (or RDEIR) shall not be less than 30 days nor longer than 60 days except under unusual circumstances. When a DEIR (or RDEIR) is submitted to the State Clearinghouse, the public review period must be at least 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. All of the noticing procedures and requirements set forth in CEQA Guidelines § 15088.5(d), § 15086, § 15087, and § 15105 for circulation of a DEIR will be complied with during the 45-day noticing period for this RDEIR.

## **R.2.3 PUBLIC COMMENTS PROCEDURE**

Pursuant to CEQA Guidelines § 15088.5(f), the Lead Agency (Riverside County) has two options to address public comments received on the previously-circulated DEIR and this subsequently-prepared RDEIR: 1) redistribute the DEIR in its entirety for public review, or 2) redistribute only the portions of the EIR that



have been subject to revision. The purpose of setting forth these options is to enable the Lead Agency to avoid confusion over whether it must respond to comments that are duplicates or that are no longer pertinent due to revisions to the DEIR. In all cases, the Lead Agency is required to respond to pertinent comments on significant environmental issues, either through the responses to comments process or through revisions inserted directly into the RDEIR document.

Pursuant to State CEQA Guidelines § 15088.5(f)(1), if the Lead Agency substantially revises the DEIR and recirculates the entire document for public review, then the Lead Agency only is required to respond to comment letters provided on the RDEIR that was subject to recirculation. In such a case, the Lead Agency is required to notify reviewers, either in the text of the RDEIR or by an attachment to the RDEIR, that although part of the administrative record, the previous comments do not require a written response in the Final EIR, and that all comments must be submitted for the RDEIR in order to be included in the Final EIR.

Due to revisions that have been incorporated into this RDEIR document, Riverside County has opted to recirculate the entire document for an additional 45-day public review period. Additionally, and although not required by the State CEQA Guidelines, this RDEIR includes written responses to the comment letters received by the County during the DEIR's initial public review period. The comment letters and written responses are part of the public record and are addressed in this RDEIR (please refer to Subsection R.3 for a description of the revisions that have been incorporated into this RDEIR document, and refer to Subsection R.6 for responses to comments received by the County on the DEIR). All written comments received by the County on the content of the RDEIR during the RDEIR's public review period will be responded to as part of the Final EIR.

As indicated on the Notice of Completion (NOC) form that will accompany the RDEIR during the public review period, all public comments on the RDEIR should be addressed as follows, and should be post-marked prior to the close of the public review period identified on the NOC form.

Russell Brady, Contract Planner  
Riverside County Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

### **R.3 SUMMARY OF REVISIONS MADE TO PREVIOUSLY CIRCULATED DRAFT EIR**

As a result of the public review period for the DEIR that concluded on May 23, 2022, Riverside County received a number of comments that necessitated revisions to the proposed Project in order to adequately address and respond to the comments received by the County. In accordance with CEQA Guidelines § 15088.5(g), the revisions made to the previously-circulated DEIR and that are reflected in this RDEIR are summarized below. It should be noted that the summary of changes provided below does not include small, non-substantive revisions that have been incorporated to correct grammatical, typographical, or formatting errors. In addition, the discussion provided below reflects changes that have been made to the Project, but does not describe in detail the revised analysis of potential Project impacts resulting from the proposed changes to the Project. Please refer to RDEIR Section 4.0, *Environmental Analysis*, for an updated discussion of potential impacts to the environment resulting from the Project's currently-proposed design. Changes that



have been made to the Project's design since circulation of the DEIR for public review are listed below; please refer to EIR Section 3.0, *Project Description*, for a complete description of the revised Project evaluated as part of this RDEIR:

- **Maximum Light Industrial Building Area.** Based on comment letters received during the public review period for DEIR, the maximum amount of Light Industrial building area allowed within Planning Areas 1 through 5 of proposed Amendment No. 1 to Specific Plan No. 239 (SP 239A1) has been reduced from 8,461,530 square feet (s.f.) to 7,350,000 s.f. under both the Primary Land Use Plan and Alternative Land Use Plan, representing a reduction in light industrial building area by approximately 13.1%. The maximum building area for the proposed Business Park uses within Planning Areas 6 and 7 of proposed SP 239A1 would remain unchanged at 1,069,398 s.f. under the Primary Land Use Plan and 936,540 s.f. under the Alternative Land Use Plan. Similarly, the maximum building area for the proposed Commercial Retail uses within Planning Areas 8A and 8B of proposed SP 239A1 would remain unchanged at 121,968 s.f. under the Primary Land Use Plan and 126,542 s.f. under the Alternative Land Use Plan.
- **Mix of Light Industrial Use Types.** The DEIR assumed that building area within the SP 239A1 Planning Areas that would be designated for Light Industrial land uses would consist of approximately 20% high-cube cold storage uses, 35% high-cube fulfillment center uses, 35% high-cube warehouse uses, and 10% manufacturing uses. In order to provide a more conservative evaluation of potential air quality and health risk impacts that could result from the Project's Light Industrial uses, the amount of high-cube cold storage uses has been increased to 40% of the Light Industrial building area, with 40% of the Light Industrial building area consisting of high-cube fulfillment center uses, 10% consisting of high-cube warehouse uses, and 10% consisting of manufacturing uses. No changes have been made to the land use assumptions for the Project's Business Park or Commercial Retail land uses.
- **Alternative Truck Routes.** In response to comment letters received during the public review period for the DEIR, a total of six (6) different alternative truck routes have been considered. The alternative truck routes have been identified in order to evaluate alternatives to the use of Ramona Expressway for westbound truck traffic in order to determine if any of the Alternative Truck Routes would reduce the Project's potential impacts to sensitive receptors along the identified truck routes. Only three of the Alternative Truck Routes were determined to be feasible: Alternative Truck Routes 1, 2, and 6, as described below.
  - Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. This alternative previously was identified as the "Southern Truck Route" by the DEIR.
  - Alternative Truck Route 2: Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto



Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.

- Alternative Truck Route 6: Alternative Truck Route 6 reflects the truck route previously evaluated in the DEIR for the Alternative Land Use Plan. Under near-term conditions and prior to full buildout of the Mid-County Parkway (MCP), truck traffic would utilize one of the alternative truck routes described above (i.e., Alternative Truck Routes 1 or 2). Once the MCP is constructed and operational, all westbound trucks would be routed along the MCP to the west to access the I-215. Under this alternative, and following completion of the MCP, all eastbound truck traffic would be routed along the MCP to the east.

Three additional Alternative Truck Routes were considered for evaluation in this RDEIR, and are described below. However, for the reasons noted below and in RDEIR subsection 3.6.2.B, Alternative Truck Routes 3, 4, and 5 were determined to be infeasible. Thus, this RDEIR does not include a detailed evaluation of Alternative Truck Routes 3, 4, or 5.

- Alternative Truck Route 3 (Infeasible): Alternative Truck Route 3 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, and west on State Route 74 (SR-74) to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 3 was determined to be infeasible because the segment of Menifee Road between Mapes Road and SR-74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 3 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.
- Alternative Truck Route 4 (Infeasible): Alternative Truck Route 4 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, northwest on Matthews Road/State Route 74 (SR 74), and west on Ethanac Road to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 4 was determined to be infeasible because the segment of Menifee Road between Mapes Road and Matthews Road/SR 74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 4 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.
- Alternative Truck Route 5 (Infeasible): Alternative Truck Route 5 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on future Evans Avenue to access the I-215 freeway. It should be noted that Evans Road south of San Jacinto Avenue and the I-215 Freeway/Evans Avenue interchange do not currently exist and would need to be improved as part of the Project or as part



of regional funding programs. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 5 was determined to be infeasible because implementation of this truck route would require use of the future I-215 Freeway/Evans Avenue. There are no publicly-accessible plans or construction schedules available from Caltrans related to the construction of this interchange, and it would not be financially feasible for the Project Applicant to construct the required interchange. As such, Alternative Truck Route 5 has been determined to be infeasible and therefore is not evaluated in detail as part of this RDEIR.

All other components of the proposed Project would be identical to the Project previously evaluated in the DEIR. Specifically, no revisions have been made to SP 239A1 since the DEIR was circulated for public review, with exception of the above-described reduction in the maximum allowable building area for the Project's proposed Light Industrial land uses. Thus, the Project as evaluated in this RDEIR would continue to be subject to the Development Standards and Design Guidelines set forth by SP 239A1 as previously described in the DEIR. The Project's limits of physical impact remains unchanged at approximately 484.9 acres within the Project site. The Project also would continue to result in impacts to approximately 27.9 acres of offsite disturbances associated with water, sewer, and roadway facilities (as previously discussed in the DEIR), although areas of off-site impacts would change depending on which Alternative Truck Route ultimately is implemented. Refer to RDEIR Section 3.0 for a complete description of off-site roadway improvements required in association with each of the three Alternative Truck Routes evaluated as part of this RDEIR.

## **R.4 OVERVIEW OF THE ENVIRONMENTAL REVIEW PROCESS**

### **R.4.1 BACKGROUND ON THE PROJECT'S ENVIRONMENTAL REVIEW PROCESS**

As part of the CEQA compliance process and prior to publication of this RDEIR, two public notices were issued, as described below:

- **Scoping Process.** As required by CEQA Guidelines § 15082, Riverside County issued a Notice of Preparation (NOP) for the DEIR. The NOP summarized the proposed Project, stated the County's intention to prepare an EIR, and requested comments from interested parties regarding the scope of the EIR. The NOP was filed with the State Clearinghouse on April 27, 2020 (SCH No. 2020040325). The public review period extended for a total of 30 days and concluded on May 27, 2020. Public notification of the NOP included a newspaper announcement and direct mailings or e-mails to all surrounding property owners, Responsible and Trustee Agencies, and other parties who had requested notification.
- **Draft EIR Public Review Process.** Riverside County published and distributed the proposed Project's DEIR for public review on April 8, 2022, which commenced a 45-day public review period that concluded on May 23, 2022. The DEIR included a detailed description of the proposed Project, analyses of potential impacts in 21 environmental disciplines; analyses of potential cumulative and growth inducing impacts analysis; identification and comparison of alternatives to the Project including the CEQA-required No Project Alternative; and mitigation measures that were identified to reduce or avoid significant environmental impacts of the proposed Project. Public notification of the DEIR



included circulation to the State Clearinghouse, and direct mailings or e-mails to all surrounding property owners, Responsible and Trustee Agencies, and other parties who has requested notification.

#### **R.4.2 RECIRCULATED DRAFT EIR ENVIRONMENTAL REVIEW AND DECISION-MAKING PROCESS**

Publication of this RDEIR commences a 45-day public review period that ends on March 11, 2024 (CEQA Guidelines §§ 15088.5[d], 15087[e], and 15108[a]). This RDEIR addresses all previous pertinent comments relating to environmental issues (please refer to Subsection R.6 for responses to individual comment letters received during the public review period for the DEIR). Upon conclusion of the 45-day recirculation period, all comments received by Riverside County on the RDEIR related to environmental issues will be responded to in writing as part of the Final EIR (FEIR). In addition, the FEIR will contain a summary of text and exhibit changes, if any, resulting from comment letters received on the RDEIR. The Final EIR also will include a summary of the entire CEQA compliance process for the proposed Project, including the scoping process, NOP, DEIR, RDEIR, and FEIR.

Riverside County, as Lead Agency, has primary approval responsibility for the proposed Project. The Riverside County Planning Commission will consider the Project as part of a publicly-noticed hearing. The Planning Commission will consider the information contained in the Final EIR and the Project's Administrative Record and will recommend to the Board of Supervisors whether to approve the Project, approve the Project with changes, or deny approval of the Project, and whether to certify the Project's Final EIR. Subsequently, the Board of Supervisors will conduct a publicly-noticed hearing for the Project, and will have the authority to approve, approve with changes, or deny approval of the proposed Project pursuant to Public Resources Code Section 2770(d). The Board of Supervisors also will consider whether to certify the Project's FEIR. In order to certify the Final EIR, the Board of Supervisors must find that the Final EIR reflects the County's independent judgment and that the Final EIR was prepared in accordance with CEQA and the State CEQA Guidelines. If the Project is approved, the Board of Supervisors also will adopt a mitigation monitoring and reporting program (MMRP) to implement the mitigation measures identified in this RDEIR (refer to RDEIR Table S-1), as required by State CEQA Guidelines § 15097. A decision to approve the Project also would be accompanied by written findings in accordance with CEQA Guidelines § 15091, and a Statement of Overriding Considerations in relation to the Project's significant and unavoidable impact(s) as required by CEQA Guidelines § 15093 (refer to RDEIR Subsection S.6.2 for a summary of the Project's significant and unavoidable impacts).

#### **R.5 FORMAT AND CONTENT OF THE RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT**

The RDEIR encompasses all sections that were included in the previously-circulated DEIR, in addition to new Section R.0. A description of the format and content of this RDEIR is provided below. An overview of the RDEIR's contents also is provided in the Table of Contents.

**Section R.0, *Recirculated Environmental Impact Report***, provides a summary of the legal requirements for recirculating a DEIR, a discussion of the Project's background, an overview of the revisions that were incorporated into the previously circulated DEIR, responses to comments received in response to the DEIR's initial public review period, and an overview of the environmental review and approval process.



**Section S.0, *Executive Summary***, provides a summary of the proposed Project, a description of the EIR process, a discussion of areas of controversy and issues to be resolved, a summary of the alternatives identified for the proposed Project, and a summary of the Project’s impacts and the mitigation measures identified to reduce or avoid those significant environmental effects.

**Section 1.0, *Introduction***, provides introductory information about the CEQA process and the responsibilities of Riverside County, serving as the Lead Agency for this EIR.

**Section 2.0, *Environmental Setting***, describes the environmental setting, including descriptions of the Project site’s physical conditions and surrounding context. The existing physical setting is the condition of the Project site and surrounding area at the approximate date this EIR’s NOP was released for public review (April 27, 2020). This section provides a description of the Project’s location and environmental setting, and identifies the cumulative setting for the proposed Project.

**Section 3.0, *Project Description***, serves as the EIR’s Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines § 15123. Section 3.0 discloses the Project’s objectives, and provides a detailed description of the construction and operational characteristics of the proposed Project.

**Section 4.0, *Environmental Analysis***, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project. A conclusion concerning significance is reached for each discussion, and feasible mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as “effects” or “impacts” interchangeably. The CEQA Guidelines also identify the terms “effects” and “impacts” as being synonymous (CEQA Guidelines § 15358). In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementation of the proposed Project. The analyses are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. In most cases, implementation of the mitigation measures would reduce the adverse environmental impact to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a statement of overriding considerations would need to be adopted by Riverside County pursuant to CEQA Guidelines § 15093.

**Section 5.0, *Other CEQA Considerations***, includes specific topics that are required by CEQA. These include a summary of the Project’s significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, potential growth-inducing impacts of the proposed Project, as well as an evaluation of the Project’s energy conservation. Section





5.0 also includes a discussion of the potential environmental effects that were found not to be significant during this EIR's NOP process and that, therefore, do not require a detailed evaluation in this EIR.

**Section 6.0, *Alternatives***, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of three (3) alternatives is presented in Section 6.0.

**Section 7.0, *References***, cites all references sources used in preparing this EIR and lists the agencies and persons that were consulted in preparing this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

## **R.6 RESPONSES TO DEIR COMMENTS**

CEQA Guidelines § 15088 requires the Lead Agency (Riverside County) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR. Although not required by CEQA, this Subsection provides all comments received on the DEIR and the County's responses to each comment, including where applicable, references to changes in the specific recirculated DEIR sections that are part of this RDEIR that moot or otherwise address the comment. A list of agencies, organizations, and persons that submitted comments on the DEIR during the public review period is presented in Table R-1, *Organizations, Persons, and Public Agencies that Commented on the DEIR*.

### **R.6.1 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES**

CEQA Guidelines § 15024(a) outlines parameters for submitting comments, and notes the focus of review and comment of DEIRs should be:

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

State CEQA Guidelines § 15204(c) further advises that, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to State CEQA Guidelines § 15064, "an effect shall not be considered significant in the absence of substantial evidence." State CEQA Guidelines



**Table R-1 Organizations, Persons, and Public Agencies that Commented on the DEIR**

<b>COMMENT LETTER</b>	<b>COMMENTING ORGANIZATION, PERSON, OR PUBLIC AGENCY</b>	<b>DATE</b>
A.	California Air Resources Board	May 26, 2022
B.	Department of Water Resources	May 23, 2022
C.	Department of Conservation	May 10, 2022
D.	State Water Resources Control Board, Division of Drinking Water	May 26, 2022
E.	Regional Water Quality Control Board	May 23, 2022
F.	City of Perris	May 20, 2022
G.	City of Riverside	May 23, 2022
H.	Riverside County Department of Waste Resources	April 18, 2022
I.	Blum Collins and Ho, LLP	May 23, 2022
J.	Sierra Club	June 17, 2020
K.	George Hague	May 26, 2022
L.	Marshall Locke	May 23, 2022
M.	California Department of Fish and Wildlife	June 15, 2022
N.	California Attorney General’s Office	July 11, 2022
O.	Advocates for the Environment	July 14, 2022
P.	Mitchel Chadwick/Riverpark Mitigation Bank	August 15, 2022

§ 15204(d) also notes that, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” State CEQA Guidelines § 15204(e) states that, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by [State CEQA Guidelines § 15204].”

**R.6.2 RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT**

CEQA Guidelines § 15088 requires the Lead Agency (Riverside County) to evaluate comments on environmental issues received from public agencies and interested parties who review the DEIR and to provide written response to any substantive comments received. The County received 16 comment letters in regard to the DEIR, including comment letters received after the close of the 45-day public review period for the DEIR. A copy of each letter with bracketed comment numbers on the right margin is followed by the response for each comment as indexed in the letter. Comment letters and specific comments are given numbers for reference purposes. As part of the comment letters that were submitted to the County, only one of the comment letters was supported by expert technical reports. Thus, while some commenters disagree with some of the conclusions reached by the EIR, they have not submitted substantial evidence in the form of expert reports to support their positions. The one technical expert report that was submitted relies on incorrect assumptions resulting in incorrect conclusions as stated in Responses I-59 through I-98.



COMMENT LETTER A



Gavin Newsom, Governor  
Jared Blumenfeld, CalEPA Secretary  
Liane M. Randolph, Chair

May 26, 2022

Russell Brady  
Contract Planner  
Riverside County  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, California 92501  
[rbrady@rivco.org](mailto:rbrady@rivco.org)

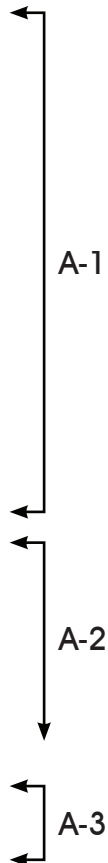
Dear Russell Brady:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Stoneridge Commerce Center Specific Plan (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2020040325. The Project site is located within unincorporated area of Riverside County, California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The Project consists of the development of an approximately 583 acre site. The DEIR evaluates environmental impacts of two proposed alternatives. The first alternative "Primary Land Use Plan" would allow for up to 8,461,530 square feet of light industrial uses, 1,069,398 square feet of business park uses and 121,968 square feet of commercial retail uses. The second alternative "Alternative Land use Plan" would allow up to 8,461,530 square feet of light industrial uses, 936,540 square feet of business park uses and 126,542 square feet of commercial retail uses. To accommodate the proposed Project, the County proposes to modify the approved lands for the Project site from community center, commercial retail, and residential land uses to light industrial, business, and park land uses. The County assumed in the DEIR that the proposed light industrial uses would consist of approximately 20 percent high-cube could storage uses, 35 percent high-cube fulfillment center uses, 35 percent high-cube warehouses uses, and 10 percent manufacturing uses. Once fully operational in the 2030, the Project could add to up to approximately 23,894 vehicle daily trips along local roadways, which includes 3,850 heavy-duty daily truck trips.

Industrial facilities, like the facility described in the Project, can result in high volumes of heavy-duty diesel trucks, locomotive operations and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.<sup>1</sup> Governor Gavin Newsom signed Executive Order N-79-20 on September 23, 2020. The executive order states: "It shall be a goal of the State that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It shall be a further goal of the State that 100 percent of medium and

1. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.





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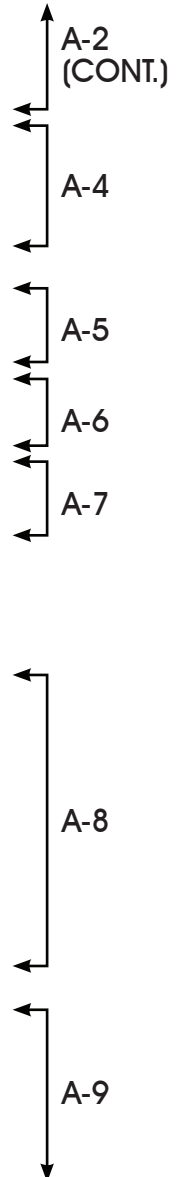
heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It shall be further a goal of the State to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.” The executive order further directs the development of regulations to help meet these goals. To ensure that lead agencies, like the County, stay in step with evolving scientific knowledge to protect public health from adverse air quality and greenhouse gas impacts from the transportation sector, which serves as the basis of the Governor’s Executive Order N-79-20, CARB staff urges the County to construct and operate the Project using the zero-emission technologies recommended in this letter.

CARB submitted a comment letter, which is attached to this letter, on the Notice of Preparation (NOP) for the DEIR released in April 2020. CARB’s comments, dated May 27, 2020, highlighted the need for preparing a health risk assessment (HRA) for the Project. The letter also encouraged the County to implement all existing and emerging zero-emission technologies to minimize exposure to diesel particulate matter (diesel PM) and nitrogen oxides (NOx) emissions for all neighboring communities, and to minimize the greenhouse gases that contribute to climate change. Due to the Project’s proximity to residences already disproportionately burdened by multiple sources of pollution, CARB’s comments expressed concerns with the potential cumulative health risks associated with the construction and operation of the Project.

**The DEIR Does Not Analyze Potential Air Quality Impacts from the Project’s Transport Refrigeration Units**

Chapter 3.3 (Proposed Project) of the DEIR states that the proposed light industrial development could result in up to 20 percent of high-cube cold storage uses. Since a portion of the Project would be used for cold storage, some of the trucks and trailers visiting the Project-site would be equipped with Transport Refrigeration Units (TRUs.). TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project-site. Should the Project include cold storage uses, residences near the Project-site could be exposed to significantly higher levels of toxic diesel PM and NO<sub>x</sub>, and greenhouse gases than trucks and trailers without TRUs. To reduce these impacts, the DEIR included Mitigation Measure 4.3-3 that would require the installation of electrical hookups to eliminate idling of main and auxiliary engines during the loading and unloading process and provide for TRUs. None of the mitigation measures in the DEIR require trucks and trails with TRUs to be plug-in capable.

Although the HRA prepared for the Project evaluated cancer risks from the operation of onsite TRUs, the County did not model and report air pollutant emissions from TRUs in the DEIR. The air pollutant emission estimates, found in Table 4.3-9 and Table 4.3-10 of the DEIR, were modeled using CalEEMod. Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, CalEEMod does not account for air pollutant emissions from TRUs. Since a portion of the Project will be used for cold storage,





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CARB urges the County to model and report the Project’s air pollution emissions from TRUs using CARB’s latest emission factors.

A-9  
(CONT.)

### The Health Risk Assessment Used Inappropriate Assumptions When Modeling the Project’s Health Risk Impacts

The HRAs prepared for the Project and presented in Section 4.3 (Air Quality) of the DEIR, concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks as high as 9.81 chances per million during Project operation. Since the Project’s cancer risks are below the South Coast Air Quality Management District (SCAQMD) significance threshold of 10 chances per million, the DEIR concluded that the Project would result in a less than significant impact on public health. CARB has reviewed the Project’s HRA and is concerned that the Project’s cancer risk impacts may have been underestimated for the reasons detailed below.

A-10

The HRA assumed all TRUs visiting the Project site would not idle longer than 15 minutes. Data obtained by CARB staff indicates that TRUs can operate for as long as two hours per visit, which is well above the 15-minute duration assumed in the HRA. Unless the County restrict TRU idling durations to less than 15 minutes, the Project’s HRA should be revised to assume a TRU idling duration legitimized by substantial evidence.

A-11

The HRA assumed 630 trucks with TRUs would operate within the Project site daily. It is unclear in the HRA how this estimate was derived. Due to the large size of the proposed warehouse development, CARB is concerned that the number of TRUs visiting the Project site may be underestimated in the HRA. CARB urges the County to provide substantial evidence to support this assumption.

A-12

The HRA used a daily breathing rate of 209 for 16<70 age group. CARB recommends the County use a daily breathing rate of 290 for this age group when estimating the Project’s operational cancer risk impacts, which is consistent with the recommend mythology found in the Office of Environmental Health Hazard Assessment’s (OHEEA) Risk Assessment Guidelines.<sup>2</sup>

A-13

The HRA did not evaluate cancer risk impacts from trucks with TRUs traveling along local roadways. According to the Project’s description, trucks serving the Project would travel along either Nuevo Road or Ramona Expressway to access the Project site. There are residences located adjacent to these roadway that will be expose to diesel PM emissions from trucks and trucks with TRUs traveling to and from the Project site that has the potential to result in a potentially significant cancer risk impact. To fully understand the Project’s

A-14

<sup>2</sup> Office of Environmental Health hazard Assessment. Air Toxics Hot Spots Program Risk Assessment Guidelines. February 2015. Accessible at <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.



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impact on public health, the revised HRA should evaluate potential cancer risks along local roadways serving the Project site.

↑ A-14  
(CONT.)  
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**The County Should Include More Mitigation Measures to Minimize the Project’s Significant and Unavoidable Impact on Air Quality**

Chapter 4.3 (Air Quality) of the DEIR concludes that NOx, reactive organic compounds (VOC) and carbon monoxide (CO) emitted during Project operation would exceed the SCAQMD’s significance thresholds. To reduce the Project’s impact on air quality, the DEIR included seven mitigation measures (MM 4.3-1 through MM 4.3-7). These mitigation measures include requiring compliance with SCAQMD’s rules, onsite blasting to be limited to the use of 1.72 tons of explosives daily, heavy duty trucks used during Project construction to be equipped with 2010 model year engines, onsite construction equipment to be equipped with Tier 3 engines, and on-site outdoor cargo handling equipment to be powered by electricity or comply with Tier 4 engine standards, installation of electric hookups for trucks with TRUs, Even after implementing these mitigation measures, the County concludes in the DEIR that the Project’s operational air pollutant emissions would remain significant after mitigation.

←  
A-15

Even where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). To meet this requirement, CARB urges the County to add the emission reduction measures listed below in the FEIR.

- In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
- In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB’s lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022.<sup>3</sup>

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A-16

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A-17

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A-18

3. In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB’s optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards> .

←  
A-19



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- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2023. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).<sup>4</sup> Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.<sup>5</sup> A-20
- Include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,<sup>6</sup> Advanced Clean Trucks Regulation,<sup>7</sup> Periodic Smoke Inspection Program (PSIP),<sup>8</sup> and the Statewide Truck and Bus Regulation.<sup>9</sup> A-21
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site. A-22
- Include contractual language in tenant lease agreements, requiring the installing of vegetative walls<sup>10</sup> or other effective barriers that separate loading docks and people living or working nearby. A-23

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4 Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

5 Carl Moyer Program and Voucher Incentive Program. <https://ww2.arb.ca.gov/carl-moyer-program-apply>

6. In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. 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 heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://ww2.arb.ca.gov/our-work/programs/ttghg>

7 On June 25, 2020, CARB approved the Advanced Clean Trucks Regulation. The regulation requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 electric trucks in California by the end of 2030 and about 300,000 by 2035. CARB is expected to consider a fleet regulation in 2021 that would be compatible with the Advanced Clean Trucks regulation, requiring fleets to purchase a certain percentage of zero-emission trucks and vans for their fleet operations. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

8. The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>

9. The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>

10. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>



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**Conclusion**

As concluded in Chapter 4.3 (Air Quality) of the DEIR, the Project's operation would expose residences to NOx, ROG and CO emissions that would result in a significant and unavoidable impact on air quality. CARB is concerned with the Project's potential cumulative impacts to the surrounding community. CARB urges the County to address the deficiencies in the Project's HRA and air quality analysis identified in this letter in the FEIR. Lastly, to reduce the Project's impact on public health, CARB urges the County to implement all the mitigation measures listed in this letter.

A-25

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

A-26

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at [stanley.armstrong@arb.ca.gov](mailto:stanley.armstrong@arb.ca.gov).

A-27

Sincerely,

Robert Krieger, Branch Chief, Risk Reduction Branch

Attachment

cc: State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Yassi Kavezade, Organizer, Sierra Club  
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Justice

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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch



Gavin Newsom, Governor  
Jared Blumenfeld, CalEPA Secretary  
Mary D. Nichols, Chair

May 27, 2020

Russell Brady  
Project Planner  
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Submitted via email: [rbrady@rivco.org](mailto:rbrady@rivco.org)

Dear Russell Brady:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Stoneridge Commerce Center (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2020040325. The Project proposes to develop the 582.9 acre site under either a Primarily Land Use Plan or Alternative Land Use Plan. The Primary Land Use Plan proposes the development of up to 389.2 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, and 8.0 acres of Commercial Retail land uses. Alternatively, under the Alternative Land Use Plan, the site would be developed to include up to 389.2 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, and 8.5 acres of Commercial Retail land uses. The Project is proposed within an unincorporated area of Riverside County (County), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

A-28

Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.<sup>1</sup> CARB has reviewed the NOP and is concerned about the air pollution and health risk impacts that would result should the County approve the Project.

A-29

**I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities**

The Project, if approved, will expose nearby disadvantaged communities to elevated levels of air pollution. Residences are located south, east, and west of the Project site, with the closest residences situated approximately 2,400 feet of the Project's

A-30

<sup>1</sup> With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

A-31



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southeastern boundary. In addition to residences, 3 schools (Orange Vista High School, Sierra Vista Elementary School, and Avalon Elementary School) are located within 2 miles of the Project. The community is surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include vehicular traffic along Interstate 215 (I-215) and local roadways. Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

A-30  
(CONT.)

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionately impacted by air pollution from traffic on I-215 and local roadways.

A-32

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 5 percent for Pollution Burden<sup>2</sup> and is considered a disadvantaged community; therefore, CARB urges the County to ensure that the Project does not adversely impact neighboring disadvantaged communities.

A-33

**II. The DEIR Should Quantify and Discuss the Potential Cancer Risks from On-site Transport Refrigeration Units**

Since the Project description does not explicitly state that the proposed industrial land uses would not be used for cold storage, there is a possibility that trucks and trailers visiting the Project site would be equipped with transport refrigeration units (TRU).<sup>3</sup> TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project site. Residences and other sensitive receptors (e.g., daycare

A-34

<sup>2</sup> Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.  
<sup>3</sup> TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

A-35



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facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact.

A-34  
(CONT.)

CARB urges the County to model air pollutant emissions from on-site TRUs in the DEIR, as well as include potential cancer risks from on-site TRUs in the Project's health risk assessment (HRA). The HRA prepared for the Project should account for all potential health risks from Project-related diesel PM emission sources such as backup generators, TRUs, and heavy-duty truck traffic, and include all the air pollutant reduction measures listed in Attachment A.

A-36

In addition to the health risks associated with operational emissions, health risks associated with construction emissions should also be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The Office of Environmental Health Hazard Assessment's (OEHHA) guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction.

A-37

The HRA prepared in support of the Project should be based on the latest OEHHA guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),<sup>4</sup> and the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook.<sup>5</sup> The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and County planners will have a complete understanding of the potential health impacts that would result from the Project.

A-38

**III. Conclusion**

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already disproportionately impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and oxides of nitrogen (NO<sub>x</sub>) emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the County and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

A-39

<sup>4</sup> Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: <https://oehha.ca.gov/media/downloads/crm/2015guidancemanual.pdf>.  
<sup>5</sup> SCAQMD's 1993 Handbook can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

A-40



Russell Brady  
May 27, 2020  
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Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

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CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at [stanley.armstrong@arb.ca.gov](mailto:stanley.armstrong@arb.ca.gov).

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A-42  
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Sincerely,

Richard Boyd, Chief  
Risk Reduction Branch  
Transportation and Toxics Division

Attachment

cc: See next page.



Russell Brady  
May 27, 2020  
Page 5

cc: State Clearinghouse  
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**ATTACHMENT A**

**Recommended Air Pollution Emission Reduction Measures  
for Warehouses and Distribution Centers**

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

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**Recommended Construction Measures**

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO<sub>x</sub>) standard starting in the year 2022.<sup>1</sup>

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<sup>1</sup> In 2013, CARB adopted optional low-NO<sub>x</sub> emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO<sub>x</sub> emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model year 2010 and later. CARB's optional low-NO<sub>x</sub> emission standard is available at: <https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm>.

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- 6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation. A-50

**Recommended Operation Measures**

- 1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site. A-51
- 2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.<sup>2</sup> A-52
- 3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable. A-53
- 4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans. A-54
- 5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission. A-55
- 6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available. A-56
- 7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030. A-57

<sup>2</sup> CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: [https://www.arb.ca.gov/msprog/tech/techreport/tru\\_07292015.pdf](https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf).

A-58





- 8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,<sup>3</sup> Periodic Smoke Inspection Program (PSIP),<sup>4</sup> and the Statewide Truck and Bus Regulation.<sup>5</sup> A-59
- 9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than 5 minutes while on site. A-60
- 10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated. A-61
- 11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid. A-62

<sup>3</sup> In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. 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 heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://www.arb.ca.gov/cc/hdghg/hdghg.htm>.

<sup>4</sup> The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvip/hdvip.htm>.

<sup>5</sup> The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>. A-63



## Letter A California Air Resources Board (CARB)

- A-1** The County appreciates this comment letter provided by CARB. The introductory text correctly describes the Project that was evaluated by the DEIR; however, please note that revisions have been made to the Project as previously described in Subsection R.3 and as more fully described in RDEIR Section 3.0, *Project Description*. No further response is necessary.
- A-2** The County acknowledges that industrial facilities, such as the proposed Project evaluated in this RDEIR, can result in high volumes of heavy-duty diesel trucks and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change. These impacts were previously evaluated throughout the DEIR and continue to be evaluated by this RDEIR (e.g., refer to DEIR/RDEIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*). The County acknowledges that pursuant to Executive Order N-79-20, it is the goal of the State that 100 percent of in-State sales of new passenger cars and trucks will be zero-emission by 2035, and that 100 percent of medium and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. The County further acknowledges that this Executive Order is likely to result in a reduction of the Project's air quality and greenhouse gas (GHG) emissions over time.
- A-3** The County acknowledges that it is CARB's position that local governments and project proponents have a responsibility to mitigate impacts due to GHGs. Please refer to the revised analysis of potential impacts due to GHGs as presented in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*. As noted in the revised discussion and analysis, the County's Climate Action Plan (CAP) Update qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although RDEIR Subsection 4.8 acknowledges that the Project would exceed the CAP Update screening threshold of 3,000 MTCO<sub>2</sub>e/yr, Mitigation Measures MM 4.8-1 and MM 4.8-2 have been imposed on the Project and would ensure that the proposed Project is fully consistent with the CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporate measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, the revised analysis concludes that with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the CAP Update and the Project's cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Because impacts would be reduced to less-than-significant levels by the identified mitigation measures, no additional mitigation measures are required (see CEQA Guidelines § 15126.4(a)(3)).



- A-4** As noted in the response to Comment A-3, the analysis presented in RDEIR Subsection 4.8 has been revised. The revised analysis demonstrates that the County’s CAP Update qualifies as a “Plan for the Reduction of Greenhouse Gas Emissions,” pursuant to State CEQA Guidelines § 15183.5(b). Additionally, State CEQA Guidelines §§ 15064(h)(3) and 15130(d) note that a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously-adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. As concluded in Subsection 4.8, with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 the Project would be fully consistent with the CAP Update; thus, with implementation of the required mitigation, the Project’s cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, because the Project’s GHG impacts would be reduced to less-than-significant levels with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, additional mitigation requiring use of zero-emissions technology is not warranted or required by CEQA.
- A-5** The County received CARB’s comment letter on the Project’s Notice of Preparation (NOP). All substantive comments raised in CARB’s NOP comment letter were addressed in the DEIR, including CARB’s request to prepare a Health Risk Assessment (HRA) for the Project, the results of which were documented in DEIR *Technical Appendices B1 and B2* and in DEIR Subsection 4.3, *Air Quality*. It should be noted that the Project’s HRA and the analysis in RDEIR Subsection 4.3 have been updated to address the changes to the Project’s maximum building area and to evaluate the Project’s three Alternative Truck Routes (refer to Subsection R.3). Refer also to responses to Comments A-28 through A-63 for responses to the individual issues addressed by CARB’s comment letter on the Project’s NOP.
- A-6** Please refer to the response to Comment A-4. As noted therein, with implementation of mitigation requiring compliance with the County’s CAP Update, the Project’s impacts due to GHG emissions would be reduced to less-than-significant levels. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, the County finds that additional mitigation requiring the use of zero-emission technologies is not required to address the Project’s impacts due to GHG emissions. Please also refer to the response to Comment A-20, which demonstrates that the mitigation measures identified in this RDEIR include requirements that are equal to or more stringent than the mitigation measures identified in this comment letter, and further explains why a requirement to achieve net-zero emissions from heavy-duty trucks by 2023 is infeasible. It also should be noted that the Project’s operational emissions of NO<sub>x</sub> would be reduced in comparison to the level of emissions disclosed by the DEIR due to the reduction in Light Industrial building area. As discussed in the revised RDEIR Subsection 4.3, *Air Quality*, although the Project still would result in significant and unavoidable impacts due to NO<sub>x</sub> emissions, a majority of the Project’s operational emissions of NO<sub>x</sub> are due to vehicular traffic (i.e., large trucks), and neither the County nor the Project Applicant have the ability or authority to measurably reduce NO<sub>x</sub> emissions



associated with vehicular traffic because regulation of vehicular emissions occurs at the State and federal levels.

- A-7** Table 4.3-12 of the DEIR (page 4.3-34) identified the calculated cancer risk at nearby sensitive receptors as a result of exposure of diesel particulate matter (DPM) over the course of the entire construction period. DEIR Table 4.3-15 (page 4.3-40) showed the calculated cancer risk at nearby sensitive receptors as a result of 9, 30, and 70 years of exposure to DPM generated by full operations of the Project. It is unclear, and the commenter provides no evidence, as to why it is appropriate to sum the estimated cancer risk from construction with the estimated cancer risk of full operations of the Project because full operation of the Project (Project Buildout) cannot occur until construction has concluded. Further, the OEHHA guidance that “the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location” is misapplied in this comment. This OEHHA guidance pertains to the exposure of two separate pollutant species at the same time. According to OEHHA, if multiple substances are analyzed, the cancer risk from each of the individual substances is summed to give the total cancer risk for the receptor location. The methodology, assumptions, and conclusion in the Draft EIR’s HRA analysis were adequate. Regardless, and in an effort to fully disclose the Project’s potential impacts to the environment, the Project’s HRA and the analysis of potential health risk impacts in EIR Subsection 4.3, *Air Quality*, have been substantially revised, and now include an assessment of cumulative health risks associated with both construction and operation of the Project. As concluded by the revised HRA and analysis in Subsection 4.3, implementation of RDEIR Mitigation Measures MM 4.3-1 and MM 4.3-2 would reduce cancer and non-cancer related health risks to below a level of significant, including cumulatively-considerable cancer and non-cancer health risks.
- A-8** The commenter is referred to the revised analysis presented in RDEIR Subsection 4.3, *Air Quality*. As demonstrated in the revised analysis, implementation of Alternative Truck Route 2 would result in potentially significant direct and cumulatively-considerable impacts due to cancer-related health risks that would exceed the SCAQMD threshold of 10 in one million. RDEIR Mitigation Measure MM 4.3-1 has been identified, which limits the maximum amount of building area that can be used for high-cube cold storage uses to a maximum Floor Area Ratio (FAR) of 0.2, but allows for an FAR of up to 0.4 if at least 50% of the overall high-cube cold storage uses are served by fully electric Transport Refrigeration Units (TRUs). In addition, RDEIR Mitigation Measure MM 4.3-2 requires that all truck docks associated with high-cube cold storage uses must include electrical hookups at all loading docks for TRUs. As demonstrated in the revised analysis in EIR Subsection 4.3, with implementation of the required mitigation, Project impacts due to cancer-related health risks would be reduced to less-than-significant levels. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Accordingly, no additional revisions to RDEIR Subsection 4.3 are warranted pursuant to this comment.
- A-9** The analysis of the Project’s potential impacts to air quality has been revised in RDEIR Subsection 4.3, *Air Quality*, and within the Project’s Air Quality Impact Analysis (“AQIA”; RDEIR *Technical*



*Appendix B1*). As documented in subsection 3.5.5 of the Project's AQIA, the TRU calculations contained in the AQIA are based on EMISSIONS FACTOR MODEL (EMFAC) version 2021. Because EMFAC 2021 does not provide emission rates per hour or mile, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with the Project. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations. Accordingly, the County finds that this RDEIR appropriately models and reports the Project's air pollution emissions from TRUs using CARB's latest emission factors.

**A-10** This comment correctly cites the information contained in DEIR Subsection 4.3, *Air Quality*, with respect to the Project's calculated health risk impacts. Please refer to Responses A-11 through A-15 for an explanation as to why the HRA circulated with the DEIR did not underestimate the Project's health risk impacts. Refer also to Subsection 4.3 of the Project's RDEIR, which includes updated air quality and health risk calculations based on the Project's revised AAQIA and HRA technical reports, and based on the revisions made to the Project since the DEIR was circulated for public review (as summarized above in Subsection R.3).

**A-11** The DEIR assumed that every truck visiting the site would idle on-site for an average of 15 minutes, which is based on guidance provided by the South Coast Air Quality Management District (SCAQMD). In addition, the Project would be subject to compliance with California Air Resources Board (CARB) Rule 2485 (13 CCR 2485), *Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling*, which limits idling to a maximum of five minutes. Pursuant to Division 26, Part 2 of the California Health and Safety Code (HSC), CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations, including Rule 2485. Furthermore, DEIR Mitigation Measure 4.3-2 required that construction contractors must prohibit truck drivers from idling more than five minutes and required trucks to turn off engines when not in use, consistent with CARB Rule 2485. It is also noted that DEIR Mitigation Measure MM 4.3-3 required that prior to issuance of building permits for tenant improvements involving cold storage warehouse uses, Riverside County must review the plans to ensure that electrical hookups are provided to eliminate idling of main and auxiliary TRU engines during the loading and unloading process. Riverside County would verify the installation of electrical hookups prior to final building inspection. Accordingly, the County finds that the DEIR's assumption that trucks, including TRUs, would only idle for a maximum of 15 minutes was supported by substantial evidence. Notwithstanding, and in order to provide a conservative evaluation of the Project's potential health risk impacts, the Project's HRA technical report (RDEIR *Technical Appendix B2*) has been revised. Consistent with the methodology presented in Appendix F of CARB's *Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRU and TRU Generator Sets, and Facilities Where TRUs Operate*, the Project's revised HRA estimates that each TRU would spend approximately 3.3 hours per load at the facility, and that the TRU engine would operate 62.5% of the time. Thus, it was estimated that for each two-way truck trip servicing the refrigerated warehouse portion of the Project, the TRU engines would operate for approximately 2.1 hours while parked at



the loading docks, resulting in a total of up to 4 hours of idling when considering both on-site and off-site/regional travel. Thus, the revised HRA includes a highly conservative assumption regarding idling time for TRUs, particularly given that the Project would be subject to the maximum 5 minutes of idling required by CARB Rule 2485.

**A-12** The County respectfully disagrees with CARB's concern that the DEIR underestimated the number of TRUs that would be associated with the Project. The DEIR conservatively assumed that approximately one-third of all heavy-duty trucks visiting the Light Industrial portions of the Project would consist of TRUs. According to CARB's EMFAC 2021 Web Query Tool, an average of 40,091 heavy duty trucks operate within Riverside County daily. According to the CARB's OFFROAD 2021 Web Query Tool, an average of 3,667 TRUs operate in Riverside County on a daily basis, which equate to a proportion of 9.1 percent. Therefore, the assumption in the DEIR that approximately one-third (33 percent) of all trucks visiting the Project's Light Industrial uses involve the use of TRUs was conservative. Regardless, and as described above in further detail in Subsection R.3, the amount of high-cube cold storage uses evaluated in this RDEIR has been increased to 40% of the total Light Industrial building area, with 40% of the Light Industrial building area consisting of high-cube fulfillment center uses, 10% consisting of high-cube warehouse uses, and 10% consisting of manufacturing uses. Based on the amount of building area anticipated by this RDEIR for the Project's high-cube cold storage uses, the number of TRUs associated with the Project has increased to 2,208 two-way truck trips. Furthermore, no new development would be authorized on site as part of the Project, as all implementing development would require future discretionary approvals from Riverside County (e.g., plot plans, conditional use permits, etc.). Such future discretionary approvals would be subject to compliance with CEQA. As part of the County's review of future implementing actions, the County would determine whether the implementing developments are consistent with the assumptions made by this RDEIR. In the event that future implementing developments include more cold-storage uses than assumed in this RDEIR, then additional analysis and review for compliance with CEQA would be required. Therefore, the County finds that the RDEIR, which has been revised to include an analysis of the proposed increase in the number of daily TRU trips, provides a reasonable and conservatively high assumption regarding the amount of cold-storage uses.

**A-13** The commenter is correct that the 2015 Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidance Manual*, Table 5.6, recommends a daily breathing rate of 290 for the 16-70 age group. Therefore, the diesel particulate matter (DPM) dispersion results from the DEIR were run through the Hot Spots Analysis & Reporting Program (HARP2 v21081) software accounting for a daily breathing rate of 290 for the 16-70 age group. The HARP2 model implements the latest regulatory guidance to develop inputs for pollutant dispersion and as the inputs for calculations for the various health risk levels using the standardized equations contained in the OEHHA *Guidance Manual for Preparation of Health Risk Assessments* (2015). Regardless, the Project's revised HRA technical report, included as RDEIR *Technical Appendix B2*, evaluates discrete variants for daily breathing rates, exposure frequency, and exposure duration, all of which were obtained from relevant distribution profiles presented in the 2015 OEHHA Guidelines. Please refer to Tables 2-11 through 2-14 of the Project's revised HRA for a summary of the breathing



rates assumed in the analysis. Furthermore, it is noted that the CARB-adopted diesel exhaust Unit Risk Factor (URF) of 300 in one million per  $\mu\text{g}/\text{m}^3$  is based upon the upper 95<sup>th</sup> percentile of estimated risk for each of the epidemiological studies utilized to develop the URF. Using the 95<sup>th</sup> percentile URF represents a very conservative (health-protective) risk posed by DPM because it represents breathing rates that are high for the human body (95% higher than the average population). (Urban Crossroads, 2023b, p. 15)

- A-14** The County respectfully disagrees with CARB’s assertion that the DEIR underestimated health risk impacts associated with TRUs traveling along local roadways that abut sensitive receptors. The Project’s operational Health Risk Assessment (HRA) analysis, which was included in *Technical Appendix B2* to the DEIR, was based on the best available information and data. Specifically, emission rates for heavy-duty trucks were obtained from the latest version of CARB’s Emission FACTor model (EMFAC). EMFAC’s emission rates for heavy-duty truck travel is provided in “grams per mile traveled.” However, CARB’s EMFAC model does not provide emission rates for TRUs. In order to obtain emission rates for idling TRUs on-site for use in the Project’s DEIR, CARB’s OFFROAD model was employed. However, like EMFAC the OFFROAD model also does not identify an emission rate for a traveling TRU, and therefore there is no available emission rate data associated with a traveling TRU. As discussed in Response A-12, onsite emissions for TRUs were calculated in the DEIR as comprising 33% of all traffic for the Project’s Light Industrial uses, which represents a conservative assumption. The highest risk values for all categories (MEIR, MEIW and PMI) were all located on or close to the Project boundary and were the result of the on-site operations and vehicle movements. Thus, it can be assumed that the onsite emissions disclosed by the DEIR captured the worst-case health risks associated with TRU emissions, and that health risks along roadway segments within the Project’s study area would be less than that disclosed by the DEIR for the MEIR, MEIW, and PMI. Regardless, the Project’s HRA technical report has been revised and is included as RDEIR *Technical Appendix B2*, and the results of the analysis are documented in EIR Subsection 4.3, *Air Quality*. The revised HRA and the analysis in RDEIR Subsection 4.3 fully account for health risk impacts associated with Project truck trips along study area roadways, including along roadway segments studied as part of the Project’s three Alternative Truck Routes, and demonstrates that with the implementation of mitigation measures the Project would not expose any sensitive receptors to health risk impacts exceeding SCAQMD’s significance thresholds of 10 in one million for cancer risks or 1.0 for non-cancer risks.
- A-15** This comment correctly cites the conclusion reached in DEIR Subsection 4.3, *Air Quality*, with respect to the Project’s impacts prior to mitigation due to emissions of NO<sub>x</sub>, VOC, and CO, and correctly summarizes the mitigation requirements presented in the DEIR. With respect to the additional mitigation measures recommended by this commenter, please refer to Responses A-16 through A-23. Commenter also is referred to the revised analysis in RDEIR Subsection 4.3, *Air Quality*, which has been substantially revised in order to evaluate the revisions made to the proposed Project, as summarized above in Subsection R.3.



- A-16** The County respectfully disagrees with CARB’s assertion that the Project must be required to utilize Tier 4 engines, except for specialized equipment for which Tier 4 engines are not available. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” As discussed in DEIR Subsection 4.3, *Air Quality*, under the analysis of Thresholds a. and b., the DEIR concluded that with implementation of Mitigation Measures 4.3-1 and 4.3-2, Project construction-related emissions would be reduced to less-than-significant levels. Furthermore, the Project’s updated AQIA, included as *Technical Appendix B1* to the RDEIR, and the revised analysis presented in RDEIR Subsection 4.3, show that the Project as revised also would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants during construction. Thus, the commenter’s suggestion to require Tier 4 or cleaner engines during construction is not required pursuant to CEQA. No new construction-related mitigation measures for air quality have been incorporated into the RDEIR in response to this comment.
- A-17** The County respectfully disagrees with CARB’s assertion that additional mitigation should be required to address the Project’s construction-related air quality emissions. As demonstrated on pages 4.3-21 through 4.3-26 of the Draft EIR, construction emissions predicted to be generated by either the Primary Land Use Plan or Alternative Land Use Plan were determined to be less than significant with the imposition of mitigation measures MM 4.3-1 and MM 4.3-2 (see DEIR p. 4.3-60). As indicated in the Project’s updated AQIA and in RDEIR Subsection 4.3, the analysis of the Project’s construction-related air quality emissions demonstrates that the Project as revised would not exceed any of the SCAQMD Regional Thresholds during construction activities. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant”; thus, no further mitigation is required to address the Project’s construction-related air quality emissions. No new construction-related mitigation measures for air quality have been incorporated into the RDEIR in response to this comment.
- A-18** The County respectfully disagrees with CARB’s assertion that additional mitigation should be required to address the Project’s construction-related air quality emissions. As indicated in the response to Comment A-17, CEQA does not require mitigation for effects found to be less than significant. As concluded by the DEIR, with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, Project construction-related air quality impacts would be less than significant. Furthermore, the Project’s updated AQIA, included as *Technical Appendix B1* to the RDEIR, and the revised analysis presented in RDEIR Subsection 4.3, show that the Project as revised also would not exceed any of the SCAQMD Regional Thresholds for criteria pollutants during construction, even without the implementation of mitigation measures. No new construction-related mitigation measures for air quality have been incorporated into the RDEIR in response to this comment.
- A-19** Comment describing CARB’s optional low-NO<sub>x</sub> emissions standards for on-road heavy-duty engines is acknowledged. No response is necessary.
- A-20** The County respectfully disagrees with the commenter’s assertion that mitigation should be imposed requiring all trucks accessing the Project site to be model year 2014 or newer, and should be zero-





emission beginning in 2023, and in particular, the proposed mitigation measure is not feasible because zero emission heavy trucks (or trucks enabling net zero emissions) are not currently commercially available. As a result, there is no evidence in the record that the proposed mitigation is technologically or financially feasible for the Project. However, as previously shown on DEIR pp. 4.3-61 through 4.3-63, Project operations would be required to implement mitigation very similar to that recommended by this comment, thereby planning accordingly for the infrastructure to support zero and near-zero emission vehicles, for use when such vehicles are commercially available and feasible to utilize for Project operations, as will eventually be required by California regulations at the appropriate time. All feasible mitigation to reduce criteria air pollutant emissions has been mandated of the Project. For instance, DEIR Mitigation measure MM 4.3-4 promoted the cleanest technologies available by providing the necessary infrastructure to support zero-emission vehicles. In addition to providing the minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations Title 24, this mitigation required the facilitation of future installation of infrastructure that would charge the batteries that power the motors of electric-powered trucks. DEIR Mitigation measure MM 4.3-7.b required that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines. The DEIR further required records to be maintained on-site and be made available for inspection by the County. The mitigation identified in the DEIR is consistent with the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). DEIR Mitigation measure MM 4.3-7 also required that future Project applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. The funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted communities in the Project vicinity. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NO<sub>x</sub> reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses. The mitigation measures identified in this RDEIR with respect to air quality emissions have been revised, and include requirements that are equal to or more stringent than the mitigation measures identified in the DEIR. RDEIR Mitigation Measure MM 4.3-1 restricts the amount of cold storage warehouse uses to a maximum of 20% of the Project’s Light Industrial building area, and Mitigation Measure MM 4.3-2 restricts the lengths of idling for TRUs. RDEIR Mitigation Measure MM 4.3-3 promotes the use of electric trucks by requiring the installation of appropriate charging infrastructure. Mitigation Measure MM 4.3-5 requires that all on-site equipment, such as forklifts, must be electric with the necessary electrical charging stations provided. Mitigation Measure MM 4.3-7 and MM 4.3-8 require compliance with the County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). The County finds that the requirement to achieve net-zero emissions



from heavy-duty trucks by 2023 is infeasible for all of the reasons set forth herein, specifically including that net zero in 2023 is not currently technologically feasible, and that the mitigation measures identified in RDEIR Subsection 4.3 provide the maximum feasible mitigation for the Project's heavy-truck-related emissions. After detailed analysis, the County finds no other feasible mitigation measures exist that would further reduce the Project's air quality impacts.

- A-21** The County disagrees that the commenter's requested mitigation is necessary. The Project would be subject to compliance with all applicable CARB rules and regulations. Pursuant to Division 26, Part 2 of the California HSC, CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations, including the regulations referenced by this comment. Because compliance with CARB rules and regulations is mandatory and enforceable, no new mitigation measures related to air quality have been added to the RDEIR in response to this comment.
- A-22** The County finds that the commenter's suggestion to restrict idling of trucks and support equipment to a maximum of two minutes is infeasible. DEIR Mitigation Measure MM 4.3-7, which implemented the requirements of County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses), required the following: "Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations." The County finds that a requirement to restrict idling to a maximum of two minutes may not be adequate to allow for normal loading and unloading of trucks, and enforcement of a two-minute requirement also would be infeasible. The Project would, however, be subject to RDEIR Mitigation Measure 4.3-7, which incorporates the same requirements as DEIR Mitigation Measure 4.3-7 restricting idling to a maximum of five (5) minutes. Even assuming such a short time period could be effectively enforced, restricting idling to two (2) minutes, instead of five (5) minutes, also would not materially or meaningfully reduce emissions, and would not reduce any significant impact to a less-than-significant level. Accordingly, no new or revised mitigation measures for air quality have been added to the RDEIR in response to this comment.
- A-23** The County respectfully disagrees with the commenter's request to require additional mitigation related to loading docks. As noted in the DEIR, the proposed Project is subject to the requirements of the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses), pursuant to DEIR Mitigation Measure MM 4.3-7. Section 3.2 of Policy F-3 requires that warehouse/distribution facilities larger than 250,000 square feet be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning



classification shall be incorporated in the design. Section 3.6 of Policy F-3 states that warehouses larger than 250,000 square feet be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced at no less than 50 feet on center. Fifty percent of the landscape screening must include a minimum of 36-inch box trees. Facility operators are responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan. Furthermore, Section 3.7 of Policy F-3 requires that dock doors shall be located where they are not readily visible from sensitive receptors or major roads. This section further states that if it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented and shall include a combination of landscaping, berms, walls, and similar features. Riverside County would review future implementing developments (e.g., plot plans, conditional use permits, etc.) for compliance with Policy F-3. The RDEIR continues to require compliance with Policy F-3 as part of RDEIR Mitigation Measure 4.3-7. Because compliance with Policy F-3 is mandatory and required pursuant to RDEIR Mitigation Measure MM 4.3-8, no additional mitigation is necessary to ensure sufficient barriers are provided between loading docks and people living or working nearby.

- A-24** Footnotes citing references for various air quality-related programs and regulations are acknowledged. No response is necessary.
- A-25** The County disagrees with the commenter's assertion that the Project would result in localized air quality impacts due to the Project's regional emissions of CO, NO<sub>x</sub>, and ROG<sub>s</sub>. The Project's regional emissions as previously reported in the DEIR do not reflect localized impacts; rather, the commenter is referred to the analysis of Threshold c. in DEIR Subsection 4.3, which demonstrated that the Project's localized air quality emissions would not exceed any of the SCAQMD Localized Significance Thresholds (LSTs) during either construction or long-term operation, and showed that the Project's construction and long-term operation would not expose any nearby sensitive receptors to cancer or non-cancer risks exceeding the SCAQMD thresholds of significance. Additionally, and as noted throughout this Subsection, the Project's AQIA has been substantially revised and incorporated into RDEIR Subsection 4.3. The revised analysis in RDEIR Subsection 4.3 continues to show that the revised Project's localized air quality impacts during both construction and operation would not exceed any of the SCAQMD LSTs, and the Project's updated HRA (*Technical Appendix B2*) shows that the Project as revised would not expose any nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance after implementation of mitigation measures. Thus, the County disagrees with the commenter's inaccurate assertion that the Project's emissions of NO<sub>x</sub>, ROG/VOC, or CO would result in a significant localized impact to air quality.
- A-26** The County acknowledges that CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the County's findings and conclusions on any issues on which CARB did not substantively submit comments. No response is necessary.



- A-27** The County appreciates the comments from CARB on the DEIR, and acknowledges that additional assistance may be available from CARB with respect to zero-emission technologies.
- A-28** This comment correctly describes the information contained with the Project's Notice of Preparation (NOP). Please note that since the NOP was distributed for public review, the Project's scope was substantially modified. Refer to EIR Section 3.0 for a complete and current description of the proposed Project.
- A-29** Comment expresses concern over the Project's air pollution and health risk impacts. DEIR Subsection 4.3, *Air Quality*, included an analysis of potential health risk and air pollution impacts, and demonstrated that the Project would result in less-than-significant localized health risk impacts to nearby sensitive receptors, while the DEIR concluded that long-term operation of the Project would result in significant and unavoidable regional emissions of ROG<sub>s</sub> and NO<sub>x</sub> after the implementation of mitigation measures. Commenter is referred to the revised analysis in EIR Subsection 4.3, which continues to demonstrate that localized air quality emissions would not exceed the SCAQMD LSTs and shows that with mitigation the Project would not expose nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance. The revised analysis does show that the Project as revised would result in significant and unavoidable impacts due to regional emissions of VOC, NO<sub>x</sub>, and CO under long-term operational conditions; however, the Project's impacts are due to regional air quality emissions, and the Project's significant and unavoidable impacts due to emissions of VOC, NO<sub>x</sub>, and CO would not result in any significant localized air quality impacts affecting nearby sensitive receptors. Please refer also to the responses to Comments A-30 through A-41.
- A-30** The County disagrees with the commenter's assertion that cumulative health risks should have been evaluated in the DEIR because the significance thresholds promulgated by the SCAQMD do not include any thresholds for cumulatively-considerable health risk effects. Notwithstanding, an analysis of potential cumulatively-considerable health risk impacts has been incorporated into the Project's HRA (RDEIR *Technical Appendix B2*) and RDEIR subsection 4.3.5. Similar to the analysis conducted for the Project's direct health risk impacts, the cumulative analysis demonstrates that Project-source TACs would incrementally increase the background cancer risk by a maximum of 9.67, 10.59, and 9.20 incidents per million population under Alternative Truck Routes 1, 2, and 6, respectively. Thus, the RDEIR concludes that because implementation of Alternative Truck Route 2 would result in an increase in cancer risk of 10.59 in one million, which would exceed the SCAQMD threshold of significance, implementation of Alternative Truck Route 2 would result in significant cumulatively-considerable impacts due to TAC emissions. Mitigation Measure MM 4.3-1 has been identified, which restricts the maximum amount of high-cube cold storage warehouse uses to a maximum of 20% of the Project's overall Light Industrial building area. As concluded in RDEIR Subsection 4.3, implementation of the required mitigation would reduce the Project's health risk impacts to below a level of significance.



- A-31** Comment expressing concern over the Project’s potential impacts due to GHGs is acknowledged. Please refer to the response to Comment A-3, which is responsive to this comment.
- A-32** Commenter is referred to the response to Comment A-30, which is responsive to this comment.
- A-33** The County acknowledges that the Project site is located in an area designated as a disadvantaged community. The DEIR demonstrated that the Project would not result in any significant localized air quality impacts during construction or long-term operation, and also showed that the Project would not expose any nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance. Commenter is referred to the revised analysis in RDEIR Subsection 4.3, *Air Quality*. As indicated in the revised analysis, the Project as revised still would not exceed any of the SCAQMD LSTs, and with mitigation the Project would not expose any nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance, even when cumulative developments are taken into consideration.
- A-34** Commenter expresses concern regarding the Project’s potential to include high-cube cold storage warehouse uses and the air quality effects associated with transport refrigeration units (TRUs). In response to comments received during the 45-day public review period for the Project’s DEIR, the mix of building use types within the Project’s Light Industrial areas has been revised from an assumption that 20% of the Project’s Light Industrial building area would comprise high-cube cold storage warehouse uses to an assumption that 40% of the Project’s Light Industrial building area would consist of high-cube cold storage warehouse uses. In addition, the Project as revised would result in an approximately 13.1% reduction in the amount of Light Industrial building area as compared to what was evaluated the DEIR. Commenter is referred to the revised analysis presented in RDEIR Subsection 4.3, *Air Quality*, which demonstrates that with the implementation of mitigation measures, the Project would not result in localized air quality emissions exceeding the SCAQMD LSTs and would not expose nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance.
- A-35** Footnotes defining the terms “Pollution Burden” and “TRUs” are acknowledged; no response is necessary.
- A-36** Commenter requests an analysis of potential health risk impacts associated with TRUs; please refer to the response to Comment A-34.
- A-37** Commenter expresses concern about potential localized air quality impacts during the Project’s construction phase. An assessment of construction-related health risks was included in DEIR Subsection 4.3, *Air Quality*, under the analysis of Threshold c., and demonstrated that construction-related localized air quality impacts would be less than significant. Commenter is referred to the revised analysis in RDEIR Subsection 4.3, *Air Quality*, which continues to show that the Project’s air quality emissions during construction would not exceed any of the SCAQMD LSTs, and would



not expose nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD's thresholds of significance.

- A-38** Commenter requests that an HRA be prepared based in OEHHA guidance and the SCAQMD CEQA Air Quality Handbook, and requests that the HRA evaluate existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The Project's revised AQIA and HRA, included as RDEIR *Technical Appendices B1 and B2*, address this comment in more detail and are based on current regulatory guidance and demonstrates that the Project would not exceed any of the SCAQMD LSTs during construction or long-term operation, and also shows that with mitigation the Project's construction and long-term operation would not expose any nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD's thresholds of significance.
- A-39** For the reasons stated in the responses to Comments A-28 through A-38, the County finds that the Project's RDEIR imposes the maximum feasible mitigation available to reduce Project impacts due to air quality emissions, and further finds that based on the analysis in RDEIR Subsection 4.3, additional mitigation beyond what already is identified in RDEIR Subsection 4.3 is not required for the Project's less-than-significant localized air quality and health risk impacts during construction or long-term operation of the proposed Project.
- A-40** Footnotes linking to SCAQMD's 1993 Handbook and the OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments are acknowledged; no response is necessary.
- A-41** The County acknowledges that CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the County's findings and conclusions on any issues on which CARB did not substantively submit comments. No response is necessary
- A-42** The County appreciates the comments from CARB on the DEIR, and acknowledges that additional assistance may be available from CARB with respect to zero-emission technologies.
- A-43** The County acknowledges the recommended measures to reduce air quality emissions. Please refer to Responses A-44 through A-48, A-50 through A-57, and A-59 through A-62, which are responsive to this comment.
- A-44** Pursuant to State CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found to be significant." As such, CEQA does not require mitigation to address the Project's construction-related air quality impacts, as such impacts were determined to be less than significant by the DEIR with the implementation of mitigation measures. Notwithstanding, the mitigation measures identified in this RDEIR do include requirements restricting idling of diesel-



powered equipment and a requirement to accommodate charging equipment at docking stations for any uses involving TRUs.

- A-45** Commenter is referred to RDEIR Mitigation Measure MM 4.3-3, which requires the installation of infrastructure to accommodate future electric-powered trucks, and requires the installation of additional infrastructure, including charging units, should future tenants be served by electric-powered trucks. As the mitigation implements the recommended measure provided by this comment, no revision to the EIR is warranted.
- A-46** Pursuant to State CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” As indicated in the revised analysis in RDEIR Subsection 4.3, *Air Quality*, the Project’s regional and localized construction-related emissions, cancer-related health risks, and non-cancer-related health risks would be below the SCAQMD thresholds of significance after the implementation of mitigation measures. Thus, CEQA does not require mitigation to address the Project’s construction-related air quality impacts. Notwithstanding, the Project would be required to comply with Riverside County Board of Supervisors Policy F-3 (“Good Neighbor” Policy for Logistics and Warehouse/Distribution Uses). Pursuant to provision 2.2 of Policy F-3, all construction equipment greater than 50 horsepower, including but not limited to excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment, are required to be equipped with CARB Tier 4 Compliant engines unless it can be demonstrated that such equipment is not available within 50 miles of the Project site, in which case such equipment would be required to meet CARB Tier 3 standards.
- A-47** Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” As such, CEQA does not require mitigation to address the Project’s construction-related air quality impacts, as such impacts were determined to be less than significant by the DEIR and this RDEIR (refer to RDEIR Subsection 4.3, *Air Quality*). No revision to the RDEIR is warranted pursuant to this comment.
- A-48** Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” As such, CEQA does not require mitigation to address the Project’s construction-related air quality impacts, as such impacts were determined to be less than significant by the DEIR and this RDEIR (refer to RDEIR Subsection 4.3, *Air Quality*). No revision to the EIR is warranted pursuant to this comment.
- A-49** Footnote describing CARB’s optional low-NOx emission standards for on-road heavy-duty engines is acknowledged; no response is necessary.
- A-50** Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” As such, CEQA does not require mitigation to address the Project’s construction-related air quality impacts, as such impacts were determined to be less than significant by the DEIR and this RDEIR (refer to RDEIR Subsection 4.3, *Air Quality*). Furthermore,



all construction contractors would be required by law to comply with any and all applicable air quality regulations. No revision to the EIR is warranted pursuant to this comment.

- A-51** Commenter is referred to the response to Comment A-20, which is responsive to this comment. As noted therein, RDEIR Mitigation Measure MM 4.3-3 requires the installation of infrastructure to accommodate future electric-powered trucks, and requires the installation of additional infrastructure, including charging units, should future tenants be served by electric-powered trucks. The Project also is required to provide the required number of automobile EV charging stations required by the California Code of Regulations Title 24. Additionally, the commenter’s suggestion to require “the cleanest technologies available” is ambiguous and unenforceable, and as such has not been added as a mitigation requirement to this RDEIR. The County cannot legally require compliance with technologies that do not currently exist or are not widely commercially available. All currently feasible mitigation measures to reduce emissions from trucks have already been implemented, within the legal constraints of the County’s ability to do so. No revision has been made to the RDEIR pursuant to this comment, although it may no longer apply to the revised project analyzed in the RDEIR.
- A-52** Commenter is referred to RDEIR Mitigation Measure MM 4.3-3, which requires the provision of electrical hookups to serve any future TRUs in order to prevent idling during the docking and unloading process. In addition, Mitigation Measure MM 4.3-3 requires the installation of infrastructure to accommodate future electric-powered trucks, and requires the installation of additional infrastructure, including charging units, should future tenants be served by electric-powered trucks, including TRUs. Because the Project would be required to comply with all mitigation measures identified in the Project’s RDEIR, no revision to the RDEIR is warranted pursuant to this comment.
- A-53** Commenter is referred to the response to Comment A-20, which is responsive to this comment.
- A-54** The County disagrees with the commenter’s suggestion to require that all future light and medium-duty delivery trucks and vans must consist of zero emission vehicles. Zero-emission light and medium-duty delivery trucks and vans are not readily commercially available at this time, and because the future tenants are unknown at this time, neither the County nor the Project Applicant has the ability to enforce a requirement that all light and medium-duty delivery trucks and vans must consist of zero emission vehicles. Furthermore, the vast majority of the Project’s air quality emissions are associated with heavy duty trucks, as light and medium duty trucks only comprise a relatively small portion of the Project’s overall anticipated truck fleet. Thus, the County finds that a requirement that all light and medium-duty delivery trucks and vans must consist of zero emission vehicles is infeasible at this time. However, as noted by this commenter, pursuant to Executive Order N-79-20, it is the goal of the State that 100 percent of in-State sales of new passenger cars and trucks will be zero-emission by 2035, and that 100 percent of medium and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. Thus,





ultimately all Project-related vehicles would consist of zero-emission vehicles once the targets set by Executive Order N-79-20 are met.

- A-55** Commenter is referred to the response to Comment A-20, which is responsive to this comment.
- A-56** Commenter is referred to RDEIR Mitigation Measures MM 4.3-5, which requires that all on-site equipment, such as forklifts, shall be electrical with the necessary electrical charging stations. Thus, RDEIR Mitigation Measure MM 4.3-5 implements this suggested mitigation measure.
- A-57** This comment requires that the County impose mitigation that requires technology not currently feasible, and specifically, to impose mitigation that would “expedite a transition to zero-emission vehicles [heavy duty trucks], and be fully zero-emission beginning in 2030.” The County cannot impose mitigation that would require technology not currently commercially available, and it may not even be widely commercially available or feasible in 2030. The County cannot rely on such an uncertain measure in making impact conclusions, nor can it impose infeasible mitigation.
- A-58** Footnote referencing CARB’s Technology Assessment for Transport Refrigerators is acknowledged; no response is necessary.
- A-59** The Project would be subject to compliance with all applicable CARB rules and regulations. Pursuant to Division 26, Part 2 of the California HSC, CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations. As such, the County finds that additional mitigation requiring compliance with CARB rules and regulations that already are mandatory is not necessary, and no revision to the RDEIR has been made pursuant to this comment.
- A-60** Commenter is referred to RDEIR Mitigation Measure MM 4.3-8, which imposes a requirement to restrict idling to no more than five minutes, and further requires that this requirement must be included in all future lease agreements. In addition, RDEIR Mitigation Measure MM 4.3-2 would restrict TRUs to a maximum idling of 15 minutes. As the mitigation recommended by this comment already is included in the RDEIR, no further revisions to the EIR is warranted pursuant to this comment.
- A-61** Commenter is referred to the revised analysis in RDEIR Subsection 4.3, *Air Quality*. RDEIR Mitigation Measure MM 4.3-2 includes a requirement restricting TRUs to a maximum idling time of 15 minutes, consistent with this comment.
- A-62** Commenter is referred to EIR Mitigation Measure MM 4.8-2, which implements the requirement of the County’s CAP Update by requiring that any future building on site that is larger than 100,000 s.f. in size must include renewable energy production on site (which may include solar) of at least 20% of the energy demand of the future buildings on site. As no site-specific applications are included as part of the Project evaluated in this RDEIR (e.g., plot plans, conditional use permits), it would not be feasible to include mitigation requiring rooftop solar panels to provide for 100% of the Project’s



energy demand. The provision of rooftop solar panels is highly dependent on building design and rooftops typically do not include enough surface area to accommodate the number of solar panels required to provide for 100% of the building's energy demand, let alone the maximum allowed for distributed solar connections to the grid, and rooftops typically are further restricted by the need to accommodate mechanical equipment, such as air conditioning units. Thus, the County cannot feasibly impose the suggested mitigation measure for all future buildings, and instead, compliance with the CAP Update is the maximum feasible mitigation that can be imposed on the Project with respect to rooftop solar at this time. The suggested mitigation measure is also uncertain and unlikely legally enforceable, in addition to infeasible. The time to consider whether this type of building specific mitigation is necessary, appropriate, and feasible would be at the plot plan or conditional use permit stage, all of which are approvals that will be subject to CEQA.

- A-63** Footnotes describing CARB regulations to reduce GHG emissions, the PSIP program, and the Statewide Truck and Bus Regulation are acknowledged.



**COMMENT LETTER B**

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, Governor

**DEPARTMENT OF WATER RESOURCES**

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**RE: SCH Number 2020040325: Stoneridge Commerce Center Draft EIR**

Dear Mr. Brady:

The California Department of Water Resources (DWR), Division of Operation and Maintenance, has reviewed the Draft EIR for the proposed Stoneridge Commerce Center project. DWR has the following comments.

**General Comments**

DWR operates and maintains the State Water Project (SWP), which includes an extensive system of aqueducts and pipelines that convey water through the Central Valley into the SWP’s terminus at Lake Perris. Lake Perris is an artificial lake, which is contained by the Perris Dam. DWR operates and maintains the Perris Dam and adjacent DWR facilities, including an equipment storage yard. Primary access to the Perris Dam for maintenance and emergency purposes is located on the Ramona Expressway. As a result of the previous Ramona Expressway widening, DWR no longer has direct left-turn access to Perris Dam, and DWR vehicles, including heavy equipment, must utilize the Bradley Road at Ramona Expressway T-intersection for U-turns east of the primary access point. As noted in the Draft EIR, access to the proposed Stoneridge Commerce Center site will also utilize Ramona Expressway. (See, e.g., Draft EIR pp. S-2, 4.18-23; DEIR Appendix L1, p. 4.)

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B-1  
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**Specific Comments**

**Transportation**

The Draft EIR notes that the county of Riverside does not provide designated truck routes. In addition, the proposed project will rely on Ramona Express way as a primary truck route. (DEIR p. 4.18-7.) Furthermore, the Draft EIR notes that truck traffic will be specifically routed to Ramona Expressway to avoid residential streets. (DEIR p. 4.18-23.) As explained above, DWR’s primary access to Perris Dam is from Ramona Expressway, and all DWR emergency and maintenance vehicles must perform a U-turn at the intersection of Bradley Road and Ramona Expressway to access the DWR facility from the west. As a result, there is a potential for conflict between the proposed project truck trips and DWR’s use of Ramona Expressway for access to Perris Dam, which includes trucks and other heavy equipment for critical maintenance work and emergency access. Additional truck and other vehicle trips associated with the proposed project may significantly impact DWR’s emergency and maintenance access to Perris Dam as well, requiring new access routes to maintain DWR’s timely emergency and maintenance access to the dam in order reduce potentially significant increase in hazards due to traffic conflicts. In fact, the Draft EIR concludes that project implementation would result in a

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B-2  
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B-3  
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significant direct impact on Ramona Expressway during project construction. (DWR p. 4.18-24.)

The Draft EIR indicates that future Traffic Impact Analyses (TIAs), which will include conditions of approval, will be prepared to address transportation deficiencies. (Draft EIR pp. 4.18-29 to 4.18-30.) These future TIAs need to analyze potential impacts to and conflicts with DWR’s emergency and maintenance access to Perris Dam, including appropriate conditions of approval to ensure that these potentially significant impacts are appropriately addressed. DWR also requests consultation on the temporary traffic control plan required by MM 4.18-2 to ensure this mitigation measure appropriately addresses potential impacts to DWR’s Perris Dam access.

**Hazards and Hazardous Materials**

The hazards and hazardous materials section of the Draft EIR concludes that the proposed project will not adversely affect traffic operations, including along segments of Ramona Expressway. (DEIR p. 4.9-14.) However, the transportation section of the Draft EIR concludes that service will be reduced to deficient LOS on Ramona Expressway, further exacerbated by the proposed project. (Draft EIR pp. 4.18-24; Appendix L1 pp. 19-22.) As noted above, Ramona Expressway provides access to DWR’s Perris Dam facility. Thus, there is a potential for the proposed project to have a significant adverse impact on DWR’s emergency response to the critical Perris Dam infrastructure. Therefore, DWR reiterates its request for consultation on the traffic control plan and future TIAs to ensure the proposed project does not have a significant adverse impact on DWR’s emergency access to Perris Dam.

**Hydrology and Water Quality**

The proposed project includes areas located in a potential dam inundation area due to the Perris Dam. (DEIR p. 4.10-19.) The Draft EIR concludes that inundation hazards associated with the failure of Perris Dam will be attenuated because of DWR’s Perris Dam Modernization Project and associated improvements expected to be completed in 2023. (DEIR pp. 4.10-20, 4.10-23.) DWR is currently working with the County to complete the Perris Dam improvements. However, if these improvements are not completed as planned, additional CEQA analysis of potentially significant dam inundation impacts will be required. Therefore, this EIR needs to include a condition of approval that requires additional inundation impact analysis if the Perris Dam improvements are not completed as assumed by the Draft EIR.

For questions regarding these comments, please contact:

Daman Badyal, Section Manager  
State Water Project Right of Way Management Section  
Division of Operations & Maintenance  
Department of Water Resources  
[Damanvir.Badyal@water.ca.gov](mailto:Damanvir.Badyal@water.ca.gov)

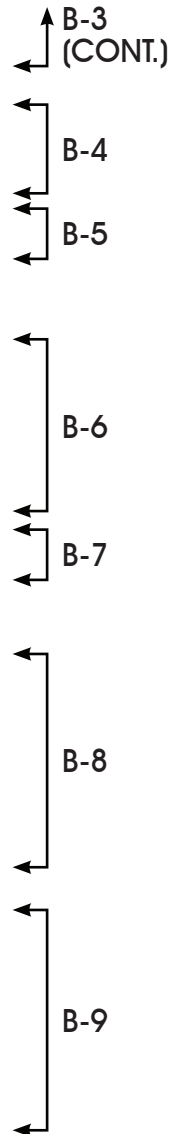
DWR appreciates the County’s consideration of these comments on the Stoneridge Commerce Center Draft EIR.

Sincerely,

*Nancy Finch*

Nancy Finch  
Attorney III  
DWR Office of the General Counsel

cc: John Wheat (DWR, Office of the General Counsel)  
California State Clearinghouse





## Letter B Department of Water Resources

- B-1** The County acknowledges that the Department of Water Resources (DWR) operates and maintains the State Water Project (SWP), including Lake Perris and the Perris Dam. The County further acknowledges that the primary access to the Perris Dam for maintenance and emergency purposes is located along the Ramona Expressway, and that access to the Perris Dam occurs via U-turns at the Bradley Road at Ramona Expressway T-intersection. Please refer to Responses B-2 through B-8 for specific responses to the concerns raised by this comment letter.
- B-2** The commenter indicates a concern about possible traffic conflicts that could adversely affect DWR's access to the Perris Dam. Commenter is referred to the revised project description presented in RDEIR Section 3.0, which identifies revisions to the Project's proposed truck routes. Specifically, the anticipated truck routes for the Project have been revised such that there would be no Project-related truck traffic along the westbound portion of Ramona Expressway, as all westbound trucks either would be routed to truck routes to the south of the Project site or would be routed to the west once the MCP is constructed and operational. The revised truck routes described in EIR Section 3.0 would ensure that there would be no conflict between the Project's truck traffic and DWR's ability to access the Perris Dam.
- B-3** While the commenter is correct that the DEIR does acknowledge a potentially significant impact to Ramona Expressway during Project construction, the DEIR also concludes that with implementation of Mitigation Measure 4.18-3, requiring the preparation and implementation of a temporary traffic control plan, Project impacts to surrounding roadways, including the Ramona Expressway, would be reduced to less-than-significant levels. As such, the County disagrees with the commenter's assertion that Project construction activities would adversely affect DWR's ability to access the Perris Dam via Ramona Expressway.
- B-4** Commenter requests that future traffic impact analysis technical reports address potential impacts to the DWR's ability to access the Perris Dam. Future implementing developments within the Project site would require Plot Plans and/or Conditional Use Permits, which are discretionary approvals subject to CEQA. As part of the required CEQA analysis for future implementing developments, potential conflicts with DWR's emergency and maintenance access to Perris Dam will be addressed if necessary, and if necessary conditions of approval will be identified as appropriate for each implementing development within the Project site to ensure impacts remain below a level of significance. However, commenter also is referred to the response to Comment B-2, which describes revisions to the Project's proposed truck routes and demonstrates that Project-related truck traffic would not inhibit the DWR's ability to access the Perris Dam.
- B-5** Commenter requests that DWR be provided with a copy of the temporary traffic control plan to review and comment to ensure that the traffic control plan accommodates appropriate DWR access to the Perris Dam. Accordingly, Mitigation Measure MM 4.18-3 in DEIR Subsection 4.18, *Transportation*, has been modified to include the following statement: "Prior to approval of the



temporary traffic control plan by Riverside County, Riverside County shall provide a copy to the Department of Water Resources, Division of Operation and Maintenance, for review and comment to ensure that the temporary traffic control plan does not interfere with emergency or maintenance access to the Perris Dam.”

- B-6** Commenter again expresses concerns regarding DWR’s ability to access the Perris Dam for maintenance. Commenter is referred to the response to Comment B-2, which describes revisions to the Project’s proposed truck routes and explains how such revisions, which would not include any truck trips along westbound Ramona Expressway, would ensure that Project-related truck traffic would not inhibit DWR’s ability to access the Perris Dam. Furthermore, the Project would be conditioned to comply with the results of the Project’s Traffic Analysis (“TA”; RDEIR *Technical Appendix L3*), which identifies Project-related improvements, fair-share contributions, and payments to fee programs as necessary to ensure that all study area intersections achieve an acceptable Level of Service (LOS). Thus, the Project would not have a significant adverse impact on DWR’s emergency response to the critical Perris Dam infrastructure.
- B-7** Commenter again requests that DWR be provided a copy of the temporary traffic control plan for construction activities associated with the Project. As noted above in Response B-5, Mitigation Measure MM 4.18-3 has been modified to require Riverside County to provide a copy of the temporary traffic control plan to the DWR for review and comment prior to issuance of grading improvements that could affect the Ramona Expressway.
- B-8** Pursuant to this comment, additional research was conducted using the California Department of Water Resources, Division of Safety of Dams (DSOD) Dam Breach Inundation Map Web Publisher mapping portal. The limits of inundation associated with the Lake Perris dam were overlaid on the Project’s proposed land use plan. As a result of this analysis, it was determined that the dam inundation areas affecting the Project site occur primarily within the Project’s planned Open Space - Conservation Habitat uses, and no portion of the dam inundation area would affect any future buildings on site (refer to *Technical Appendix R*). Because the Project would not be subject to inundation from a breach of the Lake Perris dam, the requested mitigation measure is not necessary. Furthermore, this comment concerns the impact of the environment on the Project, rather than the impact of the Project on the environment, and thus the requested analysis and mitigation is not required under CEQA. (See, *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369.)
- B-9** The County appreciates DWR’s comments on the Project and the Project’s DEIR. Any questions regarding DWR’s comments will be directed to the contact person identified by this comment. No further response is necessary.



COMMENT LETTER C



California  
**Department of Conservation**  
Division of Land Resource Protection

Gavin Newsom, Governor  
David Shabazian, Director

MAY 10, 2022

VIA EMAIL: [RBRADY@RIVCO.ORG](mailto:RBRADY@RIVCO.ORG)  
Riverside County Planning Department  
Attn: Russell Brady, Contract Planner  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

Dear Mr. Brady:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STONERIDGE COMMERCE CENTER PROJECT, SCH#2020040325

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report for the Stoneridge Commerce Center Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources.

C-1

Project Description

The Project as evaluated in the Stoneridge Commerce Center EIR includes two separate land use plans for the 582.6-acre Project site. The "Primary Land Use Plan" anticipates that the Project would be constructed with Ramona Expressway providing primary access from the north and Nuevo Road providing access from the south, and that the site would be developed with up to 3888.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail land uses, Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres.

C-2

Pursuant to Amendment No. 1 to Specific Plan No. 239 (SP 239A1), Light Industrial and Business Park land uses may be developed at a Floor Area Ratio (FAR) up to 0.50, while Commercial Retail land uses can be developed at a FAR up to 0.35. However, the Riverside County Transportation Commission (RCTC) is currently planning the construction of a regional transportation facility, the "Mid-County Parkway (MCP)," a segment of which, along with an interchange, are planned to traverse the northwestern portions of the Project site. The MCP is a long-range transportation improvement by RCTC; however, the RCTC has not secured or identified funding for the

State of California Natural Resources Agency | Department of Conservation  
715 P Street, MS 1904, Sacramento, CA 95814  
conservation.ca.gov | T: (916) 324-0850 | F: (916) 327-3430



segment of the MCP which traverses the Project area, and therefore the timing of this segment of the MCP and the associated interchange is unknown at this time.

In addition, and due to environmental, economic, right of way, or other factors, it is possible that RCTC ultimately may not construct the MCP in this portion of Riverside County. Notwithstanding, the "Alternative Land Use Plan" anticipates that the MCP would be constructed through the northwest portions of the site, in which case the site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses (of which 8.5 acres would be within the alignment of the MCP and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail land uses (of which 0.2 acre would occur within the alignment of the MCP and would not be developed with Commercial Retail land uses), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways.

As with the Primary Land Use Plan, the Alternative Land Use Plan would allow for development of Light Industrial and Business Park uses at a maximum FAR of 0.50, while Commercial Retail land uses could be developed at a maximum FAR of 0.35. Thus, in order to accommodate both the potential for the future construction of the MCP while also providing for development of the site in the event the MCP is not constructed as currently planned by RCTC, the two land use concepts are evaluated for the site throughout the Stoneridge Commerce Center EIR at an equal level of detail.

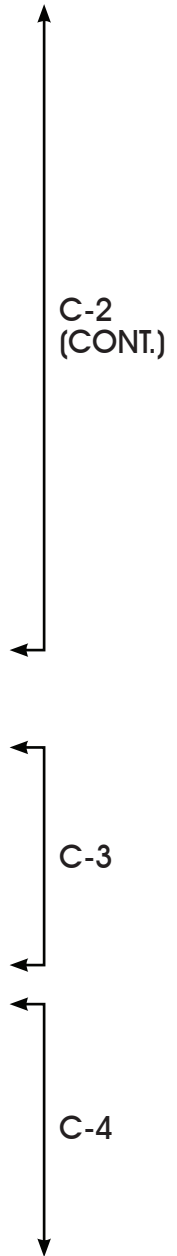
Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. CEQA requires that all feasible and reasonable mitigation be reviewed and applied to projects. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.

All mitigation measures that are potentially feasible should be included in the project's environmental review. A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Consistent with CEQA Guidelines, the Department recommends the County consider agricultural conservation easements, among other measures, as potential mitigation. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."])

Mitigation through agricultural easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and







stewardship of agricultural easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

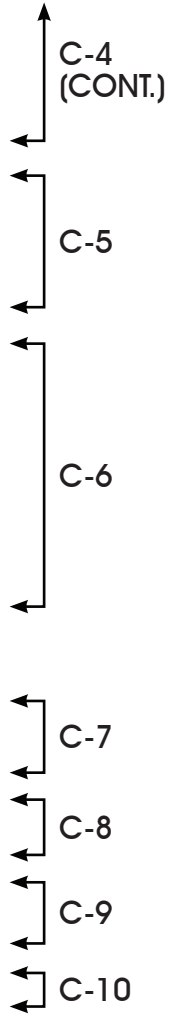
[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered. Indeed, the recent judicial opinion in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 ("KG Farms") holds that agricultural conservation easements on a 1 to 1 ratio are not alone sufficient to adequately mitigate a project's conversion of agricultural land. KG Farms does not stand for the proposition that agricultural conservation easements are irrelevant as mitigation. Rather, the holding suggests that to the extent they are considered, they may need to be applied at a greater than 1 to 1 ratio, or combined with other forms of mitigation (such as restoration of some land not currently used as farmland).

Conclusion

The Department recommends further discussion of the following issues:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Proposed mitigation measures for all impacted agricultural lands within the proposed project area.





Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Stoneridge Commerce Center Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov).

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C-11  
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Sincerely,

*Monique Wilber*

Monique Wilber  
Conservation Program Support Supervisor



## Letter C Department of Conservation

- C-1** Comment describing the Department of Conservation’s (DOC) roles and responsibilities for monitoring farmland conversion, providing technical assistance, and administering agricultural land conservation programs. The County appreciates and acknowledges the DOC’s comments on the Project’s DEIR. Please refer to Responses C-2 through C-10 for responses to the individual comments identified by this comment letter.
- C-2** Commenter correctly cites the description of the proposed Project as provided in DEIR Section 3.0. Please note that the cited acreage of Light Industrial land uses (3888.5 acres) was a typographical error on DEIR p. 3-1 that has been corrected to instead indicate 388.5 acres of Light Industrial land uses as part of the RDEIR. In addition, revisions have been incorporated into the Project, as described above in RDEIR Subsection R.3, which would result in a reduction in the maximum amount of allowable Light Industrial building area by approximately 13.1% as compared to the project described in the DEIR.
- C-3** At the time the Project’s DEIR was published and circulated for public review, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) classified the Project site as containing approximately 297.8 acres of “Prime Farmland,” approximately 24.6 acres of “Farmland of Statewide Importance,” approximately 4.0 acres of “Unique Farmland,” and approximately 180.3 acres of “Farmland of Local Importance.” However, since that time, the agricultural classifications applied to the Project site have changed. As documented in RDEIR Subsection 4.2, *Agriculture and Forestry Resources*, the Project site now is classified as containing approximately 535.1 acres of “Farmland of Local Importance” and approximately 47.6 acres of “Grazing Land.” “Farmland” is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean “Prime Farmland,” “Farmland of Statewide Importance,” and “Unique Farmland.” Thus, the Project site does not contain any “Farmland” as mapped by the FMMP. Furthermore, and based on a site-specific Land Evaluation and Site Assessment (LESA) technical report (RDEIR *Technical Appendix S*), based on the existing conditions of the Project site and surrounding areas, the Project site is determined to have a relatively low value for agricultural production, further indicating that the Project site does not contain any areas of important farmland types. The analysis in RDEIR Subsection 4.2 has been revised and now shows a less-than-significant impact to Farmland. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, mitigation measures are not required for the Project’s less-than-significant impacts to Farmland.
- C-4** Commenter is referred to the response to Comment C-3. As noted therein, the Project would result in less-than-significant impacts to Farmland, and as such mitigation measures are not required.
- C-5** Comment providing information on agricultural mitigation banks available from the California Council of Land Trusts is acknowledged. However, and as noted in the response to Comment C-3,



the Project would result in less-than-significant impacts to Farmland, and as such mitigation measures are not required.

- C-6** Commenter is referred to the response to Comment C-3. As noted therein, the Project would result in less-than-significant impacts to Farmland, and as such mitigation measures are not required.
- C-7** Commenter is referred to the Project's site-specific LESA analysis (*RDEIR Technical Appendix S*), which provides a detailed assessment of the conditions of the Project site and surrounding areas, and demonstrates that the Project site has a relatively low value for agricultural production and thus does not contain any areas of important farmland types.
- C-8** The analyses of Thresholds b., c., and d. in Subsection 4.2 of the DEIR and RDEIR demonstrate that the proposed Project would not result in any indirect impacts to existing or future agricultural uses in the surrounding area. Furthermore, the Project site occurs in a portion of Riverside County that is planned for long-term development with urban land uses, thereby indicating that the Project area is not viable for agricultural uses in the long term. As this comment does not identify any deficiencies in the DEIR's analysis of indirect impacts to agricultural resources, no revisions to the RDEIR are warranted pursuant to this comment.
- C-9** An analysis of the Project's cumulatively-considerable impacts to agricultural land is provided in subsection 4.2.5 of the DEIR and subsection 4.2.6 of the RDEIR. As concluded in RDEIR subsection 4.2.6, because the Project site does not contain any areas of important farmland types and has a relatively low value for agricultural production, the Project's impacts to agricultural resources would be less than significant on both a direct and cumulatively-considerable basis.
- C-10** Commenter is referred to the response to Comment C-3. As noted therein, the Project would result in less-than-significant impacts to Farmland, and as such mitigation measures are not required.
- C-11** The County appreciates the DOC's comments on the proposed Project and the Project's DEIR. The County will provide the DOC with notices of future hearing dates and staff reports associated with the Project. Any questions regarding the DOC's comments will be directed to the contact person identified by this comment.



COMMENT LETTER D



May 26, 2022

Riverside County  
Attn: Russell Brady  
4080 Lemon Street, 12<sup>th</sup> Floor  
Riverside, CA 92501

RIVERSIDE COUNTY (COUNTY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE  
STONERIDGE COMMERCE CENTER PROJECT (PROJECT); SCH # 2020040325

Dear Mr. Russel Brady:

Thank you for the opportunity to review the Environmental Impact Report (EIR) for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations (CCR) title 22, chapter 16 et. seq). The above referenced Project will require a new or amended water supply permit.

D-1

The State Water Board, DDW, as a responsible agency under CEQA, has the following comments on the County's draft EIR:

D-2

- Please note the replacement of the existing drinking water tank with two new tanks will require a discretionary action from the State Water Board, DDW. Please update the document to better reflect this. Please also add, under "Table 3.5 Matrix of Project Approvals/Permits, Other Agencies-Subsequent Approvals and Permits" (PDF page 175), "State Water Resources Control Board, Division of Drinking Water" and "Approval of a Water Supply Permit".
- Potable water services for the Project will be provided by the Eastern Municipal Water District (EMWD). In the CEQA document the proposed water system infrastructure is not considered a part of the defined "Project Site" area, but instead is listed as part of a defined "Off-site Impacts" area (PDF page 167). It appears that the portion of the Project that falls within the "Off-Site Impacts" area was not considered every time the "582.6-acre Project" was discussed and analyzed in the various checklist sections and was also not considered as part of the implementation of MM 4.7-1. Please address in the checklist sections the missing discussions and analysis of Project infrastructure and impacts that fall within the "Off-site Impacts" area of the Project, that were not otherwise addressed, along with updating the Project acre area in the mitigation measure.
- Address any chemical treatment that will be transported to, used, and/or stored at the booster pump station and tank during construction and operation under the Hazards and Hazardous Materials analysis. If hazardous materials will occur at these locations, please discuss how close to the schools the hazardous materials will be from the schools.

D-3  
D-4

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)



Mr. Russel Brady

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May 26, 2022

- The CEQA document indicates “A 12-inch water main also is proposed within Orange Avenue and would connect to domestic water infrastructure planned to the east of the Project site (which would be constructed by others in the future)” (PDF page 161). Please further describe what domestic water infrastructure this main will connect to. Please explain if this new infrastructure will require a State Water Board, DDW permit and if the infrastructure is required to service the development. If it will require a permit and is required for the development then, please assess the impacts of the construction and use of the infrastructure in this document or explain a tiered document the infrastructure will be assessed in prior to this Project’s construction.

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D-5  
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Once the EIR is certified, please forward the following items in support of EMWD’s permit application to the State Water Board, DDW Riverside District Office to [DWPDIST20@waterboards.ca.gov](mailto:DWPDIST20@waterboards.ca.gov):

- Copy of the draft and final EIR, including the Mitigation Monitoring and Reporting Plan, with any comment letters received and the lead agency responses as appropriate;
- Copy of the Overriding Statement of Considerations (OSC) and Findings;
- Copy of the Resolution or Board Minutes adopting the EIR, OSC, and Findings; and
- Copy of the stamped Notice of Determination filed at the Riverside County Clerk’s Office and the Governor’s Office of Planning and Research, State Clearinghouse.

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D-6  
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Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or [Lori.Schmitz@waterboards.ca.gov](mailto:Lori.Schmitz@waterboards.ca.gov), if you have any questions regarding State Water Board CEQA comments.

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D-7  
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Sincerely,

*Lori Schmitz*

Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Chun Huang  
District Engineer  
Riverside District Office



**Letter D State Water Resources Control Board (SWRCB)**

- D-1** The County acknowledges and appreciates the comments provided by the Storm Water Resources Control Board (SWRCB), Division of Drinking Water, on the Project and the Project's DEIR. The County also acknowledges that the SWRCB is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act, and that the proposed Project will require a new or amended water supply permit. RDEIR Table 3-5, which identifies subsequent approvals needed from other agencies, has been revised to acknowledge the need for a new or amended water supply permit from the SWRCB.
- D-2** The County acknowledges that the Project's proposed off-site water tanks will require a discretionary action from the State Water Board, Division of Drinking Water for approval of a water supply permit. RDEIR Table 3-6 has been revised to acknowledge the need for a new or amended water supply permit from the SWRCB.
- D-3** The DEIR accounted for all impacts of the proposed Project, including impacts due to off-site improvements required for Project implementation. The DEIR included an evaluation of potential construction and operational impacts associated with off-site improvement areas (e.g., noise, localized air quality, biological resources), and identified mitigation measures where necessary to reduce potential off-site impacts to the maximum feasible extent. Mitigation Measure MM 4.7-1 has been modified as part of the RDEIR to clarify that geotechnical studies will be required prior to issuance of permits authorizing off-site improvements. There are no impacts associated with the Project's off-site improvements that were not already addressed, and where necessary, mitigated as part of the DEIR. Accordingly, aside from the minor revision to Mitigation Measure MM 4.7-1, no revisions to the RDEIR are warranted pursuant to this comment.
- D-4** Based on correspondence between the Project's engineer (Hunsaker & Associates) and Eastern Municipal Water District (EMWD) staff, there would be no chemicals stored on the off-site water tank site. It is anticipated that EMWD would utilize chlorine tablets; however, the tablets would be transported to the water tank site on an as-needed basis by EMWD staff and would not be stored on site. There would be no risk of exposure of nearby schools to hazards associated with the use of chlorine tablets. While the future operational characteristics of the booster stations is unknown at this time, EMWD staff noted that the existing booster station within Rider Street does not include the storage of any chemicals on site. As such, it is not expected that any hazardous materials or chemicals would be stored at the water tank or booster station sites, and the future operation of the water tanks and booster stations would not adversely affect nearby schools. No revision to the RDEIR is warranted pursuant to this comment.
- D-5** The commenter correctly notes that the Project's on-site infrastructure for water service would include a 12-inch water line within Orange Avenue that ultimately would connect to a planned water line that would be constructed in the future by others to the east of the Project site. The additional water infrastructure to the east of the Project site would occur in association with future development



to the east of the Project site, and such future improvements are outside of the scope of the proposed Project. The precise alignments of any future water lines to the east of the Project site are not known (beyond the connection point at the Project's eastern boundary), and any evaluation of environmental effects associated with future water lines to be construction by others in the future would be speculative (see CEQA Guidelines § 15145). However, it is anticipated that any future water lines to the east of the Project site only would involve the extension of existing water lines and infrastructure, and it is not anticipated that such future improvements would require permits from the SWRCB. No revision to the DEIR is warranted pursuant to this comment.

- D-6** As requested, copies of the requested documents will be provided to the SWRCB, Division of Drinking Water prior to public hearings for the proposed Project.
  
- D-7** Any questions regarding the SWRCB comments will be directed to the contact person identified by this comment. No further response is necessary.





**COMMENT LETTER E**

**Jer Harding**

**From:** Robertson, Glenn@Waterboards <Glenn.Robertson@waterboards.ca.gov>  
**Sent:** Monday, May 23, 2022 3:45 PM  
**To:** Brady, Russell  
**Cc:** 'stephen.m.estes@usace.army.mil'; Machuca, Breanna@Wildlife; 'Karin\_Cleary-Rose@fws.gov'; Jer Harding; Reeder, Terri@Waterboards; Freshwater, Jason@Waterboards  
**Subject:** Regional Water Quality Control Board CEQA Comment on Stoneridge Commerce Center, SCH NO. 2020040325

To Russell Brady, Riverside County Planning Department :

This email is our official comment from staff of the Regional Water Quality Control Board, Santa Ana Region (Santa Ana Water Board), on the comment deadline for the Draft Environmental Impact Report (DEIR) for the proposed Stoneridge Commerce Center Project (SCH No. 2020040325). The Project is located east of Perris in unincorporated Riverside County, between Ramona Expressway and Nuevo Road at the San Jacinto River. Two plans are submitted for the 582.9-acre site, depending on whether the site is crossed by the long-planned Mid-County Parkway. Each plan has the Project constructing light industrial, business park, and commercial uses on 389.2 acres.

E-1

Santa Ana Water Board staff has the following comments:

Appendix C-2 (Jurisdictional Delineation) states that of 23.311 onsite acres of alkali playa and drainages jurisdictional to the Santa Ana Water Board, 23.270 acres are waters of the U.S. and 0.0410 acre is state-jurisdictional only. Under the preferred plan (no Mid-County Parkway crossing), 0.991 acre of this acreage would be permanently impacted (Biological Technical Report, p.93), but mitigated at a ratio of 3:1 through "the purchase of 2.551 acres of rehabilitation credits at the Riverpark Mitigation Bank" along the San Jacinto River. The figure of 2.551 appears to be miscalculated. We request that a corrected number and credits of a minimum 2.973 acres (3 X 0.991 ac) replace the stated 2.551 acres for minimum compensatory mitigation for the impacted 0.991 acre. Temporary impacts must be ameliorated onsite.

E-2

Also, please estimate mitigation for the second plan's scenario, were the Mid-County Parkway route to actually cross the Project site.

E-3

We thank you for including these changes throughout relevant DEIR sections.

E-4

Glenn Robertson, Engineering Geologist, Santa Ana Water Board

Copied to:

Army Corps of Engineers, Los Angeles office – Stephen Estes [Stephan.M.Estes@usace.army.mil](mailto:Stephan.M.Estes@usace.army.mil)

California Department of Fish and Wildlife, Ontario – Breanna Machuca, [Breanna.Machuca@wildlife.ca.gov](mailto:Breanna.Machuca@wildlife.ca.gov)

U.S. Fish and Wildlife Service, Palm Springs – Karin Cleary-Rose [Karin\\_Cleary-Rose@fws.gov](mailto:Karin_Cleary-Rose@fws.gov)

T&B Planning Inc., San Diego – Jerrica Harding



**Letter E      Regional Water Quality Control Board (RWQCB)**

- E-1**      The County is in receipt of comments from the Regional Water Quality Control Board (RWQCB), Santa Ana Region. This comment correctly summarizes the proposed Project. Please refer to the individual responses to the comments identified by this comment letter, provided below.
- E-2**      RDEIR Mitigation Measure 4.4-1 has been revised to require mitigation totaling 2.97 acres.
- E-3**      As depicted on DEIR and RDEIR Figures 4.4-11 through 4.4-14, the portions of the Project site containing jurisdictional drainages do not occur within the future alignment of the Mid-County Parkway (MCP). As such, Project impacts to jurisdictional resources would be the same under both the Primary Land Use Plan (without MCP) and Alternative Land Use Plan (with MCP). No revision to the RDEIR is warranted pursuant to this comment.
- E-4**      Riverside County appreciates the RWQCB's comments on the proposed Project and the Project's DEIR. No further response is necessary.



**COMMENT LETTER F**

**Jer Harding**

**To:** Brady, Russell  
**Subject:** RE: Stoneridge EIR Public Review - City of Perris DEIR Comments

**From:** Kenneth Phung <[kphung@cityofperris.org](mailto:kphung@cityofperris.org)>  
**Sent:** Friday, May 20, 2022 5:06 PM  
**To:** Brady, Russell <[rbrady@RIVCO.ORG](mailto:rbrady@RIVCO.ORG)>; [dbryant@tbplanning.com](mailto:dbryant@tbplanning.com); [jharding@tbplanning.com](mailto:jharding@tbplanning.com)  
**Subject:** RE: Stoneridge EIR Public Review - City of Perris DEIR Comments

**CAUTION:** This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Russell,

The City of Perris appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the "Stoneridge Specific Plan Amendment" ("Proposed Project") to change the adopted Specific Plan from predominately residential and commercial land uses to a predominately industrial-based land uses consisting of 389 acres of Industrial, 49 acres of Business Park and 8 acres of Commercial. The Project is located less than a ½ mile east of the City of Perris limits between Ramona Expressway and Nuevo Road.

F-1

The City is opposed to the proposed Project as it is entirely out of character with the surrounding areas in the County and in the City of Perris, which is designated for single-family residential. The City provides the attached comments addressing the inadequacy of the DEIR and concerns related to the Project resulting in having significant and unavoidable impacts and that require a statement of overriding of consideration for approval consideration.

F-2

The City of Perris thanks you for considering these comments. Please feel free to contact me at (951) 943-5003, ext. 257, if you have any questions or would like to discuss the above concern in further detail.

F-3

Kenneth Phung  
Director of Development Services

**From:** Deborah Bryant <[dbryant@tbplanning.com](mailto:dbryant@tbplanning.com)>  
**Sent:** Friday, April 8, 2022 11:06 AM  
**To:** Jer Harding <[jharding@tbplanning.com](mailto:jharding@tbplanning.com)>  
**Subject:** FW: Stoneridge EIR Public Review

To Interested Parties:

Pursuant to Title 14 of the California Code of Regulations, Chapter 3, Section 1507, this notice is to advise that the County of Riverside, as lead agency, has completed and is issuing notification of the availability and completion of a Draft Environmental Impact Report (EIR), State Clearinghouse No. 2020120546, for the project as described below.

**Project Location:** South of the Ramona Expressway, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road in unincorporated Riverside County. Assessor's Parcel Numbers (APNs) 307-070-003, 307-080-(005, 006, 008), 307-090-(001, 002, 004, 005, 006), 307-100-(001, 003, 004, 005), 307-110-(003, 007, 008), 307-220-001, and 307-230-(019, 020).



## CITY OF PERRIS

PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT  
PLANNING DIVISION  
135 N. "D" Street, Perris, CA 92570-2200  
TEL: (951) 943-5003 FAX: (951) 943-8379

May 20, 2022

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

**SUBJECT:** City of Perris Comments on the Draft Environmental Impact Report (DEIR) for the Stoneridge Specific Plan Amendment ("Proposed Project") – County Riverside Case Nos. General Plan Amendment No. 190008, Specific Plan No. 00239A01, and 3. Adoption by Change of Zone 1900024.

Dear Mr. Brady:

The City of Perris appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the "Stoneridge Specific Plan Amendment" ("Proposed Project") to change the adopted Specific Plan from predominately residential and commercial land uses to a predominately industrial-based land uses consisting of 389 acres of Industrial, 49 acres of Business Park and 8 acres of Commercial. The Project is located less than a ½ mile east of the City of Perris limits between Ramona Expressway and Nuevo Road. The City is opposed to the proposed Project as it is entirely out of character with the surrounding areas in the County and in the City of Perris, which is designated for single-family residential. The City provides the below comments addressing the inadequacy of the DEIR and concerns related to the Project resulting in having significant and unavoidable impacts and that require a statement of overriding of consideration for approval consideration:

←  
F-4  
←

1. **Incomplete Project Description.** Staff observed the following incomplete and inaccurate project descriptions that will need to be resolved.

←  
F-5  
←



**Page 3-25** Figure 3-11 shows several potential off-site impact areas that are within the City of Perris. However, the potential project actions that would occur within these areas are not described in the Project Description.

F-6

**Pages 3-32 and 3-33** Page 3-32 discusses the related environmental review and consultation requirements that would occur subsequent to approval of the proposed Project. Table 3-5 includes a list of other agencies whose subsequent approvals and/or permits would be necessary to implement the proposed Project. Figure 3-8 shows the proposed water main that may be constructed within the City of Perris and, as discussed previously, Figure 3-11 shows several potential off-site impact areas that are within the City of Perris. Approval from the City of Perris would be required to implement any improvements within these areas. Consequently, the City of Perris is a potential Responsible Agency under CEQA for this Project. This is not discussed on page 3-32 or identified in Table 3-5. Any improvements within the boundaries of the City of Perris would be subject to environmental review and approval by the City.

F-7

2. **Incomplete Analysis of the Air Quality and Potential Recirculation of the DEIR.** Staff observed the following incomplete air quality analysis that needs to be resolved with an updated Air Quality Study.

**Pages 4.3-21 through 4.3-26**

The regional construction significance analysis identifies mass daily construction emissions for the years 2021 through 2029. It is not clear whether these emissions include the construction activities within the potential off-site impact areas that are within the City of Perris.

F-8

**Pages 4.3-30 through 4.3-32**

The LST analysis identifies localized emissions of NOx and CO for the site preparation, site grading, and building construction phases. As discussed in this section, the SCAQMD has also identified LSTs for PM10 and PM2.5 emissions. However, the localized emissions of PM10 and PM2.5 are not identified in Table 4.3-11. The reasoning is that a construction HRA has been prepared to evaluate potential health risks associated with the emission of diesel particulate matter (DPM), which includes PM10 and PM2.5 resulting from construction activities. It is acceptable to prepare a construction HRA for DPM. However, DPM is only generated by diesel combustion engines. The analysis does not address the criteria pollutant aspect of DPM as well as the generation of fugitive dust from earth movement and disturbance. The analysis needs to be revised to identify the localized emissions of total PM10 and PM2.5 emissions from fugitive dust and motor vehicles generated within the construction areas and compare these to the SCAQMD's LST thresholds of significance. The applicable construction LSTs for the Perris Valley Source Receptor Area are 13 pounds per day of PM10 and 8 pounds per day of PM2.5. Based on the daily emissions identified in Table 4.3-6 and Table 4.3-8, as well as the mitigated on-site emissions tables provided in the CalEEMod results sheets in Attachment A of the Air Quality and Greenhouse Gas Assessment, the LSTs for both PM10

F-9



and PM2.5 could be exceeded during the site preparation and site grading phases. This would be a significant air quality impact that is not discussed in the Draft EIR. Pursuant to § 15088.5(a)(1) of the State CEQA Guidelines, the County would be required to revise and recirculate the Draft EIR if a new significant impact would result from the Project.

F-9  
(CONT.)

In addition, the LST analysis does not evaluate the localized impacts associated with the construction activities within the potential off-site impact areas that are within the City of Perris.

F-10

**Pages 4.3-36 and 4.3-37**

As with the construction LST analysis, the LST analysis for operational-generated air contaminants does not include the localized emissions of PM10 and PM2.5. The reasoning again is that an operational HRA has been prepared to evaluate the potential health risks associated with the emission of DPM. However, DPM is only generated by diesel combustion engines. The analysis does not address the criteria pollutant aspect of DPM as well as the generation of particulates from all on-site sources including energy use and passenger vehicles. The analysis needs to be revised to identify the localized emissions of total PM10 and PM2.5 emissions generated within the project site and compare these to the SCAQMD’s LST thresholds of significance. The applicable operational LSTs for the Perris Valley Source Receptor Area are 4 pounds per day of PM10 and 2 pounds per day of PM2.5. Based on the daily emissions identified in Table 4.3-9 and Table 4.3-10, the LST for PM2.5 would be exceeded based solely on the energy consumption emission source. This would be a significant air quality impact that is not discussed in the Draft EIR. Pursuant to § 15088.5(a)(1) of the State CEQA Guidelines, the County would be required to revise and recirculate the Draft EIR if a new significant impact would result from the Project.

F-11

- 3. **Deficient Noise Study.** Staff observed the noise study does not adequately address noise impacts for activity in Perris based on the Perris standard. But instead, rely on County requirements. Therefore, the Noise Study will need to be updated as discussed below.

F-12

**Pages 4.13-25 and 4.13-26**

The Draft EIR utilizes a noise level threshold of 85 dBA Leq as the threshold of significance for construction-related noise impacts. This is based on the threshold from the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). This threshold is used since the County has not established numeric maximum acceptable construction source noise levels at potentially affected receptors. This is acceptable for the noise levels generated within the unincorporated areas of Riverside County.

F-13

However, off-site construction activities may occur within the City of Perris. Pursuant to Section 7.34.060 of the Perris, California, Code of Ordinances, construction activity shall not exceed 80 dBA

F-14



Page 4 of 6

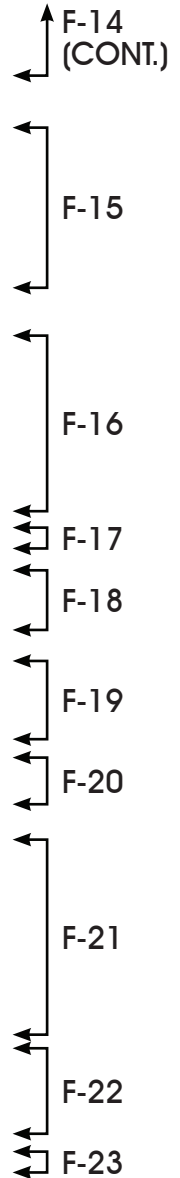
Lmax in residential zones of the City. This threshold should be identified in the Draft EIR and used to evaluate the impacts of all off-site construction activities that occur within the City of Perris.

**Pages 4.13-30 through 4.13-36**

As discussed above, off-site construction activities may occur within the City of Perris. These impacts are evaluated in relation to the NIOSH standard of 85 dBA Leq. The analysis should be updated to provide an evaluation of noise impacts based on Lmax noise levels and the City’s adopted standard of 80 dBA Lmax for all off-site construction-related activities that occur within the City of Perris.

4. **Traffic Impact Analysis/Truck Route.** The traffic scope and study were prepared without the consultation of the City of Perris staff, although 76 percent of the Project passenger car trips and 98 percent of the Project truck trips will be utilizing City of Perris streets. Staff is significantly concerned with the traffic study approach and assumption, as the City’s roadway system was never envisioned to take on an additional 8+ million square feet of warehouse truck traffic. Therefore, Perris staff provides the following comments related to the inadequacy of the traffic study that will need to be updated:

- The City objects to truck traffic within the City of Perris boundaries.
- The Project truck route shall be on roadways that are within the County’s jurisdiction. For example, truck traffic on Menifee Road to Highway 74 or Ethanac Road to ultimately connects to the I-215 Freeway.
- To ensure that trucks stay away from Ramona Expressway, Placentia Avenue, Nuevo Road, and San Jacinto Avenue, the traffic study should incorporate a truck route enforcement plan as part of the TIA, which includes: on-site signage (provide a depiction of signage) of truck routes, and truck driver/dispatcher education on truck routes away from the City’s roadway system. In addition, the Project should include a funding program to police violators who stray away from the County’s roadway system.
- The traffic study incorrectly assumed that Ramona Expressway from the easterly city limits to Redlands Avenue is a truck route and that trucks can utilize this stretch of a roadway to connect to Harley Knox Boulevard or Placentia Avenue to the I-215 Freeway. The City removed the entire stretch of Ramona Expressway as a truck route when it adopted the Perris Valley Commerce Center Specific Plan in January 2012. Ramona Expressway from the westerly city limits to the easterly city limits was subsequently removed from the General Plan and Municipal Code list of truck routes in December of 2021. The assumption needs to be corrected in the traffic study. It should be noted Harley Knox Boulevard and I-215 Freeway interchange is currently not functioning within acceptable level with a LOS F. The City is planning to fund the ultimate freeway interchange improvements in the next five years, but is still short \$16.5 million of the necessary the \$72M million budget necessary to initiate this project.
- The report needs to specify the actual number of trucks, as only the overall ADT is provided.





Page 5 of 6

Staff is requesting that a revised traffic scope be provided to reflect the City of Perris concerns before the preparation of the traffic study. Upon completion of the revised Draft Traffic Impact Analysis, a copy should be provided for staff's review and comments prior to recirculation of the Draft EIR.

F-24

5. **Senate Bill 330 No Net Loss Residential.** Pursuant to Senate Bill 330 Government Code Section 66300(i) requires no net loss of residential densities in light of the housing shortage in California. Entitlement of the project would result in the loss of 2,236 planned dwelling units. The EIR needs to address how it will offset the loss of the planned and needed dwelling units in other areas of the County.

F-25

6. **Land Use Inconsistency with Surrounding Areas And Significant and Unavoidable Impacts.** The proposed change in land use from residential to industrial-based land uses is out of character with the surrounding areas in the County and in the City of Perris, which is designated for single-family residential. The proposed Project would significantly alter the community character, and traffic flow patterns not only in the County but directly impact its neighboring City of Perris. In addition, the proposed Project has been determined to result in impacts to Aesthetics, Agriculture and Forestry Resources, Air Quality, Noise, and Transportation that are significant and unavoidable, which would worsen the quality of life in the County of Riverside and Perris. Therefore, the Project does not warrant a statement of overriding consideration for project approval consideration.

F-26  
F-27

7. **CEQA.** Please provide future notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA") under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law which includes: notices of any public hearing held pursuant to CEQA, and notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.

F-28

In summary, the DEIR document has inadequacy that needs to be resolved and has significant and unavoidable impacts that impact the quality of life for the County and Perris residents that does not warrant a statement of overriding of consideration for approval consideration. The City of Perris thanks you for considering these comments. Please feel free to contact me at (951) 943-5003, ext. 257, if you have any questions or would like to discuss the above concern in further detail.

F-29

Sincerely,

Kenneth Phung  
Director of Development Services

**Attachment:** City of Perris NOP comment letter dated May 27, 2020





Page 6 of 6

Cc: Clara Miramontes, City Manager  
Eric Dunn, City Attorney  
Stuart McKibbin, City Engineer



# CITY OF PERRIS

PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT  
PLANNING DIVISION  
135 N. "D" Street, Perris, CA 92570-2200  
TEL: (951) 943-5003 FAX: (951) 943-8379

May 27, 2020

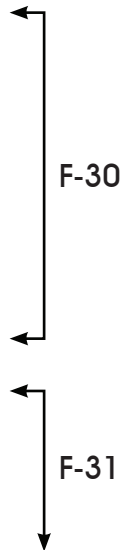
Riverside County Planning  
Attention: Russell Brady  
4080 Lemon Street 12th Floor  
Riverside, CA 92501

**SUBJECT:** City of Perris Comments on the Notice of Preparation for the Stoneridge Specific Plan Amendment ("Proposed Project") – County Riverside Case Nos. General Plan Amendment No. 190008, Specific Plan No. 239A1, and 3. Adoption by Change of Zone 1900024.

Dear Mr. Brady:

The City of Perris appreciates the opportunity to comment on the Notice of Preparation (NOP) for the "Stoneridge Specific Plan Amendment" ("Proposed Project") to change the adopted Specific Plan from predominately residential and commercial land uses to a predominately industrial-based land uses consisting of 389 acres of industrial, 49 acres of business park and 8 acres of commercial. The Project is located less than a 1/2 mile east of the City of Perris limits between Ramona Expressway and Nuevo Road. The City is opposed to the proposed Project as it is entirely out of character with the surrounding areas in the County and in the City of Perris, which is designated for single-family residential. The City provides the below comments in light of the Project's proximity to the City of Perris residential neighborhood and concerns with potential truck traffic on Ramona Expressway, Rider Street, Placentia Avenue, and Nuevo Road as they are not designated truck routes:

1. **Recirculation of the NOP Due to Incomplete Project Background.** The NOP should be recirculated as the project description does not identify that the Specific Plan Amendment (SPA) will change the adopted Stoneridge Specific Plan from predominately residential and commercial land uses to a predominately industrial-based land uses. The project description for the NOP only identifies the proposed industrial-based land use concepts. Perris City staff only





discovered the original specific plan was designated for predominately residential uses after further probing of the project background. To promote clarity and transparency on the scope and context of the Project for the public and public agencies to comment appropriately, the City recommends the NOP is recirculated with the residential background information.

F-31  
(CONT.)

2. **Land Use Inconsistency with Surrounding Areas.** The proposed change in land use from residential to industrial-based land uses is out of character with the surrounding areas in the County and in the City of Perris, which is designated for single-family residential. The proposed Project raises numerous concerns in regards to land use compatibility, truck routes, air quality, and health/risk assessment that was never envisioned or planned for the immediate area or in the City of Perris.

F-32

3. **Environmental Impact Report (EIR).** The EIR for the proposed Project should particularly evaluate how the Project will address mitigating impacts from nearby residential land uses, truck routes, noise impact, and health/risk assessment, as further identified in this letter.

F-33

4. **Traffic Impact Analysis/Truck Route.** The City of Perris has concerns related to truck traffic impacts to Ramona Expressway, Rider Street, Placentia Avenue, and Nuevo Road as these roadways are not designated truck routes east of Redlands Avenue. Please identify how the truck traffic would avoid City of Perris roadways, and include the following in the analysis:

- Evaluate all truck routes and traffic counts during AM and PM peak times.
- Incorporate a truck route enforcement plan as part of the TIA, which includes: on-site signage (provide a depiction of signage) of truck routes, and truck driver/dispatcher education on truck routes.

F-34

Upon completion of the Draft Traffic Impact Analysis, please provide staff a copy to review and comment.

5. **Acoustical.** An acoustical/noise analysis shall be prepared to mitigate noise impacts to and from the Project resulting from construction and operation in proximity to residential areas in the County and the City of Perris.

F-35

6. **Health Risk Assessment Study/GHG.** A Health Risk Assessment will need to be prepared to evaluate impacts due to an industrial project being adjacent to residential zoning designations. Additionally, the City of Perris suggests contacting the California Air Resource Board (CARB) and South Coast Air Quality Management District (SCAQMD) early in your evaluation, as they are considering changing the thresholds used to evaluate Health Risk Assessment/GHG.

F-36



Page 3 of 3

- 7. **Drainage.** A drainage study should be undertaken to analyze how all on-site drainage will be ultimately conveyed to the San Jacinto River in Perris.
- 8. **CEQA.** Please provide future notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”) under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law which includes: notices of any public hearing held pursuant to CEQA, and notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.

← F-37

← F-38

The City of Perris thanks you for considering these comments. Please feel free to contact me at (951) 943-5003, ext. 257, if you have any questions or would like to discuss the above concern in further detail.

← F-39

Sincerely,

Kenneth Phung  
Planning Manager

**Attachments:** Notice of Preparation Notice  
Original Stoneridge Specific Plan  
Proposed Stoneridge Specific Plan  
County Land Use Map

Cc: Richard Belmudez, City Manager  
Clara Miramontes, Assistant City Manager  
Isabel Carlos, Assistant City Manager  
Eric Dunn, City Attorney  
Stuart McKibbin, City Engineer



**Letter F City of Perris**

- F-1** The County of Riverside appreciates and acknowledges the comments provided by the City of Perris regarding the proposed Project. While this comment correctly describes the proposed Project if the Primary Land Use Plan is implemented as described in DEIR Section 3.0, please note that in the event the MCP is not constructed and the Alternative Land Use Plan is implemented, the Project would allow for 88.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses (of which 8.5 acres would be within the alignment of the MCP and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail land uses (of which 0.2 acre would occur within the alignment of the MCP and would not be developed with Commercial Retail land uses), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. Please also refer to the revisions that have been made to the Project’s description since the DEIR was circulated for public review, as summarized above in Subsection R.3 and as more fully described in RDEIR Section 3.0, *Project Description*. Please also refer to the individual responses to the comments included in this comment letter, provided below.
- F-2** The County acknowledges that the City of Perris is opposed to the proposed Project, and the City’s concerns regarding the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project. In addition, please note that in addition to residential land uses, the adopted Specific Plan allows for “Commercial Retail (CR)” land uses on approximately 75.0 acres. Please refer to Responses F-4 through F-28 and Responses F-31 through F-38 for responses to the individual comments provided as part of this comment letter.
- F-3** The County appreciates the comments from the City of Perris, which are addressed in detail below. Any questions regarding these comments will be directed to the contact person identified as part of this comment.
- F-4** Please refer to the responses to Comments F-1 and F-2, which address this comment.
- F-5** Please refer to the responses to Comments F-6 and F-7. As indicated therein, appropriate revisions have been made to RDEIR Section 3.0 to more fully describe improvements and approvals required within the City of Perris.
- F-6** Figure 3-11 of the DEIR did conservatively show transportation-related improvements needed within the City of Perris in the event that the MCP is not constructed through the Project site. However, it should be noted that all of the improvements previously identified by Table 1-4 of the Traffic Impact Analysis circulated as part of the DEIR (“TIA”; DEIR *Technical Appendix L3*) would not have been constructed as part of the Project. Rather, the Project Applicant would have been required to contribute fair-share contributions and/or pay fees to the County’s Development Impact Fee (DIF) and Transportation Uniform Mitigation Fee (TUMF) programs to provide funding for the required improvements. In an effort to be conservative, the Project’s DEIR included an analysis of potential



physical impacts that would result from the required improvements, including improvements needed within the City of Perris. Notwithstanding, the commenter is referred to Subsection R.3 above, which describes changes that have been incorporated into the Project that is evaluated by this RDEIR. Specifically, the Project now includes three revised Alternative Truck Routes. Under the currently-proposed Project that is evaluated by this RDEIR, prior to completion of the Mid-County Parkway (MCP) all Project-related westbound truck traffic would be routed to the south and only would occur along City of Perris designated truck routes (i.e., San Jacinto Avenue and Redlands Avenue). Project-related truck trips only would be routed to the west through the City of Perris once the MCP is fully constructed and operational, and in such a scenario all westbound Project truck trips would be restricted to using the MCP to access I-215. Therefore, the Project as revised no longer would result in any truck traffic along City of Perris roadways, except for truck traffic that would be routed along the MCP or along City of Perris designated truck routes. Project-related improvements within the City of Perris only would be required to accommodate Project-related passenger vehicle traffic, or to accommodate the Project's truck trips along the City of Perris designated truck routes. Commenter is referred to Tables 1-4 through 1-9 of the Project's revised Traffic Analysis ("TA"; RDEIR *Technical Appendix L-1*), which provide a summary of all traffic-related improvements required to implement the Project, including improvements required for each of the Project's Alternative Truck Routes that were determined to be feasible. Figure 3-11 of the RDEIR has been revised to reflect the improvements that would be required to be constructed as part of the Project to implement the Project's proposed three feasible Alternative Truck Routes.

- F-7** The County acknowledges that certain improvements would be required within the City of Perris as a result of Project implementation, including roadway improvements (as addressed above in the response to Comment F-6) as well as improvements for water service connections. RDEIR Table 3-5 has been updated to reference the need for approval from the City of Perris for required transportation and water infrastructure improvements needed within the City's boundaries. All impacts associated with the required transportation and water infrastructure improvements have been addressed as part of this RDEIR, including potential impacts that would occur within the City of Perris; thus, it is not anticipated that the City of Perris would be required to conduct separate review for compliance with CEQA in order to approve the required improvements within the City's boundaries.
- F-8** The commenter questions whether the analysis on Pages 4.3-21 through 4.3-26 of the DEIR accounted for off-site construction-related activities. As stated on pp. 4.3-23 and 4.3-25 of the DEIR, the construction-related emissions disclosed in EIR Tables 4.3-6 and 4.3-8 included emissions associated with off-site infrastructure improvements. Notwithstanding, and based on the changes incorporated into the proposed Project as described above in Subsection R.3, the analysis in RDEIR Subsection 4.3, *Air Quality*, has been revised. As with the DEIR, the construction-related emission calculations in RDEIR Subsection 4.3 account for air quality emissions associated with the Project's off-site improvements, and demonstrates that Project-related construction emissions would be less than significant.



- F-9** The County respectfully disagrees with the commenter’s assertion that the DEIR failed to disclose construction-related localized health risk impacts for PM<sub>10</sub> and PM<sub>2.5</sub>. As stated on page 4.3-17 of the DEIR, the SCAQMD has developed localized significance thresholds (LSTs) for emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance preparing LST analyses. As stated three separate times in the Preface and Introduction of the *Final Localized Significance Threshold Methodology*, the use of the LST protocol is considered "**voluntary**" (emphasis per SCAQMD) for use by local governments and "implemented at the discretion of the local agency." The SCAQMD *Final Localized Significance Threshold Methodology* further elaborates that, "lead agencies are not precluded from performing project-specific modeling if they prefer more precise results." Therefore, the County of Riverside, in its discretion, employed the SCAQMD LST protocol as part of the DEIR to analyze the effects of localized NO<sub>x</sub> and CO emissions, and then required preparation of a Health Risk Assessment ("HRA"; previously included as DEIR *Technical Appendices B1 and B2*) to evaluate potential impacts from construction-related DPM sources, which includes impacts due to emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. As stated on page 4.3-34 of the DEIR (see Table 4.3-12 on this page), the construction HRA prepared to evaluate potential health risks associated with the emission of DPM, which includes PM<sub>10</sub> and PM<sub>2.5</sub>, determined that localized DPM-related carcinogen health risks during construction would be less than significant. Accordingly, the County finds that the DEIR included an appropriate analysis of localized impacts due to construction-related emissions of PM<sub>10</sub> and PM<sub>2.5</sub>, and that the Draft EIR’s conclusion that localized PM<sub>10</sub> and PM<sub>2.5</sub> impacts would be less than significant with mitigation measures is supported by the substantial evidence presented in DEIR Subsection 4.3, *Air Quality*, and DEIR *Technical Appendices B1 and B2*. Notwithstanding, and based on the changes incorporated into the proposed Project as described above in Subsection R.3, the analysis within RDEIR Subsection 4.3 has been substantially revised, based on new Air Quality Impact Analysis (AQIA) and HRA technical reports that are included as RDEIR *Technical Appendices B1 and B2*. The Project’s current AQIA includes an analysis of potential impacts due to LSTs, including localized emissions of PM<sub>10</sub> and PM<sub>2.5</sub>, and demonstrates that Project construction and long-term operation would not exceed any of the SCAQMD LSTs, including LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>.
- F-10** Commenter is incorrect in stating that the LST analysis provided in the DEIR did not evaluate the localized impacts due to construction activities associated with off-site improvements. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Notwithstanding, the SCAQMD Methodology explicitly 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." As stated on page 4.3-31 of the DEIR, the nearest existing sensitive receptor that was evaluated is Lakeside Middle School, located approximately 2,000 feet (610 meters) to the west. However, as described in the DEIR the installation of the proposed offsite water line would occur just south of the Middle School, largely within the



Walnut Avenue right-of-way (within the City of Perris). It is also noted that while not currently constructed, the approved McCanna Hills development is located directly adjacent to the Project's western boundary. Once built-out, commercial and residential land uses would exist on what is currently vacant land adjacent to the Project's western boundary. Additionally, lands to the north, northeast, and south of the Project site are designated by the County's General Plan for future development with residential uses. As such, while not required by CEQA, but in order to provide a conservative analysis, LSTs for receptors located at 25 meters were utilized in the analysis presented in the DEIR, which accounted for off-site impact areas within Perris. Notwithstanding, and based on the changes incorporated into the proposed Project as described above in Subsection R.3, the analysis within RDEIR Subsection 4.3 has been substantially revised, based on a new AQIA technical report that is included as RDEIR *Technical Appendix B1*. As noted in the response to Comment F-6, the Project includes three Alternative Truck Routes, which would route all Project-related truck traffic along City of Perris designated truck routes and/or the MCP. Thus, the list of required off-site improvements has changed, particularly within the City of Perris. Regardless, the AQIA included with this RDEIR includes an analysis of localized air quality impacts during construction, including construction-related localized air quality impacts within the City of Perris. However, and as with the analysis in the DEIR, because there are sensitive receptors in closer proximity to the Project's proposed construction activities, the analysis focuses on the most impacted sensitive receptors. As demonstrated in the revised analysis in RDEIR Subsection 4.3, *Air Quality*, the Project's construction-related localized air quality impacts, including construction-related cancer and non-cancer health risks, would be below the SCAQMD thresholds of significance and therefore would be less than significant at all sensitive receptor locations, including sensitive receptor locations within the City of Perris.

- F-11** The County disagrees with the commenter's assertion that the DEIR's analysis of localized air quality impacts did not account for localized PM<sub>10</sub> and PM<sub>2.5</sub> emissions. As noted previously in Response F-9, the SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance preparing LST analyses. As stated three separate times in the Preface and Introduction of the *Final Localized Significance Threshold Methodology*, the use of the LST protocol is considered "**voluntary**" (emphasis per SCAQMD) for use by local governments and "implemented at the discretion of the local agency." The SCAQMD *Final Localized Significance Threshold Methodology* further elaborates that, "lead agencies are not precluded from performing project-specific modeling if they prefer more precise results." Therefore, the County of Riverside, in its discretion, employed the SCAQMD LST protocol to analyze the effects of localized operational NO<sub>x</sub> and CO emissions, and then prepared a HRA to evaluate potential impacts from operational-related DPM, which includes PM<sub>10</sub> and PM<sub>2.5</sub>. As previously shown in DEIR Tables 4.3-15 through 4.3-18, DPM emissions (including PM<sub>10</sub> and PM<sub>2.5</sub>) associated with implementation of the Primary Land Use Plan or Alternative Land Use Plan under the Project evaluated in the DEIR would not have exposed any nearby sensitive receptors to cancer risks exceeding the identified threshold of significance of 10 per one million people. DEIR Tables 4.3-18 through 4.3-20 showed that Project-related DPM emissions associated with either the Primary Land Use Plan or Alternative Land Use Plan also would not expose nearby sensitive receptors to non-cancer health risks exceeding the





identified threshold of significance of 1.0. Notwithstanding, and based on the changes incorporated into the proposed Project as described above in Subsection R.3, the analysis within RDEIR Subsection 4.3 has been substantially revised, based on a new AQIA technical report that is included as RDEIR *Technical Appendix B1*. The AQIA included as part of this RDEIR includes an LST analysis for long-term Project operations, including an analysis of the Project's potential to exceed the SCAQMD LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>. As demonstrated in the current AQIA and in RDEIR Subsection 4.3, long-term operation of the Project would not exceed any of the SCAQMD LSTs, including LSTs for PM<sub>10</sub> and PM<sub>2.5</sub>. Therefore, the County disagrees with the commenter's assertion that the Project's localized emissions of PM<sub>10</sub> and PM<sub>2.5</sub> during long-term operations would exceed the SCAQMD LSTs.

- F-12** The County disagrees with the commenter's assertion that the noise study included in the DEIR that was circulated for public review did not adequately address noise impacts based on the City of Perris standard. Refer to the responses to Comments F-13 through F-15.
- F-13** The County agrees with the commenter that the noise level threshold of 85 dBA is appropriate for the evaluation of potential construction-related noise impacts within unincorporated Riverside County. The DEIR that was circulated for public review did evaluate construction-related noise impacts using construction related noise level threshold established by the National Institute of Occupational Safety and Health (NIOSH) of 85 dBA Leq, and identified a potentially significant construction-related impact due to noise associated with construction of an off-site water line within Walnut Street. The DEIR imposed Mitigation Measure 4.13-1 requiring temporary noise barriers during construction, which the DEIR concluded would reduce construction-related impacts to less-than-significant levels. Notwithstanding, and based on revisions incorporated into the proposed Project as described above in Subsection R.3, the analysis in EIR Subsection 4.13, *Noise*, has been revised and now relies on thresholds of significance identified by the Federal Transit Agency (FTA) of 80 dBA Leq during daytime hours and 70 dBA Leq during nighttime hours. The revised analysis shows that the unmitigated off-site construction noise levels at receiver locations near the off-site improvements within Walnut Street would range from 56.0 to 64.1 dBA Leq and would not exceed the reasonable daytime 80 dBA Leq significance threshold. Additionally, and pursuant to Section 7.34.060 (Construction Noise) of the City of Perris Municipal Code, no construction activities associated with the off-site improvements in Walnut Street would occur between the hours of 7:00 pm to 7:00 am. Thus, the construction of the off-site improvements would not exceed the City of Perris construction-related thresholds of significance of 80 dBA Leq during the daytime hours and 70 dBA Leq during the nighttime hours, and would be fully consistent with the construction-noise standards established by Municipal Code Section 7.34.060.
- F-14** As a point in clarification, Section 7.34.060 of the City of Perris Municipal Code identifies a construction noise threshold of "80 dBA." The Municipal Code does not distinguish with the specific acoustical descriptor. "Lmax" is defined as the maximum noise level during a measurement period. The "Leq" noise descriptor is the noise descriptor typically used to regulate construction noise. Leq is defined as the average acoustic energy content of noise for a stated period of time, and therefore



represents an enforceable standard for a typical 8-hour workday. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Because construction noise is highly variable, use of the Leq descriptor is more appropriate for evaluating the effect of construction-related noise on sensitive receptors over an 8-hour workday. The DEIR evaluated construction-related noise impacts associated with the proposed water line within Walnut Street that is adjacent to residential and school uses within the City of Perris, and the DEIR identified and disclosed a significant construction-related noise impact. Mitigation Measure 4.13-1 was identified by the DEIR, requiring temporary noise barriers during construction of the water line. The DEIR concluded that implementation of Mitigation Measure 4.13-1 would reduce the Project's construction-related noise impacts along Walnut Street to less-than-significant levels. Notwithstanding, this RDEIR includes a revised Noise Impact Analysis (NIA), which is provided as EIR *Technical Appendix J*. The NIA included as part of this RDEIR evaluates construction-related noise impacts based on the Federal Transit Administration's (FTA), *Transit Noise and Vibration Impact Assessment Manual*, which identifies a construction-related noise threshold of 80 dBA Leq during daytime hours and 70 dBA Leq during nighttime hours. The construction-related noise thresholds used in the RDEIR are consistent with the noise level standards identified in Section 7.34.060 of the City of Perris Municipal Code, as requested by this comment. The revised analysis shows that the unmitigated off-site construction noise levels at receiver locations near the off-site improvements within Walnut Street would range from 56.0 to 64.1 dBA Leq and would not exceed the reasonable daytime 80 dBA Leq significance threshold. Additionally, and pursuant to Section 7.34.060 of the City of Perris Municipal Code, no construction activities associated with the off-site improvements in Walnut Street would occur between the hours of 7:00 pm to 7:00 am. Thus, the construction of the off-site improvements would not exceed the City of Perris construction-related thresholds of significance of 80 dBA Leq during the daytime hours and 70 dBA Leq during the nighttime hours, and would be fully consistent with the construction-noise standards established by Municipal Code Section 7.34.060.

- F-15** This comment restates the City's request to use 80 dBA as the significance threshold for construction-related noise impacts within the City of Perris; please refer to the response to Comment F-14, which addresses this comment.
- F-16** The County acknowledges that the Project that was evaluated in the DEIR would have resulted in truck traffic along roadways within the City of Perris, based on the analysis contained in the Project's Traffic Analysis ("TA"; DEIR *Technical Appendix L3*) and the TA prepared for the Southern Truck Route (DEIR *Technical Appendix L3*). However, the Project's potential impacts to Level of Service (LOS) within the City of Perris do not constitute a significant environmental impact. Pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on automobile delay shall not constitute and environmental impact." As such, for purposes of CEQA, the Project's contribution to



the projected LOS deficiencies at study area facilities, including facilities within the City of Perris, would be less than significant. Furthermore, and as indicated in Response F-6, all impacts associated with the physical construction of improvements within the City of Perris boundaries were evaluated in the DEIR and, where necessary, mitigated to the maximum feasible extent by the Project's DEIR. Notwithstanding, and based on revisions incorporated into the proposed Project as described above in Subsection R.3, the Project's TA technical report, included as *Technical Appendix L3* to this RDEIR, has been revised to account for the three (3) Alternative Truck Routes that were determined to be feasible and that are now proposed as part of the Project. Under the Project as revised, prior to the construction of the Mid-County Parkway (MCP) all westbound Project-related truck traffic would be routed to the south, and would no longer utilize Ramona Expressway to access I-215. Prior to completion of the MCP, Project-related truck traffic only would utilize officially-designated truck routes within the City of Perris, including San Jacinto Avenue and Redlands Avenue. Following completion of the MCP, all Project-related westbound truck traffic would utilize the MCP to access the I-215 freeway.

- F-17** The County acknowledges that the City of Perris objects to truck traffic within the City of Perris boundaries. Please refer to the response to Comment F-16. As noted therein, the Project has been revised to include three feasible Alternative Truck Routes. Prior to completion of the MCP, all Project-related westbound truck traffic would be routed to the south and only would utilize officially-designated truck routes within the City of Perris, including San Jacinto Avenue and Redlands Avenue. Following completion of the MCP, all Project-related westbound truck traffic would utilize the MCP to access the I-215 freeway. Pursuant to California Vehicle Code § 35703, the Project must be allowed to utilize officially-designated truck routes.
- F-18** The County acknowledges the commenter's request to route truck traffic along County roadways. Please refer to Subsection R.3, which describes the three feasible Alternative Truck Routes now included as part of the Project. As described, prior to completion of the MCP all Project-related westbound truck traffic would be routed to the south and only would utilize officially-designated truck routes within the City of Perris, including San Jacinto Avenue and Redlands Avenue. Following completion of the MCP, all Project-related westbound truck traffic would utilize the MCP to access the I-215 freeway. While Alternative Truck Routes 3 and 4 were considered as part of this RDEIR and are described above in Subsection R.3, which would have routed truck traffic along Menifee Road to Highway 74 and/or Ethanac Road to access the I-215, Alternative Truck Routes 3 and 4 were determined to be infeasible for the reasons noted in RDEIR Subsection R.3.
- F-19** For purposes of analysis, it is assumed that all future tenants and associated truck traffic would be required to follow all applicable laws, including Chapter 10.40 (Truck Routes) of the City of Perris Municipal Code. Notwithstanding, Mitigation Measure MM 4.18-4 has been added in RDEIR Subsection 4.18, *Transportation*, which requires the County to condition future implementing applications (i.e., plot plans, conditional use permits, etc.) to require that future lease agreements require all Project-related truck trips to utilize the appropriate Alternative Truck Route, and also



requires the posting of signage in appropriate locations directing truck traffic to the appropriate Alternative Truck Route.

- F-20** Commenter is referred to the response to Comment F-19. As noted therein, it is assumed that all future tenants and associated truck traffic would be required to follow all applicable laws, including Chapter 10.40 (Truck Routes) of the City of Perris Municipal Code. Furthermore, it is not the Project's responsibility to fund law enforcement activities, and any future violations of City of Perris Municipal Code Chapter 10.40 would result in financial penalties pursuant to City of Perris Municipal Code Chapters 1.16, 1.17 and/or 1.18. Any such financial penalties exacted as a result of such violations could be used to fund law enforcement activities. Moreover, the Project Applicant would be subject to payment of Development Impact Fees (DIF), pursuant to Riverside County Ordinance No. 659, a portion of which is allocated to the Riverside County Sheriff's Department (RCSD), and a portion of the Project's future taxes also would be allocated to the RCSD. Accordingly, the County finds that mitigation requiring a funding program for police services is not warranted.
- F-21** The commenter is correct that the DEIR that was circulated for public review did describe Ramona Expressway as an officially adopted City of Perris truck route. At the time the Project's Notice of Preparation (NOP) was circulated for public review in April 2020, Chapter 10.40 (Truck Routes) of the City of Perris Municipal Code identified Ramona Expressway as a truck route. The County understands that the City of Perris City Council adopted Ordinance No. 1413 in January 2022, which changed the list of designated truck routes within the City of Perris and eliminated Ramona Expressway as a designated truck route within the City. Please refer to Subsection R.3, which describes the six Alternative Truck Routes that are considered as part of this RDEIR, of which three Alternative Truck Routes were determined to be feasible. As indicated in Subsection R.3, prior to completion of the MCP all Project-related westbound truck traffic would be routed to the south and only would utilize officially-designated truck routes within the City of Perris, including San Jacinto Avenue and Redlands Avenue. Following completion of the MCP, all Project-related westbound truck traffic would utilize the MCP to access the I-215 freeway. Westbound Project-related truck traffic no longer would utilize Ramona Expressway to access I-215.
- F-22** The County acknowledges potential funding issues with planned improvements at the Harley Knox Boulevard and I-215 interchange. However, please refer to Subsection R.3, which describes the three feasible Alternative Truck Routes now included as part of the Project. Based on the Project's revised Traffic Analysis ("TA"; RDEIR *Technical Appendix L3*), Project-related truck traffic would not utilize the interchange of Harley Knox Boulevard and I-215 under any scenario. Although the Project's TA indicates that a small portion (1%) of the Project's passenger vehicle traffic would utilize this interchange under long-term conditions, Project-related passenger vehicle traffic would not utilize this interchange under near-term conditions. Regardless, improvements to this interchange are targeted for funding under the Transportation Uniform Mitigation Fee (TUMF) program, and the Project would be conditioned to require payment of appropriate TUMF fees.



- F-23** Commenter is referred to Tables 4-2 through 4-5 of the Project’s TA (included as RDEIR *Technical Appendix L3*), which identifies the number of Project-related truck trips for each study scenario.
- F-24** A revised Traffic Analysis (TA) has been prepared for the Project, and is included as RDEIR *Technical Appendix L3*. The TA was revised, in part, to address comments and concerns raised by the City of Perris. A copy of the Project’s TA will be made available during the 45-day public review period for this RDEIR.
- F-25** The commenter incorrectly alleges that the proposed Project would violate the provisions of Senate Bill 330 (SB 330). SB 330 only applies to “Affected Cities” and “Affected Counties.” Section 13 of SB 330 states that “Affected Counties” refers to “a census designated place, based on the 2013-2017 American Community Survey 5-year Estimates, that is wholly located within the boundaries of an urbanized area, as designated by the United States Census Bureau.” Based on a list of “Affected Counties” compiled by the California Department of Housing and Community Development, the only portions of unincorporated Riverside County that meet the definition of “Affected County” are the Bermuda Dunes and Coronita, and the Project site is not located within the Bermuda Dunes or Coronita portions of the County (HCD, n.d.). Accordingly, the proposed Project is not subject to the provisions of SB 330. Furthermore, the Riverside County General Plan’s Land Use and Housing Elements identify the County’s long-range plans for accommodating the region’s projected demand for housing. The Project site is not identified by the Housing Element as a site that is relied upon by the County in meeting its State-mandated Regional Housing Needs Allocation (RHNA). No revision has been made in the RDEIR based on this comment.
- F-26** Potential land use compatibility impacts were addressed throughout the DEIR (e.g., localized air quality, noise, transportation, lighting, etc.). This comment does not identify any specific environmental impacts associated with the Project that were not already addressed, evaluated, and, where necessary, mitigated to the maximum feasible extent as part of the DEIR. Accordingly, no revision has been made in the RDEIR pursuant to this comment, beyond revisions that have been made to address the Project as revised (and as described above in Subsection R.3).
- F-27** The Project’s significant and unavoidable impacts associated with agricultural resources, air quality, noise, and transportation were fully identified and disclosed within appropriate subject headings within the DEIR, and are fully addressed as part of this RDEIR. The Riverside County Board of Supervisors will consider all of the information in the Project’s administrative record, including information contained in this RDEIR and the FEIR with respect to the Project’s significant and unavoidable impacts, as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project. Furthermore, this comment does not identify any impacts that were not already addressed as part of the DEIR; thus, no revisions has been made to the RDEIR pursuant to this comment, beyond revisions that have been made to address the Project as revised (and as described above in Subsection R.3).



- F-28** Comment is acknowledged. The County of Riverside will provide the City of Perris with appropriate notices of future public hearings, as well as any notices related to scoping meetings that may be required in association with future implementing developments on site.
- F-29** For the reasons noted in Responses F-2 through F-28, the County disagrees with the commenter's opinion that the DEIR document was inadequate; notwithstanding, the analysis of the Project's potential environmental effects has been updated as part of this RDEIR to address revisions that have been incorporated into the Project, as described above in Subsection R.3. Commenter's objection to approval of the proposed Project is noted. The Riverside County Board of Supervisors will consider all of the information in the Project's administrative record, including information contained in this RDEIR and the FEIR with respect to the Project's significant and unavoidable impacts, as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project. Any questions regarding the comments included within this comment letter will be directed to the contact person identified by this comment.
- F-30** The County of Riverside appreciates and acknowledges the comments provided by the City of Perris in response to the Project's Notice of Preparation (NOP). Please note that while this comment correctly describes the Primary Land Use Plan that was described in DEIR Section 3.0, in the event the MCP is constructed and the Alternative Land Use Plan is implemented, the Project would allow for 388.5 acres of Light Industrial land uses, 43.0 acres of Business Park land uses (of which 8.5 acres would be within the alignment of the MCP and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail land uses (of which 0.2-acre would occur within the alignment of the MCP and would not be developed with Commercial Retail land uses), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. Commenter's objection to approval of the proposed Project is noted. The Riverside County Board of Supervisors will consider all of the information in the Project's administrative record, including information contained in this RDEIR and the Project's FEIR with respect to the Project's significant and unavoidable impacts, as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project. Please also refer to the individual responses to the comments included in this comment letter, provided below.
- F-31** The County disagrees with the commenter's assertion that the NOP should be recirculated because it did not identify the existing land use designations that apply to the Project site. The Project's NOP complied with all of the requirements listed in State CEQA Guidelines § 15082, which does not require the NOP to disclose the existing land use designations of a project. Furthermore, under CEQA, a project's impacts to the environment are evaluated based on a site's existing conditions, and not the conditions that may exist if the site were to be developed in accordance with applicable land use plans or zoning. As such, no recirculation of the NOP is necessary or required by the CEQA Guidelines. Furthermore, the Draft EIR itself already is being recirculated, as noted above, providing the public with more than ample opportunity and review and comment on the Project and its potential environmental effects.



- F-32** Please refer to the responses to Comments F-26 and F-27, which address this comment.
- F-33** The Project’s DEIR identified and evaluated all of the potential environmental impacts that may have result from implementation of the Project as described in the DEIR, including potential localized impacts to nearby residential uses. Notwithstanding, the analysis of the Project’s potential environmental effects has been updated as part of this RDEIR to address revisions that have been incorporated into the Project, as described above in Subsection R.3. Commenter is referred to the revised analysis of the Project’s impacts within RDEIR Section 4.0, *Environmental Analysis*. As demonstrated in the analysis therein, the Project would incorporate mitigation measures to reduce potential impacts to the maximum feasible extent.
- F-34** Copies of the Project’s Traffic Analyses (DEIR *Technical Appendices L1 and L3*) were made available during the public review period for the DEIR. Notwithstanding, commenter is referred to the Project’s revised TA, included as RDEIR *Technical Appendix L3*. Additionally, please refer to the revisions that have been incorporated into the Project, as described above in Subsection R.3. As noted therein, the Project now include three different feasible Alternative Truck Routes. The Alternative Truck Routes no longer would route Project-related truck traffic along Ramona Expressway, Rider Street, or Placentia Avenue, and no Project-related truck traffic would be routed along the portion of Nuevo Road that occurs within the City of Perris limits. All three of the Project’s currently-proposed truck routes are evaluated in the Project’s current TA. With respect to the enforceability of the identified Alternative Truck Routes, commenter is referred to the response to Comment F-19.
- F-35** Noise Impact Analyses were prepared for the Project, were included as DEIR *Technical Appendices J1 through J4*, and the results of the analyses were summarized in DEIR Subsection 4.13, *Noise*. The noise analyses included analyses of potential impacts during construction and operations, and DEIR Subsection 4.13 included appropriate mitigation to reduce the Project’s noise impacts to the maximum feasible extent. Notwithstanding, the analysis of the Project’s potential impacts due to noise has been updated as part of this RDEIR to address revisions that have been incorporated into the Project, as described above in Subsection R.3. Please refer to RDEIR Subsection 4.13, *Noise*, and the Project’s updated Noise Impact Analysis (“NIA”), included as RDEIR *Technical Appendix J*.
- F-36** An analysis of the Project’s potential to result in health risk and Greenhouse Gas (GHG) impacts was provided in DEIR *Technical Appendices B1 and B2*, the results of which were summarized in DEIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*. As was documented in these subsections of the DEIR, impacts due to localized health risks (i.e., cancer and non-cancer health risks) and due to GHG emissions were determined to be less than significant with the incorporation of mitigation measures. Notwithstanding, the analysis of the Project’s potential impacts due to health risks and GHGs has been updated as part of this RDEIR to address revisions that have been incorporated into the Project, as described above in Subsection R.3. Commenter is referred to the revised analyses within RDEIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*.



As indicated in the analysis within RDEIR Subsection 4.3, the Project would not result in any cancer or non-cancer related health risks affecting sensitive receptors that exceed the SCAQMD thresholds of significance (following the incorporation of mitigation measures), resulting in a less-than-significant impact. As noted in the revised analysis in RDEIR Subsection 4.8, the County’s Climate Action Plan (CAP) Update qualifies as a “Plan for the Reduction of Greenhouse Gas Emissions,” pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although RDEIR Subsection 4.8 acknowledges that the Project would exceed the CAP Update screening threshold of 3,000 MTCO<sub>2</sub>e/yr, Mitigation Measures MM 4.8-1 and MM 4.8-2 have been imposed on the Project and would ensure that the proposed Project is fully consistent with the CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporate measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, the revised analysis concludes that with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the CAP Update and the Project’s cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Because impacts would be reduced to less-than-significant levels by the identified mitigation measures, no additional mitigation measures are required (see CEQA Guidelines § 15126.4(a)(3)).

- F-37** A drainage study was prepared for the Project, and was included as DEIR *Technical Appendix H1*. The results of the drainage study also were summarized in DEIR Subsection 4.10, *Hydrology and Water Quality*. The Project’s drainage study has not changed since the DEIR was circulated for public review; please refer to RDEIR Subsection 4.10 for a discussion of the Project’s less-than-significant impacts to hydrology and water quality.
- F-38** Comment is acknowledged. The County of Riverside will provide the City of Perris with appropriate notices of future public hearings, as well as any notices related to scoping meetings that may be required in association with future implementing developments on site.
- F-39** The County appreciates the comments provided by the City of Perris, and will direct any questions on these comments to the contact person identified by this comment.





COMMENT LETTER G



Community Development  
Department  
Planning Division

City of Arts & Innovation

May 23, 2022

Russell Brady  
Contract Planner  
Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside, CA 92501

Subject: Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for Stoneridge Commerce Center

Dear Mr. Brady:

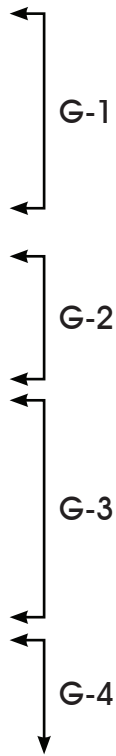
Thank you for the opportunity to comment on the DEIR for the Stoneridge Commerce Center.

The City of Riverside (City) understands that the proposed Stoneridge Commerce Center project consists of two separate land plans for the 582.9-acre project depending on whether the Riverside County Transportation Commission constructs the Mid-County Parkway (MCP) through the project site. We also understand that the "Primary Land Use Plan" and "Alternative Land Use Plan" anticipate varying acreages contingent on the construction of the MCP for major highways and Light Industrial, Business Park, Commercial Retail and Open Space land uses.

The City has reviewed the DEIR, and we wish to provide the following comments:

Public Works Department – Traffic Engineering Division:

- Requests a copy of the completed TIA for comment, and additionally requests that the City's Planning Division be sent a copy of environmental notices & documents as they become available. Please see attachment.
- It appears that the traffic study does not include alternatives with or without the Cajalco Safety Widening Project. Hence, the Traffic Division would like to request responses to the following:
  - While the project refers to the Mid County Parkway as a critical piece of infrastructure; equally important for potential impacts towards the City is the planned Cajalco safety widening. Similar constraints restricting project density should be made contingent on the completion of Cajalco between I-215 and I-15. With the congested I-215 & SR 60 interchange, it is likely that without improvements to Cajalco that project trips will divert to City of Riverside arterials such as Van Buren Boulevard as a means of "cutting through."
  - Because the project is a General Plan Amendment, surrounding corridors should be examined for their ability to serve flow associated with the project. Assumptions within the General Plan should be reviewed to confirm that Cajalco Road south of the City of Riverside (between I-215 and I-15) is correctly modeled with its newly



3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | [RiversideCA.gov](http://RiversideCA.gov)



designated maximum capacity, and not as the previously designated as a CETAP expressway complete with grade separated intersections and a transit lane. The adequacy of the new cross section of Cajalco, along with the timing of planned improvements along Cajalco should be considered as part of the TIA.

- The project should assess its impact on Vehicle Miles Traveled pursuant to recently amended CEQA regulations.

The City of Riverside appreciates your consideration of the comments provided in this letter. Please forward any updated environmental documents and responses to these comments to the City of Riverside Planning Division. Should you have any questions regarding this letter, please contact Scott Watson, Historic Preservation Officer, at (951) 826-5507, or by e-mail at swatson@riversideca.gov.

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

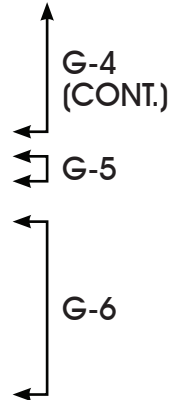
Sincerely,

David Murray  
Principal Planner

Attachment:

1. E-mail Correspondence from the Public Works Department – Traffic Engineering Division Regarding the Stoneridge Commerce Center.

- cc: Patricia Lock Dawson, Mayor  
Riverside City Council Members  
Al Zelinka, FAICP, CMSM, City Manager  
Rafael Guzman, Assistant City Manager  
Chris Christopoulos, Acting Community & Economic Development Director  
Mary Kopaskie-Brown, City Planner  
Gilbert Hernandez, Public Works Director  
Todd Corbin, Public Utilities General Manager  
Pamela Galera, Parks, Recreation and Community Services Director  
Phaedra Norton, City Attorney





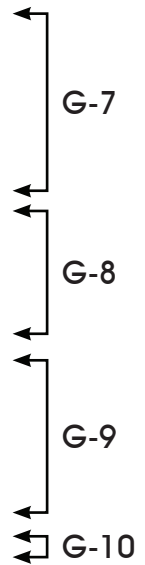
**Palafox, Daniel**

**From:** Mustafa, Nathan  
**Sent:** Friday, May 1, 2020 7:56 AM  
**To:** Tsang, Kevin  
**Cc:** Watson, Scott  
**Subject:** RE: [External] SP00239A01 (Stoneridge Commerce Center SP): Scoping Agreement

Good Morning Kevin,

I hope all is well at the County, below are several comments. I

- Riverside Traffic Engineering requests to receive a copy of the completed TIA for comment, and additionally requests that the City's Planning Division be sent a copy of environmental notices & documents as they become available.  
Contact: Scott Watson [SWatson@riversideca.gov](mailto:SWatson@riversideca.gov)
- While the project refers to the Mid County Parkway as a critical piece of infrastructure; equally important for potential impacts towards the City of Riverside is the planned Cajalco safety widening. Similar constraints restricting project density should be made contingent on the completion of Cajalco between I-215 and I-15. With the congested I-215 & SR 60 interchange, it is likely that without improvements to Cajalco that project trips will divert to City of Riverside arterials such as Van Buren Boulevard as a means of "cutting through".
- Because the project is a General Plan Amendment, surrounding corridors should be examined for their ability to serve flow associated with the project. Assumptions within the General Plan should be reviewed to confirm that Cajalco Road south of the City of Riverside (between I-215 and I-15) is correctly modeled with its newly-designated maximum capacity, and not as the previously designated as a CETAP expressway complete with grade separated intersections and a transit lane. The adequacy of the new cross section of Cajalco, along with the timing of planned improvements along Cajalco should be considered as part of the TIA.
- The project should assess its impact on Vehicle Miles Traveled pursuant to recently amended CEQA regulations.



Sincerely,

**Nathan Mustafa, PE, TE, AICP**  
**City Traffic Engineer & Mobility Planning Manager**  
 City of Riverside  
 Public Works Department, Traffic Engineering  
 Main: 951.826.5366  
 Direct: 951.826.2251  
 Cell: 951.452.8872  
[RiversideCA.gov](http://RiversideCA.gov)

**From:** Tsang, Kevin <KTSANG@RIVCO.ORG>  
**Sent:** Thursday, April 16, 2020 10:47 AM  
**To:** Mustafa, Nathan <NMustafa@riversideca.gov>; Eric Lewis (ericle@moval.org) <ericle@moval.org>; Erik Ruehr <eruehr@vrpatechnologies.com>; Kenneth Phung <kphung@cityofperris.org>; Jonathan Smith <jsmith@cityofmenifee.us>; Stuart McKibbin <stuart@trilakeconsultants.com>; Mark Lancaster <MLancaster@RCTC.org>



## Letter G City of Riverside

- G-1** The County of Riverside appreciates the comments provided by the City of Riverside. This comment correctly describes the proposed Project that was evaluated in the DEIR; however, please refer to Subsection R.3, above, for a description of changes that have been incorporated into the Project Description since circulation of the DEIR for public review. Please refer to the individual responses to the comments identified by this letter, below.
- G-2** Copies of the Project’s traffic impact analyses (DEIR *Technical Appendices L1 and L3*) were made available during the public review period for the DEIR. The Traffic Analysis (“TA”) prepared in conjunction with this RDEIR (RDEIR *Technical Appendix L3*) also will be made available during the 45-day public review period for this RDEIR. The County will provide the City of Riverside with all future environmental notices and documents as they become available.
- G-3** Based on the results of the Project’s TA that was prepared in conjunction with this RDEIR, only a nominal amount (up to 2%) of Project-related passenger vehicle and truck traffic would utilize the segment of Ramona Expressway located west of I-215. Furthermore, the Project’s TA includes a study area that evaluates all facilities that would receive at least 50 peak hour trips from the Project; based on the Project’s trip distribution and assignment, the Project would not contribute more than 50 peak hour trips to any facilities located within the City of Riverside. Furthermore, the Project’s potential impacts to Level of Service (LOS) within the City of Riverside do not constitute a significant environmental impact. Pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), “...a project’s effect on automobile delay shall not constitute an environmental impact.” As such, for purposes of CEQA, the Project’s contribution to transportation facilities within the City of Riverside would be less than significant.
- G-4** Please refer to the response to Comment G-3. As noted therein, the Project only would contribute nominal amounts of traffic along Ramona Expressway west of I-215. Furthermore, the Project’s contribution to traffic does not comprise a significant environmental effect under CEQA.
- G-5** An analysis of the Project’s potential impacts due to Vehicle Miles Traveled (VMT) was provided in a Project-specific VMT Analysis (DEIR *Technical Appendix L2*). DEIR Subsection 4.18, *Transportation*, included a summary of the results of the VMT Analysis, and concluded that even with mitigation, Project impacts due to VMT would be significant and unavoidable. Commenter is referred to the Project’s revised VMT Analysis reports, included as RDEIR *Technical Appendices L2 and L3* and described in detail in RDEIR Subsection 4.18. The analysis continues to show that the revised Project’s impacts due to VMT would be significant and unavoidable.
- G-6** Riverside County acknowledges and appreciates the comments provided by the City of Riverside. Any questions regarding the comments provided in this comment letter will be directed to the contact person identified by this comment.



- G-7** Copies of the Project’s traffic impact analyses (DEIR *Technical Appendices L1 and L3*) were made available during the public review period for the DEIR. The Project’s current TA is included as RDEIR *Technical Appendix L3*, and will be made available for public review on the County’s web site during the public review period for this RDEIR. The County also will provide the City of Riverside with all future environmental notices and documents as they become available.
- G-8** Please refer to the response to Comment G-3, which addresses this comment.
- G-9** Please refer to the response to Comment G-3. As noted therein, the Project only would contribute nominal amounts of traffic along Ramona Expressway west of I-215. Furthermore, the Project’s contribution to traffic does not comprise a significant environmental effect under CEQA.
- G-10** An analysis of the Project’s potential impacts due to Vehicle Miles Traveled (VMT) was included in the DEIR’s VMT Analysis technical report, which was included as DEIR *Technical Appendix L2*. DEIR Subsection 4.18, *Transportation*, included a summary of the results of the VMT Analysis, and concluded that even with mitigation, Project impacts due to VMT would be significant and unavoidable. Commenter is referred to the Project’s revised VMT Analysis reports, included as RDEIR *Technical Appendices L2 and L3* and described in detail in RDEIR Subsection 4.18. The analysis continues to show that the revised Project’s impacts due to VMT would be significant and unavoidable.



COMMENT LETTER H

**Brady, Russell**

---

**From:** Hesterly, Kinika  
**Sent:** Monday, April 18, 2022 10:26 AM  
**To:** Brady, Russell  
**Subject:** FW: NOP Response: Stoneridge Commerce Center Project  
**Attachments:** Stoneridge Commerce Center Project Notice of Preparation (NOP) Riverside....pdf;  
Stoneridge Commerce Center Draft Environmental Impact Report Public Comment  
Period

Hi Russell,

Please see information provided in the attached letter (previously provided). Also, since the NOP comments were provided, SB 1383 went into effect. I've included the following information for your use – *comply with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022. This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.*

H-1

Best,

Kinika Hesterly  
Urban/Regional Planner IV



---

**From:** Hesterly, Kinika  
**Sent:** Tuesday, April 28, 2020 9:33 AM  
**To:** Brady, Russell <rbrady@RIVCO.ORG>  
**Subject:** NOP Response: Stoneridge Commerce Center Project

Hi Russell,

Please see the attached NOP Response letter for the Stoneridge Commerce Center Project.

Thank you,

Kinika Hesterly  
Urban/Regional Planner IV





SENT VIA EMAIL ONLY  
[rbrady@rivco.org](mailto:rbrady@rivco.org)

April 28, 2020

Mr. Russell Brady, Project Planner  
Riverside County Planning Department  
P.O. Box 1409  
Riverside, CA 92502

**RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Stoneridge Commerce Center Project (Specific Plan Amendment No. 239A1, General Plan Amendment No. 190008, and Change of Zone No. 1900024) (Project) in the County of Riverside**

Dear Mr. Brady:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the Project. The Project is for a land use plan development for light industrial, business park, and commercial retail uses located south of Ramona Expressway and Lake Perris, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road in the County of Riverside. The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

- 1. Build-out of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. To assess waste impacts, the DEIR should include the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed land uses.

Note- CalRecycle's website may be helpful to determine the Project's waste generation:  
<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

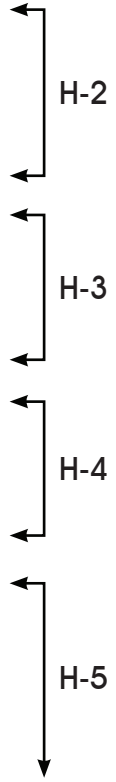
- 2. The following information can be useful in the analysis of the solid waste impacts:
  - a) Solid waste generated within the Project area is collected by Waste Management Inc. (WMI), with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTSS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.
  - b) The franchise waste hauler primarily uses the El Sobrante landfill for disposal, but may also utilize the Badlands and/or Lamb Canyon landfills for disposal of the waste generated from the proposed Project. Descriptions of the local landfills are provided below:

El Sobrante Landfill:

The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson

14310 Frederick Street • Moreno Valley, CA 92553 - (951) 486-3200 • Fax (951) 486-3205 • Fax (951) 486-3230  
[www.rcwaste.org](http://www.rcwaste.org)

Printed on recycled paper





Russell Brady  
Project Planner, County of Riverside  
NOP DEIR – Stoneridge Commerce Center Project  
April 28, 2020  
Page 2

Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2018 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 53.8 million tons.<sup>1</sup> In 2018, the El Sobrante Landfill accepted a daily average of 11,031 tons with a period total of approximately 3,386,471 tons. The landfill is expected to reach capacity in approximately 2060.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 20.5 million tons<sup>2</sup>. As of January 1, 2020 (beginning of day), the landfill had a total remaining disposal capacity of approximately 5.1 million tons.<sup>3</sup> The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2022.<sup>4</sup> From January 2019 to December 2019, the Badlands Landfill accepted a daily average of 2,878 tons with a period total of approximately 886,388 tons. Landfill expansion potential exists at the Badlands Landfill site.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 20.7 million tons.<sup>5</sup> As of January 1, 2020 (beginning of day), the landfill has a total remaining capacity of approximately 8.7 million tons<sup>6</sup>. The current landfill remaining disposal capacity is estimated to last, at a minimum, until

H-5  
(CONT.)

<sup>1</sup> 2018 El Sobrante Landfill Annual Report- Based on 134,549,993 tons remaining capacity (40% for in-county waste).  
<sup>2</sup> GASB\_18\_2019 – Engineering Estimate for total landfill capacity  
<sup>3</sup> GASB\_18\_2019 & SiteInfo  
<sup>4</sup> SWFP # 33-AA-0006  
<sup>5</sup> GASB 18\_2019 – Engineering Estimate for total landfill capacity  
<sup>6</sup> GASB 18\_2019 & SiteInfo



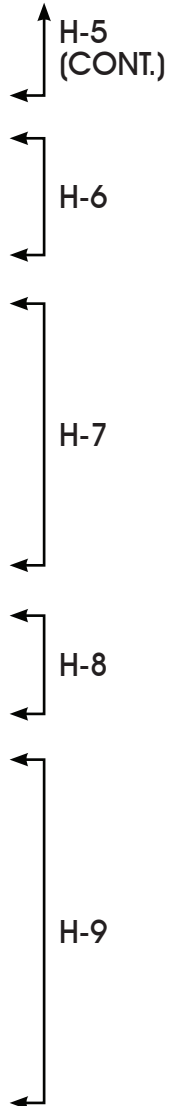


Russell Brady  
Project Planner, County of Riverside  
NOP DEIR – Stoneridge Commerce Center Project  
April 28, 2020  
Page 3

approximately 2029.<sup>7</sup> From January 2019 to December 2019, the Lamb Canyon Landfill accepted a daily average of 1,925 tons with a period total of approximately 591,125 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

3. To further reduce potential impacts to solid waste services, the RCDWR offers the following suggestions for consideration (on subsequent land development projects), which were developed to meet the goals and standards of State legislation and regulations addressing solid waste, including recycling and organics management to help reduce the Project's anticipated solid waste impacts and enhance the County's efforts to comply with the State's mandate of 50% solid waste diversion from landfilling:

- Prior to issuance of a building permit: A Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., solar panels, cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. Arrangements can be made through the franchise hauler.
- Prior to final building inspection: Evidence (i.e., receipts or other type of verification) to demonstrate project compliance with the approved WRP shall be presented by the project proponent to the Planning Division of the Riverside County Department of Waste Resources. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
- Recycling Collection Plan: Prior to issuance of a building permit, the applicant shall submit one electronic (1) copy of a Recyclables Collection and Loading Area plot plan to the Riverside County Department of Waste Resources for review and approval to WastePlanning@rivco.org. The plot plan shall conform to Design Guidelines for Recyclables Collection and Loading Areas, provided by the Department of Waste Resources (found at <http://www.rcwaste.org/business/planning/design>) and shall show the location of and access to the collection area for recyclable materials, shall demonstrate space allocation for trash and recyclable materials and have the adequate signage indicating the location of each bin in the trash enclosure. The project applicant is advised that clearance of the Recyclables Collection and Loading Area plot plan only satisfies the Waste Resources' conditions for Recyclables Collection and Loading Areas space allocation and other Recyclables Collection and Loading Area Guideline items. Detailed drawings of the Trash Enclosure and its particular construction details, e.g., building materials, location, construction methods etc., should be included as part of the Project plan submittal to the Riverside County Department of Building and Safety.

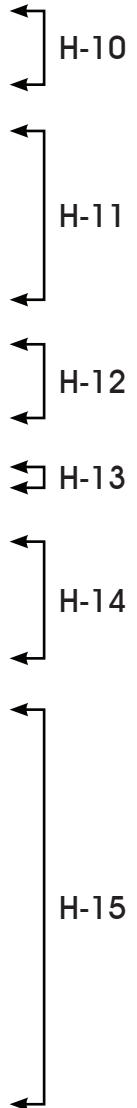


<sup>7</sup> SWFP # 33-AA-0007



Russell Brady  
Project Planner, County of Riverside  
NOP DEIR – Stoneridge Commerce Center Project  
April 28, 2020  
Page 4

- **Recyclables Collection and Loading Area Inspection:** Prior to final building inspection, the applicant shall construct the recyclables collection and loading area in compliance with the Recyclables Collection and Loading Area plot plan, as approved and verified through inspection by the Riverside County Department of Waste Resources.
- **Recycling and Organics Compliance:** Prior to final inspection, the applicant shall complete a Mandatory Commercial Recycling and Organics Recycling Compliance form (Form D). Form D requires applicants to identify programs or plans that address commercial and organics recycling, in compliance with State legislation/regulation. Once completed, Form D shall be submitted to the Recycling Section of the Department of Waste Resources for approval. For more information go to: [www.rcwaste.org/business/planning/applications](http://www.rcwaste.org/business/planning/applications). To obtain Form D, please contact the Recycling Section at 951-486-3200, or email to: [Waste-CompostingRecycling@rivco.org](mailto:Waste-CompostingRecycling@rivco.org).
- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.
- AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions. The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:
  - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
  - Subscribe to a recycling service with waste hauler.
  - Provide recycling service to tenants (if commercial or multi-family complex).
  - Demonstrate compliance with requirements of California Code of Regulations Title 14.
  - For more information, please visit: <http://www.rcwaste.org/business/recycling/mcr>





Russell Brady  
Project Planner, County of Riverside  
NOP DEIR – Stoneridge Commerce Center Project  
April 28, 2020  
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- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services. Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
  - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

←  
H-16  
←

Thank you for allowing us the opportunity to comment on the NOP. Please continue to include the RCDWR in future transmittals. Please email me at [khesterl@rivco.org](mailto:khesterl@rivco.org) if you have any questions regarding the above comments.

←  
H-17  
←

Sincerely,

Kinika Hesterly  
Urban/Regional Planner IV

DM# 256099



## Letter H Riverside County Department of Waste Resources

- H-1** The County acknowledges the information contained in the comment letter provided by the Riverside County Department of Waste Resources (RCDWR) in response to the Project's Notice of Preparation (NOP). The information in the attached letter assisted in conducting the analysis of potential impacts to Utilities and Service Systems in DEIR Subsection 4.20, and continues to be relied upon by this RDEIR. A discussion of Senate Bill 1383 has been added to the list of applicable regulations in RDEIR subsection 4.20.2.
- H-2** The County acknowledges and appreciates the RCDWR's comments on the Project's NOP. This comment correctly describes the proposed Project. No further response is necessary.
- H-3** Comment is acknowledged that the Project would result in an increase in the generation of waste disposed of at local area landfills. Thresholds a. and e. in DEIR Subsection 4.20 previously showed that the Project's impacts due to solid waste generation would be less than significant. The revised analysis in RDEIR Subsection 4.20 continues to show that impacts due to solid waste generation would be less than significant, and RDEIR Subsection 4.20.7 includes the standard conditions of approval typically requested by RCDWR. As with the DEIR, the analysis of potential solid waste impacts in the RDEIR is based on rates included in Riverside County EIR No. 521, which was prepared by the County in association with the County's 2015 General Plan Update. The waste generation rates in the link provided by this comment do not specifically identify any waste generation rates applicable to Riverside County; thus, the RDEIR's evaluation of the Project's waste generation is based on the rates used in EIR No. 521.
- H-4** Comment describing the daily capacity of the Moreno Valley Solid Waste Recycling and Transfer Station (MVTS) is acknowledged. This information is included in RDEIR Subsection 4.20.4 under the analysis of Threshold e. No further response is necessary.
- H-5** Comments providing information about local area landfills is acknowledged. This information was used as part of the analysis of the Project's impacts due to solid waste generation in RDEIR Subsection 4.20.4 under the analysis of Threshold e. No further response is necessary.
- H-6** The County acknowledges and appreciates the recommended measures from the RCDWR. Please refer to Responses H-7 through H-16 for a discussion of the individual measures recommended by this comment letter.
- H-7** This recommended measure will be included in the Project's Conditions of Approval (COAs). This measure is listed as County Regulation & Design Requirement (CRDR) 4.20-4 in RDEIR Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*.
- H-8** This recommended measure will be included in the Project's COAs. This measure is listed as part of CRDR 4.20-4 in RDEIR Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*.



- H-9** This recommended measure has been added as a requirement of CRDR 4.20-4 in RDEIR Subsection 4.20 and in RDEIR Table S-1.
- H-10** This recommended measure has been added as a requirement of CRDR 4.20-4 in RDEIR Subsection 4.20 and in FEIR RDEIR S-1.
- H-11** This recommended measure has been added as a requirement of CRDR 4.20-4 in RDEIR Subsection 4.20 and in FEIR RDEIR S-1.
- H-12** This recommended measure has been added as a requirement of CRDR 4.20-4 in RDEIR Subsection 4.20 and in FEIR RDEIR S-1.
- H-13** Future development on site would be required to comply with all provisions of proposed Specific Plan No. 2339, Amendment No. 1 (SP 239A1). SP 239A1 includes a Plant Palette (Table 4-1 of the SPA), which requires the use of drought-tolerant landscaping throughout the Project area, as discussed in RDEIR Section 3.0, *Project Description*.
- H-14** This recommended measure will be included in the Project's COAs. This measure is listed as part of CRDR 4.20-4 in RDEIR Table S-1.
- H-15** This recommended measure is addressed as part of CRDR 4.20-4 in DEIR Table S-1.
- H-16** This recommended measure has been added as a requirement of CRDR 4.20-4 in FEIR Subsection 4.20 and in RDEIR Table S-1.
- H-17** The County appreciates the comments from RCDWR, and will direct any questions to the contact person identified by this comment.



**COMMENT LETTER I**

**BLUM COLLINS AND HO, LLP  
ATTORNEYS AT LAW  
AON CENTER  
707 WILSHIRE BOULEVARD, SUITE 4880  
LOS ANGELES, CA 90017  
(213) 572-0400**

May 23, 2022

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

VIA EMAIL TO:  
[rbrady@rivco.org](mailto:rbrady@rivco.org)

*Subject: Comments on Stoneridge Commerce Center EIR (SCH NO. 2020040325)*

Dear Mr. Brady,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Stoneridge Commerce Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Also, GSEJA formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

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**1.0 Summary and Project Description**

The EIR evaluates the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of General Plan Amendment No. 190008 (GPA 190008), Amendment No. 1 to Specific Plan No. 239 (SP 239A1), and Change of Zone No. 1900024 (CZ 1900024). The proposed project is a 582.6-acre site located in the Nuevo community. The EIR evaluates two separate land use alternatives for the site. Two alternatives are considered because the Riverside County Transportation Commission (RCTC) is planning for construction of a regional transportation facility, the "Mid-County Parkway" (MCP). A portion of the MCP is currently planned to traverse the northwestern portions of the Project site. It is currently not known when or if the MCP would be constructed by RCTC; thus, for purposes of evaluation in the EIR, the "Primary Land Use Plan" anticipates that the MCP would not be constructed through the property, in which case the site would be developed with up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail,

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Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres.

The “Alternative Land Use Plan” anticipates that the MCP would be constructed through the northwest portions of the site, in which case the site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, 8.5 acres of Commercial Retail land uses, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. However, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. The “Alternative Land Use Plan” only would be implemented in the event that the RCTC constructs the MCP through the northernmost portions of the Project site.

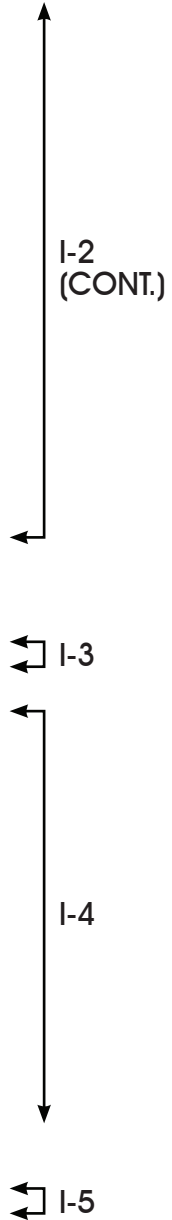
The Primary Land Use Plan proposes the construction and operation of up to 8,461,530 square feet (s.f.) of light industrial building area, up to 1,069,398 s.f. of business park building area, and up to 121,968 s.f. of commercial retail building area. The Alternative Land Use Plan proposes the construction and operation of up to 8,461,530 s.f. of light industrial building area, up to 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area.

**4.3 Air Quality, 4.6 Energy, and 4.8 Greenhouse Gas Emissions**

Please refer to attachments from SWAPE for a complete technical commentary and analysis.

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0<sup>1</sup>, CalEPA’s screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project’s census tract (6065042620) ranks worse than 69% of the rest of the state overall in pollution burden. The surrounding community, including Sierra Vista Elementary School, Lakeside Middle School, and residences to the west, residences to the southeast, and adjacent SB 535 Census Tracts 6065042719 (east), 6065042706 (south), 6065048800 (north), and 6065042904 (west), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 98th percentile for ozone burden, the 53rd percentile for particulate matter (PM) 2.5 burden, and the 82nd percentile for traffic related impacts, which are all typically attributed to heavy vehicular activity in the area. The census tract also bears more

<sup>1</sup> CalEnviroScreen 4.0 <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>





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impacts from cleanup sites than 69% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water<sup>2</sup>.

Further, the census tract is a diverse community including 69% Hispanic, 13% African-American, and 7% Asian-American residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 75% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 91st percentile for incidence of cardiovascular disease, 66th percentile for incidence of asthma, and 63rd percentile for incidence of low birth weights.

Additionally, the project’s census tract (6065042620) and the census tracts adjacent to the project site (6065042719 (east), 6065042706 (south), 6065048800 (north), and 6065042904 (west)) are identified as SB 535 Disadvantaged Communities<sup>3</sup>, which is not discussed or presented for analysis in the EIR.

The State of California lists three approved energy compliance modeling softwares<sup>4</sup> for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The spreadsheet-based and CalEEMod modeling in Appendix E does not comply with the 2019 Building Energy Efficiency Standards and under reports the project’s potentially significant GHG and Energy impacts to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling in one of the approved software types must be circulated for public review in order to adequately analyze the project’s potentially significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not one of the approved softwares.

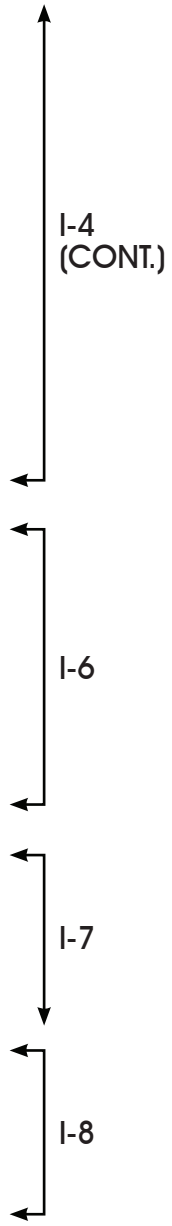
It must also be noted that the County of Riverside is not listed as a jurisdiction with local energy standards approved by the CA Energy Commission<sup>5</sup>. According to the CA Energy Commission, “Local jurisdictions are required to apply to the Energy Commission for approval, documenting the supporting analysis for how the local government has determined that their proposed Standards will save more energy than the current statewide Standards and the basis of the local government’s

<sup>2</sup> OEHHA Cleanup Sites <https://oehha.ca.gov/calenviroscreen/indicator/cleanup-sites>

<sup>3</sup> OEHHA SB 535 Census Tracts <https://oehha.ca.gov/calenviroscreen/sb535>

<sup>4</sup> 2019 Building Energy Efficiency Standards Approved Computer Compliance Programs, California Energy Commission. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-2>

<sup>5</sup> Local Ordinances Exceeding the 2019 Energy Code, California Energy Commission <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-3>







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determination that the local standards are cost-effective.” Therefore, compliance with the County’s CAP does not comply with CA Energy Commission standards or AB 32/SB 32. The EIR is misleading to the public and decision makers by stating compliance with these standards when the local jurisdiction standards have not been approved by the CA Energy Commission. A revised EIR must be prepared with adequate analysis of project impacts utilizing an approved modeling software in order to be a reliable informational document in compliance with CEQA.

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Additionally, the EIR is erroneous and misleading to the public and decision makers regarding greenhouse gas emissions. Table 4.8-4: Primary Land Use Plan Operational-Related Greenhouse Gas Emissions states that the project will generate 179,382 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) annually, which vastly exceeds the 3,000 MTCO<sub>2</sub>e threshold of significance. The EIR concludes that the project GHG emissions will be reduced to less than significant levels by the project achieving 100 points on the County’s Climate Action Plan (CAP). The EIR has not provided any meaningful evidence that achieving 100 points will actually result in mitigation and reduced MTCO<sub>2</sub>e. The EIR does not include any quantification emissions reduced by CAP programs. This is vital as the proposed project’s emissions exceed the applicable threshold by 176,382 MTCO<sub>2</sub>e annually. The EIR must be revised to provide meaningful evidence to support the claim that achieving 100 points on the County’s CAP will reduce the project’s emissions by 176,382 MTCO<sub>2</sub>e annually.

I-9

**4.4 Biological Resources**

Appendix C1: Biological Resources Report includes Exhibit 12 - Site Photographs. Exhibit 12 only includes 1 photo that is representative of onsite burrows while numerous burrows were observed onsite. The Western Riverside MSHCP <sup>6</sup> requires “A written report including *photographs* of the project site, location of burrowing owl habitat surveyed, location of transects, and burrow survey methods should be prepared” and only a single photo representative of the burrows has been provided. Additionally, the Western Riverside MSHCP requires “the location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates.” The EIR and Appendix C1 do not include the GPS coordinates.

I-10

Further, Table 2-2: Summary of Burrowing Owl Surveys within Appendix C1 lists each “polygon” that was surveyed on each date. However, a map of labeled “polygons” is excluded from public review. The size of each polygon is vital to ensure that each polygon could be adequately walked within the amount of time spent on the site each day; this is vital as the project site is approximately 582 acres in size. The Western Riverside MSHCP requires “if habitat is found on the site, then

I-11

<sup>6</sup> Western Riverside MSHCP Instructions for Burrowing Owl [https://www.wrc-ca.org/species/survey\\_protocols/burrowing\\_owl\\_survey\\_instructions.pdf](https://www.wrc-ca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf)

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walk a 150- meter (approximately 500 feet) buffer zone around the project boundary.” However, Exhibit 6A within Appendix C1 states that only a visual survey of the 500 foot buffer zone was completed. Per Google Maps, all of the land within the buffer zone is unsecured and vacant. A walking survey of the 500 foot buffer zone must be conducted and included as part of a revised EIR.

I-11  
(CONT.)

Additionally, Exhibit 6A within Appendix C1 depicts a large area within the southwest portion of the project site that was not surveyed either visually or by walking transects. A revised EIR must be completed to survey all areas of the project site by walking transects. The EIR cannot conclude that the burrowing owl is absent from the project site until and unless it surveys the entire project site and the 500 foot buffer zone.

I-13

**4.9 Hazards and Hazardous Materials**

The EIR is internally inconsistent regarding Riverside County Airport Land Use Commission review. Appendix I: General Plan Consistency Analysis concludes the project is consistent with the related General Plan policies because “As discussed in EIR Subsection 4.9, Hazards and Hazardous Materials, the Project was reviewed by the ALUC on May 5, 2021 and was found to be consistent with the MARB ALUCP, subject to standard ALUC conditions of approval.” However, EIR Subsection 4.9 states that “the Riverside County ALUC Director reviewed both portions of the Project site for consistency with the ALUCP.” The EIR is internally inconsistent as the consistency analysis claims that the Riverside County Airport Land Use Commission (RCALUC) reviewed the project on May 5, 2021 while Subsection 4.9 states that only the RCALUC’s Director reviewed the proposed project and no date is given. It must be noted that the RCALUC did not convene a meeting on May 5, 2021. The proposed project is not listed for RCALUC review on any agenda in 2021<sup>7</sup> or 2022<sup>8</sup>. The EIR must be revised to be internally consistent and include a finding of significance because the RCALUC has not reviewed the proposed project, which is required due to its proposed GPA, SPA, and ZC.

I-14

**4.11 Land Use and Planning**

The Project requires a General Plan Land Use amendment and Zoning designation change to change the Project site’s land use designations from: Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium-High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space-Recreation,” “Open Space – Conservation (OS-C),” Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water

I-15

<sup>7</sup> RCALUC 2021 Agendas <https://www.rcaluc.org/Agendas/Agenda-Archive/2021>

<sup>8</sup> RCALUC Current 2022 Agendas <https://www.rcaluc.org/Agendas/Meeting-Agendas>

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(OS-W)” to “Light Industrial (LI),” “Business Park (BP),” “Commercial Retail (CR),” “Open Space – Conservation (OS-C),” and “Open Space – Conservation Habitat (OS-CH)” via GPA 190008, SP 239A1, and CZ 1900024. The EIR concludes that the project will not result in any significant impacts because:

I-15  
(CONT.)

“With approval of GPA 190008 and SP 239A1, the Project would be fully consistent with the General Plan and LNAP land use designations for the 582.6-acre property. Moreover, impacts associated with the proposed land uses have been evaluated throughout this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent. Based on the foregoing analysis, the proposed Project would not result in a significant environmental impact due to a conflict with any land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.”

I-17

The EIR relies upon approval of the GPA/SPA itself to ensure consistency with these documents. Relying upon approval of the requested GPA/SPA to determine there will be no environmental impacts circumvents the required process of CEQA analysis. Significant and unavoidable impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable) will occur as a result of the GPA/SPA, and this is not presented for discussion or analysis in this section. The EIR is inadequate as an informational document and must be revised. This is vital as the EIR and Appendix I includes misleading consistency analysis with General Plan goals, policies and objectives adopted with the purpose of avoiding or mitigating an environmental effect, including the following:

I-18

1. LU 3.3: Promote the development and preservation of unique communities in which each community exhibits a special sense of place and quality of design. (AI 14, 30)

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The EIR concludes the project is consistent with this policy because the “Proposed SP 239A1 includes development standards and design guidelines to guide future development of the site, and includes requirements that would ensure that development on site does not conflict with existing or planned surrounding land uses and that future development occurs in a manner that would exhibit a special sense of place and quality of design.” However, the project results in significant Aesthetics impacts that will not promote the preservation of the unique community. This information is not included for analysis or discussion in the GP consistency analysis. The EIR has also excluded the proposed SP 239 amendment and design guidelines from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the proposed SP 239 amendment and design guidelines contributes directly to analysis of the problem at hand.

I-19



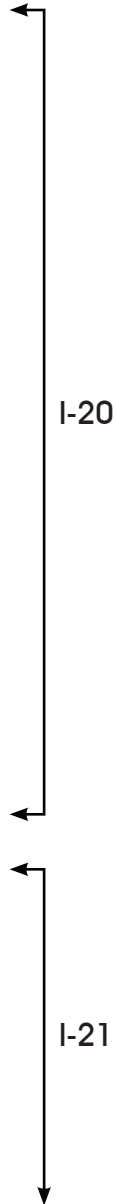
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2. LU 4.1: Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: (AI 1, 3, 6, 14, 23, 24, 41, 62) a. Compliance with the design 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 (CCR). 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.

The EIR concludes the project is consistent with this policy because “Future development on site would be subject to compliance with the development standards and design guidelines of proposed SP 239A1, which were crafted to ensure future development visually enhances and does not degrade the character of the surrounding area;” “the SP 239A1 Design Guidelines promote the use of drought tolerant landscaping;” “The Project promotes innovative and creative design concepts. SP 239A1 includes design guidelines related to signage that would ensure signage is integrated with the architectural character;” and “All entrances into the site were designed to minimize conflicts with existing and planned adjacent residential neighborhoods.”However, the project results in significant Aesthetics and Noise impacts on adjacent residential neighborhoods. This information is not included for analysis or discussion in the GP consistency analysis. The EIR has also excluded the proposed SP 239 amendment and design guidelines from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the proposed SP 239 amendment and design guidelines contributes directly to analysis of the problem at hand. The EIR must be revised and recirculated to include the proposed SP 239 amendment and design guidelines for public review.

3. LU 7.1 Require land uses to develop in accordance with the General Plan and area plans to ensure compatibility and minimize impacts.

The EIR concludes the project is consistent with this policy because “the range of land uses are consistent with the Community Development Foundation Component applied to the Project site by the General Plan Land Use Map. SP 239A1 includes design guidelines to ensure future light industrial and business park uses on site do not result in any impacts or incompatibility issues with respect to surrounding planned residential development.” However, the EIR does not include all relevant information in the consistency analysis. The project requires a GPA, SPA, and CZ to proceed. Implementation of the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air





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Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable). Significant and unavoidable cumulatively considerable impacts and incompatibility with the surrounding community will occur as a result of the GPA, SPA, and CZ. Therefore, the project is directly inconsistent with this policy. The EIR must be revised to provide this information for analysis, determine the project to be inconsistent with this policy, and include a finding of significance.

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4. 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.

The EIR concludes the project is consistent with this policy because “the Project would not result in impacts from noise,” and “Traffic impacts have been mitigated to the maximum feasible extent.” This discussion excludes information that the project will result in significant and unavoidable environmental impacts to Noise, and Transportation (VMT) (cumulatively considerable). Specifically, the project will result in “significant and unavoidable traffic-related noise impacts affecting existing residential uses along the segment of Nuevo Road between the southern Project entrance and Dunlap Drive under Existing plus Ambient plus Project (EAP) 2030 conditions,” and “Significant and Unavoidable Direct and Cumulatively-Considerable Impact to Transportation. Project generated VMT per employee for the Project’s proposed light industrial and business park uses would exceed the existing county-wide average VMT per employee threshold by 26.22%.” The proposed project is directly inconsistent with this policy. This information is not included for discussion in the consistency analysis, which is misleading to the public and decision makers. The EIR must be revised to provide this information for analysis, determine the project to be inconsistent with this policy, and include a finding of significance.

I-22

- 5. 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
- 6. 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.
- 7. LU 30.2: Control heavy truck and vehicular access to minimize potential impacts on adjacent properties.
- 8. HC 1.1 Foster the overall health and well-being of Riverside County residents, particularly the most vulnerable populations.
- 9. HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.
- 10. HC 16.15 Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

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11. HC 16.18 Promote new development that emphasizes job creation and reduction in vehicle miles traveled in job-poor areas and does not otherwise contribute to onsite emissions in order to improve air quality.

12. HC 16.24 Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

The project requires a GPA, SPA, and CZ to proceed. Implementation of the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts (all of which are designated as SB 535 Disadvantaged Communities) receiving the most significant impacts. Therefore, the project is directly inconsistent with these eight policies. The EIR must be revised to provide this information for analysis, determine the project to be inconsistent with the policies, and include a finding of significance. The consistency analysis is particularly misleading to the public and decision makers in stating that “The Project accommodates a mix of land uses (i.e., light industrial, business park, and commercial retail land uses) that would maintain and enhance Riverside County’s fiscal viability, economic diversity, and *environmental integrity*,” without discussing that significant and unavoidable environmental impacts resulting from project implementation.

13. LU 10.2: Require a fiscal impact analysis for specific plans and major development proposals so as not to have a negative fiscal impact on the County of Riverside

The EIR concludes the project is consistent with this policy because “A fiscal impact analysis was prepared for the Project, which demonstrates that the Project would not have a negative fiscal impact on the County of Riverside.” However, the fiscal impact analysis is not included for public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the fiscal impact analysis contributes directly to analysis of the problem at hand. The EIR must be revised and recirculated to include the fiscal impact analysis for public review.

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

15. LU 11.3 Accommodate the development of community centers and concentrations of development to reduce reliance on the automobile and help improve air quality.

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

17. AQ 1.4 Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

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- 18. AQ 1.5 Establish and implement air quality, land use and circulation measures that improve not only the County’s environment but the entire region.
- 19. AQ 8.2 Emphasize job creation and reductions in vehicle miles traveled in job-poor areas to improve air quality over other less efficient methods.
- 20. AQ 8.8 Promote land use patterns which reduce the number and length of motor vehicle trips.
- 21. AQ 9.1 Cooperate with local, regional, state and federal jurisdictions to reduce vehicle miles traveled and motor vehicle emissions through job creation
- 22. AQ 9.2 Attain performance goals and/or VMT reductions which are consistent with SCAG’s Growth Management Plan
- 23. AQ 20.7 Reduce VMT through increased densities in urban centers and encouraging emphasis on mixed use to provide residential, commercial and employment opportunities in closer proximity to each other. Such measures will also support achieving the appropriate jobs-housing balance within the communities.

The EIR concludes the project is consistent with these policies because “The collocation of employment-generating land uses within close proximity to residential uses would reduce the reliance on the automobile, thereby helping to improve air quality.” However, implementation of the project will result in significant and unavoidable environmental impacts to Air Quality (cumulatively considerable) and Transportation (VMT) (cumulatively considerable). The EIR concludes that “Project generated VMT per employee for the Project’s proposed light industrial and business park uses would exceed the existing county-wide average VMT per employee threshold by 26.22%.” It is clear that the consistency analysis is erroneous as the project’s VMT per employee will exceed the existing county-wide average. The project’s proximity to residential uses would not reduce the reliance on the automobile and will have a significant and unavoidable cumulatively considerable impact to air quality. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with these policies, and include a finding of significance.

- 24. LU 13.1: Provide land use arrangements that reduce reliance on the automobile and improve opportunities for pedestrian, bicycle, and transit use in order to minimize congestion and air pollution.

The EIR concludes the project is consistent with this policy because “the intensity of the proposed development would facilitate *future* expanded RTA transit access in the Project area. These amenities and design features would serve to reduce reliance on the automobile and would improve opportunities for pedestrian, bicycle, and transit use, thereby helping to minimize congestion and air pollution.” However, implementation of the project will result in significant and unavoidable environmental impacts to Air Quality (cumulatively considerable) and Transportation (VMT) (cumulatively considerable). Reliance on future expansion of RTA service is not sufficient as the EIR has not provided any documented RTA service plans to expand bus service to the project.

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This analysis attempts to utilize *future*, unplanned RTA service as a mitigation measure to determine consistency with this policy. The project’s proposed GPA, SPA, and ZC will provide a land use arrangement that increases reliance on the automobile (increases County VMT per employee by 26.22%) and has significant and unavoidable, cumulatively considerable impacts to air quality and transportation. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with the policy, and include a finding of significance.

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25. LU 13.7: Review projects for consistency with Riverside County’s Transportation Demand Ordinance.

The EIR concludes the project is consistent with this policy because “The Project’s location in close proximity to existing and planned residential uses would serve to reduce the amount of vehicle miles travelled by future tenants by providing employment opportunities in close proximity to residential uses.” However, implementation of the project will result in significant and unavoidable environmental impacts to Air Quality (cumulatively considerable) and Transportation (VMT) (cumulatively considerable). The project’s proposed GPA, SPA, and ZC will provide a land use arrangement that increases reliance on the automobile (increases County VMT per employee by 26.22%) and has significant and unavoidable, cumulatively considerable impacts to air quality and transportation. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with the policy, and include a finding of significance.

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26. LU 14.3: Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within Designated and Eligible State and County scenic highway corridors are compatible with the surrounding scenic setting or environment.

27. LU 14.4: Maintain an appropriate setback from the edge of the right-of-way for new development adjacent to Designated and Eligible State and County Scenic Highways based on local surrounding development, topography, and other conditions

28. LU 14.6: Prohibit offsite outdoor advertising displays that are visible from Designated and Eligible State and County Scenic Highways.

29. LU 14.7: Require that the size, height, and type of on-premises signs visible from Designated and Eligible State and County Scenic Highways be the minimum necessary for identification. The design, materials, color, and location of the signs shall blend with the environment, utilizing natural materials where possible.

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The EIR concludes the project is consistent with this policy because “Future development on site would be governed by proposed SP 239A1, which includes development standards and design guidelines to ensure that development on site occurs in a cohesive manner and in a manner that is not visually offensive.” However, the project results in significant Aesthetics impacts that are not discussed or presented for analysis. The consistency analysis discusses further details of SP 239A1, such as “as required by the Project’s proposed zoning requirements, an additional 25-foot





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setback would be required between the right-of-way and proposed structures on site,” and “Proposed signage on site would be governed by the signage design guidelines contained in proposed SP 239A1, which have been crafted to ensure signage associated with the Project is coordinated and visually compatible with the site and its surroundings.” The EIR has excluded the proposed SP 239 amendment and design guidelines from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the proposed SP 239 amendment and design guidelines contributes directly to analysis of the problem at hand. The EIR must be revised and recirculated to include the proposed SP 239 amendment and design guidelines for public review.

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30. HC 22.5 New specific plans or existing specific plans that includes a substantial revision that are within “disadvantaged communities,” as identified by CalEPA should address Environmental Justice goals and include appropriate policies similarly to this section.

The EIR concludes the project is consistent with this policy because “The Project site is mapped as occurring within a disadvantaged community. Proposed SP 239A1 includes policies that address the Environmental Justice goals, which are included throughout proposed SP 239A1.”The EIR has excluded the proposed SP 239 amendment and its policies that address the Environmental Justice goals from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the proposed SP 239 amendment and its policies that address the Environmental Justice goals contributes directly to analysis of the problem at hand. The EIR must be revised and recirculated to include the proposed SP 239 amendment and its policies that address the Environmental Justice goals for public review. This is vital as the proposed project’s census tract and all adjacent census tracts are identified as SB 535 Disadvantaged Communities and the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts receiving the most significant impacts.

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31. 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.

32. LU 15.4: Prior to the adoption or amendment of the General Plan or any specific plan, or the adoption or amendment of a zoning ordinance or building regulation within the Airport Influence Area of any airport land use compatibility plan, refer such proposed actions to the ALUC for review and determination as provided by the Airport Land Use Law

33. N 7.1: New land use development within Airport Influence Areas shall comply with airport land use noise compatibility criteria contained in the corresponding airport land use compatibility

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plan for the area. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix I-1 and summarized in the Policy Area section of the affected Area Plan.  
34. N 7.2: Adhere to applicable noise compatibility criteria when making decisions regarding land uses adjacent to airports.

The EIR concludes the project is consistent with these policies because “As discussed in EIR Subsection 4.9, Hazards and Hazardous Materials, the Project was reviewed by the ALUC on May 5, 2021 and was found to be consistent with the MARB ALUCP, subject to standard ALUC conditions of approval.” However, EIR Subsection 4.9 states that “the Riverside County ALUC Director reviewed both portions of the Project site for consistency with the ALUCP.” The EIR is internally inconsistent as the consistency analysis claims that the Riverside County Airport Land Use Commission (RCALUC) reviewed the project on May 5, 2021 while Subsection 4.9 states that only the RCALUC’s Director reviewed the proposed project and no date is given. It must be noted that the RCALUC did not convene a meeting on May 5, 2021. The proposed project is not listed for RCALUC review on any agenda in 2021<sup>9</sup> or 2022<sup>10</sup>. The EIR must be revised to be internally consistent and include a finding of inconsistency with these policies as the RCALUC has not reviewed the proposed project, which is required due to its proposed GPA, SPA, and ZC. A finding of significance also must be made.

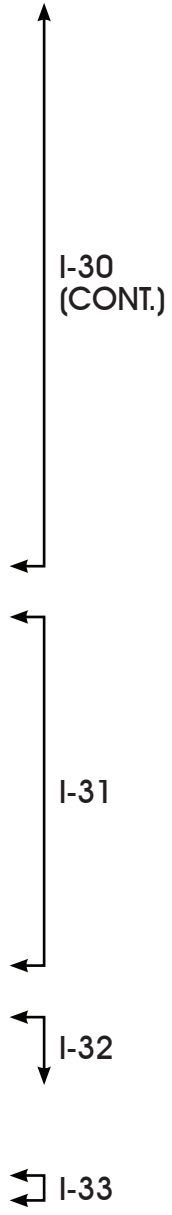
35. LU 30.1: Accommodate the continuation of existing and development of new industrial, manufacturing, research and development, and professional offices in areas appropriately

The EIR concludes the project is consistent with this policy “ With approval of the Project’s GPA and SPA applications.” The EIR relies upon approval of the GPA/SPA itself to ensure consistency with these documents. Relying upon approval of the requested GPA/SPA to determine there will be no environmental impacts circumvents the required process of CEQA analysis. Significant and unavoidable impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable) will occur as a result of the GPA/SPA, and this is not presented for discussion or analysis. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with the policy, and include a finding of significance.

36. HC 3.4 Provide for a range of housing options to accommodate a range of income levels and household types.

<sup>9</sup> RCALUC 2021 Agendas <https://www.rcaluc.org/Agendas/Agenda-Archive/2021>

<sup>10</sup> RCALUC Current 2022 Agendas <https://www.rcaluc.org/Agendas/Meeting-Agendas>





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The EIR concludes that this policy is not applicable to the project because it does not propose to construct any housing units. The EIR does not address the Housing Crisis Act (HCA) of 2019 and provisions in Senate Bill (SB) 330. The HCA of 2019 and SB 330 require replacement housing sites when land designated for housing development is changed to a non-housing use to ensure no net loss of housing capacity. Government Code Section 66300(b)(1)(A) requires that agencies shall not “change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect on January 1, 2018.” Under Government Code Section 66300(b)(1)(A), a “less intensive use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or anything that would lessen the intensity of housing. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided at the time of project approval.

This is applicable because the proposed project would remove the site’s existing General Plan land use designations of “Medium Density Residential (MDR),” “Medium-High Density Residential (MHDR),” “Very High Density Residential (VHDR),” and change them to non-residential designations. Due to this land use change, the site would not be used for the development of residential units and replacement sites must be proposed and analyzed as part of the project. The EIR does not act in conformance with these laws and has not identified replacement sites for housing. Approval of the EIR and the proposed project will result in a net loss of housing. The EIR must be revised to include replacement sites for housing which accommodate at minimum the same housing capacity and all related technical analysis. This is vital as the existing SP 239 permits the development of 2,236 dwelling units plus 300 additional bonus units (150 affordable units and 150 market-rate units) for a total of 2,536 units.

- 37. 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.
- 38. 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
- 39. N 1.6: Minimize noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses.
- 40. N 1.7: Require proposed land uses, affected by unacceptably high noise levels, to have an acoustical specialist prepare a study of the noise problems and recommend structural and site design features that will adequately mitigate the noise problem
- 41. N 3.3: Ensure compatibility between industrial development and adjacent land uses. To achieve compatibility, industrial development projects may be required to include noise mitigation measures to avoid or minimize project impacts on adjacent uses.
- 42. N 3.6: Discourage projects that are incapable of successfully mitigating excessive noise.

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(CONT.)

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43. N 9.3: Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses to provide for appropriate mitigation measures.

The EIR concludes the project is consistent with these policies because “Mitigation measures are presented in EIR Subsection 4.13, Noise, to reduce significant noise-related impacts to the maximum feasible extent.” However, implementation of the project will result in significant and unavoidable Noise impacts to existing residences. Specifically, the project will result in “significant and unavoidable traffic-related noise impacts affecting existing residential uses along the segment of Nuevo Road between the southern Project entrance and Dunlap Drive under Existing plus Ambient plus Project (EAP) 2030 conditions.” This information is excluded from the consistency analysis. Mitigation of noise-related impacts “to the maximum feasible extent” does not support a consistency determination with any of these policies. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with these policies, and include a finding of significance.

44. LNAP 6.1 Encourage the two mixed use planning areas in the adopted Stoneridge and McCanna Hills Specific Plans to adhere to those policies listed in the Community Centers Area Plan Land Use Designation section of the Land Use Element.

The EIR concludes this policy is not applicable to the proposed project because “with approval of the Project’s proposed GPA there would be no areas designated for Community Center land uses on site.” Implementation of the project removes one of two Community Centers planned in the LNAP area. The LNAP states “Both of these Community Center designations include portions of two adjacent approved Specific Plans, and are rooted in Planning Areas identified as mixed use planning areas or areas that could accommodate either commercial or higher intensity residential development.” The EIR has not provided any analysis of the project’s inconsistency with the policy. Relying upon approval of the proposed GPA to determine the policy is not applicable circumvents the required process of CEQA analysis. Significant and unavoidable impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable) will occur as a result of the GPA, and this is not presented for discussion or analysis. The project does not propose to rezone another area for a Community Center or attempt to mitigate the direct inconsistency with this policy. The EIR must be revised to include an adequate and accurate consistency analysis, state the significant and unavoidable project-related environmental impacts, determine inconsistency with the policy, and include a finding of significance.

Further, Appendix O: Project Application Materials includes a document titled “General Plan Amendment Justification (Stoneridge SP239-A1) Entitlement/Policy Amendment Findings.” The

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proposed findings listed in this document are erroneous and misleading to the public and decision makers. Approval of the proposed General Plan Amendment requires findings listed in Ordinance No. 348, Section 2.4(c)(2)<sup>11</sup> to be made by the approving bodies. The EIR concludes that the project is consistent with Mandatory Finding 2(a) via “Riverside County’s Vision for Transportation is to ensure that “the land use/transportation connection is a key part of the development process and has served to reduce the number of vehicle trips compared to earlier patterns of development.” (p V-15). The proposed Amendment is consistent with this statement because the proposed Amendment would establish the General Plan designations necessary to create local employment opportunities and improve the County’s jobs-to-housing balance, which would contribute to a reduction in average commute times, a reduction in the number of vehicle trips in the County, and contribute to reductions in the impacts Air Quality and Greenhouse Gases by reducing motor vehicle pollutants.”

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(CONT.)

However, implementation of the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts (all of which are designated as SB 535 Disadvantaged Communities) receiving the most significant impacts. Notably, the project will increase the County’s average VMT per employee by 26.22%, which in turn contributes to significant Air Quality and GHG impacts. Therefore, the project is directly inconsistent with this aspect of the County’s General Plan Vision Statement<sup>12</sup>.

Additionally, due to the project’s significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable, including inconsistency with the SCAQMD Air Quality Management Plan), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts (all of which are designated as SB 535 Disadvantaged Communities) receiving the most significant impacts, the project is directly inconsistent with the following aspects of the County’s General Plan Vision Statement:

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Transportation Vision

2. Strategies of local job creation, housing and child day care centers coupled with improvements to the transportation system, allow Riverside County residents to have access to a wide range of job opportunities within reasonable commute times.

<sup>11</sup> Riverside County Ordinance No. 348 [https://planning.rctlma.org/Portals/14/Ord\\_348\\_clean\\_version.pdf](https://planning.rctlma.org/Portals/14/Ord_348_clean_version.pdf)

<sup>12</sup> Riverside County General Plan Vision Statement [https://planning.rctlma.org/Portals/14/genplan/general\\_Plan\\_2017/elements/OCT17/Ch02\\_Vision\\_120815.pdf?ver=2017-10-11-102103-583](https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch02_Vision_120815.pdf?ver=2017-10-11-102103-583)

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11. The land use/transportation connection is a key part of the development process and has served to reduce the number of vehicle trips compared to earlier patterns of development.

Healthy Communities Vision

6. Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes.

Air Quality Vision

1. Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan's performance.

4. Riverside County actively participates with other regional jurisdictions in implementing strategies to reduce air pollution spillover into Riverside County from adjacent counties as well as limiting pollutants generated within Riverside County. This participation has led to measures that contributed to exceeding attainment goals established by the South Coast Air Quality Management District.

Sustainability and Global Environmental Stewardship Vision

1. Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations.

5. Innovative land use polices continue to foster communities where a mixture of land uses provide healthy recreation and food options close to home. These healthy communities also offer ample bicycle trails and footpaths that are well-connected to surrounding land uses and multi-modal transportation options. This interconnectivity facilitates non-motor transportation, reducing long commutes and traffic.

Further, Appendix O states that the project is consistent with General Plan Principle IV.A.5: The creation of new cities/towns, villages and aggregated specific plan areas should be considered. The process of planning for new communities should be started so that when they are built, they will have the infrastructure, the facilities, services, and economic sustainability to make them viable into the next century. Appendix O states the project is consistent with this principle because "the proposed Amendment would establish the General Plan designations appropriate for SP 239-A1, which when developed, will include the construction of substantial portions of the infrastructure, facilities, and services necessary to encourage future development of the Lakeview/Nuevo Area Plan into the next century. The proposed Amendment would provide for the development of SP239-A1 as an Industrial, Business Park and Commercial development would create the opportunity to construct regionally important infrastructure linkages in a time frame which would not be possible under the existing Residential and Commercial General Plan Designations contained in the approved SP 239." The consistency analysis relies upon approval of the GPA itself to ensure consistency with this principle, which circumvents all required technical analysis and does not provide meaningful evidence to support this conclusion. This principle does not apply

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to the proposed project because SP 239 was established in 1991<sup>13</sup> and the proposed amendment is not establishing a new specific plan, village, or city/town.

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(CONT.)

The project is not consistent with General Plan Principle II.A.1<sup>14</sup>: “Environmentally Sensitive Community Design- Environmental protection is built into the General Plan at the Countywide and Area Plan level. This sensitivity to environmental conditions is also desirable at the community level and should be carried out as appropriate to that scale.” Implementation of the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts (all of which are designated as SB 535 Disadvantaged Communities) receiving the most significant impacts. The project is not consistent with this planning principle of the General Plan.

I-40

Appendix O utilizes three policies from the General Plan to demonstrate consistency with Mandatory Finding 2(b) that “The proposed amendment would either contribute to the achievement of the purposes of the General Plan or, at a minimum, would not be detrimental to them.” However, the analysis presented above demonstrates that the project is not consistent with 43 General Plan Policies and a policy from the LNAP. This is detrimental to the purposes of the General Plan due to the significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable) resulting from project implementation.

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Due to the inconsistencies with the 43 General Plan Policies and a policy from the LNAP discussed above, the project is not consistent with Mandatory Findings 2(a) and 2(b) and the proposed GPA shall not be approved.

Further, the EIR does not address the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330<sup>15</sup>. The HCA of 2019 and SB 330 require replacement housing sites when land designated for housing development is changed to a non-housing use to ensure no net loss of housing capacity. Government Code Section 66300(b)(1)(A) requires that agencies shall not “change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use

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<sup>13</sup> SP 239 Summary

[https://planning.rctlma.org/Portals/14/splans/sp\\_document/sp239/sp239\\_summary.pdf](https://planning.rctlma.org/Portals/14/splans/sp_document/sp239/sp239_summary.pdf)

<sup>14</sup> County of Riverside General Plan Planning Principles

[https://planning.rctlma.org/Portals/14/genplan/general\\_plan\\_2016/appendices/Appendix%20B\\_120815.pdf?ver=2016-04-01-141949-710](https://planning.rctlma.org/Portals/14/genplan/general_plan_2016/appendices/Appendix%20B_120815.pdf?ver=2016-04-01-141949-710)

<sup>15</sup> Housing Crisis Act of 2019/SB 330

[https://leginfo.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200SB330](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330)

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below what was allowed under the land use designation and zoning ordinances in effect on January 1, 2018.” Under Government Code Section 66300(b)(1)(A), a “less intensive use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or anything that would lessen the intensity of housing. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided at the time of project approval.

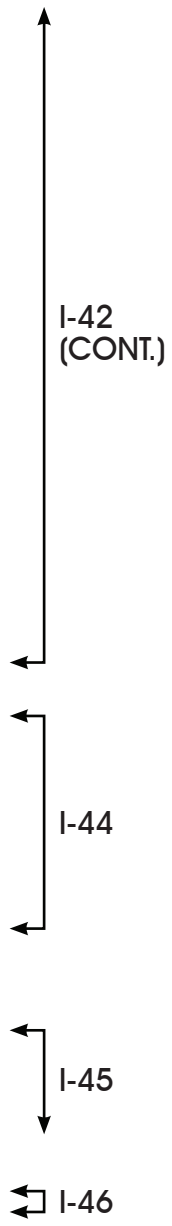
This is applicable because the proposed project would change the site’s Residential General Plan land use classifications (Medium Density Residential (MDR), Medium-High Density Residential (MHDR), and Very High Density Residential (VHDR)), to non-residential Industrial classifications. Due to this land use change, the site would not be used for the development of residential units and replacement sites must be proposed and analyzed as part of the project. The EIR does not act in conformance with these laws and has not identified replacement sites for housing. Approval of the EIR and the proposed project will result in a net loss of housing capacity. Specifically, SP239 permits the development of 2,236 dwelling units plus 150 affordable units and 150 bonus market-rate units, for a total of 2,536 dwelling units<sup>16</sup>. The lost capacity of 2,536 dwelling units is a significant environmental impact in violation of the HCA and SB 330; a finding of significance must be made. The EIR must be revised to include replacement sites for housing which accommodate at minimum 2,536 dwelling units (including at least 150 affordable housing units) and all related technical analysis.

Additionally, the proposed project is not consistent with SCAG’s 2020-2045 Connect SoCal RTP/SCS. Due to the project’s significant and unavoidable impacts to Air Quality (cumulatively considerable) and Transportation (VMT) (cumulatively considerable), errors in modeling, and modeling without supporting evidence (as noted throughout this comment letter and attachments) the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. The EIR must be revised to include this information for analysis and include a finding of significance.

**4.15 Population and Housing**

The EIR concludes that the project will generate 10,256 operational employees (Primary Land Use Plan) or 10,044 employees (Alternative Land Use Plan). The EIR does not provide a source methodology for its determination that the project will generate this amount of employees. There

<sup>16</sup> SP 239 Summary  
[https://planning.rctlma.org/Portals/14/splans/sp\\_document/sp239/sp239\\_summary.pdf](https://planning.rctlma.org/Portals/14/splans/sp_document/sp239/sp239_summary.pdf)







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is also no calculation of the employees generated by the construction of the project. The EIR must be revised to include this information.

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(CONT.)

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR states that "it is *anticipated* that any future employees generated by the Project *could* be accommodated by existing residential communities and/or by *future residential uses to be constructed* in accordance with the General Plan Land Use Plan *or the general plans of cities within the County*, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees."

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The EIR does not provide any analysis regarding future employees for construction and operational phases of the project, such as demographics, regional location, etc. Relying on the workforce population of the entire Inland Empire region will also increase project related VMT. The EIR has not provided any evidence that the project's workforce population "*could* be accommodated by existing residential communities and/or by *future residential uses to be constructed* in accordance with the General Plan Land Use Plan *or the general plans of cities within the County*," or is qualified for or interested in work in the industrial sector to substantiate these claims.

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The EIR does not provide any information or analysis to support the conclusion that the project will not necessitate the construction of housing affordable to households earning 80% or less of the County's median income to accommodate Project-related employees. The EIR does not provide any information on the wages generated by the construction or operational jobs in the proposed project. MIT's Living Wage Research Center reports that the living wage for two adults with two children is \$38.02 per hour in Riverside County<sup>17</sup>. This is an annual salary of approximately \$79,000 while MIT reports based on BLS statistics that the average annual salary in Riverside County for the transportation and material moving sector is \$33,802. HCD's area median income (AMI) for a family of four people in Riverside County is \$77,500<sup>18</sup>. 80% of the Riverside County AMI is \$62,000 and the EIR has not demonstrated that the project's 10,256 operational employees will earn an annual salary of at least \$62,000. The EIR has not provided evidence that the project will pay wages above 80% of the Riverside County AMI and thus not generate a need for affordable housing. A revised EIR must be prepared which includes this information for analysis.

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<sup>17</sup> MIT Living Wage Research Center <https://livingwage.mit.edu/counties/06065>

<sup>18</sup> HCD 2021 Income Limits <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2021.pdf>

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SCAG’s Connect SoCal Demographics and Growth Forecast<sup>19</sup> notes that the County will add 63,500 jobs and 155,100 residents between 2016 - 2045. Based on the EIR’s calculation of 10,256 jobs, the project represents 16% of the County’s job growth and 6.6% of the population growth over 29 years. A single project accounting for this amount of the projected employment and/or population over 29 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects “in the pipeline” to determine if the project will exceed SCAG’s employment growth forecast or the County’s General Plan growth projections. Given that the project requires a General Plan Amendment and Specific Plan Amendment to proceed, it is clear that this growth was not planned for and will induce substantial unplanned population growth. Additionally, the EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis. A revised EIR must be prepared which includes this information for analysis.

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**4.18 Transportation**

Appendix L2: VMT Analysis “does not include heavy duty truck trips or freight, which is consistent with OPR direction and Riverside County VMT calculation guidelines.” However, the EIR does not provide a statutory source of exemption for medium/heavy trucks and/or freight. The EIR sources the OPR’s 2018 Technical Advisory<sup>20</sup> which states that “here, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks.” However, the purpose of the OPR Technical Advisory document is purely advisory, stating in its introduction:

“The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.”

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The OPR document is not a legal interpretation, court decision, or amendment to the CEQA statute that clarifies the definition of automobile. The term “automobile” is not defined in the CEQA statute and application of the OPR interpretation is speculative and does not provide an analysis of the “worst-case scenario” for environmental impacts. Widespread public understanding and perception indicates that trucks, including medium/heavy-duty trucks and freight trips associated with the industrial nature of warehouse operations, are automobiles. The EIR must be revised to

<sup>19</sup> SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579)

<sup>20</sup> Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA [https://opr.ca.gov/ceqa/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf)

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remove this misleading information and include all truck/freight activity for quantified VMT analysis. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/freight VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations. The project's truck/trailer /freight activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer/freight activity to adequately and accurately analyze the potentially significant project transportation impacts.

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**5.0 Other CEQA Considerations**

*5.3 Growth Inducing Impacts of the Project*

The EIR does not discuss or analyze the project's proposed General Plan Amendment, Specific Plan Amendment, or Zone Change anywhere in this section. This is misleading to the public and decision makers. The EIR must be revised to include the required GPA, SPA, and ZC for discussion and analysis and include a finding of significance as the project will contribute to growth that was not included as part of growth forecasts in Connect SoCal and/or the General Plan. The EIR must also include discussion for the precedence setting action that approval of the GPA, SPA, and ZC set for future land use changes in the area.

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The EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. For example, recent industrial projects within the County including the greater Knox Business Park (piecemealed projects known as Muranaka Warehouse, Diamond Warehouse, Knox Buildings A/C/D/E, and Knox Phase 5) will generate 3,492 employees and represents 5.49% of the County's job growth and 2.25% of the population growth from 2016 - 2045. Cumulatively, the proposed project plus the greater Knox Business Park alone represent 21.49% of the County's employment growth and 8.85% of its population growth over the 29 year period.

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Further, the EIR must be revised to discuss and analyze that implementation of the project will result in significant and unavoidable environmental impacts to Aesthetics (cumulatively considerable), Agriculture (cumulatively considerable), Air Quality (cumulatively considerable), Noise, and Transportation (VMT) (cumulatively considerable), with the project census tract and adjacent census tracts (all of which are designated as SB 535 Disadvantaged Communities) receiving the most significant impacts. Project implementation will result in growth that does not comply with the AQMP and will have additional environmental impacts that cannot be mitigated. These significant and irreversible environmental changes which caused by the project necessitate a finding of significance in this section.

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**6.0 Alternatives**

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The alternatives chosen for analysis include the CEQA required “No Project” alternative and only two others (Existing General Plan Alternative and Reduced Project Alternative). The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project’s significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the site with a project that reduces all of the proposed project’s significant and unavoidable impacts to less than significant levels.

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**Conclusion**

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

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Sincerely,

Gary Ho  
Blum Collins & Ho, LLP

Attachments:  
1. SWAPE Analysis



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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May 19, 2022

Gary Ho  
Blum Collins LLP  
707 Wilshire Blvd, Ste. 4880  
Los Angeles, CA 90017

**Subject: Comments on the Stoneridge Commerce Center Project (SCH No. 2020040325)**

Dear Mr. Ho,

We have reviewed the April 2022 Draft Environmental Impact Report (“DEIR”) for the Stoneridge Commerce Center Project (“Project”) located in the County of Riverside (“County”). The Project proposes to construct 8,461,530-square-feet (“SF”) of industrial space, 1,069,398-SF of business park space, and 121,968-SF of commercial retail space on the 582.6-acre site.

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Our review concludes that the DEIR fails to adequately evaluate the Project’s air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

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**Air Quality**

**Failure to Implement All Feasible Mitigation to Reduce Emissions**

The DEIR concludes that the Project’s blasting and operational emissions would be significant-and-unavoidable. Specifically, the DEIR concludes that the NO<sub>x</sub> and CO emissions associated with the blasting would exceed the applicable South Coast Air Quality Management District (“SCAQMD”) thresholds of 100- and 550-pounds per day (“lbs/day”), respectively (see excerpt below) (p. 4.3-24, Table 4.3-7).

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Table 4.3-7 Blasting Emissions

Rate of Blasting	Tons of Explosives Denotated Daily	Pollutant (pounds per day)				
		NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
20 Days	1.72	29.27	11.37	3.44	0.07	0.00
15 Days	2.30	39.03	153.83	4.59	0.19	0.01
10 Days	3.44	58.55	230.74	6.89	0.78	0.05
5 Days	6.89	117.09	461.48	13.78	8.83	0.51
3.5 Days	9.84	167.27	659.25	19.68	30.75	1.77

Source: AP-42 Compilation of Air Emissions Factors 1998; 1980. Refer to Attachment A to the Project's AQA (Technical Appendix B1) for Model Data Outputs.

Notes: Emission projections are based on varying time spans to blast 68,877 cubic yards of hard rock. The shorter the time span, the more explosives used daily. Emissions from loading and hauling the blasted material offsite are accounted for in Table 4.3-6, which includes emissions generated from 14 haul truck trips traveling 20 miles per trip each day over the course of three years and a maximum of 4 excavators, 6 dozers, and 8 tractor loaders operating 8 hours per day over the course of site preparation and grading activities. (ECORP, 2020b, Table 2-7)

Furthermore, the DEIR concludes that the ROG, NO<sub>x</sub>, and CO emissions associated with the Project operation would also exceed the applicable SCAQMD thresholds of 55-, 55-, and 550-lbs/day (see excerpt below) (p. 4.3-29, Table 4.3-9).

Table 4.3-9 Primary Land Use Plan Operational-Related Emissions (Regional Thresholds)

Emission Source	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	66.57	0.00	0.98	0.00	0.00	0.00
Energy	3.96	32.39	27.20	0.19	2.46	2.46
Mobile						
Passenger Vehicles	87.93	175.10	1,121.14	1.79	32.06	14.62
Heavy-Duty Trucks	2.10	929.71	854.31	4.47	52.78	23.06
Mobile Source Total	90.03	1,104.81	1,975.45	6.26	84.84	37.68
<b>Total:</b>	<b>159.56</b>	<b>1,137.20</b>	<b>2,003.63</b>	<b>6.48</b>	<b>87.30</b>	<b>40.14</b>
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceed SCAQMD Regional Threshold?	Yes	Yes	Yes	No	No	No

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment A to the Project's AQA (Technical Appendix B1) for Model Data Outputs.

Notes: Emissions projections account for a trip generation rate and fleet mix identified by the Project's TIA. Specifically, the Project's TIA estimates the generation of 23,894 average vehicle trips daily, 3,916 of which would be heavy-duty trucks, under the Primary Land Use Plan. Heavy-duty trucks are a weighted average of Medium-heavy duty trucks and Heavy-heavy duty trucks as identified by the Project Traffic Assessment. The average trip length is calculated at 53.9 miles, which represents the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles. Operational emissions taken from the season (summer or winter) with the highest output. (ECORP, 2020b, Table 2-9)

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(CONT.)

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As a result, the DEIR concludes that the Project’s operational criteria air pollutant emissions would be significant-and-unavoidable (p. 4.3-28). However, while we agree that the Project’s criteria air pollutant emissions would result in a significant air quality impact, the DEIR’s conclusion that these impacts are “significant and unavoidable” is incorrect. According to CEQA Guidelines § 15096(g)(2):

“When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment.”

As stated above, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. Here, while the DEIR includes Mitigation Measure (“MM”) 4.3-1 through MM 4.3-7, as well as City Regulations & Design Requirements (“CRDR”) 4.3-1 through CRDR 4.3-4, the DEIR fails to implement *all* feasible mitigation (p. S-12 – S-20). Therefore, the DEIR’s conclusion that the Project’s air quality impacts are significant-and-unavoidable is unsubstantiated. To reduce the Project’s air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions.” Thus, the Project should not be approved until an updated EIR is prepared, incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

**Unsubstantiated Input Parameters Used to Estimate Project Emissions**

The DEIR’s air quality analysis relies on emissions calculated with California Emissions Estimator Model (“CalEEMod”) Version 2016.3.2 (p. 4.3-18).<sup>1</sup> CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project’s construction and operational emissions are calculated, and “output files” are generated. These output files disclose to the reader what parameters are utilized in calculating the Project’s air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

When reviewing the Project’s CalEEMod output files, provided in the Air Quality & Greenhouse Gas Assessment (“AQ & GHG Assessment”) as Appendix B1 to the DEIR, we found that several model inputs are not consistent with information disclosed in the DEIR. As a result, the Project’s construction and operational emissions may be underestimated. An updated EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

<sup>1</sup> “CalEEMod Version 2016.3.2.” California Air Pollution Control Officers Association (CAPCOA), November 2017, available at: <http://www.aqmd.gov/caleemod/archive/download-version-2016-3-2>.

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*Failure to Substantiate Amount of Cold Storage*

Review of the CalEEMod output files demonstrates that the “Stoneridge Commerce Center - Primary Land Use Plan” model includes 1,695,355.2-SF of refrigerated warehouse space and 6,361,502.4-SF<sup>2</sup> of unrefrigerated warehouse space (see excerpt below) (Appendix B1, pp. 105, 169, 593).

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area
Refrigerated Warehouse-No Rail	1,695.36	1000sqft	77.84	1,695,355.20
Unrefrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60
Unrefrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60
Manufacturing	847.68	1000sqft	38.92	847,677.60
Unrefrigerated Warehouse-No Rail	427.76	1000sqft	19.64	427,759.20
Industrial Park	641.84	1000sqft	29.46	641,838.80
Free-Standing Discount Superstore	100.00	1000sqft	6.56	100,000.00
Strip Mall	21.97	1000sqft	1.44	21,968.00
Other Asphalt Surfaces	37.30	Acre	37.30	1,624,788.00
Other Non-Asphalt Surfaces	31.40	Acre	31.40	1,367,784.00

Furthermore, review of the CalEEMod output files demonstrates that the “Stoneridge Commerce Center - Alternative Land Use Plan” model includes 1,695,360-SF of refrigerated warehouse space and 6,281,360-SF<sup>3</sup> of unrefrigerated warehouse space (see excerpt below) (Appendix B1, pp. 241, 304, 669593).

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area
Industrial Park	641.84	1000sqft	29.46	641,838.80
Manufacturing	847.68	1000sqft	38.92	847,680.00
Refrigerated Warehouse-No Rail	1,695.36	1000sqft	77.84	1,695,360.00
Unrefrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,870.00
Unrefrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,870.00
Unrefrigerated Warehouse-No Rail	374.62	1000sqft	20.60	374,620.00
Other Asphalt Surfaces	34.40	Acre	34.40	1,498,464.00
Other Non-Asphalt Surfaces	31.40	Acre	31.40	1,367,784.00
Free-Standing Discount Superstore	100.00	1000sqft	6.72	100,000.00
Strip Mall	26.54	1000sqft	1.78	26,540.00

As you can see in the excerpts above, the models include only a portion of the proposed warehouse space as refrigerated. However, this is unsubstantiated. Regarding the amount of cold storage for the proposed warehouse, the DEIR states:

“For purposes of analysis within this Subsection, Light Industrial building area is assumed to consist of approximately 20% high-cube cold storage uses, 35% high-cube fulfillment center uses, 35% high-cube warehouse uses, and 10% manufacturing uses” (p. 3-10).

However, the assumption that only 20% of the light industrial building area would be used for cold storage is unsupported for two reasons.

<sup>2</sup> Calculated: 2,966,871.6-SF + 2,966,871.6-SF + 427,759.2-SF = 6,361,502.4-SF.

<sup>3</sup> Calculated: 2,966,870-SF + 2,966,870-SF + 374,620-SF = 6,281,360-SF.

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First, as the DEIR and associated documents fail to provide an adequate source or explanation for this assumption, we cannot verify that 20% is an accurate representation of the expected land uses. As such, in order to conduct the most conservative analysis, the models should have accounted for the potential cold storage requirements for all 8,056,857.6-SF of warehouse space.

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(CONT.)

Second, the DEIR indicates that the future tenants of the proposed warehouses are currently unknown. Specifically, the DEIR states:

“At the time this EIR was prepared, the future users of the Stoneridge Commerce center buildings were unknown” (p. 3-26).

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Thus, the future tenants of the proposed warehouse buildings may require additional cold storage. Therefore, as refrigerated warehouse space is the most energy-intensive, the Project should have included all of the proposed warehouse space as cold storage in order to conduct the most conservative analysis.

This inadequacy presents an issue, as refrigerated warehouses release more criteria air pollutant and GHG emissions when compared to unrefrigerated warehouses for three reasons. First, warehouses equipped with cold storage, such as refrigerators and freezers, are known to consume more energy when compared to warehouses without cold storage.<sup>4</sup> Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer when compared to unrefrigerated hauling trucks.<sup>5</sup> Lastly, according to a July 2014 *Warehouse Truck Trip Study Data Results and Usage* presentation prepared by the SCAQMD, hauling trucks that require refrigeration result in greater truck trip rates when compared to non-refrigerated hauling trucks.<sup>6</sup> Furthermore, as discussed by SCAQMD, “CEQA requires the use of ‘conservative analysis’ to afford ‘fullest possible protection of the environment.’”<sup>7</sup> As such, the models should have included all proposed warehouse space as refrigerated in order account for the additional emissions that refrigeration requirements may generate.

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By failing to account for all potential cold storage requirements, the models may underestimate the Project’s operational emissions and should not be relied upon to determine Project significance. An updated EIR should be prepared to specify the square footage of required refrigerated space, or account for the possibility of additional refrigerated warehouse needs by all future tenants.

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<sup>4</sup> “Warehouses.” Business Energy Advisor, available at: <https://ouc.bizenergyadvisor.com/article/warehouses>.

<sup>5</sup> “Estimation of Fuel Use by Idling Commercial Trucks.” Transportation Research Record Journal of the Transportation Research Board, January 6 p. 8, available at: [https://www.researchgate.net/publication/245561735\\_Estimation\\_of\\_Fuel\\_Use\\_by\\_Idling\\_Commercial\\_Trucks](https://www.researchgate.net/publication/245561735_Estimation_of_Fuel_Use_by_Idling_Commercial_Trucks).

<sup>6</sup> “Warehouse Truck Trip Study Data Results and Usage” Presentation. SCAQMD Mobile Source Committee, July 2014, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymc072514.pdf?sfvrsn=2>, p. 7, 9

<sup>7</sup> “Warehouse Truck Trip Study Data Results and Usage” Presentation. SCAQMD Inland Empire Logistics Council, June 2014, available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc\\_6-19-2014.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc_6-19-2014.pdf?sfvrsn=2).

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*Unsubstantiated Changes to Individual Construction Phase Lengths*

Review of the CalEEMod output files demonstrates that the “Stoneridge Commerce Center - Primary Land Use Plan” and “Stoneridge Commerce Center - Alternative Land Use Plan” models include several changes to the default individual construction phase lengths (see excerpt below) (Appendix B1, pp. 107, 171, 243, 306, 595, 671).

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	660.00	1,473.00
tblConstructionPhase	NumDays	9,300.00	1,473.00
tblConstructionPhase	NumDays	930.00	465.00
tblConstructionPhase	NumDays	660.00	1,473.00
tblConstructionPhase	NumDays	360.00	180.00

As a result of these changes, the models include the following construction schedule (see excerpt below) (Appendix B1, pp. 114, 178, 249, 312, 604, 679):

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days
1	Site Preparation	Site Preparation	7/1/2021	3/9/2022	5	180
2	Grading	Grading	3/10/2022	12/20/2023	5	465
3	Building Construction	Building Construction	3/22/2024	11/13/2029	5	1473
4	Paving	Paving	3/22/2024	11/13/2029	5	1473
5	Architectural Coating	Architectural Coating	3/22/2024	11/13/2029	5	1473

As you can see from the excerpts above, the site preparation phase is decreased by 50%, from the default value of 360 to 180 days; the grading phase is decreased by 50%, from the default value of 930 to 465 days; the building construction phase is decreased by 84%, from the default value of 9,300 to 1,473 days; and the paving and architectural coating phases are increased by 123%, from their default values of 660 to 1,473 days. As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.<sup>8</sup> According to the “User Entered Comments & Non-Default Data” table, the justification provided for these changes is:

“Construction timing adjusted to reflect a 2021 start date and 2030 Opening Year. Building construction, paving, and painting assumed to occur simultaneously” (Appendix B1, pp. 106, 170, 242, 305, 594, 670).

Furthermore, regarding the anticipated construction schedule for the Primary Land Use Plan, the DEIR states:

<sup>8</sup> “CalEEMod User’s Guide Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.



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“The Primary Land Use Plan consists of various light industrial, business park, and commercial uses as specified in EIR Subsection 3.0 which would be constructed within a 100-month period” (p. 4.6-13).

Furthermore, regarding the anticipated construction schedule for the Alternative Land Use Plan, the DEIR states:

“The Alternative Land Use Plan consist of various light industrial, business park, and commercial uses as specified in EIR Subsection 3.0 which would be constructed within a 100-month period” (p. 4.6-20).

However, while the DEIR indicates an overall construction duration of 100 months for both the Primary and Alternative Land Use Plans, the DEIR fails to mention or justify the individual construction phase lengths. This is incorrect, as according to the CalEEMod User’s Guide:

“CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA.”<sup>9</sup>

Here, as the DEIR only justifies the total construction duration of 100 months, the DEIR fails to provide substantial evidence to support the revised individual construction phase lengths. As such, we cannot verify the changes.

These unsubstantiated changes present an issue, as the construction emissions are improperly spread out over a longer period of time for some phases, but not for others. According to the CalEEMod User’s Guide, each construction phase is associated with different emissions activities (see excerpt below).<sup>10</sup>

Demolition involves removing buildings or structures.

Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.

Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.

Building Construction involves the construction of the foundation, structures and buildings.

Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

Paving involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.

<sup>9</sup> “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user-s-guide>, p. 13-14.

<sup>10</sup> “CalEEMod User’s Guide.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user-s-guide>, p. 32.

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Thus, by disproportionately altering and extending some of the individual construction phase lengths without proper justification, the models assume there are a greater number of days to complete the construction activities required by the prolonged phases. As such, there will be less construction activities required per day and, consequently, less pollutants emitted per day. As a result, the models may underestimate the peak daily emissions associated with some phases of construction and should not be relied upon to determine Project significance.

*Unsubstantiated Reductions to Worker and Vendor Trip Numbers*

Review of the CalEEMod output files demonstrates that the “Stoneridge Commerce Center - Primary Land Use Plan” and “Stoneridge Commerce Center - Alternative Land Use Plan” models include several changes to the default worker and vendor trip numbers (see excerpt below) (Appendix B1, pp. 109, 173, 597, 244-245, 307-308, 672-673).

*Stoneridge Commerce Center - Primary Land Use Plan*

Table Name	Column Name	Default Value	New Value
tblTripsAndVMT	Vendor TripNumber	2,075.00	180.00
tblTripsAndVMT	Worker TripNumber	5,305.00	257.00
tblTripsAndVMT	Worker TripNumber	1,061.00	30.00

*Stoneridge Commerce Center - Alternative Land Use Plan*

Table Name	Column Name	Default Value	New Value
tblTripsAndVMT	Vendor TripNumber	2,033.00	178.00
tblTripsAndVMT	Worker TripNumber	35.00	18.00
tblTripsAndVMT	Worker TripNumber	40.00	20.00
tblTripsAndVMT	Worker TripNumber	5,198.00	253.00
tblTripsAndVMT	Worker TripNumber	30.00	15.00
tblTripsAndVMT	Worker TripNumber	1,040.00	15.00

As you can see in the excerpt above, the worker and vendor trip numbers are reduced in the models. As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.<sup>11</sup> According to the “User Entered Comments & Non-Default Data” table, the justification provided for these changes is:

“Building Construction worker & vendor trips reflect total building s.f. divided by the number of days of construction, coupled with the rates for commercial buildings in the CalEEMod User’s Guide, Appendix E. Painting worker trips equate to paving” (Appendix B1, pp. 106, 170, 242, 305, 594, 670).

However, this justification is insufficient. Regarding the number of worker and vendor trips included in the model, the DEIR states:

<sup>11</sup> “CalEEMod User’s Guide Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.

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“Construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on information from CalEEMod defaults” (p. 4.6-12).

As demonstrated above, the DEIR indicates that the worker and vendor trip numbers are based on CalEEMod default values. Thus, the model is inconsistent with the information provided in the DEIR and the revised worker and vendor trip numbers are underestimated.

These underestimations present an issue, as CalEEMod uses the worker and vendor trip numbers to estimate the construction-related emissions associated with on-road vehicles.<sup>12</sup> Thus, by including several unsubstantiated reductions to the default worker and vendor trip numbers, the models underestimate the Project’s mobile-source construction-related emissions and should not be relied upon to determine Project significance.

*Incorrect Application of Energy-Related Operational Mitigation Measure*

Review of the CalEEMod output files demonstrates that the “Stoneridge Commerce Center - Primary Land Use Plan” and “Stoneridge Commerce Center - Alternative Land Use Plan” models include the following energy-related operational mitigation measure (see excerpt below) (Appendix B1, pp. 162, 226, 297, 360, 652, 727):

**5.1 Mitigation Measures Energy**

**Exceed Title 24**

As previously mentioned, the CalEEMod User’s Guide requires any changes to model defaults be justified.<sup>13</sup> According to the “User Entered Comments & Non-Default Data” table, the justification provided for the inclusion of the energy-related operational mitigation measure is:

“Energy use reflects 2019 Title 24 Standards. Increase of efficiency per CEC 2019 Building Energy Efficiency Standards Frequently Asked Questions (2018)” (Appendix B1, pp. 106, 170, 242, 305, 594, 670).

Furthermore, regarding Project compliance with Title 24, the DEIR states:

“The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020, and the Project would be subject to all applicable Title 24 requirements. The Project would not cause or result in the need for additional energy producing facilities or energy delivery systems and would reduce mobile based fossil fuel reliance. As such, the Project would not conflict with or obstruct implementation of the 2019 Title 24 standards.” (p. 4.6-27).

<sup>12</sup> “CalEEMod User’s Guide Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 35.

<sup>13</sup> “CalEEMod User’s Guide Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.aqmd.gov/caleemod/user's-guide>, p. 1, 14.

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However, the inclusion of the above-mentioned energy-related operational mitigation measure is unsupported, as the DEIR fails to demonstrate that the Project intends to *exceed* Title 24 standards. According to the CalEEMod User’s Guide, the “Exceed Title 24” mitigation measure corresponds with CAPCOA’s Mitigation Measure BE-1.<sup>14</sup> Furthermore, CAPCOA indicates that buildings must exceed Title 24 Building Envelope Energy Efficiency Standards by a specific percentage to be consistent with the BE-1 mitigation strategy (see excerpt below).<sup>15</sup>

Energy						
Category	Measure Number	Strategy	BMP	Grouped With #	Range of Effectiveness	
					Percent Reduction in GHG Emissions	Basis
Building Energy Use	BE-1	Buildings exceed Title 24 Building Envelope Energy Efficiency Standards by X% (X is equal to the percentage improvement selected for the project)			For a 10% improvement over 2008 Title 24: Non-Residential electricity use: 0.2-5.5%; natural gas use: 0.7-10% Residential electricity use: 0.3-2.6%; natural gas use: 7.5-9.1%	
	BE-2	Install Programmable Thermostat Timers	X		BMP	
	BE-3	Obtain Third-party HVAC Commissioning and Verification of Energy Savings	X	BE-1	BMP	
	BE-4	Install Energy Efficient Appliances			Residential building: 2-4% Grocery Stores: 17-22%	Appliance Electricity Use
	BE-5	Install Energy Efficient Boilers			1.2-18.4%	Fuel Use

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Thus, as the DEIR fails to require the Project to *exceed* Title 24 Standards, this measure is not applicable to the proposed Project. By incorrectly including an energy-related operational mitigation measure, the models underestimate the Project’s operational emissions and should not be relied upon to determine Project significance.

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**Updated Analysis Indicates a Potentially Significant Air Quality Impact**

In an effort to more accurately estimate the Project’s construction-related and operational emissions, we prepared an updated CalEEMod model, using the Project-specific information provided by the DEIR. In our updated model, we included the correct amount of cold storage; omitted the unsubstantiated changes to the worker and vendor trip numbers; proportionately altered the individual construction phase lengths to match the proposed construction duration of 100 months; and excluded the incorrect energy-related operational mitigation measure.<sup>16</sup>

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<sup>14</sup> “CalEEMod User’s Guide Version 2020.4.0.” California Air Pollution Control Officers Association (CAPCOA), May 2021, available at: <https://www.agmd.gov/caleemod/user's-guide>, p. 58-59.

<sup>15</sup> “Quantifying Greenhouse Gas Mitigation Measures.” California Air Pollution Control Officers Association (CAPCOA), August 2010, available at: <http://www.agmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>, p. 64, Table 6-1.

<sup>16</sup> See Attachment B for updated air modeling.

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Our updated analysis estimates that the Project’s construction-related ROG and NO<sub>x</sub> emissions exceed the applicable SCAQMD thresholds of 55- and 100-lbs/day, respectively, as referenced by the DEIR (p. 4.3-17, Table 4.3-5) (see table below).<sup>17</sup>

SWAPE Criteria Air Pollutant Emissions		
Construction	ROG (lbs/day)	NO <sub>x</sub> (lbs/day)
DEIR	65.6	66.1
SWAPE	750.8	221.1
% Increase	1045%	234%
SCAQMD Threshold	<b>55</b>	<b>100</b>
Exceeds?	<b>Yes</b>	<b>Yes</b>

As you can see in the table above, construction-related ROG and NO<sub>x</sub> emissions, as estimated by SWAPE, increase by approximately 1045% and 234%, respectively, and exceed the applicable SCAQMD significance thresholds. Thus, our updated model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the DEIR. As a result, an updated EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

**Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities**

Upon review of the DEIR, we have determined that the development of the proposed Project would result in disproportionate health risk impacts on community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD:

“Those living within a half mile of warehouses are more likely to include communities of color, have health impacts such as higher rates of asthma and heart attacks, and a greater environmental burden.”<sup>18</sup>

In particular, the SCAQMD found that more than 2.4 million people live within a half mile radius of at least one warehouse, and that those areas not only experience increased rates of asthma and heart attacks, but are also disproportionately Black and Latino communities below the poverty line.<sup>19</sup> Another study similarly indicates that “neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing

<sup>17</sup> “South Coast AQMD Air Quality Significance Thresholds.” SCAQMD, April 2019, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.  
<sup>18</sup> “South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule.” SCAQMD, May 2021, available at: <http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9>.  
<sup>19</sup> “Southern California warehouse boom a huge source of pollution. Regulators are fighting back.” Los Angeles Times, May 2021, available at: <https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution>.

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facilities.”<sup>20</sup> Additionally, a report authored by the Inland Empire-based People’s Collective for Environmental Justice and University of Redlands states:

“As the warehouse and logistics industry continues to grow and net exponential profits at record rates, more warehouse projects are being approved and constructed in low-income communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxide and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas ‘diesel death zones.’”<sup>21</sup>

It is evident that the continued development of industrial warehouses within these communities poses a significant environmental justice challenge. However, the acceleration of warehouse development is only increasing despite the consequences on public health. The Inland Empire alone is adding 10 to 25 million SF of new industrial space each year.<sup>22</sup>

Riverside County, the setting of the proposed Project, has long borne a disproportionately high pollution burden compared to the rest of California. This year the County has faced some of the worst ozone pollution in California, as it has seen the second highest recorded Air Quality Index (“AQI”) values for ground-level ozone in the state.<sup>23</sup> The U.S. Environmental Protection Agency (“EPA”) indicates that ozone, the main ingredient in “smog,” can cause several health problems, which includes aggravating lung diseases and increasing the frequency of asthma attacks. The U.S. EPA states:

“Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure. Children are also more likely than adults to have asthma.”<sup>24</sup>

Furthermore, regarding the increased sensitivity of early-life exposures to inhaled pollutants, the California Air Resources Board (“CARB”) states:

“Children are often at greater risk from inhaled pollutants, due to the following reasons:

<sup>20</sup> “Location of warehouses and environmental justice: Evidence from four metros in California.” MetroFreight Center of Excellence, January 2018, available at: [https://www.metrotrans.org/assets/research/MF%201.1g\\_Location%20of%20warehouses%20and%20environmental%20justice\\_Final%20Report\\_021618.pdf](https://www.metrotrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf), p. 21.

<sup>21</sup> “Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry’s impacts on environmental justice communities across Southern California.” People’s Collective for Environmental Justice, April 2021, available at: [https://earthjustice.org/sites/default/files/files/warehouse\\_research\\_report\\_4.15.2021.pdf](https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf), p. 4.

<sup>22</sup> “2020 North America Industrial Big Box Review & Outlook.” CBRE, 2020, available at: <https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf>, p. 2.

<sup>23</sup> “High Ozone Days.” American Lung Association, 2022, available at: <https://www.lung.org/research/sota/city-rankings/states/california>.

<sup>24</sup> “Health Effects of Ozone Pollution.” U.S. EPA, May 2021, available at: <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>.

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- Children have unique activity patterns and behavior. For example, they crawl and play on the ground, amidst dirt and dust that may carry a wide variety of toxicants. They often put their hands, toys, and other items into their mouths, ingesting harmful substances. Compared to adults, children typically spend more time outdoors and are more physically active. Time outdoors coupled with faster breathing during exercise increases children’s relative exposure to air pollution.
- Children are physiologically unique. Relative to body size, children eat, breathe, and drink more than adults, and their natural biological defenses are less developed. The protective barrier surrounding the brain is not fully developed, and children’s nasal passages aren’t as effective at filtering out pollutants. Developing lungs, immune, and metabolic systems are also at risk.
- Children are particularly susceptible during development. Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development.”<sup>25</sup>

A Stanford-led study also reveals that children exposed to high levels of air pollution are more susceptible to respiratory and cardiovascular diseases in adulthood.<sup>26</sup> Thus, given children’s higher propensity to succumb to the negative health impacts of air pollutants, and as warehouses release more smog-forming pollution than any other sector, it is necessary to evaluate the specific health risk that warehouses pose to children in the nearby community.

According to the above-mentioned study by the People’s Collective for Environmental Justice and University of Redlands, there are 640 schools in the South Coast Air Basin that are located within half a mile of a large warehouse, most of them in socio-economically disadvantaged areas.<sup>27</sup> Regarding the proposed Project itself, the DEIR states that the Project is located near a residential community and two schools:

“The nearest existing noise-sensitive land uses to the Project site are Lakeside Middle School and Sierra Vista Elementary School, with a residential development beyond, located adjacent to the northwestern corner of the Project site traversing the Ramona Expressway. Lakeside Middle School is located closest to the Project site boundary approximately 2,000 feet (0.4 mile) to the west. The installation of the proposed offsite water line would occur directly adjacent to these land uses. (ECORP, 2020c, p. 13)

<sup>25</sup> “Children and Air Pollution.” California Air Resources Board (CARB), available at: <https://ww2.arb.ca.gov/resources/documents/children-and-air-pollution>.

<sup>26</sup> “Air pollution puts children at higher risk of disease in adulthood, according to Stanford researchers and others.” Stanford, February 2021, available at: <https://news.stanford.edu/2021/02/22/air-pollution-impacts-childrens-health/>.

<sup>27</sup> “Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry’s impacts on environmental justice communities across Southern California.” People’s Collective for Environmental Justice, April 2021, available at: [https://earthjustice.org/sites/default/files/files/warehouse\\_research\\_report\\_4.15.2021.pdf](https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf), p. 4.

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It is also noted that while not currently constructed, the approved McCanna Hills Specific Plan is located directly adjacent to the Project’s western boundary. Once built-out, commercial and residential land uses would exist on what is currently vacant land adjacent to the Project’s western boundary. (ECORP, 2020c, p. 13)” (p. 2-5).

As stated above, one elementary and one middle school are located within the Project’s vicinity. This poses a significant threat because, as outlined above, children are a vulnerable population that are more susceptible to the damaging side effects of air pollution. As such, the Project would have detrimental short-term and long-term health impacts on local children if approved. An updated EIR should be prepared to evaluate the disproportionate impacts of the proposed warehouse on the community adjacent to the Project, including an analysis of the impact on children and people of color who live and attend school in the surrounding area.

**Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated**

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and mobile-source operational health risk assessment (“HRA”). Specifically, the DEIR estimates that the maximum cancer risk posed to nearby, planned residential sensitive receptors associated with haul truck trip traffic along the Primary Truck Route during Project construction would be 5.12 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (p. 4.3-34, Table 4.3-12).

**Table 4.3-12 Maximum Cancer Risk for Project Construction – Primary Truck Route**

Exposure Scenario	Location	Maximum Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds SCAQMD Significance Threshold?
Construction – Highest Concentration	Just west of the northwestern boundary of the site, vacant land approved for residential land uses	5.12	10	No
Construction	Lakeside Middle School	1.06	10	No
Construction	Sierra Vista Elementary School	1.07	10	No
Construction	Neighborhoods to Southeast	0.58	10	No
Construction	Neighborhoods to South	0.56	10	No
Construction	Neighborhoods to West	0.38	10	No
Construction	Triple Crown Elementary	0.38	10	No
Construction	Avion Elementary	0.48	10	No
Construction	Neighborhoods to East	0.54	10	No

(ECORP, 2020b, Table 2-12)

Furthermore, the DEIR estimates that the maximum cancer risk posed to nearby, planned residential sensitive receptors associated with heavy-duty trucks operating under the Primary Land Use Plan and Primary Truck Route would be 8.86 in one million, which also would not exceed the SCAQMD significance threshold of 10 in one million (p. 4.3-40, Table 4.3-15).

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Table 4.3-15 Maximum Operational Cancer Risk – Primary Land Use Plan/Primary Truck Route

Exposure Scenario	Maximum Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds SCAQMD Significance Threshold?
<b>Highest Concentration Planned McCanna Hills Development to West (Residences and/or Open Space)</b>			
70-Year Exposure	9.81	10	No
30-Year Exposure	8.86	10	No
9-Year Exposure	6.33	10	No

However, the DEIR’s evaluation of the Project’s potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons.

First, the DEIR’s construction HRA is incorrect, as it relies upon a PM<sub>10</sub> estimate from a flawed air model. Specifically, the DEIR states:

“Construction equipment emissions were estimated using emission factors for exhaust fine particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and exhaust coarse particulate matter spanning between 2.5 and 10 microns in diameter (PM<sub>10</sub>) combined, as generated by the CARB-approved CalEEMod, version 2016.3.2” (p. 4.3-33)

As previously discussed, when we reviewed the Project’s CalEEMod output files, provided in the AQ & GHG Assessment as Appendix B1 to the DEIR, we found that several of the values inputted into the model are not consistent with information disclosed in the DEIR. As a result, the HRA utilizes an underestimated diesel particulate matter (“DPM”) concentration to calculate the health risk associated with Project construction. As such, the DEIR’s construction HRA and resulting cancer risk should not be relied upon to determine Project significance.

Second, while the DEIR includes two HRAs evaluating the health risk impacts to nearby, existing receptors as a result of Project construction and operation, the DEIR fails to evaluate the combined lifetime cancer risk to nearby receptors as a result of Project construction and operation together. According to OEHHA guidance, “the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location.”<sup>28</sup> However, the DEIR fails to sum the total cancer risks in order to evaluate the combined cancer risk over the course of the Project’s total construction and operation. This is incorrect and, as such, an updated analysis should quantify and sum the Project’s construction and operational health risks and to compare to the SCAQMD threshold of 10 in one million, as referenced by the DEIR (p. 4.3-34, Table 4.3-12; p. 4.3-40, Table 4.3-15).

**Failure to Identify a Potentially Significant Health Risk Impact**

As previously described, the DEIR estimates that the maximum incremental cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation would be 5.12 and 8.86 in one million, respectively, neither of which individually exceed the SCAQMD significance threshold of 10 in one million (p. 4.3-34, Table 4.3-12; p. 4.3-40, Table 4.3-15). However, as previously discussed, the DEIR should have evaluated the *combined* cancer risk of Project construction and operation. In order to

<sup>28</sup> “Guidance Manual for preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf> p. 8-4

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correctly evaluate the Project’s health risk impact, we summed the DEIR’s construction-related and operational cancer risk estimates and found that the resulting cancer risk exceeds the SCAQMD threshold of 10 in one million (see table below).

<b>DEIR Cumulative Cancer Risk</b>	
<b>HRA</b>	<b>Cancer Risk</b> (in one million)
Construction	5.12
Operation	8.86
<b>Total</b>	<b>13.98</b>
<b>SCAQMD Threshold</b>	<b>10</b>
<i>Exceeds?</i>	<b>Yes</b>

As demonstrated in the table above, the resulting combined cancer risk estimate exceeds the SCAQMD threshold of 10 in one million, thus indicating a potentially significant health risk impact not previously identified or addressed by the DEIR. As such, the DEIR is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. According to CEQA Guidelines § 15096(g)(2):

“When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment.”

As you can see, the proposed Project should not be approved until all feasible mitigation has been considered and incorporated where feasible, such as those suggested in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions.” As such, the DEIR fails to identify and adequately mitigate the Project’s significant health risk impact, and the less-than-significant impact conclusion should not be relied upon.

**Greenhouse Gas**

**Failure to Adequately Evaluate Greenhouse Gas Impacts**

The DEIR concludes that implementation of the Primary Land Use Plan would result in net annual greenhouse gas (“GHG”) emissions of 179,382 metric tons of carbon dioxide equivalents per year (“MT CO<sub>2</sub>e/year”) (see excerpt below) (p. 4.8-25, Table 4.8-4).





Table 4.8-4 Primary Land Use Plan Operational-Related Greenhouse Gas Emissions

Emissions Source	CO <sub>2</sub> e (Metric Tons/ Year)
Construction Emissions (amortized over the 30-year life of the Project)	522
Area Source Emissions	0
Energy Source Emissions	28,570
Mobile Source Emissions	
<i>Passenger Vehicles</i>	36,709
<i>Heavy-Duty Trucks</i>	107,057
Mobile Source Total	143,766
Solid Waste Emissions	4,965
Water Emissions	1,559
<b>Total Emissions</b>	<b>179,382</b>

Source: CalEEMod version 2016.3.2; EMFAC2017. Refer to Attachment D to the Project's AQA (*Technical Appendix B*) for Model Data Outputs.

As a result, the DEIR concludes that the Project's GHG emissions would exceed the City's significance threshold of 3,000 MT CO<sub>2</sub>e/year (p. 4.8-26). According to the DEIR:

"The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO<sub>2</sub>e/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO<sub>2</sub>e/yr will be required to quantify and disclose the anticipated GHG, then either: 1) demonstrate how the project would reduce GHG emissions to levels below 3,000 MTCO<sub>2</sub>e/yr through project design features and/or mitigation measures; or 2) garner 100 points through the CAP Screening Tables. As shown on Table 4.8-4 and Table 4.8-5, both the Primary Land Use Plan and Alternative Land Use Plan would result in substantially more GHG emissions than the County's screening threshold of 3,000 MTCO<sub>2</sub>e/yr. As such, prior to mitigation, the Project's impacts due to GHG emissions would be significant on a cumulatively-considerable basis, and mitigation requiring future developments to achieve 100 points per the CAP Screening Tables is required. (ECORP, 2020b, pp. 90-91)" (p. 4.8-26).

Thus, the DEIR incorporates Mitigation Measure ("MM") 4.8-1 and MM 4.8-2 and concludes that the Project's GHG emissions would be less-than-significant, stating:

"Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, with implementation of Mitigation Measure MM 4.8-1, the Project would be fully consistent with the CAP Update and the Project's cumulatively-

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considerable impacts due to GHG emissions would be reduced to less-than-significant levels” (p. 4.6-22).

However, the DEIR’s GHG analysis, as well as the subsequent significant-and-unavoidable impact conclusion, is incorrect for two reasons.

First, while the DEIR incorporates MM GHG-1, the DEIR fails to incorporate each reduction measure as a formal mitigation measure. Furthermore, the DEIR fails to consider any of the Screening Table Measures that could be implemented on the Project site to achieve 100 points. This is incorrect, as according to the Association of Environmental Professionals’ (“AEP”) *CEQA Portal Topic Paper on Mitigation Measures*:

“While not ‘mitigation’, a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact.”<sup>29</sup>

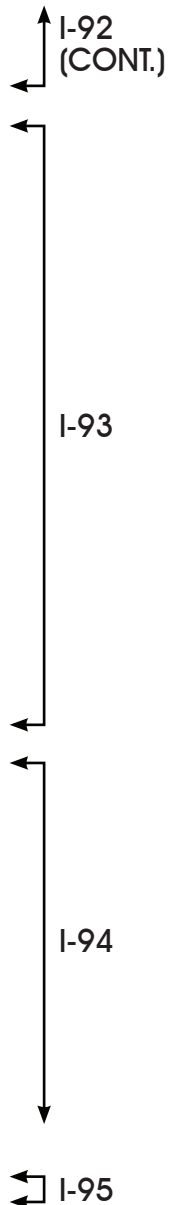
As demonstrated above, design features that are not formally included as mitigation measures may be eliminated from the Project’s design altogether. Thus, as the specific reduction features utilized to garner 100 points are not formally included as mitigation measures, or even discussed, in the DEIR, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. As such, until the specific reduction measures are identified and included as mitigation measures, the Project’s GHG analysis should not be relied upon to determine Project significance.

Second, MM 4.8-2 is insufficient. According to the DEIR:

“The CAP Update also includes measure R2-CE1, which requires on-site renewable energy production. This measure is required for any tentative tract map, plot plan, or conditional use permit that proposes to add more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent (%) of energy demand for commercial, office, industrial or manufacturing development” (p. 4.8-35).

As the Project proposes to include significantly more than 100,000-SF of commercial, office, industrial, or manufacturing development, the proposed land uses should be required to incorporate on-site renewable energy. However, MM 4.8-2 only pertains to *future* developments. Specifically, MM 4.8-2 states:

<sup>29</sup> “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.





“Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, and in accordance with measure R2-CE1 of the County’s Climate Action Plan (CAP) Update, *future* implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development” (p. S-37).

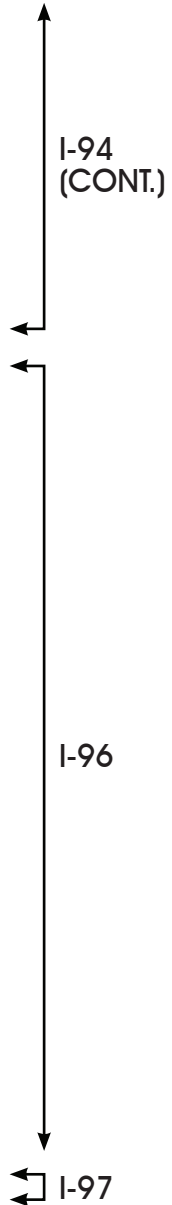
As a result, until the mitigation language used in the DEIR is altered to clarify and explicitly require all proposed land uses to incorporate on-site renewable energy, the DEIR’s GHG analysis should not be relied upon to determine Project significance.

**Feasible Mitigation Measures Available to Reduce Emissions**

The DEIR’s analysis demonstrates that the Project would result in a potentially significant air quality, health risk, and GHG impact that should be mitigated further. In an effort to reduce the Project’s emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the Department of Justice Warehouse Project Best Practices document.<sup>30</sup> Therefore, to reduce the Project’s emissions, consideration of the following measures should be made:

- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.

<sup>30</sup> “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” State of California Department of Justice.





- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building’s projected energy needs.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An updated EIR should be prepared to include all feasible mitigation measures, as well as include an updated GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The updated EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project’s significant emissions are reduced to the maximum extent possible.

**Disclaimer**

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

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Sincerely,

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

Paul E. Rosenfeld, Ph.D.

Attachment A: Construction Schedule Calculations

Attachment B: CalEEMod Output Files

Attachment C: Matt Hagemann CV

Attachment D: Paul E. Rosenfeld CV



**Attachment A**

<b>Construction Schedule Calculations</b>					
Phase	Default Phase Length	Construction Duration	%	Construction Duration	Revised Phase Length
Site Preparation	360	16673	0.0216	3057	66
Grading	930	16673	0.0558	3057	171
Construction	9300	16673	0.5578	3057	1705
Paving	660	16673	0.0396	3057	121
Architectural Coating	660	16673	0.0396	3057	121

	Total Default Construction Duration	Revised Construction Duration
Start Date	7/1/2021	7/1/2021
End Date	2/23/2067	11/13/2029
Total Days	16673	3057



1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Industrial Park	641.64	1000sqft	29.46	641,638.80	0
Manufacturing	847.68	1000sqft	38.92	847,677.60	0
Refrigerated Warehouse-No Rail	1,695.36	1000sqft	77.84	1,695,355.20	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	427.76	1000sqft	19.64	427,759.20	0
Other Asphalt Surfaces	37.30	Acres	37.30	1,624,788.00	0
Other Non-Asphalt Surfaces	31.40	Acres	31.40	1,367,784.00	0
Free-Standing Discount Superstore	100.00	1000sqft	6.58	100,000.00	0
Ship Mall	21.97	1000sqft	1.44	21,968.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.4	Precipitation Freq (Days)	28
Climate Zone	10	Operational Year	2030		
Utility Company	Southern California Edison				

CO2 Intensity (lb/MWhr)	502.65	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006
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1.3 User Entered Comments & Non-Default Data



Project Characteristics - Consistent with the DEIR's model.  
 Land Use - See SWAPE comment on "Failure to Substantiate Amount of Cold Storage."  
 Construction Phase - See SWAPE comment on "Unsubstantiated Changes to Individual Construction Phase Lengths."  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Trips and VMT - See SWAPE comment on "Unsubstantiated Reductions to Worker and Vendor Trips."  
 Grading - Consistent with the DEIR's model.  
 Vehicle Trips - Consistent with the DEIR's model.  
 Consumer Products - Consistent with the DEIR's model.  
 Energy Use -  
 Water And Wastewater - Consistent with the DEIR's model.  
 Construction Off-road Equipment Mitigation - Consistent with the DEIR's model.  
 Energy Mitigation - See SWAPE comment on "Incorrect Application of Energy-Related Operational Mitigation Measure."

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	40
tblConstDustMitigation	WaterInpavedRoadVehiclesSpeed	0	15
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00





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tblLandUse	LandUseSquareFeet	1,695,360.00	1,695,355.20
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	427,760.00	427,759.20
tblLandUse	LandUseSquareFeet	21,970.00	21,968.00
tblLandUse	LotCoverage	14.73	29.46
tblLandUse	LotCoverage	19.46	38.92
tblLandUse	LotCoverage	38.92	77.84
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	9.82	19.64
tblLandUse	LotCoverage	2.30	6.56
tblLandUse	LotCoverage	0.50	1.44
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00



tblOffRoadEquipment	OffRoadEquipmentInAmount	4.00	8.00
tblOffRoadEquipment	OffRoadEquipmentInAmount	1.00	2.00
tblProjectCharacteristics	CO2IntensityFactor	702.44	502.65
tblVehicleTrips	ST_TR	64.07	0.00
tblVehicleTrips	ST_TR	2.49	0.00
tblVehicleTrips	ST_TR	1.49	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	ST_TR	42.04	0.00
tblVehicleTrips	SU_TR	56.12	0.00
tblVehicleTrips	SU_TR	0.73	0.00
tblVehicleTrips	SU_TR	0.62	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	SU_TR	20.43	0.00
tblVehicleTrips	WD_TR	50.75	0.00
tblVehicleTrips	WD_TR	6.83	0.00
tblVehicleTrips	WD_TR	3.82	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblVehicleTrips	WD_TR	44.32	0.00
tblWater	IndoorWaterUserRate	7,407,252.15	5,330,000.00
tblWater	IndoorWaterUserRate	148,379,250.00	15,864,848.00
tblWater	IndoorWaterUserRate	196,026,000.00	31,024,945.00
tblWater	IndoorWaterUserRate	1,863,148,875.00	305,310,206.00
tblWater	IndoorWaterUserRate	1,627,373.30	1,170,000.00
tblWater	OutdoorWaterUserRate	4,539,928.74	246,000.00
tblWater	OutdoorWaterUserRate	997,422.34	54,000.00

2.0 Emissions Summary



**2.1 Overall Construction  
Unmitigated Construction**

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Year	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2021	0.5439	5.7424	3.5121	8.8500e-003	2.0704	0.2661	2.3365	0.9301	0.2448	1.1749	0.0000	602.3416	602.3416	0.1882	0.0000	607.0467
2022	2.6631	21.6996	20.2566	0.0905	6.6433	0.3477	6.9910	1.8956	0.3234	2.2190	0.0000	8.360444	8.360444	0.6317	0.0000	8.376236
2023	3.4702	23.0771	26.9638	0.1362	9.2837	0.2432	9.5269	2.5043	0.2282	2.7325	0.0000	12.63743	12.63743	0.6227	0.0000	12.653300
2024	3.3147	22.7581	25.4482	0.1347	9.3551	0.2218	9.5769	2.5236	0.2081	2.7316	0.0000	12.50616	12.50616	0.6084	0.0000	12.52137
2025	3.1307	22.0886	23.9422	0.1313	9.3193	0.1976	9.5169	2.5139	0.1853	2.6992	0.0000	12.19781	12.19781	0.5863	0.0000	12.21247
2026	3.0049	21.7823	22.7483	0.1287	9.3193	0.1961	9.5153	2.5139	0.1839	2.6977	0.0000	11.96725	11.96725	0.5685	0.0000	11.98146
2027	2.8831	21.4980	21.6981	0.1265	9.3192	0.1937	9.5129	2.5139	0.1816	2.6955	0.0000	11.76567	11.76567	0.5516	0.0000	11.77948
2028	2.6143	20.0840	19.7424	0.1173	8.7504	0.1853	8.9356	2.3604	0.1737	2.5341	0.0000	10.91274	10.91274	0.5126	0.0000	10.92556
2029	45.5663	1.1392	2.9397	7.6500e-003	0.7230	0.0538	0.7768	0.1920	0.0500	0.2419	0.0000	684.2953	684.2953	0.0767	0.0000	686.2129
Maximum	45.5663	23.0771	26.9638	0.1362	9.3551	0.3477	9.5769	2.5236	0.3234	2.7325	0.0000	12.63743	12.63743	0.6317	0.0000	12.653300





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**2.1 Overall Construction  
Mitigated Construction**

Year	tons/yr											MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
2021	0.1726	3.2440	4.0170	6.8500e-003	2.0810	0.1484	2.2093	0.9278	0.1484	1.0761	0.0000	602.3409	602.3409	0.1882	0.0000	607.0460	
2022	2.2824	20.5534	21.2972	0.0905	4.7801	0.3271	5.1072	1.4383	0.3240	1.7622	0.0000	8.360443	8.360443	0.6317	0.0000	8.376235	
2023	3.2365	23.0358	27.0075	0.1362	6.1717	0.2962	6.4679	1.7405	0.2919	2.0324	0.0000	12.63743	12.63743	0.6227	0.0000	12.653300	
2024	3.1057	22.9630	25.8954	0.1347	6.2191	0.2979	6.5170	1.7538	0.2937	2.0475	0.0000	12.50616	12.50616	0.6084	0.0000	12.521377	
2025	2.9487	22.5470	24.4091	0.1313	6.1953	0.2958	6.4911	1.7471	0.2916	2.0387	0.0000	12.19781	12.19781	0.5863	0.0000	12.212477	
2026	2.8239	22.2407	23.2162	0.1287	6.1953	0.2942	6.4895	1.7471	0.2902	2.0372	0.0000	11.96725	11.96725	0.5685	0.0000	11.981468	
2027	2.7021	21.9564	22.1651	0.1265	6.1952	0.2918	6.4870	1.7471	0.2879	2.0350	0.0000	11.76567	11.76567	0.5516	0.0000	11.779486	
2028	2.4391	20.5550	20.2215	0.1173	5.8170	0.2802	6.0973	1.6404	0.2768	1.9172	0.0000	10.91274	10.91274	0.5126	0.0000	10.925566	
2029	45.5152	1.4524	3.2306	7.6500e-003	0.4722	0.0793	0.5515	0.1304	0.0790	0.2094	0.0000	684.2950	684.2950	0.0767	0.0000	686.2126	
<b>Maximum</b>	<b>45.5152</b>	<b>23.0358</b>	<b>27.0075</b>	<b>0.1362</b>	<b>6.2191</b>	<b>0.3271</b>	<b>6.5170</b>	<b>1.7538</b>	<b>0.3240</b>	<b>2.0475</b>	<b>0.0000</b>	<b>12.63743</b>	<b>12.63743</b>	<b>0.6317</b>	<b>0.0000</b>	<b>12.653300</b>	
<b>Percent Reduction</b>	<b>2.92</b>	<b>0.83</b>	<b>-2.75</b>	<b>0.00</b>	<b>31.92</b>	<b>-21.29</b>	<b>30.40</b>	<b>28.28</b>	<b>-28.36</b>	<b>23.17</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	
<b>Quarter</b>	<b>Start Date</b>	<b>End Date</b>	<b>Maximum Unmitigated ROG + NOx (consquarter)</b>										<b>Maximum Mitigated ROG + NOx (consquarter)</b>				
<b>1</b>	<b>7-1-2021</b>	<b>9-30-2021</b>	<b>2.9253</b>										<b>1.3226</b>				



2	10-1-2021	12-31-2021	3.3343	20799
3	1-1-2022	3-31-2022	2.7389	20339
4	4-1-2022	6-30-2022	4.8523	43469
5	7-1-2022	9-30-2022	8.4359	82767
6	10-1-2022	12-31-2022	8.3878	82287
7	1-1-2023	3-31-2023	6.5493	64813
8	4-1-2023	6-30-2023	6.6720	66033
9	7-1-2023	9-30-2023	6.7453	66758
10	10-1-2023	12-31-2023	6.6948	6.6253
11	1-1-2024	3-31-2024	6.4535	6.4525
12	4-1-2024	6-30-2024	6.5016	6.5006
13	7-1-2024	9-30-2024	6.5730	6.5720
14	10-1-2024	12-31-2024	6.5244	6.5234
15	1-1-2025	3-31-2025	6.1967	6.2650
16	4-1-2025	6-30-2025	6.3133	6.3824
17	7-1-2025	9-30-2025	6.3827	6.4525
18	10-1-2025	12-31-2025	6.3344	6.4042
19	1-1-2026	3-31-2026	6.0902	6.1585
20	4-1-2026	6-30-2026	6.2052	6.2743
21	7-1-2026	9-30-2026	6.2734	6.3433
22	10-1-2026	12-31-2026	6.2255	6.2953
23	1-1-2027	3-31-2027	5.9897	6.0590
24	4-1-2027	6-30-2027	6.1038	6.1728
25	7-1-2027	9-30-2027	6.1708	6.2407
26	10-1-2027	12-31-2027	6.1228	6.1927
27	1-1-2028	3-31-2028	5.9658	6.0349
28	4-1-2028	6-30-2028	6.0134	6.0825



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	7-1-2028	9-30-2028		
29	7-1-2028	9-30-2028	6.0795	6.1494
30	10-1-2028	12-31-2028	4.8873	4.7785
31	1-1-2029	3-31-2029	0.6406	0.7923
32	4-1-2029	6-30-2029	9.3077	9.4078
33	7-1-2029	9-30-2029	24.7977	24.8043
		Highest	24.7977	24.8043

**2.2 Overall Operational  
Unmitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10 (tons/yr)				Exhaust PM10 (tons/yr)				BIO-CO2	NBIO-CO2	Total CO2	CH4	N2O	CO2e
					Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total								
Area	12.1382	1.1100e-003	0.1236	1.0000e-005	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	0.0000	0.2416	0.2416	6.2000e-004	0.0000	0.2572				
Energy	2.4106	21.9148	18.4084	0.1315	1.8695	1.8695	1.8695	1.8695	0.0000	100.9486	100.9486	4.9050	1.3976	101,479.8				
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000				
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	2,004.198	2,004.198	118.4448	0.0000	4,965.317				
Water					0.0000	0.0000	0.0000	0.0000	0.0000	113.7990	1,065.695	11.7497	0.2887	1,559.232				
<b>Total</b>	<b>14.5488</b>	<b>21.9159</b>	<b>18.5320</b>	<b>0.1315</b>	<b>0.0000</b>	<b>1.8680</b>	<b>1.8680</b>	<b>0.0000</b>	<b>1.8680</b>	<b>1.8680</b>	<b>1.8680</b>	<b>0.0000</b>	<b>2,117.997</b>	<b>102,014.5</b>	<b>104,422.5</b>	<b>135.1001</b>	<b>1.6463</b>	<b>108,008.6</b>



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**2.2 Overall Operational  
Mitigated Operational**

Category	Tons/Yr										MT/Yr						
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e	
Area	12.1382	1.1100e-003	0.1236	1.0000e-005	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	0.0000	0.2416	0.2416	6.2000e-004	0.0000	0.2572	
Energy	2.4106	21.9148	18.4084	0.1315	1.6655	1.6655	1.6655	1.6655	1.6655	1.6655	0.0000	100.9486	100.9486	4.9050	1.3576	101,475.8017	
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2,004.1988	0.0000	2,004.1988	18.4448	0.0000	4,365.3177	
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	113.7990	1,065.6558	1,179.4548	11.7497	0.2887	1,559.2321	
<b>Total</b>	<b>14.5488</b>	<b>21.9159</b>	<b>18.5320</b>	<b>0.1315</b>	<b>0.0000</b>	<b>1.6660</b>	<b>1.6660</b>	<b>0.0000</b>	<b>1.6660</b>	<b>1.6660</b>	<b>2,117.9978</b>	<b>102,014.5093</b>	<b>104,132.5071</b>	<b>135.1001</b>	<b>1.6463</b>	<b>108,000.6087</b>	
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

**3.0 Construction Detail**

**Construction Phase**



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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2021	9/30/2021	5	66	
2	Grading	Grading	10/1/2021	9/27/2022	5	171	
3	Building Construction	Building Construction	5/28/2022	12/8/2028	5	1705	
4	Paving	Paving	12/9/2028	5/28/2029	5	121	
5	Architectural Coating	Architectural Coating	5/29/2029	1/1/3/2029	5	121	

Acres of Grading (Site Preparation Phase) : 0

Acres of Grading (Grading Phase) : 855

Acres of Paving: 68.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 14,502,213; Non-Residential Outdoor: 4,834,071; Striped Parking Area: 179,554 (Architectural Coating – sqft)

OffRoad Equipment



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Phase Name	Offroad Equipment Count	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	14	Rubber Tired Dozers	6	8.00	247	0.40
Site Preparation	16	Tractor/Loaders/Backhoes	8	8.00	97	0.37
Grading	18	Excavators	4	8.00	158	0.38
Grading	12	Graders	2	8.00	187	0.41
Grading	2	Rubber Tired Dozers	2	8.00	247	0.40
Grading	4	Scrapers	4	8.00	367	0.48
Grading	4	Tractor/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	2	Cranes	2	7.00	231	0.29
Building Construction	6	Forklifts	6	8.00	89	0.20
Building Construction	2	Generator Sets	2	8.00	84	0.74
Building Construction	6	Tractor/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	2	Welders	2	8.00	46	0.45
Paving	4	Pavers	4	8.00	130	0.42
Paving	4	Paving Equipment	4	8.00	132	0.36
Paving	4	Rollers	4	8.00	80	0.38
Architectural Coating	2	Air Compressors	2	6.00	78	0.48

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	14	35.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	5,305.00	2,075.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	1,061.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT



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**3.1 Mitigation Measures Construction**

- Use Cleaner Engines for Construction Equipment
- Use Soil Stabilizer
- Water Exposed Area
- Reduce Vehicle Speed on Unpaved Roads
- Clean Paved Roads

**3.2 Site Preparation - 2021**

**Unmitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					1,192.4	0.0000	1,192.4	0.6554	0.0000	0.6554	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2566	2.6728	1.3962	2.5100e-003		0.1349	0.1349		0.1241	0.1241	0.0000	220.6757	220.6757	0.0714	0.0000	222.4600
<b>Total</b>	<b>0.2566</b>	<b>2.6728</b>	<b>1.3962</b>	<b>2.5100e-003</b>	<b>1,192.4</b>	<b>0.1349</b>	<b>1,327.3</b>	<b>0.6554</b>	<b>0.1241</b>	<b>0.7796</b>	<b>0.0000</b>	<b>220.6757</b>	<b>220.6757</b>	<b>0.0714</b>	<b>0.0000</b>	<b>222.4600</b>



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**3.2 Site Preparation - 2021**

**Unmitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.9500e-003	3.5400e-003	0.0364	1.1000e-004	0.0127	8.0000e-005	0.0128	3.3700e-003	7.0000e-005	3.4400e-003	0.0000	10.2862	10.2862	2.4000e-004	0.0000	10.2722
<b>Total</b>	<b>4.9500e-003</b>	<b>3.5400e-003</b>	<b>0.0364</b>	<b>1.1000e-004</b>	<b>0.0127</b>	<b>8.0000e-005</b>	<b>0.0128</b>	<b>3.3700e-003</b>	<b>7.0000e-005</b>	<b>3.4400e-003</b>	<b>0.0000</b>	<b>10.2862</b>	<b>10.2862</b>	<b>2.4000e-004</b>	<b>0.0000</b>	<b>10.2722</b>

**Mitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					1.1924	0.0000	1.1924	0.6554	0.0000	0.6554	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0615	1.2983	1.5154	2.5100e-003		0.0625	0.0625		0.0625	0.0625	0.0000	220.6755	220.6755	0.0714	0.0000	222.4597
<b>Total</b>	<b>0.0615</b>	<b>1.2983</b>	<b>1.5154</b>	<b>2.5100e-003</b>	<b>1.1924</b>	<b>0.0625</b>	<b>1.2548</b>	<b>0.6554</b>	<b>0.0625</b>	<b>0.7179</b>	<b>0.0000</b>	<b>220.6755</b>	<b>220.6755</b>	<b>0.0714</b>	<b>0.0000</b>	<b>222.4597</b>





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**3.2 Site Preparation - 2021**

**Mitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.9500e-003	3.3400e-003	0.0364	1.1000e-004	8.2900e-003	8.0000e-005	8.3700e-003	2.2900e-003	7.0000e-005	2.3800e-003	0.0000	10.2862	10.2862	2.4000e-004	0.0000	10.2722
<b>Total</b>	<b>4.9500e-003</b>	<b>3.3400e-003</b>	<b>0.0364</b>	<b>1.1000e-004</b>	<b>8.2900e-003</b>	<b>8.0000e-005</b>	<b>8.3700e-003</b>	<b>2.2900e-003</b>	<b>7.0000e-005</b>	<b>2.3800e-003</b>	<b>0.0000</b>	<b>10.2862</b>	<b>10.2862</b>	<b>2.4000e-004</b>	<b>0.0000</b>	<b>10.2722</b>

**3.3 Grading - 2021**

**Unmitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.8508	0.0000	0.8508	0.2674	0.0000	0.2674	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2766	3.0624	2.0380	4.0900e-003	0.1310	0.1310	0.1310	0.1206	0.1206	0.1206	0.0000	359.6669	359.6669	0.1163	0.0000	362.5750
<b>Total</b>	<b>0.2766</b>	<b>3.0624</b>	<b>2.0380</b>	<b>4.0900e-003</b>	<b>0.8508</b>	<b>0.1310</b>	<b>0.8319</b>	<b>0.2674</b>	<b>0.1206</b>	<b>0.3880</b>	<b>0.0000</b>	<b>359.6669</b>	<b>359.6669</b>	<b>0.1163</b>	<b>0.0000</b>	<b>362.5750</b>



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**3.3 Grading - 2021**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6600e-003	3.6100e-003	0.0416	1.3000e-004	1.3000e-004	9.0000e-005	0.0146	3.6500e-003	8.0000e-005	3.5300e-003	0.0000	11.7328	11.7328	2.7000e-004	0.0000	11.7396
<b>Total</b>	<b>5.6600e-003</b>	<b>3.6100e-003</b>	<b>0.0416</b>	<b>1.3000e-004</b>	<b>0.0145</b>	<b>9.0000e-005</b>	<b>0.0146</b>	<b>3.9500e-003</b>	<b>8.0000e-005</b>	<b>3.9300e-003</b>	<b>0.0000</b>	<b>11.7328</b>	<b>11.7328</b>	<b>2.7000e-004</b>	<b>0.0000</b>	<b>11.7396</b>
MT/yr																

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.8608	0.0000	0.8608	0.2674	0.0000	0.2674	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1005	1.9786	2.4237	4.0900e-003		0.0858	0.0858		0.0858	0.0858	0.0000	359.6665	359.6665	0.1163	0.0000	362.5745
<b>Total</b>	<b>0.1005</b>	<b>1.9786</b>	<b>2.4237</b>	<b>4.0900e-003</b>	<b>0.8608</b>	<b>0.0858</b>	<b>0.9366</b>	<b>0.2674</b>	<b>0.0858</b>	<b>0.3532</b>	<b>0.0000</b>	<b>359.6665</b>	<b>359.6665</b>	<b>0.1163</b>	<b>0.0000</b>	<b>362.5745</b>
MT/yr																



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**3.3 Grading - 2021**

**Mitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6600e-003	3.6100e-003	0.0416	1.3000e-004	9.4800e-003	9.0000e-005	9.5600e-003	2.6200e-003	8.0000e-005	2.7000e-003	0.0000	11.7328	11.7328	2.7000e-004	0.0000	11.7396
<b>Total</b>	<b>5.6600e-003</b>	<b>3.6100e-003</b>	<b>0.0416</b>	<b>1.3000e-004</b>	<b>9.4800e-003</b>	<b>9.0000e-005</b>	<b>9.5600e-003</b>	<b>2.6200e-003</b>	<b>8.0000e-005</b>	<b>2.7000e-003</b>	<b>0.0000</b>	<b>11.7328</b>	<b>11.7328</b>	<b>2.7000e-004</b>	<b>0.0000</b>	<b>11.7396</b>

**3.3 Grading - 2022**

**Unmitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					1.0857	0.0000	1.0857	0.3965	0.0000	0.3965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3806	4.0786	3.0494	6.5200e-003	0.1717	0.1717	0.1717	0.1579	0.1579	0.1579	0.0000	572.6133	572.6133	0.1852	0.0000	577.2432
<b>Total</b>	<b>0.3806</b>	<b>4.0786</b>	<b>3.0494</b>	<b>6.5200e-003</b>	<b>1.0857</b>	<b>0.1717</b>	<b>1.2573</b>	<b>0.3965</b>	<b>0.1579</b>	<b>0.5545</b>	<b>0.0000</b>	<b>572.6133</b>	<b>572.6133</b>	<b>0.1852</b>	<b>0.0000</b>	<b>577.2432</b>



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**3.3 Grading - 2022**

**Unmitigated Construction Off-Site**

Category	tons/yr										MT/yr						
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.4400e-003	3.4600e-003	0.0609	2.0000e-004	0.0231	1.3000e-004	0.0232	6.1300e-003	1.2000e-004	6.2300e-003	0.0000	17.9846	17.9846	3.9000e-004	0.0000	17.9844	17.9844
<b>Total</b>	<b>8.4400e-003</b>	<b>3.4600e-003</b>	<b>0.0609</b>	<b>2.0000e-004</b>	<b>0.0231</b>	<b>1.3000e-004</b>	<b>0.0232</b>	<b>6.1300e-003</b>	<b>1.2000e-004</b>	<b>6.2300e-003</b>	<b>0.0000</b>	<b>17.9846</b>	<b>17.9846</b>	<b>3.9000e-004</b>	<b>0.0000</b>	<b>17.9844</b>	<b>17.9844</b>

**Mitigated Construction On-Site**

Category	tons/yr										MT/yr						
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Fugitive Dust					1.0857	0.0000	1.0857	0.3965	0.0000	0.3965	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1599	3.1477	3.8659	6.5200e-003	0.1364	0.1364	0.1364	0.1364	0.1364	0.1364	0.0000	572.6126	572.6126	0.1852	0.0000	577.2425	577.2425
<b>Total</b>	<b>0.1599</b>	<b>3.1477</b>	<b>3.8659</b>	<b>6.5200e-003</b>	<b>1.0857</b>	<b>0.1364</b>	<b>1.2221</b>	<b>0.3965</b>	<b>0.1364</b>	<b>0.5330</b>	<b>0.0000</b>	<b>572.6126</b>	<b>572.6126</b>	<b>0.1852</b>	<b>0.0000</b>	<b>577.2425</b>	<b>577.2425</b>



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**3.3 Grading - 2022**

**Mitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.4400e-003	3.4600e-003	0.0609	2.0000e-004	2.0000e-015	1.3000e-004	0.0152	4.7600e-003	1.2000e-004	4.2300e-003	0.0000	17.9846	17.9846	3.9000e-004	0.0000	17.9844
<b>Total</b>	<b>8.4400e-003</b>	<b>3.4600e-003</b>	<b>0.0609</b>	<b>2.0000e-004</b>	<b>0.0151</b>	<b>1.3000e-004</b>	<b>0.0152</b>	<b>4.7600e-003</b>	<b>1.2000e-004</b>	<b>4.2300e-003</b>	<b>0.0000</b>	<b>17.9846</b>	<b>17.9846</b>	<b>3.9000e-004</b>	<b>0.0000</b>	<b>17.9844</b>

**3.4 Building Construction - 2022**  
**Unmitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.2645	2.4204	2.5363	4.1700e-003	0.1254	0.1254	0.1254	0.1180	0.1180	0.1180	0.0000	359.1741	359.1741	0.0861	0.0000	361.3253
<b>Total</b>	<b>0.2645</b>	<b>2.4204</b>	<b>2.5363</b>	<b>4.1700e-003</b>	<b>0.1254</b>	<b>0.1254</b>	<b>0.1254</b>	<b>0.1180</b>	<b>0.1180</b>	<b>0.1180</b>	<b>0.0000</b>	<b>359.1741</b>	<b>359.1741</b>	<b>0.0861</b>	<b>0.0000</b>	<b>361.3253</b>



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**3.4 Building Construction - 2022  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3580	14.1265	2.6871	0.0406	1.0156	0.0241	1.0398	0.2830	0.0231	0.3161	0.0000	3,889,645	3,889,645	0.2836	0.0000	3,896,734
Worker	1.9516	1,0687	11,9230	0.0389	4,5169	0.0264	4,5433	1,2000	0.0243	1,2242	0.0000	3,521,027	3,521,027	0.0765	0.0000	3,522,940
<b>Total</b>	<b>2.0996</b>	<b>15,1952</b>	<b>14,6100</b>	<b>0.0796</b>	<b>5,5346</b>	<b>0.0505</b>	<b>5,5850</b>	<b>1,4930</b>	<b>0.0473</b>	<b>1,5403</b>	<b>0.0000</b>	<b>7,410,672</b>	<b>7,410,672</b>	<b>0.3601</b>	<b>0.0000</b>	<b>7,419,674</b>

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1045	2,2050	2,7704	4.1700e-003	0.1401	0.1401	0.1401	0.1401	0.1401	0.1401	0.0000	359,1737	359,1737	0.0861	0.0000	361,3249
<b>Total</b>	<b>0.1045</b>	<b>2,2050</b>	<b>2,7704</b>	<b>4.1700e-003</b>	<b>0.1401</b>	<b>0.1401</b>	<b>0.1401</b>	<b>0.1401</b>	<b>0.1401</b>	<b>0.1401</b>	<b>0.0000</b>	<b>359,1737</b>	<b>359,1737</b>	<b>0.0861</b>	<b>0.0000</b>	<b>361,3249</b>



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**3.4 Building Construction - 2022  
Mitigated Construction Off-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.3580	14.1265	2.6871	0.0406	0.7279	0.0241	0.7520	0.2224	0.0231	0.2454	0.0000	3,889,645	3,889,645	0.2836	0.0000	3,896,734	
Worker	1.8516	1,0867	11,9230	0.0389	2,9915	0.0264	2,9779	0.8152	0.0243	0.8395	0.0000	3,521,027	3,521,027	0.0765	0.0000	3,522,940	
<b>Total</b>	<b>2.0996</b>	<b>15,1952</b>	<b>14,6100</b>	<b>0.0796</b>	<b>3,6793</b>	<b>0.0505</b>	<b>3,7298</b>	<b>1,0376</b>	<b>0.0473</b>	<b>1,0849</b>	<b>0.0000</b>	<b>7,410,672</b>	<b>7,410,672</b>	<b>0.3601</b>	<b>0.0000</b>	<b>7,419,674</b>	

**3.4 Building Construction - 2023  
Unmitigated Construction On-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.4089	3,7401	4,2234	7.0100e-003	0.1819	0.1819	0.1819	0.1712	0.1712	0.1712	0.0000	602,6923	602,6923	0.1434	0.0000	606,2766	
<b>Total</b>	<b>0.4089</b>	<b>3,7401</b>	<b>4,2234</b>	<b>7.0100e-003</b>	<b>0.1819</b>	<b>0.1819</b>	<b>0.1819</b>	<b>0.1712</b>	<b>0.1712</b>	<b>0.1712</b>	<b>0.0000</b>	<b>602,6923</b>	<b>602,6923</b>	<b>0.1434</b>	<b>0.0000</b>	<b>606,2766</b>	



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**3.4 Building Construction - 2023  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4594	17.7211	3.9255	0.0664	1.7036	0.0181	1.7216	0.4915	0.0173	0.5088	0.0000	6,352,666 <sup>2</sup>	6,352,666	0.3641	0.0000	6,361,767 <sup>5</sup>
Worker	2.8019	1.6159	18.4349	0.0628	7.5801	0.0432	7.6233	2.0128	0.0398	2.0526	0.0000	5,862,077 <sup>9</sup>	5,862,077	0.1153	0.0000	5,864,960 <sup>9</sup>
<b>Total</b>	<b>3.0613</b>	<b>19.3370</b>	<b>22.3603</b>	<b>0.1292</b>	<b>9.2837</b>	<b>0.0613</b>	<b>9.3449</b>	<b>2.5043</b>	<b>0.0570</b>	<b>2.5613</b>	<b>0.0000</b>	<b>12,034,744<sup>41</sup></b>	<b>12,034,744</b>	<b>0.4794</b>	<b>0.0000</b>	<b>12,046,727<sup>78</sup></b>

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1752	3.6998	4.6472	7.0100e-003	0.2349	0.2349	0.2349	0.2349	0.2349	0.2349	0.0000	602,6916	602,6916	0.1434	0.0000	606,2759
<b>Total</b>	<b>0.1752</b>	<b>3.6998</b>	<b>4.6472</b>	<b>7.0100e-003</b>	<b>0.2349</b>	<b>0.2349</b>	<b>0.2349</b>	<b>0.2349</b>	<b>0.2349</b>	<b>0.2349</b>	<b>0.0000</b>	<b>602,6916</b>	<b>602,6916</b>	<b>0.1434</b>	<b>0.0000</b>	<b>606,2759</b>





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**3.4 Building Construction - 2023  
Mitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4594	17.7211	3.9255	0.0664	1.2208	0.0181	1.2389	0.3730	0.0173	0.3903	0.0000	6,352,666 <sup>2</sup>	6,352,666	0.3641	0.0000	6,361,767 <sup>5</sup>
Worker	2.6019	1.6159	18.4349	0.0628	4.9909	0.0432	4.9941	1.3675	0.0398	1.4072	0.0000	5,862,077 <sup>9</sup>	5,862,077	0.1153	0.0000	5,864,960 <sup>9</sup>
<b>Total</b>	<b>3.0613</b>	<b>19.3370</b>	<b>22.3603</b>	<b>0.1292</b>	<b>6.1717</b>	<b>0.0613</b>	<b>6.2330</b>	<b>1.7405</b>	<b>0.0570</b>	<b>1.7975</b>	<b>0.0000</b>	<b>12,034,744<sup>41</sup></b>	<b>12,034,744</b>	<b>0.4794</b>	<b>0.0000</b>	<b>12,046,727<sup>8</sup></b>

**3.4 Building Construction - 2024  
Unmitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.3686	3.5223	4.2357	7.0600e-003	0.1607	0.1607	0.1607	0.1512	0.1512	0.1512	0.0000	607,4447	607,4447	0.1436	0.0000	611,0357
<b>Total</b>	<b>0.3686</b>	<b>3.5223</b>	<b>4.2357</b>	<b>7.0600e-003</b>	<b>0.1607</b>	<b>0.1607</b>	<b>0.1607</b>	<b>0.1512</b>	<b>0.1512</b>	<b>0.1512</b>	<b>0.0000</b>	<b>607,4447</b>	<b>607,4447</b>	<b>0.1436</b>	<b>0.0000</b>	<b>611,0357</b>



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**3.4 Building Construction - 2024  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4541	17.7598	3.8230	0.0666	1.7166	0.0181	1.7347	0.4852	0.0173	0.5125	0.0000	6.377441	6.377441	0.3588	0.0000	6.386412
Worker	2.4790	1.4760	17.3896	0.0610	7.6394	0.0431	7.6815	2.0283	0.0396	2.0679	0.0000	5.521281	5.521281	0.1060	0.0000	5.523950
<b>Total</b>	<b>2.9292</b>	<b>19.2356</b>	<b>21.2125</b>	<b>0.1276</b>	<b>9.3551</b>	<b>0.0612</b>	<b>9.4162</b>	<b>2.5236</b>	<b>0.0569</b>	<b>2.5805</b>	<b>0.0000</b>	<b>11.89872</b>	<b>11.89872</b>	<b>0.4648</b>	<b>0.0000</b>	<b>11.91034</b>

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1766	3.7272	4.6829	7.0600e-003	0.2367	0.2367	0.2367	0.2367	0.2367	0.2367	0.0000	607.4439	607.4439	0.1436	0.0000	611.0350
<b>Total</b>	<b>0.1766</b>	<b>3.7272</b>	<b>4.6829</b>	<b>7.0600e-003</b>	<b>0.2367</b>	<b>0.2367</b>	<b>0.2367</b>	<b>0.2367</b>	<b>0.2367</b>	<b>0.2367</b>	<b>0.0000</b>	<b>607.4439</b>	<b>607.4439</b>	<b>0.1436</b>	<b>0.0000</b>	<b>611.0350</b>



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**3.4 Building Construction - 2024  
Mitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4541	17.7598	3.8230	0.0666	1.2302	0.0181	1.2483	0.3758	0.0173	0.3931	0.0000	6.377441	6.377441	0.3588	0.0000	6.386412
Worker	2.4730	1.4760	17.3896	0.0610	4.9890	0.0431	5.0320	1.3780	0.0396	1.4176	0.0000	5.521281	5.521281	0.1060	0.0000	5.523930
<b>Total</b>	<b>2.9282</b>	<b>19.2356</b>	<b>21.2125</b>	<b>0.1276</b>	<b>6.2191</b>	<b>0.0612</b>	<b>6.2803</b>	<b>1.7538</b>	<b>0.0569</b>	<b>1.8108</b>	<b>0.0000</b>	<b>11.89872</b>	<b>11.89872</b>	<b>0.4648</b>	<b>0.0000</b>	<b>11.91034</b>

**3.4 Building Construction - 2025  
Unmitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.3569	3.2546	4.1981	7.0400e-003	0.1377	0.1377	0.1377	0.1295	0.1295	0.1295	0.0000	605.3098	605.3098	0.1423	0.0000	608.8670
<b>Total</b>	<b>0.3569</b>	<b>3.2546</b>	<b>4.1981</b>	<b>7.0400e-003</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.0000</b>	<b>605.3098</b>	<b>605.3098</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608.8670</b>



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**3.4 Building Construction - 2025  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4409	17.4954	3.6813	0.0659	1.7100	0.0178	1.7278	0.4833	0.0170	0.5104	0.0000	6,312.436	6,312.436	0.3483	0.0000	6,321,142.9
Worker	2.3229	1.3395	16.0627	0.0584	7.6093	0.0421	7.6514	2.0206	0.0388	2.0593	0.0000	5,280.072	5,280.072	0.0957	0.0000	5,282,466.1
<b>Total</b>	<b>2.7738</b>	<b>18.8340</b>	<b>19.7441</b>	<b>0.1242</b>	<b>9.3193</b>	<b>0.0599</b>	<b>9.3792</b>	<b>2.5139</b>	<b>0.0558</b>	<b>2.5697</b>	<b>0.0000</b>	<b>11,592.5085</b>	<b>11,592.5085</b>	<b>0.4440</b>	<b>0.0000</b>	<b>11,603,609.0</b>

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1759	3.7130	4.6651	7.0400e-003	0.2358	0.2358	0.2358	0.2358	0.2358	0.2358	0.0000	605.3091	605.3091	0.1423	0.0000	608,866.3
<b>Total</b>	<b>0.1759</b>	<b>3.7130</b>	<b>4.6651</b>	<b>7.0400e-003</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.0000</b>	<b>605.3091</b>	<b>605.3091</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608,866.3</b>



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**3.4 Building Construction - 2025  
Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4409	17.4954	3.6813	0.0659	1.2254	0.0178	1.2432	0.3744	0.0170	0.3914	0.0000	6,312.436	6,312.436	0.3483	0.0000	6,321.142
Worker	2.3229	1.3395	16.0627	0.0584	4.9699	0.0421	5.0120	1.3727	0.0388	1.4115	0.0000	5,280.072	5,280.072	0.0957	0.0000	5,282.466
<b>Total</b>	<b>2.7738</b>	<b>18.8340</b>	<b>19.7441</b>	<b>0.1242</b>	<b>6.1953</b>	<b>0.0599</b>	<b>6.2553</b>	<b>1.7471</b>	<b>0.0558</b>	<b>1.8029</b>	<b>0.0000</b>	<b>11,592.50</b>	<b>11,592.50</b>	<b>0.4440</b>	<b>0.0000</b>	<b>11,603.50</b>
												<b>85</b>	<b>85</b>			<b>90</b>

**3.4 Building Construction - 2026  
Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e	
tons/yr																	
Off-Road	0.3569	3.2546	4.1981	7.0400e-003	0.1377	0.1377	0.1377	0.1295	0.1295	0.1295	0.0000	605.3098	605.3098	0.1423	0.0000	608.8670	
<b>Total</b>	<b>0.3569</b>	<b>3.2546</b>	<b>4.1981</b>	<b>7.0400e-003</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.0000</b>	<b>605.3098</b>	<b>605.3098</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608.8670</b>	



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**3.4 Building Construction - 2026  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4309	17.3013	3.5780	0.0655	1.7100	0.0176	1.7275	0.4833	0.0168	0.5101	0.0000	6,274,179	6,274,179	0.3389	0.0000	6,282,651
Worker	2.2171	1.2264	14.9731	0.0562	7.6093	0.0408	7.6501	2.0206	0.0375	2.0581	0.0000	5,087,768	5,087,768	0.0873	0.0000	5,089,950
<b>Total</b>	<b>2.6480</b>	<b>18.5277</b>	<b>18.5812</b>	<b>0.1217</b>	<b>9.3193</b>	<b>0.0584</b>	<b>9.3776</b>	<b>2.5139</b>	<b>0.0543</b>	<b>2.5682</b>	<b>0.0000</b>	<b>11,361,947</b>	<b>11,361,947</b>	<b>0.4262</b>	<b>0.0000</b>	<b>11,372,601</b>
MT/yr																

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	0.1759	3.7130	4.6651	7.0400e-003	0.2358	0.2358	0.2358	0.2358	0.2358	0.2358	0.0000	605,3091	605,3091	0.1423	0.0000	608,8663
<b>Total</b>	<b>0.1759</b>	<b>3.7130</b>	<b>4.6651</b>	<b>7.0400e-003</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.0000</b>	<b>605,3091</b>	<b>605,3091</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608,8663</b>
MT/yr																



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**3.4 Building Construction - 2026  
Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4309	17.3013	3.5780	0.0655	1.2254	0.0176	1.2429	0.3744	0.0168	0.3912	0.0000	6,274,179	6,274,179	0.3389	0.0000	6,282,651
Worker	2.2171	1.2284	14.9731	0.0582	4.9899	0.0408	5.0307	1.3727	0.0375	1.4103	0.0000	5,087,768	5,087,768	0.0873	0.0000	5,089,950
<b>Total</b>	<b>2.6480</b>	<b>18.5277</b>	<b>18.5512</b>	<b>0.1217</b>	<b>6.1953</b>	<b>0.0584</b>	<b>6.2536</b>	<b>1.7471</b>	<b>0.0543</b>	<b>1.8014</b>	<b>0.0000</b>	<b>11,361,947</b>	<b>11,361,947</b>	<b>0.4262</b>	<b>0.0000</b>	<b>11,372,801</b>
MT/yr																

**3.4 Building Construction - 2027  
Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	0.3569	3.2546	4.1981	7.0400e-003	0.1377	0.1377	0.1377	0.1295	0.1295	0.1295	0.0000	605,3098	605,3098	0.1423	0.0000	608,8670
<b>Total</b>	<b>0.3569</b>	<b>3.2546</b>	<b>4.1981</b>	<b>7.0400e-003</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1377</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.1295</b>	<b>0.0000</b>	<b>605,3098</b>	<b>605,3098</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608,8670</b>
MT/yr																



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**3.4 Building Construction - 2027  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4227	17.1168	3.4936	0.0651	1.7099	0.0173	1.7272	0.4833	0.0166	0.5098	0.0000	6,241,175	6,241,175	0.3295	0.0000	6,249,413
Worker	2.1036	1.1286	14.0064	0.0543	7.6093	0.0387	7.6479	2.0206	0.0356	2.0561	0.0000	4,919,187	4,919,187	0.0797	0.0000	4,921,180
<b>Total</b>	<b>2.5262</b>	<b>18.2434</b>	<b>17.5000</b>	<b>0.1195</b>	<b>9.3192</b>	<b>0.0560</b>	<b>9.3752</b>	<b>2.5139</b>	<b>0.0521</b>	<b>2.5660</b>	<b>0.0000</b>	<b>11,160,362</b>	<b>11,160,362</b>	<b>0.4093</b>	<b>0.0000</b>	<b>11,170,394</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.1759	3.7130	4.6651	7.0400e-003	0.2358	0.2358	0.2358	0.2358	0.2358	0.2358	0.0000	605,3091	605,3091	0.1423	0.0000	608,8663
<b>Total</b>	<b>0.1759</b>	<b>3.7130</b>	<b>4.6651</b>	<b>7.0400e-003</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.2358</b>	<b>0.0000</b>	<b>605,3091</b>	<b>605,3091</b>	<b>0.1423</b>	<b>0.0000</b>	<b>608,8663</b>





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**3.4 Building Construction - 2027  
Mitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.4227	17.1168	3.4936	0.0651	1.2253	0.0173	1.2427	0.3744	0.0166	0.3909	0.0000	6.241,175	6,241,175	0.3295	0.0000	6,249,413
Worker	2.1036	1.1266	14.0064	0.0543	4.9699	0.0387	5.0086	1.3727	0.0356	1.4083	0.0000	4,919,187	4,919,187	0.0797	0.0000	4,921,180
<b>Total</b>	<b>2.5262</b>	<b>18,2434</b>	<b>17,5000</b>	<b>0.1195</b>	<b>6,1952</b>	<b>0,0560</b>	<b>6,2512</b>	<b>1,7471</b>	<b>0,0521</b>	<b>1,7992</b>	<b>0,0000</b>	<b>11,160,36</b>	<b>11,160,36</b>	<b>0,4093</b>	<b>0,0000</b>	<b>11,170,39</b>

**3.4 Building Construction - 2028  
Unmitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.3350	3.0551	3.9407	6.6100e-003	0.1293	0.1293	0.1293	0.1216	0.1216	0.1216	0.0000	568,2027	568,2027	0.1336	0.0000	571,5418
<b>Total</b>	<b>0.3350</b>	<b>3,0551</b>	<b>3,9407</b>	<b>6,6100e-003</b>	<b>0,1293</b>	<b>0,1293</b>	<b>0,1293</b>	<b>0,1216</b>	<b>0,1216</b>	<b>0,1216</b>	<b>0,0000</b>	<b>568,2027</b>	<b>568,2027</b>	<b>0,1336</b>	<b>0,0000</b>	<b>571,5418</b>



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**3.4 Building Construction - 2028  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.3905	15.9254	3.2223	0.0609	1.6051	0.0161	1.6211	0.4630	0.0154	0.4784	0.0000	5.853.432	5.853.432	0.3006	0.0000	5.840.946	
Worker	1.8884	0.9743	12.3864	0.0495	7.1428	0.0338	7.1765	1.8967	0.0309	1.9276	0.0000	4.479.535	4.479.535	0.0888	0.0000	4.481.254	
<b>Total</b>	<b>2.2589</b>	<b>16.8999</b>	<b>15.5787</b>	<b>0.1103</b>	<b>8.7479</b>	<b>0.0497</b>	<b>8.7976</b>	<b>2.3597</b>	<b>0.0463</b>	<b>2.4061</b>	<b>0.0000</b>	<b>10,312.9675</b>	<b>10,312.9675</b>	<b>0.3893</b>	<b>0.0000</b>	<b>10,322.2006</b>	

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	0.1651	3.4854	4.3791	6.6100e-003	0.2214	0.2214	0.2214	0.2214	0.2214	0.2214	0.0000	568.2020	568.2020	0.1336	0.0000	571.5412	
<b>Total</b>	<b>0.1651</b>	<b>3.4854</b>	<b>4.3791</b>	<b>6.6100e-003</b>	<b>0.2214</b>	<b>0.2214</b>	<b>0.2214</b>	<b>0.2214</b>	<b>0.2214</b>	<b>0.2214</b>	<b>0.0000</b>	<b>568.2020</b>	<b>568.2020</b>	<b>0.1336</b>	<b>0.0000</b>	<b>571.5412</b>	



**3.4 Building Construction - 2028**

**Mitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.3905	15.9254	3.2223	0.0609	1.1502	0.0161	1.1663	0.3514	0.0154	0.3668	0.0000	5.853,432	5.853,432	0.3006	0.0000	5,840,946
Worker	1.8884	0.9745	12.3564	0.0495	4.8652	0.0336	4.8989	1.2886	0.0309	1.3195	0.0000	4,479,535	4,479,535	0.0888	0.0000	4,481,254
<b>Total</b>	<b>2.2589</b>	<b>16.8999</b>	<b>15.5787</b>	<b>0.1103</b>	<b>5.8154</b>	<b>0.0497</b>	<b>5.8651</b>	<b>1.6400</b>	<b>0.0463</b>	<b>1.6863</b>	<b>0.0000</b>	<b>10,312,967</b>	<b>10,312,967</b>	<b>0.3893</b>	<b>0.0000</b>	<b>10,322,206</b>

**3.5 Paving - 2028**

**Unmitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.0137	0.1287	0.2187	3.4000e-004	6.2800e-003	6.2800e-003	6.2800e-003	5.7800e-003	5.7800e-003	5.7800e-003	0.0000	30,0289	30,0289	9.7100e-003	0.0000	30,2717
Paving	6.0600e-003				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0198</b>	<b>0.1287</b>	<b>0.2187</b>	<b>3.4000e-004</b>	<b>6.2800e-003</b>	<b>6.2800e-003</b>	<b>6.2800e-003</b>	<b>5.7800e-003</b>	<b>5.7800e-003</b>	<b>5.7800e-003</b>	<b>0.0000</b>	<b>30,0289</b>	<b>30,0289</b>	<b>9.7100e-003</b>	<b>0.0000</b>	<b>30,2717</b>



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**3.5 Paving - 2028**

**Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.5000e-004	3.4000e-004	4.2800e-003	2.0000e-003	2.4700e-003	1.0000e-003	2.4800e-003	6.6000e-004	1.0000e-003	6.7000e-004	0.0000	1.5509	1.5509	2.0000e-003	0.0000	1.5515
<b>Total</b>	<b>6.5000e-004</b>	<b>3.4000e-004</b>	<b>4.2800e-003</b>	<b>2.0000e-003</b>	<b>2.4700e-003</b>	<b>1.0000e-003</b>	<b>2.4800e-003</b>	<b>6.6000e-004</b>	<b>1.0000e-003</b>	<b>6.7000e-004</b>	<b>0.0000</b>	<b>1.5509</b>	<b>1.5509</b>	<b>2.0000e-003</b>	<b>0.0000</b>	<b>1.5515</b>

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	8.4100e-003	0.1694	0.2594	3.4000e-004	9.1400e-003	9.1400e-003	9.1400e-003	9.1400e-003	9.1400e-003	9.1400e-003	0.0000	30.0289	30.0289	9.7100e-003	0.0000	30.2717
Paving	6.0600e-003				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0145</b>	<b>0.1694</b>	<b>0.2594</b>	<b>3.4000e-004</b>	<b>9.1400e-003</b>	<b>9.1400e-003</b>	<b>9.1400e-003</b>	<b>9.1400e-003</b>	<b>9.1400e-003</b>	<b>9.1400e-003</b>	<b>0.0000</b>	<b>30.0289</b>	<b>30.0289</b>	<b>9.7100e-003</b>	<b>0.0000</b>	<b>30.2717</b>



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**3.5 Paving - 2028**

**Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.5000e-004	3.4000e-004	4.2800e-003	2.0000e-003	1.6200e-003	1.0000e-003	1.8300e-003	4.5000e-004	1.0000e-003	4.6000e-004	0.0000	1.5509	1.5509	2.0000e-003	0.0000	1.5515
<b>Total</b>	<b>6.5000e-004</b>	<b>3.4000e-004</b>	<b>4.2800e-003</b>	<b>2.0000e-003</b>	<b>1.6200e-003</b>	<b>1.0000e-003</b>	<b>1.8300e-003</b>	<b>4.5000e-004</b>	<b>1.0000e-003</b>	<b>4.6000e-004</b>	<b>0.0000</b>	<b>1.5509</b>	<b>1.5509</b>	<b>2.0000e-003</b>	<b>0.0000</b>	<b>1.5515</b>
MT/yr																

**3.5 Paving - 2029**

**Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road Paving	0.0970	0.9097	1.5453	2.4200e-003	0.0444	0.0444	0.0444	0.0408	0.0408	0.0408	0.0000	212.2041	212.2041	0.0886	0.0000	213.9199
<b>Total</b>	<b>0.1398</b>	<b>0.9097</b>	<b>1.5453</b>	<b>2.4200e-003</b>	<b>0.0444</b>	<b>0.0444</b>	<b>0.0444</b>	<b>0.0408</b>	<b>0.0408</b>	<b>0.0408</b>	<b>0.0000</b>	<b>212.2041</b>	<b>212.2041</b>	<b>0.0886</b>	<b>0.0000</b>	<b>213.9199</b>
MT/yr																



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**3.5 Paving - 2029**

**Unmitigated Construction Off-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-003	2.2000e-003	0.0284	1.2000e-004	0.0175	8.0000e-005	0.0176	4.8400e-003	7.0000e-005	4.7100e-003	0.0000	10.8643	10.8643	1.5000e-004	0.0000	10.8682
<b>Total</b>	<b>4.3000e-003</b>	<b>2.2000e-003</b>	<b>0.0284</b>	<b>1.2000e-004</b>	<b>0.0175</b>	<b>8.0000e-005</b>	<b>0.0176</b>	<b>4.8400e-003</b>	<b>7.0000e-005</b>	<b>4.7100e-003</b>	<b>0.0000</b>	<b>10.8643</b>	<b>10.8643</b>	<b>1.5000e-004</b>	<b>0.0000</b>	<b>10.8682</b>

**Mitigated Construction On-Site**

Category	tons/yr										MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.0595	1.1973	1.8333	2.4200e-003	0.0646	0.0646	0.0646	0.0646	0.0646	0.0646	0.0000	212.2039	212.2039	0.0886	0.0000	213.9196
Paving	0.0428				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.1023</b>	<b>1.1973</b>	<b>1.8333</b>	<b>2.4200e-003</b>	<b>0.0646</b>	<b>0.0646</b>	<b>0.0646</b>	<b>0.0646</b>	<b>0.0646</b>	<b>0.0646</b>	<b>0.0000</b>	<b>212.2039</b>	<b>212.2039</b>	<b>0.0886</b>	<b>0.0000</b>	<b>213.9196</b>



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**3.5 Paving - 2029**

**Mitigated Construction Off-Site**

Category	tons/yr										MT/yr						
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-003	2.2000e-003	0.0284	1.2000e-004	0.0114	8.0000e-005	0.0115	3.1500e-003	7.0000e-005	3.2200e-003	0.0000	10.8643	10.8643	1.5000e-004	0.0000	10.8682	10.8682
<b>Total</b>	<b>4.3000e-003</b>	<b>2.2000e-003</b>	<b>0.0284</b>	<b>1.2000e-004</b>	<b>0.0114</b>	<b>8.0000e-005</b>	<b>0.0115</b>	<b>3.1500e-003</b>	<b>7.0000e-005</b>	<b>3.2200e-003</b>	<b>0.0000</b>	<b>10.8643</b>	<b>10.8643</b>	<b>1.5000e-004</b>	<b>0.0000</b>	<b>10.8682</b>	<b>10.8682</b>

**3.6 Architectural Coating - 2029**  
**Unmitigated Construction On-Site**

Category	tons/yr										MT/yr						
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Arch. Coating	45.2280				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0207	0.1386	0.2189	3.8000e-004	6.2300e-003	6.2300e-003	6.2300e-003	6.2300e-003	6.2300e-003	6.2300e-003	0.0000	30.8944	30.8944	1.6900e-003	0.0000	30.9385	30.9385
<b>Total</b>	<b>45.2486</b>	<b>0.1386</b>	<b>0.2189</b>	<b>3.8000e-004</b>	<b>6.2300e-003</b>	<b>6.2300e-003</b>	<b>6.2300e-003</b>	<b>6.2300e-003</b>	<b>6.2300e-003</b>	<b>6.2300e-003</b>	<b>0.0000</b>	<b>30.8944</b>	<b>30.8944</b>	<b>1.6900e-003</b>	<b>0.0000</b>	<b>30.9385</b>	<b>30.9385</b>



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**3.6 Architectural Coating - 2029  
Unmitigated Construction Off-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.1735	0.0887	1.1471	4.7500e-003	0.7055	3.0800e-003	0.7066	0.1874	2.8300e-003	0.1902	0.0000	430.5325	430.5325	6.2300e-003	0.0000	430.6883	
<b>Total</b>	<b>0.1735</b>	<b>0.0887</b>	<b>1.1471</b>	<b>4.7500e-003</b>	<b>0.7055</b>	<b>3.0800e-003</b>	<b>0.7066</b>	<b>0.1874</b>	<b>2.8300e-003</b>	<b>0.1902</b>	<b>0.0000</b>	<b>430.5325</b>	<b>430.5325</b>	<b>6.2300e-003</b>	<b>0.0000</b>	<b>430.6883</b>	

**Mitigated Construction On-Site**

Category	tons/yr											MT/yr					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Archit. Coating	45.2280					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	7.1900e-003	0.1642	0.2217	3.8000e-004		0.0715	0.0715		0.0715	0.0715	0.0000	30.8943	30.8943	1.6900e-003	0.0000	30.9385	
<b>Total</b>	<b>45.2351</b>	<b>0.1642</b>	<b>0.2217</b>	<b>3.8000e-004</b>		<b>0.0715</b>	<b>0.0715</b>		<b>0.0715</b>	<b>0.0715</b>	<b>0.0000</b>	<b>30.8943</b>	<b>30.8943</b>	<b>1.6900e-003</b>	<b>0.0000</b>	<b>30.9385</b>	





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**3.6 Architectural Coating - 2029  
Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1735	0.0887	1.1471	4.7500e-003	0.4693	3.0890e-003	0.4639	0.1273	2.8300e-003	0.1301	0.0000	430.5325	430.5325	6.2300e-003	0.0000	430.6883
<b>Total</b>	<b>0.1735</b>	<b>0.0887</b>	<b>1.1471</b>	<b>4.7500e-003</b>	<b>0.4693</b>	<b>3.0890e-003</b>	<b>0.4639</b>	<b>0.1273</b>	<b>2.8300e-003</b>	<b>0.1301</b>	<b>0.0000</b>	<b>430.5325</b>	<b>430.5325</b>	<b>6.2300e-003</b>	<b>0.0000</b>	<b>430.6883</b>

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**



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Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Free-Standing Discount Superstore	0.00	0.00	0.00		
Industrial Park	0.00	0.00	0.00		
Manufacturing	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Refrigerated Warehouse-Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Strip Mall	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

4.3 Trip Type Information



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Land Use	Miles				Trip %				Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by			
Free-Standing Discount	16.60	8.40	6.90	13.20	67.80	19.00	47.5	35.5	17			
Industrial Park	16.60	8.40	6.90	59.00	28.00	13.00	79	19	2			
Manufacturing	16.60	8.40	6.90	59.00	28.00	13.00	92	5	3			
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0			
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0			
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3			
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3			
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3			
Strip Mall	16.60	8.40	6.90	16.60	64.40	19.00	45	40	15			

4.4 Fleet Mix

Land Use	LDA	LD1	LD2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Free-Standing Discount	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Supertore	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Industrial Park	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Manufacturing	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Non-Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Refrigerated Warehouse-No Rail	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Strip Mall	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Category	tons/yr										MT/yr					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	77,091.72	77,091.72	4,447.8	0.9202	77,477.14
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	77,091.72	77,091.72	4,447.8	0.9202	77,477.14
Natural Gas Mitigated	2,4106	21,9148	18,4084	0.1315	1,6655	1,6655	1,6655	1,6655	1,6655	1,6655	0.0000	23,856.89	23,856.89	0.4573	0.4374	23,998.66
Natural Gas Unmitigated	2,4106	21,9148	18,4084	0.1315	1,6655	1,6655	1,6655	1,6655	1,6655	1,6655	0.0000	23,856.89	23,856.89	0.4573	0.4374	23,998.66



5.2 Energy by Land Use - Natural Gas  
Unmitigated

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Land Use	Natural Gas Use kBTU/yr	toms/yr										MT/yr				
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O
Free-Standing	222000	1.2000e-003	0.0109	9.1400e-003	7.0000e-005	8.3000e-004	8.3000e-004	8.3000e-004	8.3000e-004	8.3000e-004	0.0000	11.8468	11.8468	2.3000e-004	2.2000e-004	11.9172
Discount Superstore	2.22648e+006	0.0120	0.1091	0.0917	6.5000e-004	8.2900e-003	8.2900e-003	8.2900e-003	8.2900e-003	8.2900e-003	0.0000	118.8138	118.8138	2.2800e-003	2.1800e-003	119.5199
Industrial Park	2.7541e+007	0.1485	1.3901	1.1340	8.1000e-003	0.1026	0.1026	0.1026	0.1026	0.1026	0.0000	1.469.695	1.469.695	0.0282	0.0289	1.478.428
Manufacturing	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No +008	1.53956e+008	1.6561	15.0554	12.8466	0.0903	1.1442	1.1442	1.1442	1.1442	1.1442	0.0000	16.389.65	16.389.65	0.3141	0.3005	16.487.05
Rail	2.21408e+007	0.1194	1.0853	0.9117	6.5100e-003	0.0825	0.0825	0.0825	0.0825	0.0825	0.0000	1.181.518	1.181.518	0.0227	0.0217	1.188.539
Refrigerated Warehouse-No +007	8.77516e+007	0.4732	4.3016	3.6133	0.0258	0.3289	0.3289	0.3289	0.3289	0.3289	0.0000	4.682.758	4.682.758	0.0898	0.0859	4.710.586
Rail	497.69	2.390e-004	2.390e-003	2.010e-003	1.000e-005	1.860e-004	1.860e-004	1.860e-004	1.860e-004	1.860e-004	0.0000	2.5023	2.5023	5.000e-005	5.000e-005	2.6180
Strip Mall	497.69	2.390e-004	2.390e-003	2.010e-003	1.000e-005	1.860e-004	1.860e-004	1.860e-004	1.860e-004	1.860e-004	0.0000	2.5023	2.5023	5.000e-005	5.000e-005	2.6180
<b>Total</b>	<b>2.4106</b>	<b>21.9148</b>	<b>18.4084</b>	<b>0.1315</b>	<b>1.8655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>0.0000</b>	<b>23,856.89</b>	<b>23,856.89</b>	<b>0.4573</b>	<b>0.4374</b>	<b>23,998.66</b>



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**5.2 Energy by Land Use - Natural Gas Mitigated**

Land Use	Natural Gas Use kBTU/yr	Tons/yr										MT/yr				
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O
Free-Standing	222000	1.2000e-003	0.0109	9.1400e-003	7.0000e-005	8.3000e-004	8.3000e-004	8.3000e-004	8.3000e-004	8.3000e-004	0.0000	11.8468	11.8468	2.3000e-004	2.2000e-004	11.9172
Discount	2.22648e+006	0.0120	0.1091	0.0917	6.5000e-004	8.2900e-003	8.2900e-003	8.2900e-003	8.2900e-003	8.2900e-003	0.0000	118.8138	118.8138	2.2800e-003	2.1800e-003	119.5199
Industrial Park	2.7541e+007	0.1485	1.3901	1.1340	8.1000e-003	0.1026	0.1026	0.1026	0.1026	0.1026	0.0000	1.469.695	1.469.695	0.0282	0.0289	1.478.428
Manufacturing	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No +008	1.53956e+008	1.6561	15.0554	12.8466	0.0903	1.1442	1.1442	1.1442	1.1442	1.1442	0.0000	16.389.65	16.389.65	0.3141	0.3005	16.487.05
Rail	2.21408e+007	0.1194	1.0853	0.9117	6.5100e-003	0.0825	0.0825	0.0825	0.0825	0.0825	0.0000	1.181.518	1.181.518	0.0227	0.0217	1.188.539
Refrigerated Warehouse-No +007	8.77516e+007	0.4732	4.3016	3.6133	0.0258	0.3289	0.3289	0.3289	0.3289	0.3289	0.0000	4.682.758	4.682.758	0.0898	0.0859	4.710.586
Rail	497.69	2.390e-004	2.390e-003	2.010e-003	1.000e-005	1.860e-004	1.860e-004	1.860e-004	1.860e-004	1.860e-004	0.0000	2.5023	2.5023	5.000e-005	5.000e-005	2.6180
<b>Total</b>	<b>2.4106</b>	<b>21.9148</b>	<b>18.4084</b>	<b>0.1315</b>	<b>1.8655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>1.6655</b>	<b>0.0000</b>	<b>23,856.89</b>	<b>23,856.89</b>	<b>0.4573</b>	<b>0.4374</b>	<b>23,998.66</b>



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**5.3 Energy by Land Use - Electricity  
Unmitigated**

Land Use	Electricity Use KWh/yr	Total CO2	CH4	N2O	CO2e
		MT/yr			
Free-Standing Discount Superstore	1.283e +006	287,9817	0.0166	3.4400e- 003	289,4014
Industrial Park	6.1084e +006	1,392,704	0.0604	0.0166	1,399,667
Manufacturing	8.60393e +006	1,961,680	0.1132	0.0234	1,971,487
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	1.18527e +008	54,047.66	3.1182	0.6452	54,317.87
Refrigerated Warehouse-No Rail	1.7089e +007	3,896,256	0.2248	0.0465	3,915,726
Refrigerated Warehouse-No Rail	6.77294e +007	15,442.19	0.8909	0.1843	15,510.39
Strip Mall	277436	632394	3.550e- 003	7.660e- 004	633797
<b>Total</b>		<b>77,091,72</b> <b>11</b>	<b>4,4478</b>	<b>0,9202</b>	<b>77,477,14</b> <b>14</b>



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**5.3 Energy by Land Use - Electricity Mitigated**

Land Use	Electricity Use kWh/yr	Total CO2	CH4	N2O	CO2e
		MT/yr			
Free-Standing Discount Superstore	1,263e+006	287,981.7	0.0166	3.4400e-003	289,401.4
Industrial Park	6,109e+006	1,392,704.6	0.0604	0.0166	1,399,667.4
Manufacturing	8,603,939e+006	1,961,680.1	0.1132	0.0234	1,971,487.5
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	1,185,277e+008	54,047.6678	3.1182	0.6452	54,317.8792
Refrigerated Warehouse-No Rail	1,708,999e+007	3,896,256.8	0.2248	0.0465	3,915,726.1
Refrigerated Warehouse-No Rail	6,772,946e+007	15,442.1908	0.8909	0.1843	15,516.3841
Strip Mall	27,456	63,239.003	3.5500e-003	7.6600e-004	63,979.7
<b>Total</b>		<b>77,091,721.1</b>	<b>4,4478</b>	<b>0.9202</b>	<b>77,477,141.4</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**





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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															
Mitigated	12,1382	1,1100e-003	0,1236	1,0000e-005	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	0,0000	0,2416	0,2416	6,2000e-004	0,0000	0,2572
Unmitigated	12,1382	1,1100e-003	0,1236	1,0000e-005	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	0,0000	0,2416	0,2416	6,2000e-004	0,0000	0,2572
	MT/yr															

**6.2 Area by SubCategory**  
**Unmitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
	tons/yr															
Architectural Coating	4,5228				0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Consumer Products	7,8041				0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000	0,0000
Landscaping	0,0113	1,1100e-003	0,1236	1,0000e-005	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	4,4000e-004	0,0000	0,2416	0,2416	6,2000e-004	0,0000	0,2572
<b>Total</b>	<b>12,1382</b>	<b>1,1100e-003</b>	<b>0,1236</b>	<b>1,0000e-005</b>	<b>4,4000e-004</b>	<b>4,4000e-004</b>	<b>4,4000e-004</b>	<b>4,4000e-004</b>	<b>4,4000e-004</b>	<b>4,4000e-004</b>	<b>0,0000</b>	<b>0,2416</b>	<b>0,2416</b>	<b>6,2000e-004</b>	<b>0,0000</b>	<b>0,2572</b>
	MT/yr															



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**6.2 Area by SubCategory  
Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	4.5228					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	7.6041					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0113	1.1100e-003	0.1236	1.0000e-003	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	4.4000e-004	0.0000	0.2416	0.2416	6.2000e-004	0.0000	0.2572
<b>Total</b>	<b>12.1382</b>	<b>1.1100e-003</b>	<b>0.1236</b>	<b>1.0000e-003</b>	<b>4.4000e-004</b>	<b>4.4000e-004</b>	<b>4.4000e-004</b>	<b>4.4000e-004</b>	<b>4.4000e-004</b>	<b>4.4000e-004</b>	<b>0.0000</b>	<b>0.2416</b>	<b>0.2416</b>	<b>6.2000e-004</b>	<b>0.0000</b>	<b>0.2572</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**



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Category	MT/Yr			
	Total CO2	CH4	N2O	CO2e
Mitigated	1,179,454	11,7497	0.2887	1,559,232
Unmitigated	1,179,454	11,7497	0.2887	1,559,232



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**7.2 Water by Land Use  
Unmitigated**

Land Use	Mgal	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
			MT/yr			
Free-Standing Discount Superstore	5.33 / 0.246		18.1376	0.1746	4.3000e-003	23.7639
Industrial Park	15.8648 / 0		52.1322	0.5197	0.0128	68.9291
Manufacturing	31.0249 / 0		101.9485	1.0163	0.0250	134.7962
Other/Asphalt Surfaces	0 / 0		0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0 / 0		0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	305.31 / 0		1,003.255	10.0008	0.2457	1,326.502
Strip Mall	1.17 / 0.054		3.9814	0.0383	9.4000e-004	5.2209
<b>Total</b>			<b>1,179,454.8</b>	<b>11,749.7</b>	<b>0.2887</b>	<b>1,559,232.1</b>



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**7.2 Water by Land Use Mitigated**

Land Use	Mgal	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
			MT/yr			
Free-Standing Discount Superstore	5.33 / 0.246		18.1376	0.1746	4.3000e-003	23.7639
Industrial Park	15.8648 / 0		52.1322	0.5197	0.0128	68.9291
Manufacturing	31.0249 / 0		101.9485	1.0163	0.0250	134.7962
Other/Asphalt Surfaces	0 / 0		0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0 / 0		0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	305.531 / 0		1,003.255	10.0008	0.2457	1,326.502
Strip Mall	1.177 / 0.054		3.9814	0.0383	9.4000e-004	5.2209
<b>Total</b>			<b>1,179,454</b>	<b>11,7497</b>	<b>0,2887</b>	<b>1,559,232</b>

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**



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**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	2,004,198 <sup>8</sup>	118,444 <sup>8</sup>	0.0000 <sup>7</sup>	4,965,317 <sup>7</sup>
Unmitigated	2,004,198 <sup>8</sup>	118,444 <sup>8</sup>	0.0000 <sup>7</sup>	4,965,317 <sup>7</sup>



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**8.2 Waste by Land Use  
Unmitigated**

Land Use	Waste Disposed Tons	MT/yr			
		Total CO2	CH4	N2O	CO2e
Free-Standing Discount Superstore	430.07	87.3003	5.1593	0.0000	216.2829
Industrial Park	795.63	161.5057	9.5447	0.0000	400.1235
Manufacturing	1051.12	213.3679	12.6097	0.0000	528.6098
Other/Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	7573.45	1,537,341	90.8543	0.0000	3,808,699
Strip Mall	2307	4.8830	0.2768	0.0000	11,6019
<b>Total</b>		<b>2,004,198</b>	<b>118,4448</b>	<b>0.0000</b>	<b>4,965,317</b>



**8.2 Waste by Land Use Mitigated**

Land Use	Waste Disposed Tons	Total CO2	CH4	N2O	CO2e
		MT/yr			
Free-Standing Discount Superstore	430.07	87.3003	5.1593	0.0000	216.2829
Industrial Park	795.63	161.5057	9.5447	0.0000	400.1235
Manufacturing	1051.12	213.3679	12.6097	0.0000	528.6098
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	7573.45	1,537,341	90,854.3	0.0000	3,808,699
Strip Mall	2307	48830	0.2768	0.0000	11,601.9
<b>Total</b>		<b>2,004,198</b>	<b>118,444.8</b>	<b>0.0000</b>	<b>4,965,317</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
<b>User Defined Equipment</b>					
Equipment Type	Number				

**11.0 Vegetation**



**Stoneridge Commerce Center - Primary Land Use Plan**  
Riverside-South Coast County, Summer

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Industrial Park	641.64	1000sqft	29.46	641,638.80	0
Manufacturing	847.68	1000sqft	38.92	847,677.60	0
Refrigerated Warehouse-No Rail	1,695.36	1000sqft	77.84	1,695,355.20	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	427.76	1000sqft	19.64	427,759.20	0
Other Asphalt Surfaces	37.30	Acres	37.30	1,624,788.00	0
Other Non-Asphalt Surfaces	31.40	Acres	31.40	1,367,784.00	0
Free-Standing Discount Superstore	100.00	1000sqft	6.58	100,000.00	0
Ship Mall	21.97	1000sqft	1.44	21,968.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.4	Precipitation Freq (Days)	28
Climate Zone	10	Operational Year	2030		
Utility Company	Southern California Edison				

CO2 Intensity (lb/MWhr)	502.65	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006
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**1.3 User Entered Comments & Non-Default Data**



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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.  
 Land Use - See SWAPE comment on "Failure to Substantiate Amount of Cold Storage."  
 Construction Phase - See SWAPE comment on "Unsubstantiated Changes to Individual Construction Phase Lengths."  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Trips and VMT - See SWAPE comment on "Unsubstantiated Reductions to Worker and Vendor Trips."  
 Grading - Consistent with the DEIR's model.  
 Vehicle Trips - Consistent with the DEIR's model.  
 Consumer Products - Consistent with the DEIR's model.  
 Energy Use -  
 Water And Wastewater - Consistent with the DEIR's model.  
 Construction Off-road Equipment Mitigation - Consistent with the DEIR's model.  
 Energy Mitigation - See SWAPE comment on "Incorrect Application of Energy-Related Operational Mitigation Measure."

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	40
tblConstDustMitigation	WaterInpavedRoadVehiclesSpeed	0	15
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00





Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Summer

tblLandUse	LandUseSquareFeet	1,695,360.00	1,695,355.20
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	427,760.00	427,759.20
tblLandUse	LandUseSquareFeet	21,970.00	21,968.00
tblLandUse	LotCoverage	14.73	29.46
tblLandUse	LotCoverage	19.46	38.92
tblLandUse	LotCoverage	38.92	77.84
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	9.82	19.64
tblLandUse	LotCoverage	2.30	6.56
tblLandUse	LotCoverage	0.50	1.44
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00



tblOffRoadEquipment	OffRoadEquipmentInAmount	4.00	8.00
tblOffRoadEquipment	OffRoadEquipmentInAmount	1.00	2.00
tblProjectCharacteristics	CO2IntensityFactor	702.44	502.65
tblVehicleTrips	ST_TR	64.07	0.00
tblVehicleTrips	ST_TR	2.49	0.00
tblVehicleTrips	ST_TR	1.49	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	ST_TR	42.04	0.00
tblVehicleTrips	SU_TR	56.12	0.00
tblVehicleTrips	SU_TR	0.73	0.00
tblVehicleTrips	SU_TR	0.62	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	SU_TR	20.43	0.00
tblVehicleTrips	WD_TR	50.75	0.00
tblVehicleTrips	WD_TR	6.83	0.00
tblVehicleTrips	WD_TR	3.82	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblVehicleTrips	WD_TR	44.32	0.00
tblWater	IndoorWaterUserRate	7,407,252.15	5,330,000.00
tblWater	IndoorWaterUserRate	148,379,250.00	15,864,848.00
tblWater	IndoorWaterUserRate	196,026,000.00	31,024,945.00
tblWater	IndoorWaterUserRate	1,863,148,875.00	305,310,206.00
tblWater	IndoorWaterUserRate	1,627,373.30	1,170,000.00
tblWater	OutdoorWaterUserRate	4,539,928.74	246,000.00
tblWater	OutdoorWaterUserRate	997,422.34	54,000.00

2.0 Emissions Summary



**2.1 Overall Construction (Maximum Daily Emission)  
Unmitigated Construction**

Year	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
2021	8,5720	92,9077	63,2358	0.1283	36,5237	4,0912	40,6150	19,9851	3,7639	23,7291	0.0000	12,439.98	12,439.98	3,8958	0.0000	12,557.38
2022	31,4547	225,2897	245,4978	1.1328	72,5838	3,2723	74,8491	19,5513	3,0106	21,6605	0.0000	115,746.7	115,746.7	6,2753	0.0000	115,903.6
2023	28,6677	176,6235	227,5290	1.0976	72,5833	1,8887	74,4919	19,5611	1,7536	21,3047	0.0000	112,165.2	112,165.2	5,2494	0.0000	112,316.4
2024	27,1294	172,9206	216,0089	1.0766	72,5828	1,6917	74,2745	19,5509	1,5867	21,1376	0.0000	110,103.1	110,103.1	5,0827	0.0000	110,200.2
2025	25,6874	168,5681	203,6322	1.0527	72,5824	1,5128	74,0952	19,5508	1,4185	20,9693	0.0000	107,726.8	107,726.8	4,9099	0.0000	107,849.6
2026	24,6099	166,3212	193,1437	1.0317	72,5820	1,5009	74,0829	19,5507	1,4074	20,9581	0.0000	105,627.1	105,627.1	4,7554	0.0000	105,746.0
2027	23,5685	164,2395	183,0941	1.0133	72,5817	1,4628	74,0643	19,5505	1,3905	20,9410	0.0000	103,793.7	103,793.7	4,6100	0.0000	103,908.9
2028	22,5631	162,4759	175,9317	0.9974	72,5814	1,4597	74,0411	19,5504	1,3893	20,9198	0.0000	102,212.0	102,212.0	4,4751	0.0000	102,323.8
2029	751,0490	17,2021	29,7911	0.0914	11,8595	0,8385	12,0134	3,1452	0,7714	3,2950	0.0000	9,087,234	9,087,234	1,4310	0.0000	9,091,154
Maximum	751,0490	225,2897	245,4978	1,1328	72,5838	4,0912	74,8491	19,9851	3,7639	23,7291	0.0000	115,746.7	115,746.7	6,2753	0.0000	115,903.6



**2.1 Overall Construction (Maximum Daily Emission)  
Mitigated Construction**

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2021	3,2358	60,0845	74,9240	0,1283	36,3877	2,6015	38,2823	19,9317	2,6013	21,8262	0,0000	12,439,98	12,439,98	3,8958	0,0000	12,557,38
											72	72	72			11
2022	29,3900	222,5106	248,5186	1,1328	48,1774	2,6014	50,6317	13,5608	2,6012	15,9746	0,0000	115,746,7	115,746,7	6,2753	0,0000	115,903,6
											741	741	741			563
2023	26,8699	176,3079	230,7866	1,0976	48,1768	2,2763	50,4931	13,5604	2,2439	15,8045	0,0000	112,165,2	112,165,2	5,2494	0,0000	112,316,4
											129	129	129			474
2024	25,5530	174,4852	219,4229	1,0766	48,1764	2,2722	50,4485	13,5603	2,2400	15,8002	0,0000	110,103,1	110,103,1	5,0827	0,0000	110,260,2
											731	731	731			404
2025	24,3005	172,0809	207,2104	1,0527	48,1759	2,2648	50,4407	13,5601	2,2331	15,7932	0,0000	107,726,8	107,726,8	4,9099	0,0000	107,849,6
											717	717	717			198
2026	23,2219	169,8339	196,7219	1,0317	48,1756	2,2528	50,4284	13,5600	2,2220	15,7820	0,0000	105,627,1	105,627,1	4,7554	0,0000	105,746,0
											539	539	539			384
2027	22,1815	167,7523	187,4723	1,0133	48,1752	2,2346	50,4038	13,5599	2,2051	15,7650	0,0000	103,793,7	103,793,7	4,6100	0,0000	103,908,9
											345	345	345			844
2028	21,1661	165,9887	179,5100	0,9974	48,1750	2,2117	50,3866	13,5598	2,1839	15,7437	0,0000	102,212,0	102,212,0	4,4751	0,0000	102,323,8
											082	082	082			850
2029	7,50,8261	22,6293	35,2285	0,0914	7,7354	1,2201	7,9764	2,1329	1,2200	2,3699	0,0000	9,087,234	9,087,234	1,4310	0,0000	9,091,154
											0	0	0			2
Maximum	750,3261	222,5106	248,5186	1,1328	48,1774	2,6015	50,6317	19,9317	2,6013	21,8262	0,0000	115,746,7	115,746,7	6,2753	0,0000	115,903,6
											741	741	741			563
Percent Reduction	1,76	1,11	-2,67	0,00	31,47	-12,51	30,22	26,57	-19,90	22,91	0,00	0,00	0,00	0,00	0,00	0,00





**2.2 Overall Operational  
Unmitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
b/day																
Area	66.5391	8.9100e-003	0.9892	7.0000e-005		3.5100e-003	3.5100e-003		3.5100e-003	3.5100e-003		2.1309	2.1309	5.5000e-003		2.2883
Energy	13.2089	120.0809	100.8680	0.7205		9.1282	9.1282		9.1282	9.1282		144.0970	144.0970	2.7619		144.9533
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>79.7480</b>	<b>120.0898</b>	<b>101.8571</b>	<b>0.7206</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>		<b>144.0992</b>	<b>144.0992</b>	<b>2.7674</b>		<b>144.9556</b>
lb/day																

**Mitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
b/day																
Area	66.5391	8.9100e-003	0.9892	7.0000e-005		3.5100e-003	3.5100e-003		3.5100e-003	3.5100e-003		2.1309	2.1309	5.5000e-003		2.2883
Energy	13.2089	120.0809	100.8680	0.7205		9.1282	9.1282		9.1282	9.1282		144.0970	144.0970	2.7619		144.9533
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>79.7480</b>	<b>120.0898</b>	<b>101.8571</b>	<b>0.7206</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>		<b>144.0992</b>	<b>144.0992</b>	<b>2.7674</b>		<b>144.9556</b>
lb/day																



ROG Percent Reduction	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2021	9/30/2021	5	66	
2	Grading	Grading	10/1/2021	5/27/2022	5	171	
3	Building Construction	Building Construction	5/28/2022	12/8/2028	5	1705	
4	Paving	Paving	12/9/2028	5/28/2029	5	121	
5	Architectural Coating	Architectural Coating	5/29/2029	11/3/2029	5	121	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 855

Acres of Paving: 68.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 14,502,213; Non-Residential Outdoor: 4,834,071; Striped Parking Area: 179,554 (Architectural Coating – sqft)

OffRoad Equipment



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Phase Name	Offroad Equipment Count	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	14	Rubber Tired Dozers	6	8.00	247	0.40
Site Preparation	16	Tractor/Loaders/Backhoes	8	8.00	97	0.37
Grading	18	Excavators	4	8.00	158	0.38
Grading	12	Graders	2	8.00	187	0.41
Grading	2	Rubber Tired Dozers	2	8.00	247	0.40
Grading	4	Scrapers	4	8.00	367	0.48
Grading	4	Tractor/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	2	Cranes	2	7.00	231	0.29
Building Construction	6	Forklifts	6	8.00	89	0.20
Building Construction	2	Generator Sets	2	8.00	84	0.74
Building Construction	6	Tractor/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	2	Welders	2	8.00	46	0.45
Paving	4	Pavers	4	8.00	130	0.42
Paving	4	Paving Equipment	4	8.00	132	0.36
Paving	4	Rollers	4	8.00	80	0.38
Architectural Coating	2	Air Compressors	2	6.00	78	0.48

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	14	35.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	5,305.00	2,075.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	1,061.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT



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**3.1 Mitigation Measures Construction**

- Use Cleaner Engines for Construction Equipment
- Use Soil Stabilizer
- Water Exposed Area
- Reduce Vehicle Speed on Unpaved Roads
- Clean Paved Roads

**3.2 Site Preparation - 2021**

**Unmitigated Construction On-Site**

Category	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					36,1325	0.0000	36,1325	19,8614	0.0000	19,8614			0.0000			0.0000
Off-Road	7,7764	80,9942	42,3085	0.0760		4,0889	4,0889		3,7618	3,7618		7,371,313 <sup>8</sup>	7,371,313 <sup>8</sup>	2,3840		7,430,914 <sup>6</sup>
<b>Total</b>	<b>7,7764</b>	<b>80,9942</b>	<b>42,3085</b>	<b>0.0760</b>	<b>36,1325</b>	<b>4,0889</b>	<b>40,2214</b>	<b>19,8614</b>	<b>3,7618</b>	<b>23,6232</b>		<b>7,371,313<sup>8</sup></b>	<b>7,371,313<sup>8</sup></b>	<b>2,3840</b>		<b>7,430,914<sup>6</sup></b>



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**3.2 Site Preparation - 2021**

**Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1699	0.0945	1.2940	3.7400e-003	0.3912	2.3100e-003	0.3935	0.1038	2.1200e-003	0.1059		372.6628	372.6628	8.8900e-003		372.8850
<b>Total</b>	<b>0.1699</b>	<b>0.0945</b>	<b>1.2940</b>	<b>3.7400e-003</b>	<b>0.3912</b>	<b>2.3100e-003</b>	<b>0.3935</b>	<b>0.1038</b>	<b>2.1200e-003</b>	<b>0.1059</b>		<b>372.6628</b>	<b>372.6628</b>	<b>8.8900e-003</b>		<b>372.8850</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					36.1325	0.0000	36.1325	19.8614	0.0000	19.8614		0.0000	0.0000			0.0000
Off-Road	1.8623	38.1312	45.9201	0.0760		1.8923	1.8923	1.8923	1.8923	1.8923	0.0000	7.371.313	7.371.313	2.3940		7.430.914
<b>Total</b>	<b>1.8623</b>	<b>38.1312</b>	<b>45.9201</b>	<b>0.0760</b>	<b>36.1325</b>	<b>1.8923</b>	<b>38.0249</b>	<b>19.8614</b>	<b>1.8923</b>	<b>21.7537</b>	<b>0.0000</b>	<b>7.371.313</b>	<b>7.371.313</b>	<b>2.3940</b>		<b>7.430.914</b>



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**3.2 Site Preparation - 2021**

**Mitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1699	0.0945	1.2940	3.7400e-003	0.2552	2.3100e-003	0.2575	0.0704	2.1200e-003	0.0729		372.6628	372.6628	8.8900e-003		372.8890
<b>Total</b>	<b>0.1699</b>	<b>0.0945</b>	<b>1.2940</b>	<b>3.7400e-003</b>	<b>0.2552</b>	<b>2.3100e-003</b>	<b>0.2575</b>	<b>0.0704</b>	<b>2.1200e-003</b>	<b>0.0729</b>		<b>372.6628</b>	<b>372.6628</b>	<b>8.8900e-003</b>		<b>372.8890</b>

**3.3 Grading - 2021**

**Unmitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930		0.0000	0.0000			0.0000
Off-Road	8.3824	92.7997	61.7569	0.1240		3.9707	3.9707		3.6530	3.6530		12,014.08	12,014.08	3.8856		12,111.22
<b>Total</b>	<b>8.3824</b>	<b>92.7997</b>	<b>61.7569</b>	<b>0.1240</b>	<b>17.3467</b>	<b>3.9707</b>	<b>21.3173</b>	<b>7.1930</b>	<b>3.6530</b>	<b>10.8460</b>		<b>12,014.08</b>	<b>12,014.08</b>	<b>3.8856</b>		<b>12,111.22</b>



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**3.3 Grading - 2021**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1896	0.1080	1.4739	4.2700e-003	0.4471	2.6300e-003	0.4497	0.1186	2.4300e-003	0.1210		425.9004	425.9004	0.0102		426.1543
<b>Total</b>	<b>0.1896</b>	<b>0.1080</b>	<b>1.4739</b>	<b>4.2700e-003</b>	<b>0.4471</b>	<b>2.6300e-003</b>	<b>0.4497</b>	<b>0.1186</b>	<b>2.4300e-003</b>	<b>0.1210</b>		<b>425.9004</b>	<b>425.9004</b>	<b>0.0102</b>		<b>426.1543</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930		0.0000	0.0000			0.0000
Off-Road	3.0462	59.9564	73.4452	0.1240		2.5989	2.5989		2.5989	2.5989		12,014.08	12,014.08	3.8856		12,111.22
<b>Total</b>	<b>3.0462</b>	<b>59.9564</b>	<b>73.4452</b>	<b>0.1240</b>	<b>17.3467</b>	<b>2.5989</b>	<b>19.9455</b>	<b>7.1930</b>	<b>2.5989</b>	<b>9.7919</b>	<b>0.0000</b>	<b>12,014.08</b>	<b>12,014.08</b>	<b>3.8856</b>		<b>12,111.22</b>



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**3.3 Grading - 2021**

**Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1898	0.1080	1.4739	4.2700e-003	0.2916	2.6300e-003	0.2943	0.0804	2.4300e-003	0.0828	425.9004	425.9004	425.9004	0.0102		426.1543
<b>Total</b>	<b>0.1898</b>	<b>0.1080</b>	<b>1.4739</b>	<b>4.2700e-003</b>	<b>0.2916</b>	<b>2.6300e-003</b>	<b>0.2943</b>	<b>0.0804</b>	<b>2.4300e-003</b>	<b>0.0828</b>	<b>425.9004</b>	<b>425.9004</b>	<b>425.9004</b>	<b>0.0102</b>		<b>426.1543</b>

**3.3 Grading - 2022**

**Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	7.2497	77.6870	58.0830	0.1242		3.2698	3.2698		3.0082	3.0082	12,022.8211	12,022.8211	12,022.8211	3.8884		12,120.0317
<b>Total</b>	<b>7.2497</b>	<b>77.6870</b>	<b>58.0830</b>	<b>0.1242</b>	<b>17.3467</b>	<b>3.2698</b>	<b>20.6165</b>	<b>7.1930</b>	<b>3.0082</b>	<b>10.2012</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>3.8884</b>		<b>12,120.0317</b>





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**3.3 Grading - 2022**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1774	0.0972	1.3640	4.1200e-003	0.4471	2.5700e-003	0.4497	0.1186	2.3600e-003	0.1209	410.3384	410.3384	410.3384	9.1200e-003		410.5665
<b>Total</b>	<b>0.1774</b>	<b>0.0972</b>	<b>1.3640</b>	<b>4.1200e-003</b>	<b>0.4471</b>	<b>2.5700e-003</b>	<b>0.4497</b>	<b>0.1186</b>	<b>2.3600e-003</b>	<b>0.1209</b>		<b>410.3384</b>	<b>410.3384</b>	<b>9.1200e-003</b>		<b>410.5665</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	3.0462	59.9564	73.4452	0.1242		2.5989	2.5989	2.5989	2.5989	2.5989	0.0000	12,022.8211	12,022.8211	3.8884		12,120.0317
<b>Total</b>	<b>3.0462</b>	<b>59.9564</b>	<b>73.4452</b>	<b>0.1242</b>	<b>17.3467</b>	<b>2.5989</b>	<b>19.9456</b>	<b>7.1930</b>	<b>2.5989</b>	<b>9.7919</b>	<b>0.0000</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>3.8884</b>		<b>12,120.0317</b>



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**3.3 Grading - 2022**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1774	0.0972	1.3840	4.1200e-003	0.2916	2.5700e-003	0.2942	0.0804	2.3800e-003	0.0828	410.3384	410.3384	9.1200e-003			410.3665
<b>Total</b>	<b>0.1774</b>	<b>0.0972</b>	<b>1.3840</b>	<b>4.1200e-003</b>	<b>0.2916</b>	<b>2.5700e-003</b>	<b>0.2942</b>	<b>0.0804</b>	<b>2.3800e-003</b>	<b>0.0828</b>	<b>410.3384</b>	<b>410.3384</b>	<b>9.1200e-003</b>			<b>410.3665</b>

**3.4 Building Construction - 2022**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	3.4125	31.2313	32.7288	0.0539		1.6180	1.6180		1.5223	1.5223	5,108.667	5,108.667	1.2239			5,139.264
<b>Total</b>	<b>3.4125</b>	<b>31.2313</b>	<b>32.7288</b>	<b>0.0539</b>		<b>1.6180</b>	<b>1.6180</b>		<b>1.5223</b>	<b>1.5223</b>	<b>5,108.667</b>	<b>5,108.667</b>	<b>1.2239</b>			<b>5,139.264</b>



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**3.4 Building Construction - 2022  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.9170	181.1641	31.8652	0.5329	13.2864	0.3071	13.5935	3.8254	0.2937	4.1190	46	56,216.97	56,216.97	3.8416		56,313.01
Worker	23.5253	12.8944	180.9059	0.5461	59.2974	0.3402	59.6376	19.7260	0.3132	16.0392	23	54,421.18	54,421.13	1.2098		54,451.37
<b>Total</b>	<b>28.4422</b>	<b>194.0584</b>	<b>212.7710</b>	<b>1.0790</b>	<b>72.5838</b>	<b>0.6473</b>	<b>73.2311</b>	<b>19.5513</b>	<b>0.6069</b>	<b>20.1582</b>	<b>69</b>	<b>110,638.1</b>	<b>110,638.1</b>	<b>5.0514</b>		<b>110,764.3</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,108.667	5,108.667	1.2239		5,139.264
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,108.667</b>	<b>5,108.667</b>	<b>1.2239</b>		<b>5,139.264</b>



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**3.4 Building Construction - 2022**

**Mitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	4.9170	181.1641	31.8652	0.5329	9.5006	0.3071	9.8076	2.8961	0.2937	3.1898	46	56,216.97	56,216.97	3.8416		56,313.01
Worker	23.5253	12.8994	180.9059	0.5461	38.6768	0.3402	39.0170	10.8649	0.3132	10.9777	23	54,421.18	54,421.13	1.2098		54,451.37
<b>Total</b>	<b>28.0422</b>	<b>194.0584</b>	<b>212.7710</b>	<b>1.0790</b>	<b>48.1774</b>	<b>0.6473</b>	<b>48.8246</b>	<b>13.5906</b>	<b>0.6069</b>	<b>14.1675</b>		<b>110,638.1</b>	<b>110,638.1</b>	<b>5.0514</b>		<b>110,764.3</b>

**3.4 Building Construction - 2023**  
**Unmitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	3.1455	28.7698	32.4880	0.0539		1.3995	1.3995		1.3169	1.3169		5,110.419	5,110.419	1.2157		5,140.812
<b>Total</b>	<b>3.1455</b>	<b>28.7698</b>	<b>32.4880</b>	<b>0.0539</b>		<b>1.3995</b>	<b>1.3995</b>		<b>1.3169</b>	<b>1.3169</b>		<b>5,110.419</b>	<b>5,110.419</b>	<b>1.2157</b>		<b>5,140.812</b>



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**3.4 Building Construction - 2023  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	3.4645	136.2276	28.0865	0.5184	13.2859	0.1371	13.4229	3.8251	0.1310	3.9562		54,721.80	54,721.80	2,947.8		54,795.60
Worker	22.0576	11,6281	166,9545	0.5292	59,2874	0.3321	59,6295	15,7280	0.3057	16,0337		52,352.98	52,352.98	1,085.9		52,360.13
<b>Total</b>	<b>25.5221</b>	<b>147.8568</b>	<b>195.0410</b>	<b>1.0437</b>	<b>72.5833</b>	<b>0.4692</b>	<b>73.0525</b>	<b>19.5511</b>	<b>0.4368</b>	<b>19.9879</b>		<b>107,074.7</b>	<b>107,074.7</b>	<b>4,033.7</b>		<b>107,175.6</b>
												<b>931</b>	<b>931</b>			<b>353</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,110.419	5,110.419	1.2157		5,140.812
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,110.419</b>	<b>5,110.419</b>	<b>1.2157</b>		<b>5,140.812</b>
												<b>8</b>	<b>8</b>			<b>1</b>



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**3.4 Building Construction - 2023**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.4645	136.2276	28.0865	0.5184	9.5000	0.1371	9.6371	2.8859	0.1310	3.0269	54,721.80	54,721.80	59	2,947.8		54,795.60
Worker	22.0576	11.6281	166.9545	0.5292	38.6768	0.3321	39.0090	10.8645	0.3057	10.9703	52,352.98	52,352.98	72	1,089.9		52,380.13
<b>Total</b>	<b>25.8221</b>	<b>147.8558</b>	<b>195.0410</b>	<b>1.0437</b>	<b>48.1768</b>	<b>0.4692</b>	<b>48.6460</b>	<b>13.5604</b>	<b>0.4368</b>	<b>13.9972</b>	<b>107,074.7</b>	<b>107,074.7</b>	<b>931</b>	<b>4,033.7</b>		<b>107,175.6</b>

**3.4 Building Construction - 2024**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				lb/day	
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	2.9431	26.8876	32.3336	0.0539		1.2266	1.2266		1.1538	1.1538	5,111.397	5,111.397	8	1,208.7		5,141.615	
<b>Total</b>	<b>2.9431</b>	<b>26.8876</b>	<b>32.3336</b>	<b>0.0539</b>		<b>1.2266</b>	<b>1.2266</b>		<b>1.1538</b>	<b>1.1538</b>	<b>5,111.397</b>	<b>5,111.397</b>	<b>8</b>	<b>1,208.7</b>		<b>5,144.615</b>	



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**3.4 Building Construction - 2024**

**Unmitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3976	135.4883	27.1315	0.5163	13.2854	0.1364	13.4218	3.8250	0.1304	3.9554	54,507.72	63	54,507.72	2.8838		54,579.82
Worker	20.7876	10,5448	196.5439	0.5064	59.2974	0.3287	59.6261	15.7260	0.3025	16.0285	50,484.04	50	50,484.04	0.9902		50,508.80
<b>Total</b>	<b>24.1882</b>	<b>146.0331</b>	<b>183.8753</b>	<b>1.0227</b>	<b>72.5828</b>	<b>0.4651</b>	<b>73.0479</b>	<b>19.5509</b>	<b>0.4329</b>	<b>19.9838</b>	<b>104,991.7</b>	<b>753</b>	<b>104,991.7</b>	<b>3.8740</b>		<b>105,088.6</b>

**Mitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,111.397	8	5,111.397	1.2087	5,141.615
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,111.397</b>	<b>8</b>	<b>5,111.397</b>	<b>1.2087</b>	<b>5,144.615</b>



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**3.4 Building Construction - 2024**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3976	135.4883	27.1315	0.5163	9.4995	0.1364	9.6359	2.8957	0.1304	3.0261	54,507.72	54,507.72	2.8838	63	63	54,579.82
Worker	20.7876	10,5448	196.5439	0.5064	38.6768	0.3287	39.0055	10.8645	0.3025	10.9670	50,484.04	50,484.04	0.9902	30	30	50,508.80
<b>Total</b>	<b>24.1882</b>	<b>146.0331</b>	<b>183.8753</b>	<b>1.0227</b>	<b>48.1764</b>	<b>0.4651</b>	<b>48.6414</b>	<b>13.5803</b>	<b>0.4329</b>	<b>13.9931</b>	<b>104,991.7</b>	<b>104,991.7</b>	<b>3.8740</b>	<b>93</b>	<b>93</b>	<b>105,088.6</b>

**3.4 Building Construction - 2025**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				CO2e
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	
Off-Road	2.7348	24.9394	32.1693	0.0539		1.0551	1.0551		0.9925	0.9925	5,112.948	5,112.948	1.2019	7	7	5,142.996
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>		<b>1.0551</b>	<b>1.0551</b>		<b>0.9925</b>	<b>0.9925</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>	<b>7</b>	<b>7</b>	<b>5,142.996</b>





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**3.4 Building Construction - 2025  
Unmitigated Construction Off-Site**

Category	lb/day											lb/day					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	3.3100	134.0266	26.2043	0.5128	13.2850	0.1348	13.4198	3.8248	0.1289	3.9537	54,153.06	54,153.06	20	2.8105		54,223.32	
Worker	19,6427	9,6021	145,2396	0.4880	59,2974	0.3228	59,6202	15,7260	0.2371	16,0230	48,460.86	48,460.86	10	0.8976		48,463.30	
<b>Total</b>	<b>22,9527</b>	<b>143,6288</b>	<b>171,4628</b>	<b>0.9988</b>	<b>72,5824</b>	<b>0,4577</b>	<b>73,0400</b>	<b>19,5908</b>	<b>0,4260</b>	<b>19,9767</b>	<b>102,613.9</b>	<b>102,613.9</b>	<b>230</b>	<b>3,7080</b>		<b>102,706.5</b>	

**Mitigated Construction On-Site**

Category	lb/day											lb/day					
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,112.948	5,112.948	7		5,142.996	
<b>Total</b>	<b>1.3478</b>	<b>28,4521</b>	<b>35,7476</b>	<b>0,0539</b>		<b>1,8071</b>	<b>1,8071</b>		<b>1,8071</b>	<b>1,8071</b>	<b>0,0000</b>	<b>5,112,948</b>	<b>5,112,948</b>	<b>7</b>		<b>5,142,996</b>	



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**3.4 Building Construction - 2025  
Mitigated Construction Off-Site**

Category	lb/day											lb/day						
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic	CO2	NBiogenic	CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	3.3100	134.0266	26.2043	0.5128	9.4991	0.1348	9.6340	2.8956	0.1289	3.0245		54,153.06	20	54,153.06	2,810.5			54,223.32
Worker	19.6427	9.6021	145.2396	0.4860	38.6768	0.3228	38.9996	10.8645	0.2371	10.9616		48,460.86	10	48,460.86	0.8976			48,463.30
<b>Total</b>	<b>22.9527</b>	<b>143.6288</b>	<b>171.4628</b>	<b>0.9988</b>	<b>48.1759</b>	<b>0.4577</b>	<b>48.6336</b>	<b>13.5601</b>	<b>0.4260</b>	<b>13.9861</b>		<b>102,613.9</b>	<b>230</b>	<b>102,613.9</b>	<b>3,708.0</b>			<b>102,706.5</b>

**3.4 Building Construction - 2026  
Unmitigated Construction On-Site**

Category	lb/day											lb/day						
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic	CO2	NBiogenic	CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.7348	24.9394	32.1693	0.0539		1.0551	1.0551		0.9925	0.9925		5,112.948	7	5,112.948	1,201.9			5,142.996
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>		<b>1.0551</b>	<b>1.0551</b>		<b>0.9925</b>	<b>0.9925</b>		<b>5,112.948</b>	<b>7</b>	<b>5,112.948</b>	<b>1,201.9</b>			<b>5,142.996</b>



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**3.4 Building Construction - 2026  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.2334	132.5818	25.4513	0.5095	13.2846	0.1331	13.4177	3.8247	0.1272	3.9519	23	53,819.26	53,819.26	2.7354		53,887.64
Worker	18.6407	8,8000	135.5231	0.4882	58.2874	0.3127	59.6101	15.7280	0.2877	16.0158	28	46,694.94	46,694.94	0.8181		46,715.39
<b>Total</b>	<b>21.8741</b>	<b>141.3818</b>	<b>160.9743</b>	<b>0.9777</b>	<b>72.5620</b>	<b>0.4457</b>	<b>73.0278</b>	<b>19.5507</b>	<b>0.4149</b>	<b>19.9655</b>		<b>100,514.2052</b>	<b>100,514.2052</b>	<b>3.5535</b>		<b>100,603.0433</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539	1.8071	1.8071	1.8071	1.8071	1.8071	1.8071	0.0000	5,112.9487	5,112.9487	1.2019		5,142.9961
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.9487</b>	<b>5,112.9487</b>	<b>1.2019</b>		<b>5,142.9961</b>



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**3.4 Building Construction - 2026**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.2334	132.5818	25.4513	0.5095	9.4988	0.1331	9.6318	2.8954	0.1272	3.0227	23	53,819.26	53,819.26	2,735.4	23	53,887.64
Worker	18.6407	8.8000	135.5231	0.4882	38.6768	0.3127	38.9895	10.8645	0.2877	10.9522	28	46,694.94	46,694.94	0.8181	28	46,715.39
<b>Total</b>	<b>21.8741</b>	<b>141.3818</b>	<b>160.9743</b>	<b>0.9777</b>	<b>48.1756</b>	<b>0.4457</b>	<b>48.6213</b>	<b>13.5800</b>	<b>0.4149</b>	<b>13.9749</b>		<b>100,514.2</b>	<b>100,514.2</b>	<b>3.5335</b>		<b>100,603.0</b>

**3.4 Building Construction - 2027**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				CO2e
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	
Off-Road	2.7348	24.9394	32.1693	0.0539		1.0551	1.0551		0.9925	0.9925		5,112.948	5,112.948	1.2019		5,142.996
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>		<b>1.0551</b>	<b>1.0551</b>		<b>0.9925</b>	<b>0.9925</b>		<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>



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**3.4 Building Construction - 2027  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.1700	131.2143	24.8342	0.5067	13.2843	0.1313	13.4156	3.8246	0.1255	3.9501	84	53,532.17	53,532.17	2.8606	84	53,598.69
Worker	17.6637	8,0836	126.8905	0.4526	59.2974	0.2362	59.5336	15.7260	0.2725	15.9984	74	45,148.60	45,148.60	0.7475	74	45,167.29
<b>Total</b>	<b>20.8337</b>	<b>139.3002</b>	<b>151.7248</b>	<b>0.9593</b>	<b>72.5817</b>	<b>0.4275</b>	<b>73.0092</b>	<b>19.5505</b>	<b>0.3980</b>	<b>19.9485</b>	<b>58</b>	<b>98,680.78</b>	<b>98,680.78</b>	<b>3.4081</b>	<b>58</b>	<b>98,765.98</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539	1.8071	1.8071	1.8071	1.8071	1.8071	1.8071	0.0000	5,112.948	5,112.948	1.2019	7	5,142.996
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>	<b>7</b>	<b>5,142.996</b>



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**3.4 Building Construction - 2027  
Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.1700	131.2143	24.8342	0.5067	9.4984	0.1313	9.6297	2.8953	0.1255	3.0209	53.532.17	53.532.17	84	2.8606	36	53,598.69
Worker	17.6637	8,0836	126.8905	0.4526	38.6768	0.2362	38.9130	10.8645	0.2725	10.9370	45,148.60	45,148.60	74	0.7475	47	45,167.29
<b>Total</b>	<b>20.8337</b>	<b>139.3002</b>	<b>151.7248</b>	<b>0.9593</b>	<b>48.1752</b>	<b>0.4275</b>	<b>48.6027</b>	<b>13.5599</b>	<b>0.3980</b>	<b>13.9579</b>	<b>98,680.78</b>	<b>98,680.78</b>	<b>58</b>	<b>3.4081</b>	<b>83</b>	<b>98,765.98</b>

**3.4 Building Construction - 2028  
Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.7348	24.9394	32.1693	0.0539	1.0551	1.0551	1.0551	0.9925	0.9925	0.9925	5,112.948	5,112.948	7	1.2019	1	5,142.996
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>	<b>1.0551</b>	<b>1.0551</b>	<b>1.0551</b>	<b>0.9925</b>	<b>0.9925</b>	<b>0.9925</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>7</b>	<b>1.2019</b>	<b>1</b>	<b>5,142.996</b>



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**3.4 Building Construction - 2028  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.1191	130.0831	24.3898	0.5044	13.2840	0.1300	13.4141	3.8245	0.1243	3.9488	53,298.72	53,298.72	2.5861	53,363.37	32	53,363.37
Worker	16.6992	7.4534	119.3726	0.4391	58.2874	0.2745	58.5619	15.7260	0.2525	15.9785	43,800.33	43,800.33	0.6871	43,817.51	37	43,817.51
<b>Total</b>	<b>19.8183</b>	<b>137.5366</b>	<b>143.7524</b>	<b>0.9435</b>	<b>72.5614</b>	<b>0.4046</b>	<b>72.9660</b>	<b>19.5504</b>	<b>0.3768</b>	<b>19.9273</b>	<b>97,099.05</b>	<b>97,099.05</b>	<b>3.2732</b>	<b>97,150.38</b>	<b>89</b>	<b>97,150.38</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539	1.8071	1.8071	1.8071	1.8071	1.8071	1.8071	0.0000	5,112,948.7	5,112,948.7	1.2019	5,142,996.1	1
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112,948.7</b>	<b>5,112,948.7</b>	<b>1.2019</b>	<b>5,142,996.1</b>	<b>1</b>



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**3.4 Building Construction - 2028**

**Mitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.1191	130.0831	24.3898	0.5044	9.4981	0.1300	9.6282	2.8952	0.1243	3.0195	53,298.72	53,298.72	53,298.72	2.5861	15	53,363.37
Worker	16.6992	7.4534	119.3726	0.4391	38.6768	0.2745	38.9513	10.8645	0.2525	10.9171	43,800.33	43,800.33	43,800.33	0.6871	79	43,817.51
<b>Total</b>	<b>19.8183</b>	<b>137.5366</b>	<b>143.7524</b>	<b>0.9435</b>	<b>48.1750</b>	<b>0.4046</b>	<b>48.5795</b>	<b>13.5398</b>	<b>0.3768</b>	<b>13.9366</b>	<b>97,099.05</b>	<b>97,099.05</b>	<b>97,099.05</b>	<b>3.2732</b>	<b>95</b>	<b>97,150.88</b>

**3.5 Paving - 2028**

**Unmitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.8303	17.1633	29.1559	0.0456	0.8371	0.8371	0.8371	0.7701	0.7701	0.7701	4,413.490	4,413.490	4,413.490	1.4274	3	4,449.175
Paving	0.8077				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>2.6379</b>	<b>17.1633</b>	<b>29.1559</b>	<b>0.0456</b>	<b>0.8371</b>	<b>0.8371</b>	<b>0.8371</b>	<b>0.7701</b>	<b>0.7701</b>	<b>0.7701</b>	<b>4,413.490</b>	<b>4,413.490</b>	<b>4,413.490</b>	<b>1.4274</b>	<b>3</b>	<b>4,449.175</b>





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**3.5 Paving - 2028**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0944	0.0422	0.6751	2.4800e-003	0.3353	1.3300e-003	0.3369	0.0889	1.4300e-003	0.0904	247.6928	247.6928	247.6928	3.8900e-003		247.7899
<b>Total</b>	<b>0.0944</b>	<b>0.0422</b>	<b>0.6751</b>	<b>2.4800e-003</b>	<b>0.3353</b>	<b>1.5500e-003</b>	<b>0.3369</b>	<b>0.0889</b>	<b>1.4300e-003</b>	<b>0.0904</b>		<b>247.6928</b>	<b>247.6928</b>	<b>3.8900e-003</b>		<b>247.7899</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.1219	22.5905	34.5913	0.0456		1.2187	1.2187		1.2187	1.2187	0.0000	4,413,490	4,413,490	1.4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000	0.0000	3	3	0.0000		0.0000
<b>Total</b>	<b>1.9295</b>	<b>22.5905</b>	<b>34.5913</b>	<b>0.0456</b>		<b>1.2187</b>	<b>1.2187</b>		<b>1.2187</b>	<b>1.2187</b>	<b>0.0000</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1.4274</b>		<b>4,449,175</b>



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**3.5 Paving - 2028**

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0944	0.0422	0.6751	2.4800e-003	0.2187	1.5500e-003	0.2203	0.0603	1.4300e-003	0.0617	247.6928	247.6928	247.6928	3.8900e-003		247.7899
<b>Total</b>	<b>0.0944</b>	<b>0.0422</b>	<b>0.6751</b>	<b>2.4800e-003</b>	<b>0.2187</b>	<b>1.5500e-003</b>	<b>0.2203</b>	<b>0.0603</b>	<b>1.4300e-003</b>	<b>0.0617</b>		<b>247.6928</b>	<b>247.6928</b>	<b>3.8900e-003</b>		<b>247.7899</b>

**3.5 Paving - 2029**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.8303	17.1633	29.1559	0.0456		0.8371	0.8371		0.7701	0.7701	4,413,490	4,413,490	4,413,490	1.4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000	3	3	3	0.0000		6
<b>Total</b>	<b>2.6379</b>	<b>17.1633</b>	<b>29.1559</b>	<b>0.0456</b>		<b>0.8371</b>	<b>0.8371</b>		<b>0.7701</b>	<b>0.7701</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1.4274</b>		<b>4,449,175</b>



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**3.5 Paving - 2029**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0887	0.0399	0.6352	2.4200e-003	0.3353	1.4400e-003	0.3368	0.0889	1.3200e-003	0.0903		241.0275	241.0275	3.5700e-003		241.1166
<b>Total</b>	<b>0.0887</b>	<b>0.0399</b>	<b>0.6352</b>	<b>2.4200e-003</b>	<b>0.3353</b>	<b>1.4400e-003</b>	<b>0.3368</b>	<b>0.0889</b>	<b>1.3200e-003</b>	<b>0.0903</b>		<b>241.0275</b>	<b>241.0275</b>	<b>3.5700e-003</b>		<b>241.1166</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.1219	22.5905	34.5913	0.0456		1.2187	1.2187		1.2187	1.2187	0.0000	4,413,490	4,413,490	1.4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000		3	3	0.0000		6
<b>Total</b>	<b>1.9295</b>	<b>22.5905</b>	<b>34.5913</b>	<b>0.0456</b>		<b>1.2187</b>	<b>1.2187</b>		<b>1.2187</b>	<b>1.2187</b>	<b>0.0000</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1.4274</b>		<b>4,449,175</b>



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**3.5 Paving - 2029**

**Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0887	0.0399	0.6352	2.4200e-003	0.2187	1.4400e-003	0.2202	0.0603	1.3200e-003	0.0616		241.0275	241.0275	3.5700e-003		241.1166
<b>Total</b>	<b>0.0887</b>	<b>0.0399</b>	<b>0.6352</b>	<b>2.4200e-003</b>	<b>0.2187</b>	<b>1.4400e-003</b>	<b>0.2202</b>	<b>0.0603</b>	<b>1.3200e-003</b>	<b>0.0616</b>		<b>241.0275</b>	<b>241.0275</b>	<b>3.5700e-003</b>		<b>241.1166</b>

**3.6 Architectural Coating - 2029**  
**Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	747.5895					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.3417	2.2910	3.6183	5.9400e-003	0.1030	0.1030	0.1030	0.1030	0.1030	0.1030		562.8961	562.8961	0.0307		563.6637
<b>Total</b>	<b>747.9312</b>	<b>2.2910</b>	<b>3.6183</b>	<b>5.9400e-003</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>		<b>562.8961</b>	<b>562.8961</b>	<b>0.0307</b>		<b>563.6637</b>



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**3.6 Architectural Coating - 2029  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.1378	1.3741	22.4643	0.0854	11.8899	0.0509	11.9104	3.1452	0.0468	3.1920	0.0000	8,524,337 <sup>9</sup>	8,524,337 <sup>9</sup>	0.1281	0.0000	8,527,480 <sup>5</sup>
<b>Total</b>	<b>3.1378</b>	<b>1.3741</b>	<b>22.4643</b>	<b>0.0854</b>	<b>11.8899</b>	<b>0.0509</b>	<b>11.9104</b>	<b>3.1452</b>	<b>0.0468</b>	<b>3.1920</b>		<b>8,524,337<sup>9</sup></b>	<b>8,524,337<sup>9</sup></b>	<b>0.1281</b>		<b>8,527,480<sup>5</sup></b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	747.5895					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1189	2.7140	3.6648	5.9400e-003	0.1902	0.1902	0.1902	0.1902	0.1902	0.1902	0.0000	562,8961	562,8961	0.0307		563,6637
<b>Total</b>	<b>747.6884</b>	<b>2.7140</b>	<b>3.6648</b>	<b>5.9400e-003</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.0000</b>	<b>562,8961</b>	<b>562,8961</b>	<b>0.0307</b>		<b>563,6637</b>



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**3.6 Architectural Coating - 2029  
Mitigated Construction Off-Site**

Category	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.1378	1.3741	22.4643	0.0854	7.7354	0.0509	7.7863	2.1329	0.0468	2.1797	9	8,524,337	9	8,524,337	0.1261	8,527,480
<b>Total</b>	<b>3.1378</b>	<b>1.3741</b>	<b>22.4643</b>	<b>0.0854</b>	<b>7.7354</b>	<b>0.0509</b>	<b>7.7863</b>	<b>2.1329</b>	<b>0.0468</b>	<b>2.1797</b>	<b>9</b>	<b>8,524,337</b>	<b>9</b>	<b>8,524,337</b>	<b>0.1261</b>	<b>8,527,480</b>

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**



Category	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Free-Standing Discount Superstore	0.00	0.00	0.00		
Industrial Park	0.00	0.00	0.00		
Manufacturing	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Refrigerated Warehouse-Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Strip Mall	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information



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Land Use	Miles						Trip %						Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by							
Free-Standing Discount	16.60	8.40	6.90	13.20	67.80	19.00	47.5	35.5	17							
Industrial Park	16.60	8.40	6.90	59.00	28.00	13.00	79	19	2							
Manufacturing	16.60	8.40	6.90	59.00	28.00	13.00	92	5	3							
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0							
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Strip Mall	16.60	8.40	6.90	16.60	64.40	19.00	45	40	15							

4.4 Fleet Mix

Land Use	LDA	LD1	LD2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Free-Standing Discount	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Industrial Park	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Manufacturing	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Non-Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Refrigerated Warehouse-No Rail	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Strip Mall	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
NaturalGas Mitigated	132089	120.0809	100.8680	0.7205		9.1262	9.1262		9.1262	9.1262	144,097.0	992	144,097.0	2.7619	264.18	144,953.3
NaturalGas Unmitigated	132089	120.0809	100.8680	0.7205		9.1262	9.1262		9.1262	9.1262	144,097.0	992	144,097.0	2.7619	264.18	144,953.3



5.2 Energy by Land Use - Natural Gas  
Unmitigated

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Land Use	Natural Gas Use kBTU/yr	lb/day										lb/day												
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e							
Free-Standing	608,219	5.5600e-003	0.0586	0.0501	3.6000e-004	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	0.0000	0.0000	0.0000	0.0000	71.5552	71.5552	1.3700e-003	1.3100e-003	71.9804	
Discount Superstore	6099,96	0.0668	0.5980	0.5024	3.5000e-003	0.0455	0.0455	0.0455	0.0455	0.0455	0.0455	0.0455	0.0455	0.0455	0.0000	0.0000	0.0000	0.0000	717.6428	717.6428	0.0138	0.0132	721.9073	
Industrial Park	75454.9	0.8137	7.3975	6.2139	0.0444	0.5622	0.5622	0.5622	0.5622	0.5622	0.5622	0.5622	0.5622	0.5622	0.0000	0.0000	0.0000	0.0000	8.877049	8.877049	0.1701	0.1628	8.929801	
Manufacturing	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	240415	2.5927	23.5701	19.7989	0.1414	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	0.0000	0.0000	0.0000	0.0000	28284.15	28284.15	0.5421	0.5185	28452.23	
Refrigerated Warehouse-No Rail	420727	9.0745	82.4955	69.2962	0.4950	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	0.0000	0.0000	0.0000	0.0000	98.99453	98.99453	1.9974	1.8149	99.58281	
Refrigerated Warehouse-No Rail	60669.8	0.6542	5.9470	4.9955	0.0357	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.0000	0.0000	0.0000	0.0000	7.136443	7.136443	0.1368	0.1308	7.178851	
Strip Mall	133074	0.003	0.0131	0.0110	0.005	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	0.0000	0.0000	0.0000	0.0000	15.7193	15.7193	0.004	0.004	15.9127	
<b>Total</b>	<b>132089</b>	<b>120.0809</b>	<b>100.6680</b>	<b>0.7205</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>144.0970</b>	<b>144.0970</b>	<b>2.7619</b>	<b>2.6418</b>	<b>144.9533</b>	<b>144.9533</b>	<b>2.7619</b>	<b>2.6418</b>	<b>144.9533</b>	



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5.2 Energy by Land Use - NaturalGas Mitigated

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day							
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e		
Free-Standing Discount Superstore Industrial Park	0.609219	5.5600e-003	0.0596	0.0501	3.6000e-004	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	71.5552	71.5552	1.3700e-003	1.3100e-003	71.9804
Manufacturing	75.4549	0.1137	7.3975	6.2139	0.0444	0.5622	0.5622	0.0455	0.5622	0.5622	0.0455	0.5622	0.5622	0.0455	8.877049	8.877049	0.1701	0.1628	8.929801
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	240.415	2.5927	23.5701	19.7989	0.1414	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	28.28415	28.28415	0.5421	0.5185	28.45223
Refrigerated Warehouse-No Rail	420.727	9.0745	82.4955	69.2962	0.4950	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	98.99453	98.99453	1.9974	1.8149	99.58281
Refrigerated Warehouse-No Rail	60.6598	0.6542	5.9470	4.9955	0.0357	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	6	6	0.1368	0.1308	7.178851
Strip Mall	0.133814	0.003	0.0131	0.0110	0.005	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	15.7193	15.7193	0.004	2.000e-004	15.9127
<b>Total</b>	<b>13.2089</b>	<b>120.0809</b>	<b>100.6680</b>	<b>0.7205</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>144.0970</b>	<b>144.0970</b>	<b>2.7619</b>	<b>2.6418</b>	<b>144.9533</b>

6.0 Area Detail

6.1 Mitigation Measures Area



Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Mitigated	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883
Unmitigated	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883

**6.2 Area by SubCategory**  
**Unmitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Architectural Coating	24.7825				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1682				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Landscaping	0.0905	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883
<b>Total</b>	<b>66.5391</b>	<b>8.9100e-003</b>	<b>0.9892</b>	<b>7.0000e-005</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>2.1309</b>	<b>2.1309</b>	<b>2.1309</b>	<b>5.5000e-003</b>		<b>2.2883</b>



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**6.2 Area by SubCategory Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	24.7825					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	41.6662					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0905	8.9100e-003	0.9892	7.0000e-005		3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003		2.1309	2.1309	8.5000e-003		2.2663
<b>Total</b>	<b>66.5391</b>	<b>8.9100e-003</b>	<b>0.9892</b>	<b>7.0000e-005</b>		<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>		<b>2.1309</b>	<b>2.1309</b>	<b>5.5000e-003</b>		<b>2.2663</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**



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Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter  
**Stoneridge Commerce Center - Primary Land Use Plan**  
 Riverside-South Coast County, Winter

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Industrial Park	641.64	1000sqft	29.46	641,638.80	0
Manufacturing	847.68	1000sqft	38.92	847,677.60	0
Refrigerated Warehouse-No Rail	1,695.36	1000sqft	77.84	1,695,355.20	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	2,966.87	1000sqft	136.22	2,966,871.60	0
Refrigerated Warehouse-No Rail	427.76	1000sqft	19.64	427,759.20	0
Other Asphalt Surfaces	37.30	Acres	37.30	1,624,788.00	0
Other Non-Asphalt Surfaces	31.40	Acres	31.40	1,367,784.00	0
Free-Standing Discount Superstore	100.00	1000sqft	6.58	100,000.00	0
Ship Mall	21.97	1000sqft	1.44	21,968.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.4	Precipitation Freq (Days)	28
Climate Zone	10	Operational Year	2030		
Utility Company	Southern California Edison				

CO2 Intensity (lb/MWhr)	502.65	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006
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**1.3 User Entered Comments & Non-Default Data**



Project Characteristics - Consistent with the DEIR's model.  
 Land Use - See SWAPE comment on "Failure to Substantiate Amount of Cold Storage."  
 Construction Phase - See SWAPE comment on "Unsubstantiated Changes to Individual Construction Phase Lengths."  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Off-road Equipment - Consistent with the DEIR's model.  
 Trips and VMT - See SWAPE comment on "Unsubstantiated Reductions to Worker and Vendor Trips."  
 Grading - Consistent with the DEIR's model.  
 Vehicle Trips - Consistent with the DEIR's model.  
 Consumer Products - Consistent with the DEIR's model.  
 Energy Use -  
 Water And Wastewater - Consistent with the DEIR's model.  
 Construction Off-road Equipment Mitigation - Consistent with the DEIR's model.  
 Energy Mitigation - See SWAPE comment on "Incorrect Application of Energy-Related Operational Mitigation Measure."

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	40
tblConstDustMitigation	WaterInpavedRoadVehiclesSpeed	0	15
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00







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tblLandUse	LandUseSquareFeet	1,695,360.00	1,695,355.20
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	2,966,870.00	2,966,871.60
tblLandUse	LandUseSquareFeet	427,760.00	427,759.20
tblLandUse	LandUseSquareFeet	21,970.00	21,968.00
tblLandUse	LotCoverage	14.73	29.46
tblLandUse	LotCoverage	19.46	38.92
tblLandUse	LotCoverage	38.92	77.84
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	68.11	136.22
tblLandUse	LotCoverage	9.82	19.64
tblLandUse	LotCoverage	2.30	6.56
tblLandUse	LotCoverage	0.50	1.44
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00



tblOffRoadEquipment	OffRoadEquipmentInAmount	4.00	8.00
tblOffRoadEquipment	OffRoadEquipmentInAmount	1.00	2.00
tblProjectCharacteristics	CO2IntensityFactor	702.44	502.65
tblVehicleTrips	ST_TR	64.07	0.00
tblVehicleTrips	ST_TR	2.49	0.00
tblVehicleTrips	ST_TR	1.49	0.00
tblVehicleTrips	ST_TR	1.68	0.00
tblVehicleTrips	ST_TR	42.04	0.00
tblVehicleTrips	SU_TR	56.12	0.00
tblVehicleTrips	SU_TR	0.73	0.00
tblVehicleTrips	SU_TR	0.62	0.00
tblVehicleTrips	SU_TR	1.68	0.00
tblVehicleTrips	SU_TR	20.43	0.00
tblVehicleTrips	WD_TR	50.75	0.00
tblVehicleTrips	WD_TR	6.83	0.00
tblVehicleTrips	WD_TR	3.82	0.00
tblVehicleTrips	WD_TR	1.68	0.00
tblVehicleTrips	WD_TR	44.32	0.00
tblWater	IndoorWaterUserRate	7,407,252.15	5,330,000.00
tblWater	IndoorWaterUserRate	148,379,250.00	15,864,848.00
tblWater	IndoorWaterUserRate	196,026,000.00	31,024,945.00
tblWater	IndoorWaterUserRate	1,863,148,875.00	305,310,206.00
tblWater	IndoorWaterUserRate	1,627,373.30	1,170,000.00
tblWater	OutdoorWaterUserRate	4,539,928.74	246,000.00
tblWater	OutdoorWaterUserRate	997,422.34	54,000.00

2.0 Emissions Summary



**2.1 Overall Construction (Maximum Daily Emission)  
Unmitigated Construction**

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBIogenic CO2	Total CO2	CH4	N2O	CO2e
2021	8.5685	92.9114	62.8506	0.1279	36.5237	4.0912	40.6150	19.9851	3.7639	23.7291	0.0000	12.39616	12.39616	3.8944	0.0000	12.49352
							43				43					50
2022	31.3712	223.9109	216.3627	1.0563	72.5838	3.2723	74.8590	19.5513	3.0106	21.6699	0.0000	108.0231	108.0231	6.5617	0.0000	108.1871
							511				511					944
2023	28.5946	173.1613	199.2801	1.0241	72.5839	1.8732	74.4565	19.5611	1.7380	21.3091	0.0000	104.7063	104.7063	5.4297	0.0000	104.9020
							239				239					687
2024	27.1309	171.4586	189.4309	1.0053	72.5828	1.6958	74.2787	19.5509	1.5906	21.1416	0.0000	102.8865	102.8865	5.2981	0.0000	103.0282
							396				396					427
2025	25.7507	167.0339	179.0999	0.9838	72.5824	1.5166	74.0990	19.5508	1.4221	20.9729	0.0000	100.7578	100.7578	5.0988	0.0000	100.8852
							171				171					888
2026	24.7302	164.7414	170.3519	0.9648	72.5820	1.5044	74.0864	19.5507	1.4107	20.9614	0.0000	98.86575	98.86575	4.9451	0.0000	98.98938
							46				46					12
2027	23.7370	162.6093	162.5470	0.9462	72.5817	1.4658	74.0673	19.5505	1.3938	20.9441	0.0000	97.20959	97.20959	4.7990	0.0000	97.32938
							43				43					80
2028	22.7526	160.8112	156.0224	0.9339	72.5814	1.4627	74.0441	19.5504	1.3722	20.9227	0.0000	95.78098	95.78098	4.6615	0.0000	95.89752
							57				57					41
2029	751.0553	17.2033	29.6629	0.0825	11.8595	0.8385	12.0134	3.1452	0.7714	3.2950	0.0000	8.208725	8.208725	1.4305	0.0000	8.212242
							8				8					2
Maximum	751.0553	223.9109	216.3627	1.0563	72.5838	4.0912	74.8590	19.9851	3.7639	23.7291	0.0000	108.0231	108.0231	6.5617	0.0000	108.1871
							511				511					944



Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)  
Mitigated Construction

Year	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
2021	3.2323	60.0681	74.6389	0.1279	36.3877	2.6015	38.2823	19.9317	2.6013	21.8262	0.0000	12,396.16	12,396.16	3.8944	0.0000	12,493.52
2022	29.3065	221.1317	219.3834	1.0563	48.1774	2.6014	50.6416	13.5608	2.6012	15.9841	0.0000	108,023.1	108,023.1	6.5617	0.0000	108,187.1
2023	26.7969	174.8436	202.5486	1.0241	48.1768	2.2809	50.4577	13.5604	2.2462	15.8086	0.0000	104,766.3	104,766.3	5.4297	0.0000	104,892.0
2024	25.5556	173.0031	192.8448	1.0053	48.1764	2.2763	50.4527	13.5603	2.2439	15.8042	0.0000	102,886.5	102,886.5	5.2681	0.0000	103,028.2
2025	24.3638	170.5467	182.6782	0.9838	48.1759	2.2686	50.4445	13.5601	2.2367	15.7968	0.0000	100,757.8	100,757.8	5.0988	0.0000	100,885.2
2026	23.3432	168.2542	173.9301	0.9648	48.1756	2.2563	50.4319	13.5600	2.2253	15.7853	0.0000	98,865.75	98,865.75	4.9451	0.0000	98,989.98
2027	22.3300	166.1221	166.2252	0.9462	48.1752	2.2378	50.4130	13.5599	2.2082	15.7680	0.0000	97,209.59	97,209.59	4.7990	0.0000	97,329.58
2028	21.3656	164.3239	159.6006	0.9339	48.1750	2.2147	50.3896	13.5598	2.1868	15.7466	0.0000	95,780.98	95,780.98	4.6615	0.0000	95,897.52
2029	750.8324	22.6305	35.0983	0.0825	7.7354	1.2201	7.9764	2.1329	1.2200	2.3699	0.0000	8,208.725	8,208.725	1.4305	0.0000	8,212.242
Maximum	750.8324	221.1317	219.3834	1.0563	48.1774	2.6015	50.6416	19.9317	2.6013	21.8262	0.0000	108,023.1	108,023.1	6.5617	0.0000	108,187.1
Percent Reduction	1.76	1.12	-3.01	0.00	31.47	-12.50	30.22	26.57	-19.88	22.91	0.00	0.00	0.00	0.00	0.00	0.00



**2.2 Overall Operational  
Unmitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	5.5000e-003			2.2883
Energy	13.2089	120.0809	100.8680	0.7205	9.1282	9.1282	9.1282	9.1282	9.1282	9.1282	144.0970	144.0970	2.7619	2.6418	144.9533	982
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>79.7480</b>	<b>120.0898</b>	<b>101.8571</b>	<b>0.7206</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>144.0992</b>	<b>144.0992</b>	<b>2.7674</b>	<b>2.6418</b>	<b>144.9556</b>	<b>645</b>

**Mitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	5.5000e-003			2.2883
Energy	13.2089	120.0809	100.8680	0.7205	9.1282	9.1282	9.1282	9.1282	9.1282	9.1282	144.0970	144.0970	2.7619	2.6418	144.9533	982
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>79.7480</b>	<b>120.0898</b>	<b>101.8571</b>	<b>0.7206</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>0.0000</b>	<b>9.1297</b>	<b>9.1297</b>	<b>144.0992</b>	<b>144.0992</b>	<b>2.7674</b>	<b>2.6418</b>	<b>144.9556</b>	<b>645</b>



ROG Percent Reduction	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	BiO-CO2	NBiO-CO2	Total CO2	CH4	N2O	CO2e
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail**

**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	7/1/2021	9/30/2021	5	66	
2	Grading	Grading	10/1/2021	5/27/2022	5	171	
3	Building Construction	Building Construction	5/28/2022	12/8/2028	5	1705	
4	Paving	Paving	12/9/2028	5/28/2029	5	121	
5	Architectural Coating	Architectural Coating	5/29/2029	11/3/2029	5	121	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 855

Acres of Paving: 68.7

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 14,502,213; Non-Residential Outdoor: 4,834,071; Striped Parking Area: 179,554 (Architectural Coating – sqft)

OffRoad Equipment



Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

Phase Name	Offroad Equipment Count	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	14	Rubber Tired Dozers	6	8.00	247	0.40
Site Preparation	16	Tractor/Loaders/Backhoes	8	8.00	97	0.37
Grading	18	Excavators	4	8.00	158	0.38
Grading	12	Graders	2	8.00	187	0.41
Grading	2	Rubber Tired Dozers	2	8.00	247	0.40
Grading	4	Scrapers	4	8.00	367	0.48
Grading	4	Tractor/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	2	Cranes	2	7.00	231	0.29
Building Construction	6	Forklifts	6	8.00	89	0.20
Building Construction	2	Generator Sets	2	8.00	84	0.74
Building Construction	6	Tractor/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	2	Welders	2	8.00	46	0.45
Paving	4	Pavers	4	8.00	130	0.42
Paving	4	Paving Equipment	4	8.00	132	0.36
Paving	4	Rollers	4	8.00	80	0.38
Architectural Coating	2	Air Compressors	2	6.00	78	0.48

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	14	35.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	16	40.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	5,305.00	2,075.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	12	30.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	1,061.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT





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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

**3.1 Mitigation Measures Construction**

- Use Cleaner Engines for Construction Equipment
- Use Soil Stabilizer
- Water Exposed Area
- Reduce Vehicle Speed on Unpaved Roads
- Clean Paved Roads

**3.2 Site Preparation - 2021**

**Unmitigated Construction On-Site**

Category	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					36,1325	0.0000	36,1325	19,8614	0.0000	19,8614			0.0000			0.0000
Off-Road	7,7764	80,9942	42,3085	0.0760		4,0889	4,0889		3,7618	3,7618		7,371,313 <sup>8</sup>	7,371,313 <sup>8</sup>	2,3840		7,430,914 <sup>6</sup>
<b>Total</b>	<b>7,7764</b>	<b>80,9942</b>	<b>42,3085</b>	<b>0.0760</b>	<b>36,1325</b>	<b>4,0889</b>	<b>40,2214</b>	<b>19,8614</b>	<b>3,7618</b>	<b>23,6232</b>		<b>7,371,313<sup>8</sup></b>	<b>7,371,313<sup>8</sup></b>	<b>2,3840</b>		<b>7,430,914<sup>6</sup></b>



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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

**3.2 Site Preparation - 2021**

**Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1628	0.0978	1.0445	3.3500e-003	0.3912	2.3100e-003	0.3935	0.1038	2.1200e-003	0.1059		334.3177	334.3177	7.7300e-003		334.5109
<b>Total</b>	<b>0.1628</b>	<b>0.0978</b>	<b>1.0445</b>	<b>3.3500e-003</b>	<b>0.3912</b>	<b>2.3100e-003</b>	<b>0.3935</b>	<b>0.1038</b>	<b>2.1200e-003</b>	<b>0.1059</b>		<b>334.3177</b>	<b>334.3177</b>	<b>7.7300e-003</b>		<b>334.5109</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					36.1325	0.0000	36.1325	19.8614	0.0000	19.8614		0.0000	0.0000			0.0000
Off-Road	1.8623	38.1312	45.9201	0.0760		1.8923	1.8923	1.8923	1.8923	1.8923		7.371.313	7.371.313	2.3840		7.430.914
<b>Total</b>	<b>1.8623</b>	<b>38.1312</b>	<b>45.9201</b>	<b>0.0760</b>	<b>36.1325</b>	<b>1.8923</b>	<b>38.0249</b>	<b>19.8614</b>	<b>1.8923</b>	<b>21.7537</b>	<b>0.0000</b>	<b>7.371.313</b>	<b>7.371.313</b>	<b>2.3840</b>		<b>7.430.914</b>



**3.2 Site Preparation - 2021**

**Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1628	0.0978	1.0445	3.3500e-003	0.2552	2.3100e-003	0.2575	0.0704	2.1200e-003	0.0725	334.3177	334.3177	334.3177	7.7300e-003		334.5109
<b>Total</b>	<b>0.1628</b>	<b>0.0978</b>	<b>1.0445</b>	<b>3.3500e-003</b>	<b>0.2552</b>	<b>2.3100e-003</b>	<b>0.2575</b>	<b>0.0704</b>	<b>2.1200e-003</b>	<b>0.0725</b>	<b>334.3177</b>	<b>334.3177</b>	<b>334.3177</b>	<b>7.7300e-003</b>		<b>334.5109</b>

**3.3 Grading - 2021**

**Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	8.3824	92.7997	61.7569	0.1240		3.9707	3.9707		3.6530	3.6530	12,014.08	12,014.08	12,014.08			12,111.22
<b>Total</b>	<b>8.3824</b>	<b>92.7997</b>	<b>61.7569</b>	<b>0.1240</b>	<b>17.3467</b>	<b>3.9707</b>	<b>21.3173</b>	<b>7.1930</b>	<b>3.6530</b>	<b>10.8460</b>	<b>12,014.08</b>	<b>12,014.08</b>	<b>12,014.08</b>	<b>3.8856</b>		<b>12,111.22</b>



**3.3 Grading - 2021**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1861	0.1117	1.1937	3.8300e-003	0.4471	2.6300e-003	0.4497	0.1186	2.4300e-003	0.1210	382.0774	382.0774	382.0774	8.8300e-003		382.2982
<b>Total</b>	<b>0.1861</b>	<b>0.1117</b>	<b>1.1937</b>	<b>3.8300e-003</b>	<b>0.4471</b>	<b>2.6300e-003</b>	<b>0.4497</b>	<b>0.1186</b>	<b>2.4300e-003</b>	<b>0.1210</b>		<b>382.0774</b>	<b>382.0774</b>	<b>8.8300e-003</b>		<b>382.2982</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	3.0462	59.9564	73.4452	0.1240		2.5989	2.5989		2.5989	2.5989	0.0000	12,014.08	12,014.08	3.8856		12,111.22
<b>Total</b>	<b>3.0462</b>	<b>59.9564</b>	<b>73.4452</b>	<b>0.1240</b>	<b>17.3467</b>	<b>2.5989</b>	<b>19.9455</b>	<b>7.1930</b>	<b>2.5989</b>	<b>9.7919</b>	<b>0.0000</b>	<b>12,014.08</b>	<b>12,014.08</b>	<b>3.8856</b>		<b>12,111.22</b>



**3.3 Grading - 2021**

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1861	0.1117	1.1937	3.8300e-003	0.2916	2.6300e-003	0.2943	0.0804	2.4300e-003	0.0828	382.0774	382.0774	382.0774	8.8300e-003		382.2982
<b>Total</b>	<b>0.1861</b>	<b>0.1117</b>	<b>1.1937</b>	<b>3.8300e-003</b>	<b>0.2916</b>	<b>2.6300e-003</b>	<b>0.2943</b>	<b>0.0804</b>	<b>2.4300e-003</b>	<b>0.0828</b>	<b>382.0774</b>	<b>382.0774</b>	<b>382.0774</b>	<b>8.8300e-003</b>		<b>382.2982</b>

**3.3 Grading - 2022**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	7.2497	77.6870	58.0830	0.1242		3.2698	3.2698	3.0082	3.0082	3.0082	12,022.8211	12,022.8211	12,022.8211	3.8884		12,120.0317
<b>Total</b>	<b>7.2497</b>	<b>77.6870</b>	<b>58.0830</b>	<b>0.1242</b>	<b>17.3467</b>	<b>3.2698</b>	<b>20.6165</b>	<b>7.1930</b>	<b>3.0082</b>	<b>10.2012</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>3.8884</b>		<b>12,120.0317</b>



**3.3 Grading - 2022**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1746	0.1005	1.0994	3.6900e-003	0.4471	2.5700e-003	0.4497	0.1186	2.3600e-003	0.1209	368.1356	368.1356	7.9400e-003	368.1356	7.9400e-003	368.3340
<b>Total</b>	<b>0.1746</b>	<b>0.1005</b>	<b>1.0994</b>	<b>3.6900e-003</b>	<b>0.4471</b>	<b>2.5700e-003</b>	<b>0.4497</b>	<b>0.1186</b>	<b>2.3600e-003</b>	<b>0.1209</b>		<b>368.1356</b>	<b>368.1356</b>	<b>7.9400e-003</b>		<b>368.3340</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					17.3467	0.0000	17.3467	7.1930	0.0000	7.1930	0.0000	0.0000	0.0000			0.0000
Off-Road	3.0462	59.9564	73.4452	0.1242		2.5989	2.5989		2.5989	2.5989	0.0000	12,022.8211	12,022.8211	3.8884		12,120.0317
<b>Total</b>	<b>3.0462</b>	<b>59.9564</b>	<b>73.4452</b>	<b>0.1242</b>	<b>17.3467</b>	<b>2.5989</b>	<b>19.9456</b>	<b>7.1930</b>	<b>2.5989</b>	<b>9.7919</b>	<b>0.0000</b>	<b>12,022.8211</b>	<b>12,022.8211</b>	<b>3.8884</b>		<b>12,120.0317</b>



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**3.3 Grading - 2022**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1746	0.1005	1.0994	3.6900e-003	0.2916	2.5700e-003	0.2942	0.0804	2.3600e-003	0.0828	368.1356	368.1356	7.9400e-003	368.3340		368.3340
<b>Total</b>	<b>0.1746</b>	<b>0.1005</b>	<b>1.0994</b>	<b>3.6900e-003</b>	<b>0.2916</b>	<b>2.5700e-003</b>	<b>0.2942</b>	<b>0.0804</b>	<b>2.3600e-003</b>	<b>0.0828</b>	<b>368.1356</b>	<b>368.1356</b>	<b>7.9400e-003</b>	<b>368.3340</b>		<b>368.3340</b>

**3.4 Building Construction - 2022**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	3.4125	31.2313	32.7268	0.0539	1.6180	1.6180	1.6180	1.5223	1.5223	1.5223	5,108.667	5,108.667	1.2239	5,139.264		5,139.264
<b>Total</b>	<b>3.4125</b>	<b>31.2313</b>	<b>32.7268</b>	<b>0.0539</b>	<b>1.6180</b>	<b>1.6180</b>	<b>1.6180</b>	<b>1.5223</b>	<b>1.5223</b>	<b>1.5223</b>	<b>5,108.667</b>	<b>5,108.667</b>	<b>1.2239</b>	<b>5,139.264</b>		<b>5,139.264</b>



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**3.4 Building Construction - 2022**

**Unmitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.8040	179.3496	37.8312	0.5128	13.2864	0.3170	13.6034	3.8254	0.3031	4.1285	54,090.50	54,090.50	54,090.50	4.2849		54,197.62
Worker	23.1548	13.3500	145.8047	0.4897	59.2974	0.3402	59.6376	15.7260	0.3132	16.0392	48,823.97	48,823.97	48,823.97	1.0530		48,850.30
<b>Total</b>	<b>27.9587</b>	<b>192.6796</b>	<b>183.8359</b>	<b>1.0025</b>	<b>72.5838</b>	<b>0.6572</b>	<b>73.2410</b>	<b>19.5513</b>	<b>0.6163</b>	<b>20.1676</b>	<b>102,914.4</b>	<b>102,914.4</b>	<b>102,914.4</b>	<b>5.3378</b>		<b>103,047.3</b>

**Mitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,108.667	5,108.667	1.2239		5,139.264
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,108.667</b>	<b>5,108.667</b>	<b>1.2239</b>		<b>5,139.264</b>





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**3.4 Building Construction - 2022  
Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	4.8040	179.3496	37.8312	0.5128	9.5006	0.3170	9.8175	2.8861	0.3031	3.1892		54.090.50	54.090.50	4.2849		54.197.62
Worker	23.1548	13.3500	145.8047	0.4897	38.6768	0.3402	39.0170	10.8645	0.3132	10.9777		48.823.97	48.823.97	1.0530		48.850.30
<b>Total</b>	<b>27.9567</b>	<b>192.6796</b>	<b>183.8359</b>	<b>1.0025</b>	<b>48.1774</b>	<b>0.6572</b>	<b>48.8345</b>	<b>13.5906</b>	<b>0.6163</b>	<b>14.1770</b>		<b>102.914.4</b>	<b>102.914.4</b>	<b>5.3378</b>		<b>103.047.3</b>

**3.4 Building Construction - 2023  
Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	3.1455	28.7698	32.4880	0.0539		1.3995	1.3995		1.3169	1.3169		5,110,419	5,110,419	1,2157		5,140,812
<b>Total</b>	<b>3.1455</b>	<b>28.7698</b>	<b>32.4880</b>	<b>0.0539</b>		<b>1.3995</b>	<b>1.3995</b>		<b>1.3169</b>	<b>1.3169</b>		<b>5,110,419</b>	<b>5,110,419</b>	<b>1,2157</b>		<b>5,140,812</b>



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**3.4 Building Construction - 2023  
Unmitigated Construction Off-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.6702	134.3764	32.4376	0.4992	13.2859	0.1416	13.4275	3.8251	0.1354	3.9605	52,684.79	52,684.79	52,684.79	3.2676		52,766.48
Worker	21.7789	12.0151	134.3645	0.4710	59.2874	0.3321	59.6295	15.7280	0.3057	16.0337	46,971.10	46,971.10	46,971.10	0.3464		46,994.76
<b>Total</b>	<b>25.4491</b>	<b>146.3915</b>	<b>166.8021</b>	<b>0.9702</b>	<b>72.5833</b>	<b>0.4738</b>	<b>73.0570</b>	<b>19.5531</b>	<b>0.4411</b>	<b>19.9922</b>	<b>99,655.90</b>	<b>99,655.90</b>	<b>99,655.90</b>	<b>4.2140</b>		<b>99,761.25</b>

**Mitigated Construction On-Site**

Category	lb/day															
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,110.419	5,110.419	1.2157		5,140.812
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,110.419</b>	<b>5,110.419</b>	<b>1.2157</b>		<b>5,140.812</b>



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**3.4 Building Construction - 2023**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.6702	134.3764	32.4376	0.4992	9.5000	0.1416	9.6416	2.8959	0.1354	3.0313	68	52,684.79	52,684.79	3,267.6		52,766.48
Worker	21,7789	12,0151	134,3645	0,4710	38,6768	0,3321	39,0090	10,8645	0,3057	10,9703	53	46,971,10	46,971,10	0,3464		46,994,76
<b>Total</b>	<b>25,4491</b>	<b>146,3915</b>	<b>166,8021</b>	<b>0,9702</b>	<b>48,1768</b>	<b>0,4738</b>	<b>48,6506</b>	<b>13,5604</b>	<b>0,4411</b>	<b>14,0015</b>	<b>61</b>	<b>99,655,90</b>	<b>99,655,90</b>	<b>4,2140</b>		<b>99,761,25</b>

**3.4 Building Construction - 2024**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.9431	26.8876	32.3336	0.0539		1.2266	1.2266		1.1538	1.1538	8	5,111,397	5,111,397	1,2087		5,141,615
<b>Total</b>	<b>2,9431</b>	<b>26,8876</b>	<b>32,3336</b>	<b>0,0539</b>		<b>1,2266</b>	<b>1,2266</b>		<b>1,1538</b>	<b>1,1538</b>	<b>8</b>	<b>5,111,397</b>	<b>5,111,397</b>	<b>1,2087</b>		<b>5,141,615</b>



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**3.4 Building Construction - 2024  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.6001	133.6606	31.3943	0.4973	13.2854	0.1406	13.4260	3.8250	0.1344	3.9593	52,497.77	52,497.77	52,497.77	3.1960		52,577.67
Worker	20.5877	10,8904	123,7029	0.4540	59,2974	0.3287	59,6261	15,7260	0.3025	16,0285	45,297.37	45,297.37	45,297.37	0.8634		45,308.95
<b>Total</b>	<b>24.1878</b>	<b>144.5510</b>	<b>157.0972</b>	<b>0.9514</b>	<b>72.5828</b>	<b>0.4692</b>	<b>73.0520</b>	<b>19.5509</b>	<b>0.4369</b>	<b>19.9878</b>	<b>97,795.14</b>	<b>97,795.14</b>	<b>97,795.14</b>	<b>4.0594</b>		<b>97,886.82</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,111.397	5,111.397	1.2087		5,141.615
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,111.397</b>	<b>5,111.397</b>	<b>1,2087</b>		<b>5,141.615</b>



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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

**3.4 Building Construction - 2024  
Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.6001	133.6606	31.3943	0.4973	9.4995	0.1406	9.6401	2.8957	0.1344	3.0301	52,497.7706	52,497.7706	52,497.7706	3.1960		52,577.6713
Worker	20.5977	10,8904	123,7029	0.4540	38,6768	0.3287	39,0055	10,8645	0.3025	10,9670	45,297.3712	45,297.3712	45,297.3712	0.8634		45,308.9560
<b>Total</b>	<b>24.1878</b>	<b>144.5510</b>	<b>157.0972</b>	<b>0.9514</b>	<b>48.1764</b>	<b>0.4692</b>	<b>48.6456</b>	<b>13.5903</b>	<b>0.4369</b>	<b>13.9971</b>	<b>97,795.1418</b>	<b>97,795.1418</b>	<b>97,795.1418</b>	<b>4.0594</b>		<b>97,896.6273</b>

**3.4 Building Construction - 2025  
Unmitigated Construction On-Site**

Category	lb/day											lb/day				lb/day	
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	2.7348	24.9394	32.1693	0.0539		1.0551	1.0551		0.9925	0.9925	5,112.9487	5,112.9487	5,112.9487	1.2019		5,142.9961	
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>		<b>1.0551</b>	<b>1.0551</b>		<b>0.9925</b>	<b>0.9925</b>	<b>5,112.9487</b>	<b>5,112.9487</b>	<b>5,112.9487</b>	<b>1.2019</b>		<b>5,142.9961</b>	



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**3.4 Building Construction - 2025  
Unmitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.5097	132.1814	30.3941	0.4941	13.2850	0.1387	13.4236	3.8248	0.1325	3.9574	52,169.72	52,169.72	52,169.72	3.1137		52,247.56
Worker	19.5063	9.9132	116.5365	0.4338	59.2974	0.3228	59.6202	15.7260	0.2971	16.0230	43,475.14	43,475.14	43,475.14	0.7832		43,484.72
<b>Total</b>	<b>23.0160</b>	<b>142.0946</b>	<b>146.9306</b>	<b>0.9279</b>	<b>72.5824</b>	<b>0.4615</b>	<b>73.0459</b>	<b>19.5508</b>	<b>0.4296</b>	<b>19.9804</b>		<b>95,644.86</b>	<b>95,644.86</b>	<b>3.8969</b>		<b>95,742.29</b>

**Mitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,112.948	5,112.948	1.2019		5,142.996
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>



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**3.4 Building Construction - 2025  
Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.5097	132.1814	30.3941	0.4941	9.4991	0.1387	9.6378	2.8956	0.1325	3.0281	52,169.72	52,169.72	52,169.72	3.1137	47	52,247.56
Worker	19.5063	9.9132	116.5365	0.4338	38.6768	0.3228	38.9996	10.8645	0.2971	10.9616	43,475.14	43,475.14	43,475.14	0.7832	37	43,484.72
<b>Total</b>	<b>23.0160</b>	<b>142.0946</b>	<b>146.9306</b>	<b>0.9279</b>	<b>48.1759</b>	<b>0.4615</b>	<b>48.6374</b>	<b>13.5601</b>	<b>0.4296</b>	<b>13.9897</b>	<b>95,644.86</b>	<b>95,644.86</b>	<b>95,644.86</b>	<b>3.8969</b>	<b>84</b>	<b>95,742.29</b>

**3.4 Building Construction - 2026  
Unmitigated Construction On-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	2.7348	24.9394	32.1693	0.0539	1.0551	1.0551	1.0551	0.9925	0.9925	0.9925	5,112.948	5,112.948	5,112.948	1.2019	7	5,142.996
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>	<b>1.0551</b>	<b>1.0551</b>	<b>1.0551</b>	<b>0.9925</b>	<b>0.9925</b>	<b>0.9925</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>	<b>7</b>	<b>5,142.996</b>



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**3.4 Building Construction - 2026  
Unmitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.4307	130.7201	29.5780	0.4911	13.2846	0.1366	13.4212	3.8247	0.1306	3.9553	51,861.29	51,861.29	51,861.29	3.0291		51,937.02
Worker	18.5647	9.0819	108.6046	0.4198	58.2874	0.3127	59.6101	15.7260	0.2877	16.0136	41,891.51	41,891.51	41,891.51	0.7141		41,909.36
<b>Total</b>	<b>21.9954</b>	<b>139.8021</b>	<b>138.1826</b>	<b>0.9109</b>	<b>72.5620</b>	<b>0.4492</b>	<b>73.0313</b>	<b>19.5907</b>	<b>0.4182</b>	<b>19.9699</b>	<b>93,752.80</b>	<b>93,752.80</b>	<b>93,752.80</b>	<b>3.7432</b>		<b>93,846.38</b>

**Mitigated Construction On-Site**

Category	lb/day											lb/day					CO2e
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O		
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,112.948	5,112.948	1.2019		5,142.996	
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>	





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**3.4 Building Construction - 2026**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.4307	130.7201	29.5780	0.4911	9.4988	0.1366	9.6353	2.8954	0.1306	3.0260	51,861.29	51,861.29	51,861.29	3.0291	56	51,937.02
Worker	18.5647	9,081.9	108.6046	0.4198	38.6768	0.3127	38,989.95	10,864.9	0.2877	10,952.2	41,891.51	41,891.51	41,891.51	0.7141	03	41,909.36
<b>Total</b>	<b>21.9954</b>	<b>139.8021</b>	<b>138.1826</b>	<b>0.9109</b>	<b>48.1756</b>	<b>0.4492</b>	<b>48,624.8</b>	<b>13,580.0</b>	<b>0.4182</b>	<b>13,978.2</b>	<b>93,752.80</b>	<b>93,752.80</b>	<b>93,752.80</b>	<b>3.7432</b>	<b>58</b>	<b>93,846.38</b>

**3.4 Building Construction - 2027**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				lb/day	
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	2.7348	24.9394	32.1693	0.0539	1.0551	1.0551	1.0551	0.9925	0.9925	0.9925	5,112.948	5,112.948	5,112.948	1.2019	7	5,142.996	
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>	<b>1.0551</b>	<b>1.0551</b>	<b>1.0551</b>	<b>0.9925</b>	<b>0.9925</b>	<b>0.9925</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>	<b>7</b>	<b>5,142.996</b>	



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**3.4 Building Construction - 2027  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3657	129.3281	28.9126	0.4884	13.2843	0.1346	13.4189	3.8246	0.1286	3.9532	51,593.98	51,593.98	51,593.98	2.9446		51,667.59
Worker	17.6385	8,341.8	101.3650	0.4059	59,297.4	0.2362	59,399.6	15,726.0	0.2725	15,998.4	40,502.66	40,502.66	40,502.66	0.6525		40,578.97
<b>Total</b>	<b>21.0022</b>	<b>137.6699</b>	<b>130.4776</b>	<b>0.9943</b>	<b>72.5617</b>	<b>0.4307</b>	<b>73.0124</b>	<b>19.5905</b>	<b>0.4011</b>	<b>19.9916</b>	<b>92,096.64</b>	<b>92,096.64</b>	<b>92,096.64</b>	<b>3.5971</b>		<b>92,186.57</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,112.948	5,112.948	1.2019		5,142.996
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>



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**3.4 Building Construction - 2027**

**Mitigated Construction Off-Site**

Category	lb/day											lb/day				
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3657	129.3281	28.9126	0.4884	9.4984	0.1346	9.6330	2.8953	0.1286	3.0239	51,593.98	51,593.98	51,593.98	2.9446		51,667.59
Worker	17.6385	8,341.8	101.5850	0.4059	38.6768	0.2962	38,973.0	10,8645	0.2725	10,937.0	40,502.66	40,502.66	40,502.66	0.6525		40,578.97
<b>Total</b>	<b>21.0022</b>	<b>137.6699</b>	<b>130.4776</b>	<b>0.9943</b>	<b>48.1752</b>	<b>0.4307</b>	<b>48,606.9</b>	<b>13.5899</b>	<b>0.4011</b>	<b>13,969.9</b>	<b>92,096.64</b>	<b>92,096.64</b>	<b>92,096.64</b>	<b>3.5971</b>		<b>92,186.57</b>

**3.4 Building Construction - 2028**  
**Unmitigated Construction On-Site**

Category	lb/day											lb/day				lb/day	
	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e	
Off-Road	2.7348	24.9394	32.1693	0.0539		1.0551	1.0551		0.9925	0.9925	5,112.948	5,112.948	5,112.948	1.2019		5,142.996	
<b>Total</b>	<b>2.7348</b>	<b>24.9394</b>	<b>32.1693</b>	<b>0.0539</b>		<b>1.0551</b>	<b>1.0551</b>		<b>0.9925</b>	<b>0.9925</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>	



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**3.4 Building Construction - 2028  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3134	128.1854	28.4321	0.4883	13.2840	0.1331	13.4171	3.8245	0.1272	3.9517	06	51,377.70	51,377.70	2.8603		51,449.20
Worker	16.7044	7.6884	96.4210	0.3937	58.2874	0.2745	58.5619	15.7260	0.2525	15.9785	03	39,290.33	39,290.33	0.5994		39,305.52
<b>Total</b>	<b>20.0178</b>	<b>135.8718</b>	<b>123.8530</b>	<b>0.8800</b>	<b>72.5614</b>	<b>0.4076</b>	<b>72.9690</b>	<b>19.5504</b>	<b>0.3797</b>	<b>19.9301</b>		<b>90,668.03</b>	<b>90,668.03</b>	<b>3.4596</b>		<b>90,754.32</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.3478	28.4521	35.7476	0.0539		1.8071	1.8071		1.8071	1.8071	0.0000	5,112.948	5,112.948	1.2019		5,142.996
<b>Total</b>	<b>1.3478</b>	<b>28.4521</b>	<b>35.7476</b>	<b>0.0539</b>		<b>1.8071</b>	<b>1.8071</b>		<b>1.8071</b>	<b>1.8071</b>	<b>0.0000</b>	<b>5,112.948</b>	<b>5,112.948</b>	<b>1.2019</b>		<b>5,142.996</b>



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**3.4 Building Construction - 2028**

**Mitigated Construction Off-Site**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3134	128.1854	28.4321	0.4863	9.4981	0.1331	9.6312	2.8952	0.1272	3.0224	51,377.70	06	51,377.70	2.8603	06	51,449.20
Worker	16.7044	7.8884	96.4210	0.3937	38.6768	0.2745	38.9513	10.8645	0.2525	10.9171	39,290.33	03	39,290.33	0.5994	03	39,305.32
<b>Total</b>	<b>20.0178</b>	<b>135.8718</b>	<b>123.8530</b>	<b>0.8800</b>	<b>48.1750</b>	<b>0.4076</b>	<b>48.5825</b>	<b>13.5998</b>	<b>0.3797</b>	<b>13.9395</b>	<b>90,668.03</b>	<b>69</b>	<b>90,668.03</b>	<b>3.4596</b>	<b>69</b>	<b>90,754.32</b>

**3.5 Paving - 2028**

**Unmitigated Construction On-Site**

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.8303	17.1633	29.1559	0.0456	0.8371	0.8371	0.8371	0.7701	0.7701	0.7701	4,413.490	3	4,413.490	1.4274	3	4,449.175
Paving	0.8077				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>2.6379</b>	<b>17.1633</b>	<b>29.1559</b>	<b>0.0456</b>	<b>0.8371</b>	<b>0.8371</b>	<b>0.8371</b>	<b>0.7701</b>	<b>0.7701</b>	<b>0.7701</b>	<b>4,413.490</b>	<b>3</b>	<b>4,413.490</b>	<b>1.4274</b>	<b>3</b>	<b>4,449.175</b>



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**3.5 Paving - 2028**

**Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0945	0.0435	0.5396	2.2300E-003	0.3353	1.3300E-003	0.3369	0.0889	1.4300E-003	0.0904	222.1885	222.1885	222.1885	3.3900E-003		222.2733
<b>Total</b>	<b>0.0945</b>	<b>0.0435</b>	<b>0.5396</b>	<b>2.2300E-003</b>	<b>0.3353</b>	<b>1.5500E-003</b>	<b>0.3369</b>	<b>0.0889</b>	<b>1.4300E-003</b>	<b>0.0904</b>		<b>222.1885</b>	<b>222.1885</b>	<b>3.3900E-003</b>		<b>222.2733</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NBiogenic CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.1219	22.5905	34.5913	0.0456		1.2187	1.2187		1.2187	1.2187	0.0000	4,413,490	4,413,490	1,4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000	0.0000	3	3	0.0000		0.0000
<b>Total</b>	<b>1.9295</b>	<b>22.5905</b>	<b>34.5913</b>	<b>0.0456</b>		<b>1.2187</b>	<b>1.2187</b>		<b>1.2187</b>	<b>1.2187</b>	<b>0.0000</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1,4274</b>		<b>4,449,175</b>



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**3.5 Paving - 2028**

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0945	0.0435	0.5396	2.2300e-003	0.2187	1.5500e-003	0.2203	0.0603	1.4300e-003	0.0617	222.1885	222.1885	222.1885	3.3900e-003		222.2733
<b>Total</b>	<b>0.0945</b>	<b>0.0435</b>	<b>0.5396</b>	<b>2.2300e-003</b>	<b>0.2187</b>	<b>1.5500e-003</b>	<b>0.2203</b>	<b>0.0603</b>	<b>1.4300e-003</b>	<b>0.0617</b>		<b>222.1885</b>	<b>222.1885</b>	<b>3.3900e-003</b>		<b>222.2733</b>

**3.5 Paving - 2029**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.8303	17.1633	29.1559	0.0456		0.8371	0.8371		0.7701	0.7701	4,413,490	4,413,490	4,413,490	1.4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000		0.0000	0.0000			0.0000
<b>Total</b>	<b>2.6379</b>	<b>17.1633</b>	<b>29.1559</b>	<b>0.0456</b>		<b>0.8371</b>	<b>0.8371</b>		<b>0.7701</b>	<b>0.7701</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1.4274</b>		<b>4,449,175</b>



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**3.5 Paving - 2029**

**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0889	0.0401	0.5070	2.1700e-003	0.3353	1.4400e-003	0.3368	0.0889	1.3200e-003	0.0903		216.1875	216.1875	3.1100e-003		216.2652
<b>Total</b>	<b>0.0889</b>	<b>0.0401</b>	<b>0.5070</b>	<b>2.1700e-003</b>	<b>0.3353</b>	<b>1.4400e-003</b>	<b>0.3368</b>	<b>0.0889</b>	<b>1.3200e-003</b>	<b>0.0903</b>		<b>216.1875</b>	<b>216.1875</b>	<b>3.1100e-003</b>		<b>216.2652</b>

**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.1219	22.5905	34.5913	0.0456		1.2187	1.2187		1.2187	1.2187	0.0000	4,413,490	4,413,490	1.4274		4,449,175
Paving	0.8077					0.0000	0.0000		0.0000	0.0000		3	3	0.0000		6
<b>Total</b>	<b>1.9295</b>	<b>22.5905</b>	<b>34.5913</b>	<b>0.0456</b>		<b>1.2187</b>	<b>1.2187</b>		<b>1.2187</b>	<b>1.2187</b>	<b>0.0000</b>	<b>4,413,490</b>	<b>4,413,490</b>	<b>1.4274</b>		<b>4,449,175</b>





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**3.5 Paving - 2029**

**Mitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0889	0.0401	0.3070	2.1700e-003	0.2187	1.4400e-003	0.2202	0.0603	1.3200e-003	0.0616		216.1875	216.1875	3.1100e-003		216.2652
<b>Total</b>	<b>0.0889</b>	<b>0.0401</b>	<b>0.3070</b>	<b>2.1700e-003</b>	<b>0.2187</b>	<b>1.4400e-003</b>	<b>0.2202</b>	<b>0.0603</b>	<b>1.3200e-003</b>	<b>0.0616</b>		<b>216.1875</b>	<b>216.1875</b>	<b>3.1100e-003</b>		<b>216.2652</b>

**3.6 Architectural Coating - 2029**  
**Unmitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	747.5895					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.3417	2.2910	3.6183	5.9400e-003	0.1030	0.1030	0.1030	0.1030	0.1030	0.1030		562.8961	562.8961	0.0307		563.6637
<b>Total</b>	<b>747.9312</b>	<b>2.2910</b>	<b>3.6183</b>	<b>5.9400e-003</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>	<b>0.1030</b>		<b>562.8961</b>	<b>562.8961</b>	<b>0.0307</b>		<b>563.6637</b>



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**3.6 Architectural Coating - 2029  
Unmitigated Construction Off-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	3.1440	1.4164	17.9299	0.0766	11.8995	0.0509	11.9104	3.1452	0.0468	3.1920		7,645,829	7,645,829	0.1100		7,648,578
<b>Total</b>	<b>3.1440</b>	<b>1.4164</b>	<b>17.9299</b>	<b>0.0766</b>	<b>11.8995</b>	<b>0.0509</b>	<b>11.9104</b>	<b>3.1452</b>	<b>0.0468</b>	<b>3.1920</b>		<b>7,645,829</b>	<b>7,645,829</b>	<b>0.1100</b>		<b>7,648,578</b>

**Mitigated Construction On-Site**

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	747.5895					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1189	2.7140	3.6648	5.9400e-003	0.1902	0.1902	0.1902	0.1902	0.1902	0.1902	0.0000	562.8961	562.8961	0.0307		563.6637
<b>Total</b>	<b>747.6884</b>	<b>2.7140</b>	<b>3.6648</b>	<b>5.9400e-003</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.1902</b>	<b>0.0000</b>	<b>562.8961</b>	<b>562.8961</b>	<b>0.0307</b>		<b>563.6637</b>



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**3.6 Architectural Coating - 2029  
Mitigated Construction Off-Site**

Category	lb/day										lb/day					
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.1440	1.4164	17.9299	0.0766	7.7354	0.0509	7.7863	2.1329	0.0468	2.1797	7	7,645,829	7	7,645,829	0.1100	7,645,578
<b>Total</b>	<b>3.1440</b>	<b>1.4164</b>	<b>17.9299</b>	<b>0.0766</b>	<b>7.7354</b>	<b>0.0509</b>	<b>7.7863</b>	<b>2.1329</b>	<b>0.0468</b>	<b>2.1797</b>	<b>7</b>	<b>7,645,829</b>	<b>7</b>	<b>7,645,829</b>	<b>0.1100</b>	<b>7,645,578</b>

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**



Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

Category	lb/day															
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Free-Standing Discount Superstore	0.00	0.00	0.00		
Industrial Park	0.00	0.00	0.00		
Manufacturing	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Refrigerated Warehouse-No Rail	0.00	0.00	0.00		
Strip Mall	0.00	0.00	0.00		
<b>Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		

4.3 Trip Type Information



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Land Use	Miles						Trip %						Trip Purpose %			
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by							
Free-Standing Discount	16.60	8.40	6.90	13.20	67.80	19.00	47.5	35.5	17							
Industrial Park	16.60	8.40	6.90	59.00	28.00	13.00	79	19	2							
Manufacturing	16.60	8.40	6.90	59.00	28.00	13.00	92	5	3							
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0							
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Refrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3							
Strip Mall	16.60	8.40	6.90	16.60	64.40	19.00	45	40	15							

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Free-Standing Discount	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Supertore	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Industrial Park	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Manufacturing	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Other Non-Asphalt Surfaces	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Refrigerated Warehouse-No Rail	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615
Strip Mall	0.562310*	0.034239	0.191194	0.102231	0.010280	0.004149	0.017053	0.070255	0.001423	0.001071	0.004354	0.000825	0.000615

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
NaturalGas Mitigated	132089	120.0899	100.8680	0.7205		9.1262	9.1262		9.1262	9.1262	144,097.0	992	144,097.0	2,7619	2,6418	144,953.3
NaturalGas Unmitigated	132089	120.0899	100.8680	0.7205		9.1262	9.1262		9.1262	9.1262	144,097.0	992	144,097.0	2,7619	2,6418	144,953.3



5.2 Energy by Land Use - Natural Gas  
Unmitigated

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Land Use	Natural Gas Use kBTU/yr	lb/day														
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Total CO2	CH4	N2O	CO2e
Free-Standing Discount Superstore Industrial Park	6099.96	0.068	0.598	0.524	3.900e-003	0.045	0.045	0.045	0.045	0.045	0.045	717.6428	717.6428	0.138	0.0132	721.9073
Manufacturing	75454.9	0.8137	7.3975	6.2139	0.0444	0.5622	0.5622	0.5622	0.5622	0.5622	0.5622	8.877049	8.877049	0.1701	0.1628	8.929801
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	240415	2.5927	23.5701	19.7989	0.1414	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	28.28415	28.28415	0.5421	0.5185	28.45223
Refrigerated Warehouse-No Rail	420727	9.0745	82.4955	69.2962	0.4950	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	98.99453	98.99453	1.9974	1.8149	99.58281
Refrigerated Warehouse-No Rail	60669.8	0.5642	5.9470	4.9955	0.0357	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	6	6	0.1368	0.1308	6.178851
Strip Mall	133074	0.003	0.0131	0.0110	0.005	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	1.000e-003	15.7193	15.7193	0.004	2.000e-004	15.9127
<b>Total</b>	<b>132089</b>	<b>120.0809</b>	<b>100.8680</b>	<b>0.7205</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>144.0970</b>	<b>144.0970</b>	<b>2.7619</b>	<b>2.6418</b>	<b>144.9533</b>



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Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

**5.2 Energy by Land Use - NaturalGas Mitigated**

Land Use	NaturalGas Use kBTU/yr	lb/day										lb/day							
		ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bi-CO2	NBi-CO2	Total CO2	CH4	N2O	CO2e		
Free-Standing Discount Superstore Industrial Park	0.609219	5.5600e-003	0.0586	0.0501	3.6000e-004	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	4.5300e-003	4.5300e-003	0.0455	71.5552	71.5552	1.3700e-003	1.3100e-003	71.9804
Manufacturing	75.4549	0.1137	7.3975	6.2139	0.0444	0.5622	0.5622	0.0455	0.5622	0.5622	0.0455	0.5622	0.5622	0.0455	8.877049	8.877049	0.1701	0.1628	8.925801
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Refrigerated Warehouse-No Rail	240.415	2.5927	23.5701	19.7989	0.1414	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	1.7913	28.28415	28.28415	0.5421	0.5185	28.45223
Refrigerated Warehouse-No Rail	420.727	9.0745	82.4955	69.2962	0.4950	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	6.2697	98.99453	98.99453	1.9974	1.8149	99.58281
Refrigerated Warehouse-No Rail	60.6598	0.6542	5.9470	4.9955	0.0357	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	0.4520	6	6	0.1368	0.1308	7.178851
Strip Mall	0.133814	0.003	0.0131	0.0110	0.0005	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	1.0000e-003	15.7193	15.7193	0.0004	2.0004	15.9127
<b>Total</b>	<b>13.2089</b>	<b>120.0809</b>	<b>100.6680</b>	<b>0.7205</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>9.1261</b>	<b>144.0970</b>	<b>144.0970</b>	<b>2.7619</b>	<b>2.6418</b>	<b>144.9533</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**





Stoneridge Commerce Center - Primary Land Use Plan - Riverside-South Coast County, Winter

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Mitigated	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883
Unmitigated	66.5391	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883

6.2 Area by SubCategory  
Unmitigated

SubCategory	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Architectural Coating	24.7825				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	4.1682				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Landscaping	0.0905	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	2.1309	2.1309	2.1309	5.5000e-003		2.2883
<b>Total</b>	<b>66.5391</b>	<b>8.9100e-003</b>	<b>0.9892</b>	<b>7.0000e-005</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>2.1309</b>	<b>2.1309</b>	<b>2.1309</b>	<b>5.5000e-003</b>		<b>2.2883</b>



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**6.2 Area by SubCategory Mitigated**

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	24.7825				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Consumer Products	41.6662				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Landscaping	0.0905	8.9100e-003	0.9892	7.0000e-005	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003	3.5100e-003		2.1309	2.1309	8.5000e-003		2.2663
<b>Total</b>	<b>66.5391</b>	<b>8.9100e-003</b>	<b>0.9892</b>	<b>7.0000e-005</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>	<b>3.5100e-003</b>		<b>2.1309</b>	<b>2.1309</b>	<b>5.5000e-003</b>		<b>2.2663</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**



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Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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Attachment C



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**Matthew F. Hagemann, P.G., C.Hg., QSD, QSP**

**Geologic and Hydrogeologic Characterization  
Investigation and Remediation Strategies  
Litigation Support and Testifying Expert  
Industrial Stormwater Compliance  
CEQA Review**

**Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.  
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

**Professional Certifications:**

California Professional Geologist  
California Certified Hydrogeologist  
Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA’s Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 – 2003);



- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.



- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

**Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

**Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted



public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

**Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific



- principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

**Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

**Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).





**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.



**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M.F.**, Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.



**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.



**Attachment D**



**SOIL WATER AIR PROTECTION ENTERPRISE**  
2656 29th Street, Suite 201  
Santa Monica, California 90405  
Attn: Paul Rosenfeld, Ph.D.  
Mobil: (310) 795-2335  
Office: (310) 452-5555  
Fax: (310) 452-5550  
Email: [prosenfeld@swape.com](mailto:prosenfeld@swape.com)

***Paul Rosenfeld, Ph.D.***

**Chemical Fate and Transport & Air Dispersion Modeling**

*Principal Environmental Chemist*

**Risk Assessment & Remediation Specialist**

**Education**

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.  
M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.  
B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

**Professional Experience**

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.



### **Professional History:**

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner  
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)  
UCLA School of Public Health; 2003 to 2006; Adjunct Professor  
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator  
UCLA Institute of the Environment, 2001-2002; Research Associate  
Komex H<sub>2</sub>O Science, 2001 to 2003; Senior Remediation Scientist  
National Groundwater Association, 2002-2004; Lecturer  
San Diego State University, 1999-2001; Adjunct Professor  
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager  
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager  
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor  
King County, Seattle, 1996 – 1999; Scientist  
James River Corp., Washington, 1995-96; Scientist  
Big Creek Lumber, Davenport, California, 1995; Scientist  
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist  
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

### **Publications:**

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A., Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermol and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E.** & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.



- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.
- Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.
- Rosenfeld, P.E.**, J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.
- Rosenfeld, P. E.**, M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.
- Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing
- Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.
- Rosenfeld P. E.**, J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.
- Rosenfeld, P.E.**, and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.
- Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.
- Rosenfeld, P. E.**, Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.
- Rosenfeld, P.E.**, Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS-6), Sacramento, CA Publication #442-02-008.
- Rosenfeld, P.E.**, and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.
- Rosenfeld, P.E.**, and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.
- Rosenfeld, P.E.**, C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.
- Rosenfeld, P.E.**, and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.
- Rosenfeld, P.E.**, and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.



Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E.** (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E.** (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

### **Presentations:**

**Rosenfeld, P.E.**, "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

**Rosenfeld, P.E.**, Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

**Rosenfeld, P.E.** (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tucson, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tucson, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23<sup>rd</sup> Annual International*



*Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D.** (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D.** (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D.** (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.





Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E., Grey, M.,** (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D.** (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E.** and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld, P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

**Rosenfeld, P.E.** (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E.** (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E., C.L. Henry, R. Harrison.** (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E., and C.L. Henry.** (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E., C.L. Henry, R. Harrison.** (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.



**Rosenfeld, P.E., C.L. Henry.** (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E., C.L. Henry, R. Harrison.** (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills.** (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

### **Teaching Experience:**

UCLA Department of Environmental Health (Summer 2003 through 2010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

### **Academic Grants Awarded:**

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.



United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

**Deposition and/or Trial Testimony:**

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants  
Case No.: No. 09-L-2295  
Rosenfeld Deposition, 5-14-2021  
Trial, October 8-4-2021

In the Circuit Court of Cook County Illinois  
Joseph Rafferty, Plaintiff vs. Consolidated Rail Corporation and National Railroad Passenger Corporation  
d/b/a AMTRAK,  
Case No.: No. 18-L-6845  
Rosenfeld Deposition, 6-28-2021

In the United States District Court For the Northern District of Illinois  
Theresa Romcoe, Plaintiff vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA  
Rail, Defendants  
Case No.: No. 17-cv-8517  
Rosenfeld Deposition, 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa  
Mary Tryon et al., Plaintiff vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.  
Case Number CV20127-094749  
Rosenfeld Deposition: 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division  
Robinson, Jeremy et al *Plaintiffs*, vs. CNA Insurance Company et al.  
Case Number 1:17-cv-000508  
Rosenfeld Deposition: 3-25-2021

In the Superior Court of the State of California, County of San Bernardino  
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.  
Case No. 1720288  
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse  
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.  
Case No. 18STCV01162  
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri  
Karen Cornwell, *Plaintiff*, vs. Marathon Petroleum, LP, *Defendant*.  
Case No.: 1716-CV10006  
Rosenfeld Deposition. 8-30-2019

In the United States District Court For The District of New Jersey  
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.  
Case No.: 2:17-cv-01624-ES-SCM  
Rosenfeld Deposition. 6-7-2019



- In the United States District Court of Southern District of Texas Galveston Division  
M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”  
*Defendant*.  
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237  
Rosenfeld Deposition. 5-9-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants  
Case No.: No. BC615636  
Rosenfeld Deposition, 1-26-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants  
Case No.: No. BC646857  
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19
- In United States District Court For The District of Colorado  
Bells et al. Plaintiff vs. The 3M Company et al., Defendants  
Case No.: 1:16-cv-02531-RBJ  
Rosenfeld Deposition, 3-15-2018 and 4-3-2018
- In The District Court Of Regan County, Texas, 112<sup>th</sup> Judicial District  
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants  
Cause No.: 1923  
Rosenfeld Deposition, 11-17-2017
- In The Superior Court of the State of California In And For The County Of Contra Costa  
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants  
Cause No C12-01481  
Rosenfeld Deposition, 11-20-2017
- In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants  
Case No.: No. 09-L-2295  
Rosenfeld Deposition, 8-23-2017
- In United States District Court For The Southern District of Mississippi  
Guy Manuel vs. The BP Exploration et al., Defendants  
Case: No 1:19-cv-00315-RHW  
Rosenfeld Deposition, 4-22-2020
- In The Superior Court of the State of California, For The County of Los Angeles  
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC  
Case No.: LC102019 (c/w BC582154)  
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018
- In the Northern District Court of Mississippi, Greenville Division  
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*  
Case Number: 4:16-cv-52-DMB-JVM  
Rosenfeld Deposition: July 2017



- In The Superior Court of the State of Washington, County of Snohomish  
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants  
Case No.: No. 13-2-03987-5  
Rosenfeld Deposition, February 2017  
Trial, March 2017
- In The Superior Court of the State of California, County of Alameda  
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants  
Case No.: RG14711115  
Rosenfeld Deposition, September 2015
- In The Iowa District Court In And For Poweshiek County  
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants  
Case No.: LALA002187  
Rosenfeld Deposition, August 2015
- In The Circuit Court of Ohio County, West Virginia  
Robert Andrews, et al. v. Antero, et al.  
Civil Action N0. 14-C-30000  
Rosenfeld Deposition, June 2015
- In The Iowa District Court For Muscatine County  
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant  
Case No 4980  
Rosenfeld Deposition: May 2015
- In the Circuit Court of the 17<sup>th</sup> Judicial Circuit, in and For Broward County, Florida  
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.  
Case Number CACE07030358 (26)  
Rosenfeld Deposition: December 2014
- In the County Court of Dallas County Texas  
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.  
Case Number cc-11-01650-E  
Rosenfeld Deposition: March and September 2013  
Rosenfeld Trial: April 2014
- In the Court of Common Pleas of Tuscarawas County Ohio  
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*  
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)  
Rosenfeld Deposition: October 2012
- In the United States District Court for the Middle District of Alabama, Northern Division  
James K. Benefield, et al., *Plaintiffs*, vs. International Paper Company, *Defendant*.  
Civil Action Number 2:09-cv-232-WHA-TFM  
Rosenfeld Deposition: July 2010, June 2011
- In the Circuit Court of Jefferson County Alabama  
Jaeanette Moss Anthony, et al., *Plaintiffs*, vs. Drummond Company Inc., et al., *Defendants*  
Civil Action No. CV 2008-2076  
Rosenfeld Deposition: September 2010
- In the United States District Court, Western District Lafayette Division  
Ackle et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants*.  
Case Number 2:07CV1052  
Rosenfeld Deposition: July 2009



**Letter I Blum Collins and Ho, LLP**

- I-1 The County acknowledges and appreciates these comments, which were provided on behalf of Golden State Environmental Justice Alliance (GSEJA). The GSEJA will be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this Project, and all communications will be provided to the contact information provided by this comment. It also is acknowledged that the GSEJA withdrew their comment letter on the Project's EIR in a letter dated July 18, 2022. Notwithstanding, and in the interest of full disclosure, responses to the comments identified by this comment letter are provided below.
- I-2 These comments accurately summarize the description of the proposed Project as presented in the DEIR. Commenter is referred above to Subsection R.3, which provides a summary of the changes that have been made to the Project since distribution of the DEIR. In particular, please note that the total amount of Light Industrial building area included as part of the Project evaluated in this RDEIR has been reduced by approximately 13.1% as compared to the Project described and evaluated in the DEIR.
- I-3 The County acknowledges and appreciates these comments, as well as the comments included in the SWAPE technical memorandum. Please refer to Responses I-4 through I-98.
- I-4 The County disagrees with the commenter's assertion that the DEIR did not provide an analysis of relevant environmental justice issues. The DEIR included an analysis of the Project's potential localized air quality impacts (DEIR Subsection 4.3, *Air Quality*), an analysis of the Project's potential impacts due to aesthetics (DEIR Subsection 4.1), hazards/hazardous materials (DEIR Subsection 4.9), land use/planning (DEIR Subsection 4.11), and noise (DEIR Subsection 4.13). Notwithstanding, additional information about the area's existing pollution exposures, environmental effects, health risk, and socioeconomic burdens has been added to EIR Subsection 2.2. Commenter is referred to the revised analysis of the Project's potential environmental effects, as presented in Section 4.0, *Environmental Analysis*, of this RDEIR.
- I-5 The internet link to CalEnviroScreen 4.0 is acknowledged; no response is necessary.
- I-6 The commenter states that the State of California lists two approved compliance modeling software for non-residential buildings related to energy. The two compliance models referenced by the commenter are specifically intended to evaluate compliance with Title 24, which is typically evaluated at the time of application for building permits. The Project as evaluated by the DEIR and this RDEIR consists of applications for a General Plan Amendment, Amendment No. 1 to Specific Plan No. 239, and a Change of Zone. No site-specific applications are proposed as part of the current Project. Furthermore, no building permits would be issued until Riverside County approves implementing plot plans and/or conditional use permits within the Project boundaries. Therefore, the final design and construction drawings for the Project are not available at this time and will not be



available until building permit applications are filed with Riverside County. The DEIR and underlying technical studies correctly utilized CalEEMod, which estimates energy demand based on average intensity factors for similar land use types based on the land use plans provided to the County for entitlement. Since the Project's tenants are unknown at this time, and information about the future buildings' energy use is not available at this time, it is appropriate to defer to the CalEEMod default assumptions that have been derived by the California Air Pollution Control Officers Association (CAPCOA) based on survey data. Compliance with the 2022 Building Energy Efficiency Standards would be enforced at the time of application for a building permit by the County Building and Safety Department. As such, this RDEIR and the Project's air quality, energy, and greenhouse gas (GHG) technical reports (RDEIR *Technical Appendices B1, E, and T*, respectively) continue to utilize the latest version of CalEEMod in estimating the Project's air quality emissions and energy demands.

- I-7 The commenter makes reference to a lack of California Energy Commission (CEC) approved local energy standards. As clearly indicated in the reference cited in footnote 5 to this comment, the requirement to submit a local energy ordinance to the CEC for approval only applies when such a local energy ordinance is voluntarily adopted by a local agency. That is, in the event a local jurisdiction opts to adopt a local energy ordinance, such ordinance would be subject to review by the CEC. There is no requirement under State law mandating the preparation of a local energy ordinance. While the commenter is correct that Riverside County does not currently have a locally-adopted energy ordinance, the County is not required to adopt any such ordinance as all projects within Riverside County are subject to compliance with applicable energy-related laws and regulations promulgated by the State of California. Accordingly, the County disagrees with the commenter's assertion that the County's Climate Action Plan (CAP) Update does not comply with CA Energy Commission standards or AB 32/SB 32; on the contrary, the CAP Update and technical appendices thereto provide substantial evidence that the measures included in the CAP Update fully comply with the provisions of AB 32 and SB 32, and there are no provisions of the CAP Update that conflict with Energy Commission standards. Furthermore, the DEIR was not misleading to the public and decision makers because, as noted, there is no requirement under State law to adopt a CEC-approved local energy ordinance. Commenter also is referred to the revised analysis of the Project's impacts due to GHG emissions, presented in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*, which concludes that the Project's GHG impacts would be less than significant after mitigation requiring compliance with the County's CAP Update. As such, the revised analysis demonstrates that because the proposed Project would comply with the CAP Update, the Project also would be consistent with AB 32/SB 32. With respect to the portion of this comment related to modeling software, please refer to the response to Comment I-6.
- I-8 The internet links provided in these footnotes are acknowledged; no response is necessary, beyond what is provided in the response to Comment I-7.
- I-9 The County disagrees with the commenter's assertion that the DEIR was "erroneous and misleading" regarding the DEIR's conclusion that the Project's impacts due to greenhouse gas (GHG) emissions would be reduced to less-than-significant levels with the implementation of mitigation measures. The



DEIR analyzed Project GHG emissions consistent with the SCAQMD's Tier 2 GHG threshold, which requires an analysis of whether or not a project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, and that has an approved GHG emissions inventory. Thus, the Project was evaluated in the DEIR against the Riverside County CAP Update, which was subject to CEQA review and public hearings, and has an approved GHG emissions inventory. As stated on page 4.8-37 of the DEIR, the Riverside County CAP Update (November 2019) qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, and as described above, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. The DEIR found that implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through on-site renewable energy production. As stated by the CAP, "[i]f a project can obtain 100 points from the screening table, the mitigated project will implement pertinent reduction measures such that it meets the reduction goals of the CAP and a less than significant finding can be made for the project. The menu of options in the screening table is tied to the R2 Measures in the CAP Update and the Implementation Measures (IMs) in the General Plan such that 100 points would meet the emission reductions associated with the R2 Measures and IMs. This menu allows for maximum flexibility for projects to meet its reduction allocation." (Riverside County, 2019a, pp. 7-8) Accordingly, the County finds that the DEIR's conclusion that the Project's GHG impacts would be reduced to less-than-significant levels with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 was based on substantial evidence and was in full compliance with the CEQA Guidelines. No revisions have been incorporated into the RDEIR pursuant to this comment, beyond revisions needed to address revisions made to the Project as described in Subsection R.3. The revised analysis continues to conclude that impacts due to GHGs would be less than significant with compliance with the County's CAP Update.

- I-10** As the commenter notes, the MSHCP Burrowing Owl Survey Instructions state that "a written report including photographs of the project site, location of burrowing owl habitat surveyed, location of transects, and burrow survey methods should be prepared." DEIR *Technical Appendix C1* provided each of these items, including multiple photographs of the Project site depicting representative areas of suitable burrowing owl habitat. The commenter also states that only one photograph of a representative burrow was provided, implying that more than one burrow should have been depicted in a photo. However, the Survey Instructions do not specifically require the depiction of any burrows in photos, let alone multiple burrows. As such, the reporting of the burrowing owl surveys in DEIR *Technical Appendix C1* is and was consistent with what is recommended in the Survey Instructions. The commenter quotes the Survey Instructions in saying that "the location of all suitable burrowing





owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates,” and then states that GPS coordinates were not included in DEIR *Technical Appendix C1*. The portions of the Survey Instructions which state that areas of suitable habitat, etc. should be mapped to include GPS coordinates means that mapping should be conducted with GPS. GPS was used in performing the surveys, which is how the suitable burrows were mapped that were depicted on Exhibit 6A of DEIR *Technical Appendix C1*. However, the Survey Instructions do not state that actual GPS coordinates must be provided in the reporting. Regardless, providing the locations of burrows in a GIS format, which was accomplished in DEIR *Technical Appendix C1*, represents the actual coordinates. Furthermore, providing the actual GPS coordinates does not affect the validity of the burrowing owl surveys. The report exhibits sufficiently identify the locations surveyed for burrowing owls, including locations where suitable burrows were mapped.

- I-11** The 2006 MSHCP Burrowing Owl Survey Instructions state that “to efficiently survey projects larger than 100 acres, it is recommended that two or more qualified surveyors conduct concurrent surveys.” This means that one individual should not survey more than 100 acres per visit, i.e., the maximum size of a single survey polygon should not exceed 100 acres. The comment references that the Project site (i.e., the onsite portion) is approximately 582 acres. As noted on page 14 of DEIR *Technical Appendix C1*, the onsite portion was divided into seven survey polygons, which equates to a maximum of 83 acres per survey polygon assuming that the entire site is suitable habitat. As such, the focused surveys adhered to the recommendation of no more than 100 acres per surveyor, and therefore the survey coverage was adequate on the basis of acreage. The commenter also quotes the Survey Instruction in stating that “if habitat is found on the site, then walk a 150-meter (approximately 500 feet) buffer zone around the project boundary,” and then the commenter states “Exhibit 6A within Appendix C1 states that only a visual survey of the 500 foot buffer zone was completed. Per Google Maps, all of the land within the buffer zone is unsecured and vacant. A walking survey of the 500 foot buffer zone must be conducted and included as part of a revised EIR”. However, the Burrowing Owl Survey Instructions state that “if permission to access the buffer area cannot be obtained, do not trespass on adjacent property but visually inspect the adjacent habitat areas with binoculars and/or spotting scopes.” Portions of the lands within the 500-foot buffer were outside of lands controlled by the Project Applicant; therefore, it was appropriate for the buffer areas to be visually inspected since the biologists did not have permission to access those lands within the buffer area. Portions of the buffer area within the Project Proponent’s control were physically surveyed per the burrowing owl survey protocol and no owls were observed or identified.
- I-12** The internet link to the Western Riverside MSHCP Instructions for Burrowing Owl is acknowledged; no response is necessary.
- I-13** The area in question is a hillside/hill which was determined by the Project biologists to not support suitable habitat for the burrowing owl. Since no suitable habitat was present in this area, burrowing owl surveys were not required or necessary. Furthermore, pre-construction burrowing owl surveys would be required pursuant to DEIR (and RDEIR) Mitigation Measure MM 4.4-3, and if any



burrowing owls are present the Project Applicant would be required to implement a Burrowing Owl Management Plan to preclude impacts to the burrowing owl. No revision to the RDEIR is warranted pursuant to this comment.

- I-14** The proposed Project was reviewed by the Director of the Riverside County Airport Land Use Commission (ALUC). The ALUC issued a consistency determination letter dated May 5, 2021, which found that the Project would be fully consistent with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. DEIR *Technical Appendix I* incorrectly referred to the May 5 letter as the date of ALUC’s consistency determination. The text in *Technical Appendix I* has been revised to instead reference the May 5 consistency determination letter rather than the date of approval. The ALUC’s consistency determination letter has been added as *Technical Appendix P* to the RDEIR. As such, the commenter is incorrect in asserting that impacts due to airport-related hazards would represent a significant impact of the proposed Project, and is further incorrect in asserting that the Project was not reviewed by the ALUC. No revision has been made to the analysis in RDEIR Subsection 4.9 as a result of this comment.
- I-15** This comment correctly describes the Project’s proposed General Plan Amendment and Change of Zone; no further response is necessary
- I-16** The web links to the ALUC agendas are acknowledged; please refer to Response I-14. No further response is necessary.
- I-17** This comment correctly quotes the text from the analysis of Threshold a. in DEIR subsection 4.11.4; no further response is necessary.
- I-18** The County disagrees with the commenter’s assertion that the DEIR failed to acknowledge the Project’s impacts under the issue areas of aesthetics, agriculture, air quality, noise, and transportation. As was stated in the analysis of Threshold a. in DEIR Subsection 4.11, *Land Use and Planning*, “...impacts associated with the proposed land uses have been evaluated throughout this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent” (DEIR at p. 4.11-17). A full analysis and disclosure of the Project’s significant and unavoidable impacts were presented in DEIR Subsections 4.1 (Aesthetics), 4.2 (Agriculture and Forestry Resources), 4.3 (Air Quality), 4.13 (Noise), and 4.18 (Transportation). The County finds that the DEIR correctly concluded that impacts to land use and planning would be less than significant as the Project’s proposed General Plan Amendment and Change of Zone would not result in any significant environmental effects not already addressed in other sections of the DEIR under the appropriate subject headings.
- I-19** The County disagrees with the commenter’s assertion that the proposed Project would result in significant environmental impacts due to a conflict with General Plan Policy LU 3.3. The fact that the Project was conservatively concluded to result in a significant impact to aesthetics does not demonstrate the Project’s inconsistency with Policy LU 3.3. Through compliance with the SP 239A1



Design Guidelines and Development Standards, the County finds that the Project would establish a unique community on site with a special sense of place and quality of design. In addition, the draft SP 239A1 document was incorporated by reference in full compliance with State CEQA Guidelines § 15150 and was available for public review by contacting the Riverside County Planning Department and requesting an electronic copy of the document. No revision to the RDEIR or technical appendices is warranted pursuant to this comment, and the draft SP 239A1 document will be made available on the County's web site during the public review period for this RDEIR.

**I-20** The County disagrees with the commenter's assertion that the Project would be inconsistent with General Plan Policy LU 4.1 because of the Project's significant and unavoidable impacts to aesthetics and due to traffic-related noise. As indicated in *Technical Appendix I*, the Project would not conflict with the LNAP land use category design standards; the Project would not conflict with any requirements of Riverside County's zoning, building code, or other pertinent codes and regulations; proposed SP 239A1 requires the use of drought-tolerant landscaping; future implementing developments would be required to incorporate energy efficient design features (as documented in DEIR Subsection 4.6, *Energy*); and the Project would be required to implement water conservation features, as discussed in DEIR Subsection 4.20, *Utilities and Service Systems*. The Project's significant and unavoidable aesthetics and noise impacts are unrelated to the measures identified by Policy LU 4.1, and thus the Project's significant and unavoidable aesthetics and noise impacts do not represent a conflict with this Policy. In addition, the draft SP 239A1 document was incorporated by reference in full compliance with State CEQA Guidelines § 15150 and was available for public review by contacting the Riverside County Planning Department and requesting an electronic copy of the document. No revision to the RDEIR or technical appendices is warranted pursuant to this comment, and the draft SP 239A1 document will be made available on the County's web site during the public review period for this RDEIR (refer to RDEIR *Technical Appendix Q*).

**I-21** The County disagrees with the commenter's assertion that because the Project requires a General Plan Amendment (GPA), Specific Plan Amendment (SPA), and Change of Zone (CZ), the Project is inconsistent with General Plan Policy LU 7.1. With approval of these applications, the Project would be fully consistent with the site's General Plan and Specific Plan designations and would be fully consistent with the site's zoning classification. While the commenter is correct that the DEIR found that the Project would result in significant and unavoidable impacts to aesthetics, agricultural/forestry resources, air quality, noise, and transportation, such impacts were fully evaluated and disclosed in the DEIR. The County has reviewed the proposed Project and has determined that the Project would be consistent with the General Plan with approval of the Project's GPA, and further finds that the Project's SPA includes appropriate development standards and design guidelines to ensure compatibility with surrounding uses and that the DEIR included mitigation measures to reduce the Project's environmental effects to the maximum feasible extent. No revision has been made in the RDEIR pursuant to this comment.

**I-22** The County disagrees with the commenter's assertion that the Project would conflict with General Plan Policy LU 7.4 because the Project would result in significant and unavoidable traffic-related



noise impacts and unavoidable impacts due to VMT. The discussion in DEIR *Technical Appendix I* has been modified to clarify that the Project would not result in any “operational stationary” noise impacts (i.e., impacts due to on-site operations). Under existing conditions, the Project site does not directly abut any “existing residential, employment, [or] agricultural” land uses. Although the Project site abuts open space associated with the San Jacinto River, the Project has been designed to include 81.6 acres of conserved open space adjacent to the San Jacinto River open space areas, which would ensure full compliance with the County’s Multiple Species Habitat Conservation Plan (MSHCP) and would serve as a buffer between the Project’s land uses and the existing open space areas. Indirect impacts to the San Jacinto River open space area also were addressed in DEIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., which concluded that indirect impacts of the proposed Project would be reduced to less-than-significant levels with the incorporation of mitigation measures. The commenter is correct that the DEIR disclosed that existing residences along the roadway segment of Nuevo Road between Dunlap Drive and the Project entrance (Antelope Road) would experience noise levels exceeding the County’s standard of 65 dBA CNEL under Existing Plus Ambient Plus Project (EAP) 2030 conditions; however, and as was shown in DEIR Table 4.13-13, this roadway segment already would be exposed to noise levels exceeding 65 dBA CNEL under Existing Plus Ambient (EA) (2030) conditions even without the addition of Project traffic. Furthermore, the DEIR noted that the Project only would contribute 1.6 dBA CNEL to this roadway segment under EAP (2030) conditions, and the DEIR found that the Project’s contribution to noise along this roadway segment would be less than significant when considering traffic-related noise from cumulative developments under Existing Plus Ambient Plus Project Plus Cumulative (EAPC) conditions in 2030. Therefore, the County finds that the DEIR’s conclusion that the Project’s near-term cumulatively-considerable noise impacts along one roadway segment, which only would occur in the absence of traffic from cumulative developments, does not represent a conflict with General Plan Policy LU 7.4. Additionally, while the Project would result in significant and unavoidable impacts due to Vehicle Miles Traveled (VMT), the Project’s impacts due to VMT would not result in any direct adverse effects to “the integrity” of nearby existing residential or agricultural uses; thus, the County also finds that the Project’s significant and unavoidable impacts due to VMT do not constitute a conflict with Policy LU 7.4. Notwithstanding, the RDEIR has been revised to include an updated evaluation of the Project’s impacts due to noise and VMT. Although the Project as revised still would result in significant and unavoidable impacts due to traffic-related noise and VMT, the County finds that this does not represent a conflict with General Plan Policy LU 7.4 because this RDEIR identifies mitigation measures to reduce the Project’s significant and unavoidable impacts to the maximum feasible extent, and because the Project would not “encroach” upon any existing residential or any other land uses.

- I-23** The County disagrees with the commenter’s assertion that the proposed Project would conflict with General Plan Policies LU 8.1, LU 30.6, LU 30.2, HC 1.1, HC 14.2, HC 16.15, HC 16.18, and HC 16.24, and further disagrees with the commenter’s assertion that the fact that the Project requires a GPA, SPA, and CZ demonstrates inconsistency with these policies. This comment correctly cites the DEIR’s conclusions with respect to significant and unavoidable aesthetics, agriculture, air quality, noise, and transportation impacts. Additionally, the County acknowledges that the Project is located



within a SB 535 Disadvantaged Community. However, the fact that the Project would result in significant and unavoidable impacts to the environment does not indicate Project inconsistency with these policies, and there is no information provided in this comment demonstrating how the Project's significant and unavoidable effects would conflict with any of these policies. The Project would introduce employment-generating land uses in a portion of the County that suffers from an imbalance of job opportunities relative to the number of residents; thus, the Project would be consistent with Policy LU 8.1. The Project's DEIR included a number of standard requirements and mitigation measures to address noise, air pollution, and other impacts, thereby demonstrating Project consistency with Policies LU 30.6 and LU 30.2. As indicated in *Technical Appendix I*, Policy HC 1.1 provides direction to County staff and decision makers and is not applicable to the proposed Project; thus, the Project has no potential to conflict with this policy. Although the nearest existing residential use to the Project site is located approximately 0.5-mile from the Project site, the analysis in DEIR Subsection 4.3, *Air Quality*, demonstrated that the Project would not expose any nearby sensitive receptors to substantial pollutant concentrations; therefore, the Project would be consistent with Policies HC 14.2 and HC 16.15. Although Policy HC 16.18 provides direction to County staff and decision makers and is not applicable to the proposed Project, the Project would introduce job-creating land uses in an area that suffers from a poor jobs-housing balance, and the Project would not expose nearby sensitive receptors to substantial pollutant concentrations; thus, the Project would not conflict with Policy HC 16.18. In addition, proposed SP 239A1 includes development standards and design guidelines addressing site design issues, while the DEIR contained a number of standard requirements and mitigation measures to address noise, land use, traffic, and GHG emissions; thus, the Project would be consistent with Policy HC 16.24. Accordingly, the County finds that the proposed Project would not conflict with General Plan Policies LU 8.1, LU 30.6, LU 30.2, HC 1.1, HC 14.2, HC 16.15, HC 16.18, and HC 16.24, and no revisions to the RDEIR are warranted pursuant to this comment.

- I-24** The County disagrees with the commenter's assertion that the Project is inconsistent with General Plan Policy LU 10.2 because the Project's Fiscal Impact Analysis was not included for public review. The results of the Fiscal Impact Analysis are unrelated to any of the Project's physical impacts to the environment, and as such the Fiscal Impact Analysis was not referenced by or relied upon by the DEIR, with exception of the consistency analysis of Policy LU 10.2 in *Technical Appendix I*. Accordingly, the Fiscal Impact Analysis was not incorporated by reference by the DEIR pursuant to CEQA Guidelines 15150, and as such the Fiscal Impact Analysis did not need to be made available for public review. Because a Fiscal Impact Analysis was prepared, which demonstrates that the Project would not have a negative fiscal impact on the County of Riverside, the Project is fully consistent with Policy LU 10.2, and in any case there would be no adverse physical effects to the environment resulting from a conflict with Policy LU 10.2. Accordingly, no revisions have been incorporated into the RDEIR pursuant to this comment.
- I-25** The County disagrees with the commenter's assertion that because the Project would result in significant and unavoidable air quality and transportation impacts, the Project is inconsistent with General Plan Policies LU 11.2, LU 11.3, LU 11.5, AQ 1.4, AQ 1.5, AQ 8.2, AQ 8.8, AQ 9.1, AQ



9.2, or AQ 20.7. The fact that the Project would result in significant and unavoidable impacts to the environment does not indicate Project inconsistency with these policies, and there is no information provided in this comment demonstrating how the Project's significant and unavoidable effects would conflict with any of these policies. The analysis of localized impacts throughout the DEIR demonstrated that the Project would not expose any sensitive receptors to impacts associated with pollution-producing activities; thus, the County finds the Project is consistent with Policy LU 11.2. The County also finds that the analysis in DEIR *Technical Appendix I* was correct in that Policy LU 11.3 provides direction to County staff and decision makers, and is unrelated to the proposed Project; thus, the County finds that the Project would not conflict with Policy LU 11.3. The County further finds that the Project also would inherently be consistent with Policy LU 11.5, as the Project would be subject to compliance with all applicable requirements set forth by the County's CAP Update; thus, the Project would fully comply with the GHG reduction measures identified in the General Plan Air Quality Element and the County's CAP Update. Additionally, the County finds that the analyses of Policies AQ 1.4, AQ 1.5, and AQ 9.1 in DEIR *Technical Appendix I* were correct in that these policies provide direction to County staff and decision makers, and the Project would have no potential to interfere with coordination efforts with the SCAQMD and MDAQMD; would have no potential to inhibit the County's ability to establish and implement air quality, land use, and circulation measures that improve the County and the region's environment; and would have no potential to interfere with County efforts to cooperate with local, regional, State, and federal jurisdictions to reduce VMT and vehicular air quality emissions. While the County acknowledges that the DEIR disclosed that the Project would result in significant and unavoidable impacts due to VMT, the DEIR also noted that the Project would generate between approximately 10,044 to 10,256 jobs within a portion of Riverside County that suffers from a poor jobs-housing balance, thereby assisting the County in reducing commuter distances for workers in the local area; thus, the County finds that the DEIR's conclusion was correct that the Project would not result in significant environmental effects due to a conflict with General Plan Policies AQ 8.2 or AQ 8.8. In addition, the County finds that the analysis of General Plan Policy AQ 9.1 in DEIR *Technical Appendix I* was correct in that Policy AQ 9.1 provides direction to County staff and decision makers regarding the development of regional and local land use planning efforts, and the Project would not inhibit the ability of the County to conduct long-range planning efforts that would serve to reduce VMT and motor vehicle emissions. Furthermore, the Project would introduce new jobs in an area with a poor jobs-housing balance, which would assist the County in the long term in reducing VMT associated with employment, further demonstrating that the Project would not conflict with Policy AQ 8.8. Additionally, although the County acknowledges that the Project would result in significant and unavoidable impacts due to VMT, the County finds that Policy AQ 9.2 is aspirational and that this policy merely provides direction to County staff and decision makers. There are no components of the Project that would interfere with the County's ability to attain performance goals and/or VMT reductions which are consistent with SCAG's Growth Management Plan. Finally, the County finds that the analysis in DEIR *Technical Appendix I* was correct with respect to the fact that the Project is not located within a designated "urban center" and therefore the Project has no potential to conflict with Policy AQ 20.7. No revision to the RDEIR has been made pursuant to this comment.



- I-26** The County disagrees with the commenter’s assertion that the Project would be inconsistent with General Plan Policy LU 13.1. Policy 13.1 provides direction to County staff and decision makers to “provide land use arrangements that reduce reliance on the automobile” and to “improve opportunities for pedestrian, bicycle, and transit use.” The County finds that the analysis in DEIR *Technical Appendix I* was correct in that the land use patterns that would be established by the Project would introduce jobs into an area that suffers from a poor jobs-housing balance; thus, by locating employment opportunities near residential areas, the Project would inherently reduce reliance on the automobile. Additionally, the County finds that the analysis is correct in that the Project would improve opportunities for pedestrian, bicycle, and transit use. Although the commenter is correct that RTA service is not currently available in the area, the Project’s land use intensity would “provide opportunities” for new or expanded bus routes. Additionally, the Project includes a number of facilities for pedestrians and bicycles, as was discussed in DEIR Subsection 3.5.2.C and as was depicted on DEIR Figure 3-6. Accordingly, the County finds that the Project would be fully consistent with Policy LU 13.1, and no revision has been made as part of the RDEIR pursuant to this comment.
- I-27** The County disagrees with the commenter’s assertion that the Project would conflict with General Plan Policy LU 13.7. In particular, this comment incorrectly asserts that the Project would increase “County VMT per employee by 26.2%”; rather, the DEIR disclosed that the Project would exceed the County’s threshold of significance of 14.24 VMT per employee by 26.2%, as the DEIR disclosed that the Project would result in approximately 19.3 VMT per employee. Additionally, General Plan Policy LU 13.7 directs the County to “review projects for consistency” with the County’s Transportation Demand Ordinance (TDO). As stated by Riverside County Ordinance No. 726, “[n]ew development should therefore be encouraged to incorporate transportation demand management measures into project design and operations...on a voluntary basis.” Thus, the measures identified by Ordinance No. 726 are optional and not mandatory. Nonetheless, the County finds that the analysis in DEIR *Technical Appendix I* was correct in that the Project would introduce employment opportunities into a portion of the County that lacks adequate employment opportunities, thereby assisting the County in meeting the goal of the TDO to reduce overall vehicular trips. Other provisions of Ordinance No. 726 relate to traffic congestion, while pursuant to State CEQA Guidelines Section 15064.3(a), “...a project’s effect on automobile delay shall not constitute a significant environmental impact.” Furthermore, and in compliance with the TDO, traffic impact analyses were prepared for the Project and were included in DEIR *Technical Appendices L1 and L3*. The traffic impact analyses included measures (physical improvements, fair-share contributions, and fee payments) to address the Project’s contribution to traffic congestion within the Project’s study area. Additionally, the DEIR included Mitigation Measure MM 4.18-1, which would serve to reduce the Project’s impacts due to VMT to the maximum feasible extent and implements several of the recommended Transportation Demand Management measures identified by the TDO. Accordingly, the County finds that the Project is consistent with the County’s TDO, and is therefore consistent with Policy LU 13.7. Accordingly, no revisions have been incorporated into the RDEIR pursuant to this comment.



- I-28** The draft SP 239A1 document was incorporated by reference in full compliance with CEQA Guidelines § 15150 and was available for public review by contacting the Riverside County Planning Department and requesting an electronic copy of the document. Additionally, any specific requirements of SP 239A1 that were relied upon in the analysis of the Project’s impacts were specifically identified by the EIR, including the measures referenced by this comment. Notwithstanding, the County will make a copy of SP 239A1 available for public review during the 45-day public review period for this RDEIR (refer to RDEIR *Technical Appendix Q*). Furthermore, and as demonstrated by the analysis in RDEIR *Technical Appendix I*, the Project as described by this RDEIR would not conflict with General Plan Policies LU 14.3 through LU 14.7. While the commenter is correct the Project would result in significant unavoidable impacts to aesthetics, this impact is the result of the change in visual character of the Project site from undeveloped land to urban development, and is not due to any aesthetic characteristics of the Project. The development standards and design guidelines set forth by SP 239A1 have been crafted to provide standards for development components including landscaping, structures, equipment, signage, and grading, and compliance with the measures identified by SP 239A1 would ensure the Project does not conflict with the surrounding scenic setting or environment, in compliance with Policy LU 14.3. The County has reviewed the design of the proposed Project and has determined the Project accommodates adequate setbacks from Ramona Expressway, in compliance with Policy LU 14.4. No signage would be installed on site prior to preparation and approval by Riverside County of a Master Sign Program, as required by the Signage Guidelines included in subsection 4.4.11 of SP 239A1. Riverside County would review the Master Sign Program to ensure compliance with all applicable General Plan policies and requirements, including Policies LU 14.6 and LU 14.7. No revision has been incorporated into the RDEIR pursuant to this comment, and the draft SP 239A1 document will be made available on the County’s web site during the public review period for this RDEIR.
- I-29** The County acknowledges that the proposed Project is located within a Disadvantaged Community pursuant to SB 535, and that the DEIR found that the Project would result in significant and unavoidable impacts to aesthetics, agriculture, air quality, noise, and transportation. It should be noted that since the DEIR was distributed for public review, the Project site was reclassified by the State FMMP program and no longer contains any areas mapped as containing Farmland, a finding supported by a site-specific LESA analysis (RDEIR *Technical Appendix S*); thus, as evaluated in this RDEIR, the Project’s impacts to agricultural resources would be less than significant (refer to the discussion and analysis in RDEIR Subsection 4.2, *Agriculture and Forestry Resources*). However, none of the Project’s significant and unavoidable impacts as disclosed by the DEIR would directly impact nearby residents or other sensitive receptors, with exception of the Project’s cumulatively-considerable and unavoidable traffic-related noise impact along the roadway segment of Nuevo Road between Dunlap Drive and the Project entrance (Antelope Road). However, and as shown in DEIR Table 4.13-13, this roadway segment already would be exposed to noise levels exceeding 65 dBA CNEL under Existing Plus Ambient (EA) (2030) conditions even without the addition of Project traffic. Furthermore, the DEIR found that the Project only would contribute 1.6 dBA CNEL to this roadway segment under EAP (2030) conditions, and the DEIR demonstrated that the Project’s contribution to noise along this roadways segment would be less than significant when considering





traffic-related noise from cumulative developments under Existing Plus Ambient Plus Project Plus Cumulative (EAPC) conditions in 2030. As previously noted, the draft SP 239A1 document was incorporated by reference in full compliance with CEQA Guidelines § 15150 and was available for public review by contacting the Riverside County Planning Department and requesting an electronic copy of the document. No revision has been incorporated into the RDEIR pursuant to this comment (beyond the revisions that have been incorporated into this RDEIR based on changes to the Project's design, as described above in Subsection R.3). The draft SP 239A1 document will be made available on the County's web site during the public review period for this RDEIR (refer to *Technical Appendix Q*).

- I-30** The County disagrees with the commenter's assertion that the proposed Project would be inconsistent with General Plan Policies LU 15.1, LU 15.4, N 7.1, or N 7.2. As previously indicated in Response I-14, the proposed Project was reviewed by the Director of the Riverside County Airport Land Use Commission (ALUC). The ALUC issued a consistency determination letter dated May 5, 2021, which found that the Project would be fully consistent with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to compliance with the ALUC's standard conditions of approval. DEIR *Technical Appendix I* incorrectly referred to the May 5 letter as the date of ALUC's consistency determination. The text in *Technical Appendix I* has been revised to instead reference the May 5 consistency determination letter rather than the date of approval. The ALUC's consistency determination letter has been added as *Technical Appendix P* to this RDEIR. As such, the commenter is incorrect in asserting that impacts due to airport-related hazards would represent a conflict with these policies, and is further incorrect in asserting that the Project was not reviewed by the ALUC. No revisions have been incorporated into this RDEIR document pursuant to this comment, beyond the above-referenced minor clarification made to *Technical Appendix I*.
- I-31** The County disagrees with the commenter's assertion that the Project would be inconsistent with General Plan Policy LU 30.1, resulting in a significant environmental land use impact. While the County acknowledges that the Project requires approval of a GPA, SPA, and CZ, the Project would not inhibit the County's ability to accommodate industrial, manufacturing, research and development, and professional office uses in areas designated by the General Plan and area plan land use maps. In addition, the DEIR fully disclosed the Project's significant and unavoidable impacts to aesthetics, agricultural resources, air quality, noise, and transportation. The simple fact that the Project would result in significant and unavoidable impact under these issue areas does not provide evidence that the Project is in any way in conflict with Policy LU 30.1. Accordingly, the County finds that there are no components of the Project that would conflict with Policy LU 30.1, and further finds that the analysis contained in *Technical Appendix I* correctly determined that the Project would be consistent with this policy. No revision has been incorporated into this RDEIR pursuant to this comment.
- I-32** The commenter incorrectly alleges that the proposed Project would violate the provisions of Senate Bill 330 (SB 330), and disagrees with the commenter's assertion that the Project would therefore be inconsistent with General Plan Policy HC 3.4. The County's General Plan and the various area plans throughout the County constitute long-range planning efforts undertaken by the County to ensure that



the General Plan accommodates a range of housing options to accommodate a range of income levels and household types. In addition, the Project site is not identified by the General Plan Housing Element as a site that is intended to accommodate the County's RHNA obligations. Furthermore, SB 330 only applies to "Affected Cities" and "Affected Counties." Section 13 of SB 330 states that "Affected Counties" refers to "a census designated place, based on the 2013-2017 American Community Survey 5-year Estimates, that is wholly located within the boundaries of an urbanized area, as designated by the United States Census Bureau." Based on a list of "Affected Counties" compiled by the California Department of Housing and Community Development, the only portions of unincorporated Riverside County that meet the definition of "Affected County" are the Bermuda Dunes and Coronita, and the Project site is not located within the Bermuda Dunes or Coronita portions of the County (HCD, n.d.). Accordingly, the proposed Project is not subject to the provisions of SB 330. Therefore, the County finds that the Project would not conflict with Policy HC 3.4 and that no revisions to *Technical Appendix I* are needed with respect to the Project's consistency with Policy HC 3.4. No revisions to the RDEIR are warranted pursuant to this comment.

- I-33** Web links to the Riverside County ALUC agendas are acknowledged; no further response is necessary. In addition, please refer to Response I-30.
- I-34** The County disagrees with the commenter's assertion that the proposed Project would be inconsistent with General Plan Policies N 1.5, N 1.6, N 1.7, N 3.3, N 3.6, or N 9.3. The County acknowledges that the DEIR disclosed that the Project would result in significant and unavoidable cumulatively-considerable impacts due to traffic-related noise along the roadway segment of Nuevo Road between Dunlap Drive and the Project's entrance (Antelope Road). However, and as more fully explained in Response I-22, and as was shown in DEIR Table 4.13-13, this roadway segment already would be exposed to noise levels exceeding 65 dBA CNEL under Existing Plus Ambient (EA) (2030) conditions even without the addition of Project traffic. Furthermore, the Project only would contribute 1.6 dBA CNEL to this roadway segment under EAP (2030) conditions, and the Project's contribution to noise along this roadways segment would be less than significant when considering traffic-related noise from cumulative developments under Existing Plus Ambient Plus Project Plus Cumulative (EAPC) conditions in 2030. The discussion provided in DEIR subsection 4.13.8 included a detailed explanation as to why mitigation measures are not available to reduce the Project's near-term cumulatively-considerable traffic-related noise impacts. Notwithstanding, and based on the revised analysis of the Project's potential noise impacts, RDEIR Subsection 4.13, *Noise*, has been revised and now shows that the Project would result in significant and unavoidable traffic-related noise impacts along several study area roadways (refer to RDEIR Subsection 4.13, as the list of affected segments varies depending on which Alternative Truck Route is implemented). RDEIR Subsection 4.13 incorporates mitigation measures to reduce these impacts to the maximum feasible extent, although even with mitigation impacts would remain significant and unavoidable. However, the fact that the Project would result in significant and unavoidable impacts does not provide substantial evidence that the Project would be inconsistent with any of these policies. The mitigation measures identified in RDEIR Subsection 4.13 would reduce the Project's traffic-related noise to the maximum feasible extent, in conformance with Policy N 1.5. Policy N 1.6 relates specifically to



stationary operational noise based on its reference to “spillover or encroachment from commercial and industrial land uses,” and the revised analysis included in RDEIR Subsection 4.13 demonstrates that the Project’s stationary operational noise impacts would be less than significant at all receiver locations; thus, the County finds that the Project would be fully consistent with General Plan Policy N 1.6. Policy N 1.7 relates to land uses that would be “affected by unacceptably high noise levels,” while the Project’s proposed land uses would not be exposed to noise levels exceeding the County’s standards; thus, the Project would not conflict with Policy N 1.7. Policy N 3.3 also relates to stationary noise impacts as it references “compatibility between industrial development and adjacent land uses,” and as noted the Project’s stationary operational-related noise levels would not expose any nearby sensitive receptors to noise levels exceeding the County’s standards. Mitigation measures are identified in RDEIR Subsection 4.13 that would serve to reduce the Project’s potential noise impacts to the maximum feasible extent, in conformance with Policies N 3.6 and N 9.3. Accordingly, the County finds that the DEIR correctly concluded that the Project would not result in a conflict with General Plan Policies N 1.5, N 1.6, N 1.7, N 3.3, N 3.6, or N 9.3. Therefore, no revisions to the RDEIR are warranted pursuant to this comment.

- I-35** Policy LNAP 6.1 of the Lakeview/Nuevo Area Plan (LNAP) of the General Plan is intended to ensure that future development within areas designated as Community Centers will adhere to the policies listed for Community Centers by the General Plan and LNAP. As noted by this comment, the Project includes applications for a GPA and SPA that would change the land use designations that apply to the Project site. Following approval of the Project’s GPA and SPA, the Project no longer would include Community Center land uses, and thus future development on site would not be subject to compliance with the policies listed in the Community Centers Area Plan Land Use Designation section of the Land Use Element, as these policies only pertain to lands that are designated as Community Centers. There are no environmental effects associated with the Project’s proposed GPA and SPA that were not already evaluated and disclosed by the DEIR. Accordingly, no revision to the RDEIR has been made pursuant to this comment.
- I-36** The County disagrees with the commenter’s assertion that inaccuracies in DEIR *Technical Appendix O* render the DEIR deficient. *Technical Appendix O* merely includes application materials that were submitted by the Project Applicant to initiate County review and processing of the Project’s GPA, SPA, and CZ applications. The required findings to approve the Project’s GPA will be refined by County staff prior to public hearings for the Project. Furthermore, the DEIR did not rely on any of the arguments or conclusions reached by the Project’s application materials. As such, no revisions have been incorporated into the RDEIR pursuant to this comment.
- I-37** The County disagrees with the commenter’s assertion that the Project would be inconsistent with the County’s General Plan vision because the Project would result in significant and unavoidable environmental impacts. Under the commenter’s logic, any land development application that requires an EIR would be inherently inconsistent with the County’s vision statement, as EIRs only are required under CEQA for projects that would result in impacts that cannot be mitigated to below a level of significance. Furthermore, the County finds that the Project would not conflict with the



General Plan’s vision statements. Specifically, the Project would be consistent with Transportation Vision 2 because the Project would expand local job opportunities in a portion of the County that suffers from a poor balance of jobs and housing. The Project would be consistent with Transportation Vision 11 because the provision of local employment uses in an area that suffers from a lack of job opportunities would serve to reduce the distance future Project employees would need to travel, as compared to locating the Project in a portion of the County that does not suffer from a lack of job opportunities. The Project also is consistent with Health Communities Vision 6, as the Project’s DEIR fully discloses the Project’s impacts on the health of Riverside County residents, and the Riverside County Board of Supervisors will consider the Project’s significant environmental effects as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project. General Plan Air Quality Vision 1 provides direction to County staff and decision makers, and the Project has no potential to interfere with the County’s ability to monitor the General Plan’s performance in reducing overall air quality emissions. Moreover, there are no components of the proposed Project that would conflict with General Plan Air Quality Vision 4, as Vision 4 relates to the County’s cooperation with other regional jurisdictions to reduce air quality impacts, and the Project would not interfere in any way with such cooperation efforts. Furthermore, the DEIR identified a number of mitigation measures to reduce the Project’s air quality impacts to the maximum feasible extent. The Project also would not conflict with Sustainability and Global Environmental Stewardship Vision 1, as the Project would be required to fully comply with the Riverside County CAP Update and the Project would not result in any impacts due to energy consumption. Finally, the Project would not conflict with Global Environmental Stewardship Vision 5, as Vision 5 provides direction to County staff and decision makers, and the Project would not interfere with the County’s ability to promote innovative land use policies related to mixed uses. Therefore, the County finds that the Project would not conflict with the General Plan’s Vision statements, and no revisions have been incorporated into the RDEIR pursuant to this comment.

- I-38** Web links to County Ordinance No. 348 and the General Plan are acknowledged; no response is necessary.
- I-39** Please refer to the response to Comment I-36. As indicated therein, *Technical Appendix O* merely contains materials that were submitted by the Project Applicant as part of the Project’s application materials, and the information and content contained in *Technical Appendix O* were not relied upon in evaluating the Project’s potential impacts to the environment. Accordingly, the County finds that the commenter’s allegation that the DEIR was deficient based on information contained in the Project’s initial application materials is erroneous, and no revisions to the RDEIR or its technical appendices have been made pursuant to this comment.
- I-40** The County disagrees with the commenter’s assertion that the Project would be inconsistent with General Plan Principle II.A.1 because the Project would result in significant and unavoidable impacts to the environment. Under this logic, any project that requires an EIR would be inconsistent with this portion of the County’s vision, as EIRs only are required under CEQA for projects that would result in significant and unavoidable environmental impacts. The Project’s potential impacts to the



environment were evaluated and disclosed throughout the DEIR, and mitigation measures were identified as appropriate and necessary to reduce potential impacts to the maximum feasible extent. Furthermore, while the County acknowledges that the Project is located in a Disadvantaged Community pursuant to SB 535, none of the Project's significant and unavoidable environmental impacts would impact residents or other sensitive receptors within the Project vicinity, with exception of the traffic-related noise impact to the segment of Nuevo Road between Dunlap Drive and the Project entrance (Antelope Road) that was identified by the DEIR. Please refer to Response I-22. As noted therein, the DEIR found that this roadway segment would be impacted by noise even without implementation of the Project, and the Project's noise impacts along this roadway segment would be less than significant when considering traffic from cumulative developments. The RDEIR has been revised to reflect revisions made to the Project, as previously summarized in Subsection R.3. While the revised analysis does show traffic-related noise impacts along several roadway segments (depending on which Alternative Truck Route is implemented), mitigation measures have been identified in RDEIR Subsection 4.13, *Noise*, to reduce the Project's traffic-related noise impacts to the maximum feasible extent. Thus, the Project, with mitigation, would be sensitive to environmental conditions in the surrounding area, in compliance with General Plan Principle II.A.1. Furthermore, it bears noting that the Project need not be consistent with every line and verse of the General Plan to nonetheless be consistent therewith. (*Save Our Heritage Organization v. City of San Diego* (2015) 237 Cal.App.4th 163, 185–186; see also, *San Francisco Tomorrow v. City and County of San Francisco* (2014) 229 Cal. App. 4th 498, 513-14 [“it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan”].) Additionally, a project's consistency with a General Plan is not an environmental consideration and does not need to be addressed in a CEQA document. (See, e.g., *North Coast Rivers Alliance et al. v. Marin Municipal Water District* (2013) 216 Cal.App.4th 614, 633; *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal. App. 4th 889, 919)

- I-41** The County disagrees with the commenter's assertion that the Project would be inconsistent with the Riverside County General Plan (assuming approval of the Project's applications). As noted in the response to Comment I-36, DEIR *Technical Appendix O* merely included the application materials that were submitted by the Project Applicant in order to initiate County staff review of the Project's applications, and the DEIR did not rely on any of the information provided in *Technical Appendix O* in evaluating the Project's potential impacts to the environment. Furthermore, and for the reasons cited under the responses to Comments I-19 through I-40, the County finds that the proposed Project would not conflict with any provision of the General Plan, including General Plan Policies and Vision statements, and the required findings for approval of a GPA will be refined by County staff and will be considered by the Riverside County Board of Supervisors as part of their deliberations as to whether to approve, approve with modifications, or deny approval of the proposed Project. No revisions to this RDEIR are warranted pursuant to this comment.
- I-42** For the reasons cited in Response F-25, the County finds that the proposed Project would not conflict with any provisions of the Housing Crisis Act (HCA) or SB 330.



- I-43** Web links to SP 239, the General Plan, and HCA are acknowledged; no response is necessary.
- I-44** The County disagrees with the commenter’s assertion that the Project would not be consistent with SCAG’s 2020-2045 RTP/SCS. The mere fact that the Project would result in significant and unavoidable impacts to the environment does not demonstrate an inconsistency with the RTP/SCS. An analysis of the Project’s consistency with the 2020-2045 RTP/SCS was presented under the analysis of Threshold a. in DEIR Subsection 4.11, *Land Use and Planning*. The analysis demonstrated that the Project as evaluated by the DEIR would not have conflicted with any of the RTP/SCS goals (refer specifically to the analysis in DEIR Table 4.11-1). There are no components of the Project as revised that would affect the conclusion reached by DEIR Subsection 4.11 that the Project would not conflict with SCAG’s 2020-2045 RTP/SCS. Thus, no revision has been made in the RDEIR pursuant to this comment.
- I-45** The County finds that the commenter is incorrect in asserting that the DEIR did not include any information about future employment that would be generated by the Project. A discussion of jobs that would be generated by the Project was provided in DEIR subsection 3.6.2.A, and the rates used to estimate future employment were derived from Appendix E-1 to the Riverside County General Plan. Thus, the commenter is incorrect that the DEIR does not provide “a source or methodology” for estimating the number of jobs that would be generated by the Project. With respect to employees during construction, the analysis in DEIR *Technical Appendices B1, B2, E* accounted for employee generated impacts, particularly with respect to employee-related traffic, based on defaults included within AQMD’s CalEEMod software. As such, no revision has been incorporated into the RDEIR pursuant to this comment, although this RDEIR does include an updated calculation of the number of anticipated employees based on the proposed reduction in Light Industrial building area (refer to RDEIR subsection 3.6.2.A).
- I-46** Web link to the SP 239 summary is acknowledged; no further response is necessary.
- I-47** The County disagrees with the commenter’s assertion that the DEIR did not provide any meaningful analysis of the Project’s potential impacts due to population and housing. The analysis of Threshold b. in DEIR Subsection 4.15 included a reference to the Riverside County General Plan, which acknowledges that the County suffers from a poor job-to-housing ratio (wherein there are not enough jobs for local residents). The Project would include employment-generating land uses in a portion of Riverside County that is dominated by residential development and open space, with very limited numbers of job opportunities. Because there are more residents than there are jobs in this portion of Riverside County, the DEIR’s conclusion that the Project would not create a demand for additional housing, including affordable housing, was based upon substantial evidence. There is no evidence in this comment letter nor in the administrative record for the Project demonstrating that the Project’s proposed land uses would result in an increase in residential development within Riverside County beyond what already is accommodated by the Riverside County General Plan. Accordingly, no revision has been incorporated into the RDEIR pursuant to this comment.



- I-48** Please refer to the response to Comment I-47, which addresses this comment. As noted therein, because the Project area suffers from a poor jobs-to-housing balance, wherein there are not enough jobs for local area residents, it can be concluded that the Project would not create a demand for new housing beyond what already is planned for and accommodated by the Riverside County General Plan. Accordingly, no revisions have been incorporated into the RDEIR pursuant to this comment.
- I-49** The Riverside County General Plan’s Land Use and Housing Elements identify the County’s long-range plans for accommodating the region’s projected demand for housing. The Project site is not identified by the Housing Element as a site that is relied upon by the County in meeting its State-mandated Regional Housing Needs Allocation (RHNA), including RHNA requirements related to affordable housing. The population projections relied upon by the California Department of Housing and Community Development (HCD) in developing the RHNA allocations do not rely on local land use inputs, but rely instead on population projections published by the California Department of Finance (CDF). Thus, the Project’s employment-generating land uses would not result in an increase in demand for affordable housing beyond what already is accommodated by the Riverside County General Plan, and no revision has been made to the RDEIR pursuant to this comment.
- I-50** Web links to the MIT Living Wage Research Center and HCD 2021 Income Limits are acknowledged; no further response is necessary.
- I-51** The County disagrees with the commenter’s assertion that the Project would result in significant growth impacts not adequately addressed by the DEIR. Commenter is referred to DEIR Subsection 5.3, which included an analysis of the Project’s potential growth inducing impacts. The Project site is and would continue to be designated for urban development under the County General Plan’s Community Development Foundation Component. While the Project would generate a substantial number of jobs, the analysis in the DEIR demonstrated that the County suffers from a poor jobs-to-housing ratio, wherein there are insufficient jobs for the number of residents residing in the local area. All impacts associated with the Project, including cumulatively-considerable impacts, were fully evaluated and disclosed by the DEIR, and where necessary mitigation measures were identified to reduce the Project’s impacts to the maximum feasible extent. While the County acknowledges that the proposed Project would generate a substantial number of jobs, this comment does not identify any deficiencies in the analysis that was presented in the DEIR. There is no requirement under CEQA to geographically locate potential future employees or residents for any proposed development projects. As this comment does not identify any specific deficiencies with the analysis presented in the DEIR, no revisions have been incorporated as part of this RDEIR pursuant to this comment.
- I-52** The County disagrees with the commenter’s assertion that the DEIR’s analysis of potential impacts due to VMT were erroneous because it did not include VMT associated with heavy-duty truck trips. The VMT Analysis that was included as DEIR *Technical Appendix L2* was prepared in full conformance with the Riverside County *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled* (“County Guidelines”), dated December 2020. As clearly indicated in Figure 6 of the County’s Guidelines, the County’s threshold of significance for VMT is based on Work VMT



per employee, and thus explicitly excludes heavy-duty truck trips from the analysis. Notwithstanding, and in the interest of full disclosure, an analysis of the Project's total VMT, inclusive of heavy-duty truck trips, is now included under the analysis of Threshold b. in RDEIR Subsection 4.18, *Transportation*. The analysis of total VMT is based on a Project-specific technical study included as RDEIR *Technical Appendix L3*.

- I-53** Web links to SCAG Connect SoCal Demographics and Growth Forecast, and the OPRs Technical Advisory for Evaluating Transportation Impacts in CEQA are acknowledged; no further response is necessary.
- I-54** The County disagrees with the commenter's assertion that the Project's GPA, SPA, and ZC would result in substantial unplanned growth. Under existing conditions, the General Plan and Lakeview/Nuevo Area Plan (LNAP) designate the property for urban land uses, including "Community Center (CC)," "Commercial Retail (CR)," "Medium Density Residential (MDR)," "Medium High Density Residential (MHDR)," and "Very High Density Residential (VHDR)" land uses. While the Project does include a GPA, SPA, and ZC, the Project still would result in urban development on the Project site, consistent with the Project site's existing General Plan Foundation Component designation of "Community Development." Thus, the Project would not contribute to growth that was not included as part of growth forecasts in Connect SoCal or the General Plan. No revision to the RDEIR is warranted pursuant to this comment.
- I-55** The County disagrees with the commenter's assertion that the Project would result in substantial unplanned growth that would be cumulatively considerable. Cumulative impact analyses were conducted and included throughout the analysis of the Project's environmental effects within DEIR Section 4.0, *Environmental Analysis*. In addition, it is unclear from this comment how the Project, when combined with employment and population associated with the Knox Business Park project, would represent 8.85% of the anticipated growth within Riverside County between 2016 and 2045. The Project does not include any residential uses, and it is anticipated that a majority of the jobs that would be generated by the Project would be accommodated by existing or planned residential uses within the County based on the fact that the Project site occurs within a portion of the County that suffers from a poor jobs-to-housing balance, wherein there are not enough jobs for local area residents. Thus, it is not anticipated that the jobs that would be created by the Project would result in a substantial increase in unplanned growth within unincorporated Riverside County. Furthermore, under existing conditions the Project site is planned for development with urban level uses pursuant to the Project site's "Community Development" Foundation Component land use designation. Specifically, under existing conditions the Project site is targeted for development with 2,020 residential dwelling units and 68.1 acres of "Commercial Retail" land uses. Based on the population and employment factors listed in Appendix E to the Riverside County General Plan, the adopted land





uses for the Project site would have resulted in approximately 6,484 residents<sup>1</sup> and 1,023 employees<sup>2</sup>. The number of residents under the site's adopted land use designations would represent approximately 4.2% of the anticipated population growth within unincorporated Riverside County between 2016-2045, while the number of employees based on the site's adopted land uses would comprise approximately 1.6% of the anticipated growth in employment over this same period. Thus, the Project site already is planned for substantial population growth under existing conditions. No revision to the RDEIR is warranted pursuant to this comment.

**I-56** The County disagrees with the commenter's assertion that the Project would result in substantial environmental effects to a disadvantaged community or that the Project would exceed growth projections. First, cumulative effects of the proposed Project were fully analyzed and disclosed in DEIR Section 4.0, *Environmental Analysis*. In addition, the County disagrees with the commenter's assertion that the Project's significant and unavoidable impacts to the environment would adversely affect the existing surrounding community, which is identified as a Disadvantaged Community pursuant to SB 535. While the DEIR did disclose significant and unavoidable impacts under the issue areas of aesthetics, agriculture/forestry resources, air quality, noise, and transportation, none of the significant and unavoidable impacts disclosed by the DEIR would have substantially affected the surrounding community, with exception of traffic-related noise along one roadway segment. Specifically, the Project's unavoidable impacts to aesthetics would result from the substantial change of the Project site from undeveloped land to a developed property with urban land uses; however, the Project site already is targeted for urban development under existing conditions, and there are no components of the Project that would result in increased aesthetics impacts as compared to development of the Project site with Light Industrial, Business Park, and Commercial Retail land uses. Similarly, the Project's impacts to important farmland types (as previously disclosed by the DEIR) would not represent an impact to the surrounding community, particularly given the fact that the Project site already is targeted for urban development. The Project's impacts due to VMT also would not result in any adverse environmental effects to the surrounding community, beyond the impacts that already were evaluated and disclosed as part of the DEIR. While the DEIR disclosed that the Project would result in significant and unavoidable traffic-related noise impacts along the roadway segment of Nuevo Road between Dunlap Drive and the Project entrance (Antelope Road), this roadway segment already would be exposed to noise levels exceeding 65 dBA CNEL under EA (2030) conditions even without the addition of Project traffic, and the Project's contribution to noise along this roadways segment would have been less than significant when considering traffic-related noise from cumulative developments under Existing Plus Ambient Plus Project Plus Cumulative (EAPC) conditions in 2030. In addition, please refer to the response to Comment I-55 which

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<sup>1</sup> Pursuant to Table E-2 of Appendix E to the General Plan, the average household size in the LNAP is 3.21. Thus, the 2,020 dwelling units allocated to the Project site under existing conditions would generate approximately 6,484 residents ( $2,020 \times 3.21 = 6,484$ ).

<sup>2</sup> Based on the net parcel factors, development FAR factors, and commercial employment factors specified in Tables E-3 through E-5 of General Plan Appendix E, the 68.1 acres of Commercial Retail uses would generate approximately 1,023 employees ( $68.1 \text{ acres} \times 0.75 \text{ net parcel acre factor} \times 0.23 \text{ "Probable" FAR} \times 43,560 \text{ s.f./acre} \div 500 \text{ s.f./employee} = 1,023 \text{ employees}$ ).



demonstrates why the Project would not result in significant environmental effects due to unplanned population growth.

- I-57** The County disagrees with the commenter’s assertion that the DEIR failed to include a reasonable range of alternatives. No alternative is available that would fully reduce the Project’s significant and unavoidable environmental impacts to below a level of significance while still meeting all of the Project’s objectives, and no specific alternative has been identified by this commenter. Specifically, the only alternative available to avoid all of the Project’s significant environmental effects is the No Development Alternative, which would fail to meet any of the Project’s objectives. The DEIR found that the Reduced Project Alternative (RPA), which was identified by the DEIR as the Environmentally Superior Alternative pursuant to State CEQA Guidelines § 15126.6, would meet the Project’s objectives (although to a lesser extent) and would reduce, but would not completely avoid, the Project’s significant and unavoidable impacts to aesthetics, air quality, noise, and transportation. Additionally, the RPA would not have reduced or avoid the Project’s significant and unavoidable impacts to agricultural resources as identified by the DEIR. DEIR subsection 6.2.2 also explains why development of the Project at an alternative site location is not feasible and would not avoid all of the Project’s significant and unavoidable environmental effects, and may even have the potential to result in increased environmental effects as compared to the proposed Project. Accordingly, the County finds that the DEIR included a reasonable range of alternatives in full compliance with CEQA Guidelines § 15126.6. Notwithstanding, revisions have been incorporated into EIR Section 6.0, *Alternatives*, based on changes incorporated into the Project, as previously summarized in RDEIR Subsection R.3.
- I-58** For the reasons stated in the responses to Comments I-2 through I-57, the County disagrees with the commenter’s assertion that the DEIR was flawed. Notwithstanding, the commenter is referred to the revised analysis in the RDEIR, which has been updated based on changes incorporated into the Project, as previously summarized in RDEIR Subsection R.3. The County will ensure that Golden State Alliance is included on applicable public interest lists regarding any subsequent environmental documents, public notices, public hearings, and notices of determination, and all communications will be sent to the contact person identified by this comment.
- I-59** This comment accurately describes the proposed Project as evaluated in the DEIR, if the Primary Land Use Plan were implemented. Please note that in the event the MCP is constructed, then the Alternative Land Use Plan evaluated in the DEIR would have been implemented, which would have allowed for up to 8,461,530 s.f. of light industrial building area, up to 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area. In addition, please note the revisions that have been incorporated into the Project’s design as previously summarized in RDEIR Subsection R.3. Responses to the individual comments identified by this comment letter are provided below.
- I-60** The County disagrees with the commenter’s assertion that the DEIR failed to adequately evaluate the Project’s air quality, health risk, and greenhouse gas impacts, and further disagrees with the



commenter's contention that the emissions and health risk impacts associated with construction and operation of the Project were underestimated in the DEIR. Please refer to the responses to Comments I-61 through I-96 for responses to the individual issues identified by this comment letter.

- I-61** This comment incorrectly states that the DEIR concluded that the Project's blasting emissions would be significant and unavoidable. As was documented in DEIR Subsection 4.3, *Air Quality*, with implementation of Mitigation Measures MM 4.3-1 and 4.3-2, construction-related impacts to air quality, including impacts related to blasting activities, were found to be reduced to less-than-significant levels. The data in DEIR Table 4.3-7 showed air quality emissions associated with different rates of blasting, and was prepared to identify an appropriate rate of blasting that would avoid exceeding the SCAQMD thresholds of significance. Mitigation Measure MM 4.3-1 restricted blasting activities to a maximum of 1.72 tons of explosives per day, which the DEIR found would reduce blasting-related air quality impacts to less-than-significant levels. The County acknowledges that the Project evaluated in the DEIR would have resulted in significant and unavoidable impacts due to emissions of ROG<sub>s</sub> and NO<sub>x</sub> and due to a conflict with the SCAQMD AQMP; however, the Project's significant and unavoidable operational air quality impacts were fully disclosed by the DEIR. Notwithstanding, commenter is referred to the revised analysis in RDEIR Subsection 4.3, which has been updated to address revisions that have been incorporated into the Project as previously summarized in RDEIR Subsection R.3.
- I-62** This comment correctly describes the DEIR's finding that prior to mitigation, the Project's operational emissions of ROG<sub>s</sub>, NO<sub>x</sub>, and CO would have exceeded the SCAQMD regional thresholds of significance for these pollutants. Notwithstanding, commenter is referred to the revised analysis in RDEIR Subsection 4.3, which has been updated to address revisions that have been incorporated into the Project as previously summarized in RDEIR Subsection R.3.
- I-63** The County disagrees with the commenter's assertion that the DEIR's conclusion that the Project's significant and unavoidable air quality impacts was "incorrect" and further disagrees with commenter's assertion that additional feasible mitigation measures were available to reduce the Project's air quality impacts. The CEQA Guidelines do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the mitigation consistent with the manner in which other impact areas are handled in CEQA. The County of Riverside, in their discretion, selected a robust program of feasible mitigation to reduce both criteria air pollutants, air toxics, and GHG emissions (see DEIR pages 4.3-61 through 4.3-63 and 4.8-36 through 4.8-37 for a complete list of the robust emission-reducing mitigation program required of the Project). Additionally, the Project as evaluated in the DEIR was required to adhere to the County of Riverside Board of Supervisors Policy F-3, *Good Neighbor Policy for Logistics and Warehouse/Distribution Uses*. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. As disclosed by the DEIR, the majority of emissions of NO<sub>x</sub> and CO emissions associated with Project operations would have



resulted from vehicular traffic and on-site equipment, and in particular truck traffic. Specifically, and as was shown in DEIR Table 4.3-9, under the Primary Land Use Plan mobile source emissions accounted for 56.4% of the Project's ROG emissions, 97.2% of the Project's NO<sub>x</sub> emissions, and 98.6% of the Project's CO emissions. Similarly, and as was shown in EIR Table 4.3-10, under the Alternative Land Use Plan mobile source emissions accounted for 56.3% of the Project's ROG emissions, 97.1% of the Project's NO<sub>x</sub> emissions, and 98.6% of the Project's CO emissions. Mobile source emissions are regulated by standards imposed by federal and State agencies, not local governments. No other mitigation measures related to vehicle tailpipe emissions are available that are within Riverside County's jurisdictional authority and that are feasible for Riverside County to enforce and have a proportional nexus to the Project's level of impact. Please refer also to the response to Comment I-93 for a discussion of individual mitigation measures recommended by this comment letter.

- I-64 The County disagrees with the commenter's assertion that the CalEEMod modeling inputs were inconsistent with the information disclosed in the DEIR. Please refer to the responses to Comments I-66 through I-77 for responses to the individual comments related to the CalEEMod modeling inputs.
- I-65 Web link to CalEEMod Version 2016.3.2 is acknowledged; no response is necessary.
- I-66 This comment correctly describes the air quality modeling inputs used in the DEIR, which assumed that 20% of the total light industrial building area would have consisted of high-cube cold storage uses. This comment is outdated and no longer applicable in light of the revision to the Project outlined in the RDEIR. However, the County disagrees with the commenter's assertion that the assumption about the amount of high-cube cold storage uses was unsupported. The Project evaluated in the DEIR consisted of applications for a GPA, CZ, and SPA, and the assumption that 20% of the light industrial building area would consist of high-cube cold storage uses represented the Project Applicant's best estimation as to the amount of high-cube cold storage uses that ultimately would be constructed on site. Any future development within the Project site would be subject to subsequent discretionary approvals (i.e., Plot Plans and/or Conditional Use Permits). As discretionary actions, these future approvals would be subject to compliance with CEQA. As part of the County's review of future implementing actions within the Project site, the County would have reviewed the implementing developments for consistency with the assumptions made as part of the DEIR. In the event that high-cube cold storage uses occupied more than 20% of the overall light industrial building area, then additional technical analyses would have been required to determine whether the implementing developments would have resulted in any of the conditions listed in CEQA Guidelines § 15162 calling for the preparation of a Subsequent EIR. Notwithstanding, and in an effort to provide a conservative analysis of the Project's impacts, the Project's Air Quality Impact Analysis (AQIA) technical report has been revised, and the results have been incorporated into RDEIR Subsection 4.3, *Air Quality*. The revised AQIA and analysis in RDEIR Subsection 4.3 account for changes that have been made to the Project, as summarized above in Subsection R.3. As noted in Subsection R.3, the amount of high-cube cold storage uses has been increased from an assumption of 20% of the overall Light Industrial building area (as evaluated in the DEIR) to an assumption that 40% of the overall



Light Industrial building area would consist of high-cube cold storage uses (as evaluated by this RDEIR). Based on the revised analysis presented in RDEIR Subsection 4.3, Mitigation Measure 4.3-1 has been identified which would restrict high-cube cold storage uses to a maximum of 20% of the Light Industrial building area, unless it can be demonstrated that Transport Refrigerated Trucks (TRUs) associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements). The identified mitigation would ensure that high-cube cold storage warehouse uses are appropriately restricted to ensure consistency with the air quality modeling results presented in RDEIR Subsection 4.3. Please refer also to the response to Comment I-67.

- I-67** This comment correctly cites the DEIR’s statement that the future tenants of the proposed warehouses are currently unknown. However, the County disagrees with the commenter’s assertion that 100% of the light industrial building area should have been evaluated as containing high-cube cold storage uses. The assumption that 20% of the light industrial building area would consist of high-cube cold storage uses represented the Project Applicant’s best estimation as to the amount of high-cube cold storage uses that ultimately would have been constructed on site, based on current market conditions and other forecasting mechanisms. Furthermore, while refrigerated warehouse space is the most energy-intensive use, other types of light industrial development, such as manufacturing uses, generate substantially more traffic than high-cube cold storage uses. For example, and as was shown in Table 4-1 of the Project’s Traffic Impact Analysis that was included as DEIR *Technical Appendix L3*, high-cube cold storage uses generate 1.40 daily trips per 1,000 s.f. of building area (in terms of actual vehicles), whereas manufacturing uses generate approximately 3.93 daily trips per 1,000 s.f. of building area (in terms of actual vehicles). Thus, if the DEIR had assumed that 100% of the light industrial building area would be developed with high-cube cold storage uses, the DEIR would have underestimated the amount of truck traffic that would be generated by the Project, which in turn would have resulted in the DEIR underestimating the Project’s impacts due to air quality emissions (including localized health risk impacts), GHG emissions, traffic-related noise, and VMT. Notwithstanding, and in an effort to provide a conservative analysis of the Project’s impacts, the Project’s Air Quality Impact Analysis (AQIA) and Health Risk Assessment (HRA) technical reports have been revised, and the results have been incorporated into RDEIR Subsection 4.3, *Air Quality*. The revised AQIA, HRA, and analysis in RDEIR Subsection 4.3 account for changes that have been made to the Project, as summarized above in Subsection R.3. As noted in Subsection R.3, the amount of high-cube cold storage uses has been increased from an assumption of 20% of the overall Light Industrial building area (as evaluated in the DEIR) to an assumption that 40% of the overall Light Industrial building area would consist of high-cube cold storage uses (as evaluated by this RDEIR). Based on the revised analysis presented in RDEIR Subsection 4.3, Mitigation Measure 4.3-1 has been identified which would restrict high-cube cold storage uses to a maximum of 20% of the Light Industrial building area, unless it can be demonstrated that TRUs associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements). Accordingly, the County finds that revised Mitigation Measure MM 4.3-1 would ensure that high-cube cold storage



warehouse uses are appropriately restricted to ensure consistency with the air quality modeling results presented in RDEIR Subsection 4.3.

**I-68** The County acknowledges that refrigerated warehouses are associated with higher levels of energy consumption as compared to other types of light industrial uses. However, the County disagrees with the commenter's assertion that high-cube cold storage uses would generate more air quality and GHG emissions than the Project evaluated in the DEIR. As was shown in DEIR Table 4.3-9, 56.4% of the operational emissions of ROG and 97.2% of the operational emissions of NO<sub>x</sub> under the Primary Land Use Plan would have been due to mobile sources. Similarly, and as was shown in DEIR Table 4.3-10, under the Alternative Land Use Plan, approximately 56.3% of the operational emissions of ROG and 97.1% of the operational emissions of NO<sub>x</sub> would have been due to mobile sources. Additionally, DEIR Tables 4.8-4 and 4.8-5 showed that 80.1% of the GHG emissions would have been due to mobile sources under both the Primary Land Use Plan and Alternative Land Use Plan. As noted under the response to Comment I-67, assuming 100% of the light industrial building area would consist of high-cube cold storage uses would have resulted in an underestimation of the amount of traffic that would be generated by the Project, which in turn would underestimate the Project's level of air quality and GHG emissions. Furthermore, and for the reasons stated in the response to Comment I-66, the amount of high-cube cold storage uses assumed in the DEIR represented the Project Applicant's best estimation as to the amount of high-cube cold storage uses that ultimately would be constructed on site. Notwithstanding, and in an effort to provide a conservative analysis of the Project's impacts, the Project's Air Quality Impact Analysis (AQIA) technical report has been revised, and the results have been incorporated into RDEIR Subsection 4.3, *Air Quality*. The revised AQIA and analysis in RDEIR Subsection 4.3 account for changes that have been made to the Project, as summarized above in Subsection R.3. As noted in Subsection R.3, the amount of high-cube cold storage uses has been increased from an assumption of 20% of the overall Light Industrial building area (as evaluated in the DEIR) to an assumption that 40% of the overall Light Industrial building area would consist of high-cube cold storage uses (as evaluated by this RDEIR). Based on the revised analysis presented in RDEIR Subsection 4.3, Mitigation Measure 4.3-1 has been identified which would restrict high-cube cold storage uses to a maximum of 20% of the Light Industrial building area, unless it can be demonstrated that TRUs associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements). Accordingly, the County finds that revised Mitigation Measure MM 4.3-1 would ensure that high-cube cold storage warehouse uses are appropriately restricted to ensure consistency with the air quality modeling results presented in RDEIR Subsection 4.3.

**I-69** For the reasons cited in the responses to Comments I-66 through I-68, the County disagrees with the commenter's assertion that the DEIR failed to account for all potential cold storage requirements and rejects the commenter's contention that the DEIR underestimated the Project's operational emissions. Notwithstanding, and as noted in Responses I-66 through I-68, the RDEIR now assumes 40% of the Light Industrial building area would consist of high-cube cold storage uses, although the total amount of high-cube cold storage uses would be restricted to a maximum of 20% of the Light Industrial



building area pursuant to RDEIR Mitigation Measure 4.3-1, unless it can be demonstrated that TRUs associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements).

- I-70** Web links cited in the discussion of Comment I-68 are acknowledged; no response is necessary.
- I-71** The County disagrees with the commenter’s assertion that inappropriate changes were made to the construction phase lengths in the Air Quality Impact Analysis (AQIA) circulated with the DEIR. The CalEEMod User's Guide encourages changes to model defaults, especially in the case of long spanning construction projects such as that proposed by the Project. As stated on page 3-26 of the DEIR, at the time the Project’s Notice of Preparation (NOP) was distributed for public review in April 2020, it was anticipated that Project construction activities would commence as early as summer 2021, and would be completed by 2030. Due to delays caused by the COVID-19 pandemic, it is now likely that Project construction activities would not commence until at least 2024. Notwithstanding, the analysis throughout the DEIR assumed construction would commence in summer 2021, which provided a “worst case” assessment of potential construction-related impacts since air quality emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. Although it is anticipated that the Project would be phased, no phasing plan was proposed in the Project evaluated by the DEIR. Buildout of the Project evaluated by the DEIR would have occurred based on market conditions at the time of implementation. Therefore, various changes were made to the default values contained in CalEEMod to account for an eight-year construction timeframe while remaining health conservative. For instance, as shown in *Technical Appendix B1* of the DEIR, all of the CalEEMod default construction equipment was doubled to account for the shortened construction duration identified in EIR Section 3.0, *Project Description*, which was conservative and likely overstated impacts due to construction-related emissions. The assumption that building construction, paving activities, and painting activities would occur simultaneously also was justified, as these construction activities would have been likely to overlap over the predicted eight to nine years of construction, and because by assuming overlap of these phases the peak daily emissions are increased as compared to an analysis that assumes these construction phases would occur independently of one another. Furthermore, the County finds that the assumptions regarding construction durations as presented in the DEIR’s AQIA provided a worst-case analysis of the Project’s potential construction-related air quality impacts. Specifically, as noted by this comment, the duration of the site preparation and grading phases were reduced by 50% from the default value, while the duration of the building construction phase was reduced by 84% from the default value. These assumptions were conservative in nature because by shortening the duration of these construction phases, the total construction emissions are averaged over a shorter period of time, resulting in higher daily construction emission levels as compared to the CalEEMod default values. As the SCAQMD thresholds of significance for construction emissions are based on daily emissions, the adjustments made to the CalEEMod default values provided a worst-case assessment of the Project’s construction-related air quality impacts. In addition, the commenter’s assertion that Project buildings would have been constructed over the



course of 9,300 days before any paving or painting associated with these buildings is erroneous. The construction of buildings requires paved foundations, and newly constructed structures would not be left exposed to the elements without architectural coatings. Although the County finds that the DEIR utilized appropriate and conservative assumptions regarding the Project's construction-related air quality emissions, the Project's AQIA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised AQIA, which is appended to this RDEIR as *Technical Appendix B1*.

- I-72** Web link to CalEEMod User's Guide Version 2020.4.0 is acknowledged; no response is necessary.
- I-73** The Project emission generation calculations identified in the DEIR did not underestimate peak daily emissions. As noted in the response to Comment I-71, reducing the duration of site preparation, grading, and building construction resulted in increased daily emissions of criteria pollutants because the total amount of pollutants were averaged over a shorter period of time. While commenter is correct that the duration of architectural and paving phases were increased by 123%, the duration of these phases was adjusted to reflect the timing of the building construction phase, as paving and architectural coatings would occur simultaneously with building construction. Furthermore, all of the CalEEMod default construction equipment was doubled, resulting in a conservative analysis of the Project's potential construction-related impacts. Notwithstanding, the Project's AQIA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised AQIA, which is appended to this RDEIR as *Technical Appendix B1*.
- I-74** Web links to CalEEMod User's Guide are acknowledged; no response is necessary.
- I-75** As identified in the Emissions Assessment that was included as DEIR *Technical Appendix B1*, the building construction worker commute and vendor trips were based on the total proposed building square footage divided by the number of days of construction, coupled with the rates for commercial buildings in the CalEEMod User's Guide, Appendix E. This method is based on the guidance provided in the CalEEMod User's Guide. The Project's Energy Analysis, which was included as DEIR *Technical Appendix E*, relied in full on the CalEEMod output files included the Project's Emissions Assessment. Thus, the Energy Analysis was based on the same modeling assumptions as the Project's Emissions Assessment. Notwithstanding, the Project's AQIA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised AQIA, which is appended to this RDEIR as *Technical Appendix B1*.
- I-76** Web link to CalEEMod User's Guide Version 2020.4.0 is acknowledged; no response is necessary.





- I-77** The County disagrees with this comment, and finds that the assumption used in the DEIR that the Project would exceed the Title 24 requirements is supported by substantial evidence. As was described numerous times in DEIR Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*, Project emissions were calculated using CalEEMod, version 2016.3.2. The energy consumption-related defaults contained in CalEEMod 2016.3.2 are based on the California Energy Commission's (CEC) 2016 Building Energy Efficiency Standards. The Project evaluated by the DEIR would have been built to the CEC 2022 Building Energy Efficiency Standards, which are 30 percent more energy efficient than the 2016 standards. Therefore, the emissions modeling conducted in the DEIR accounted for adherence to the CEC 2022 Building Energy Efficiency Standards, which required an adjustment to the CalEEMod modeling inputs to reflect the increased energy efficiency. Notwithstanding, the Project's Energy Analysis and analysis in RDEIR Subsection 4.6 (Energy) have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised Energy Analysis, which is appended to this RDEIR as *Technical Appendix E*.
- I-78** Web links to CalEEMod User's Guide are acknowledged; no response is necessary.
- I-79** The County disagrees with the commenter's assertion that the air quality modeling utilized in the DEIR underestimated the Project's operational emissions. As noted in Response I-77, the Project's emission estimates in the DEIR were calculated using CalEEMod 2016.3.2, which assumes mandatory compliance with the outdated 2016 Building Energy Efficiency Standards. The emissions modeling software defaults were adjusted to account for the fact that the Project evaluated in the DEIR would have been subject to compliance with the CEC 2022 Building Energy Efficiency Standards, which are 30 percent more energy efficient than the 2016 standards. Compliance with the CEC 2022 Building Energy Efficiency Standards is mandatory pursuant to State law and Riverside County Ordinance No. 457, and as such did not need to be imposed as mitigation in the DEIR. Notwithstanding, the Project's Energy Analysis and analysis in RDEIR Subsection 4.6 (Energy) have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised Energy Analysis, which is appended to this RDEIR as *Technical Appendix E*.
- I-80** The County finds that the commenter's calculations are based on faulty assumptions. Please refer to Responses I-71, I-73, I-75, I-77, and I-79, which demonstrate that the methodology, assumptions, and conclusions in the DEIR related to the Project's air quality emissions and impacts were based upon substantial evidence. As noted therein, the DEIR made appropriate assumptions regarding the amount of high-cube cold storage uses, worker and vendor trip numbers, and individual phase lengths, and the modeling appropriately assumes mandatory compliance with the CEC 2022 Building Energy Efficiency Standards. Notwithstanding, the Project's AQIA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the updated assumptions included in the revised AQIA, which is appended to this RDEIR as *Technical Appendix B1*.



- I-81** Web links to CalEEMod User’s Guide and the CAPCOA “Quantifying Greenhouse Gas Mitigation Measures” publication are acknowledged; no response is necessary.
- I-82** This comment discusses health risk impacts of warehouse uses generally, and does not provide any comments specifically related to the Project evaluated in the DEIR or the information or analysis that was disclosed in the Project’s DEIR. Notwithstanding, the Project’s Health Risk Assessment (HRA) and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project’s revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*.
- I-83** Web links to the SCAQMD Air Quality Significance Thresholds, SCAQMD Indirect Source Rule, and the article from the Los Angeles Times are acknowledged; no response is necessary.
- I-84** Comment cites information related to health risks and potential effects on children, and asserts that specific health risks associated with the Project’s warehouse uses, particularly potential effects on children, should be evaluated. Health Risk Assessments (HRAs) were prepared for the Project evaluated in the DEIR, and were included in DEIR *Technical Appendices B1 and B2*. The HRAs evaluated potential health risk associated with Project construction and operation. The calculated concentration values at vicinity sensitive receptors were then used to calculate chronic and carcinogenic health risk using the standardized equations contained in the California Office of Environmental Health Hazard Assessment’s (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments* (2015), which includes age sensitive factors to account for the increased sensitivity to carcinogens during early-in-life exposure. As was shown in DEIR Tables 4.13-15 through 4.3-20, potential impacts to school children at the existing Lakeside Middle School and Sierra Vista Elementary School were evaluated, and the analysis results demonstrated that the Project would not expose any school children to cancer risks exceeding the SCAQMD threshold of significance of 10 per one million, and would not expose any school children to non-carcinogenic hazards exceeding the acute or chronic hazard index of 1.0. The maximum carcinogenic risk for nearby school children disclosed by the DEIR was calculated at 2.43 per one million, which is well below the threshold of 10 per one million. The maximum non-carcinogenic chronic hazard health risk affecting nearby school children was calculated at 0.001 while the maximum acute hazard health risk was calculated at 0.026, both of which are well below the threshold of significance of 1.0. Notwithstanding, the Project’s HRA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project’s revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*. As demonstrated in the revised analysis in this RDEIR, the Project’s health risk impacts to the Maximally Exposed Individual School Child (MEISC) still would be well below the SCAQMD thresholds of significance for cancer and non-cancer related health risks.
- I-85** Web links to the articles referenced in Comments I-82 and I-84 are acknowledged; no response is necessary.



- I-86** Commenter asserts that the DEIR should have evaluated the Project's health risk impacts on nearby school children and residents. As noted in Response I-84, the Project's potential health risk impacts on nearby school children and residents were evaluated as part of the DEIR. As was shown in DEIR Tables 4.13-15 through 4.3-20, the Project would not have exposed any nearby school children or residents to cancer risks exceeding the SCAQMD threshold of significance of 10 per one million, and would not have exposed any school children to non-carcinogenic hazards exceeding the acute or chronic hazard index of 1.0. As such, the County finds that the DEIR correctly concluded that the Project's health risk impacts would be less than significant. Notwithstanding, the Project's HRA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project's revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*. As demonstrated in the revised analysis in this RDEIR, the Project's health risk impacts to the Maximally Exposed Individual School Child (MEISC) and Maximally Exposed Individual Resident (MEIR) would be below the SCAQMD thresholds of significance for cancer and non-cancer related health risks with the implementation of Mitigation Measure 4.3-1 restricting the amount of high-cube cold storage uses building area to a maximum of 20% of the Project's Light Industrial building area, unless it can be demonstrated that TRUs associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements).
- I-87** Web links to the articles referenced in Comments I-84 and I-86 are acknowledged; no response is necessary.
- I-88** This comment accurately describes the DEIR's findings with respect to construction-related health risks; however, the County disagrees with the commenter's assertion that the DEIR's health risk evaluation was incorrect because of the changes made to the CalEEMod default inputs. Please refer to the responses to Comments I-71, I-73, I-75, I-77, and I-79, which demonstrate that the methodology, assumptions, and conclusions related to the Project's construction-related inputs were based upon substantial evidence and were not inconsistent with the description of the Project as presented in DEIR Section 3.0. Notwithstanding, the Project's HRA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project's revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*.
- I-89** The County disagrees with the commenter's assertion that the DEIR's health risk evaluation was incorrect because it failed to sum the Project's construction-related impacts with the Project's operational-related impacts. Table 4.3-12 of the DEIR (page 4.3-34) identified the calculated cancer risk at nearby sensitive receptors as a result of exposure of DPM over the course of the entire construction period. DEIR Table 4.3-15 (page 4.3-40) showed the calculated cancer risk at nearby sensitive receptors as a result of 9, 30, and 70 years of exposure to DPM generated by full operations of the Project. It is unclear, and the commenter provides no evidence, as to why it is appropriate to



sum the estimated cancer risk from construction with the estimated cancer risk of full operations of the Project, as full operation of the Project (Project Buildout) that was evaluated in the DEIR would not have occurred until construction has concluded. Further, the OEHHA guidance that “the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location” is misinterpreted by this commenter. This OEHHA guidance pertains to the exposure of two separate pollutant species at the same time. According to OEHHA, if multiple substances are analyzed, the cancer risk from each of the individual substances is summed to give the total cancer risk for the receptor location. The quoted text does not indicate that construction and operational health risks must be combined. The methodology, assumptions, and conclusion in the DEIR’s HRA analysis were adequate and fully complied with OEHHA guidance. Notwithstanding, the Project’s HRA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project’s revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*. The revised analysis in RDEIR Subsection 4.3 includes an analysis that combines construction- and operational-related health risks, and demonstrates that even the combined construction and operational health risks would not exceed the SCAQMD thresholds of significance of 10 in one million for cancer risks and 1.0 for non-cancer risks.

- I-90** Commenter again incorrectly asserts that the Project’s construction-related and operational-related health risks as evaluated in the DEIR should have been added together and compared against the identified thresholds of significance. As noted in Response I-89, the guidance from the OEHHA does not require a calculation that combines construction and operational-related health risks. In addition, the highest level of DPM emissions during construction as disclosed by the DEIR would have occurred during site grading activities, which would have occurred in one phase and would be completed prior to occupancy of any of the proposed buildings on site, and all construction activities would have been completed prior to full occupancy of the proposed Project. Thus, it would be erroneous to add cancer and non-cancer health risk values together, as DPM exposure associated with construction activities would not overlap with DPM emissions associated with full Project buildout. Notwithstanding, the Project’s HRA and analysis in RDEIR Subsection 4.3 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analysis and the Project’s revised HRA technical report, which is appended to this RDEIR as *Technical Appendix B2*. The revised analysis in RDEIR Subsection 4.3 includes an analysis that combines construction- and operational-related health risks, and demonstrates that even the combined construction and operational health risks would not exceed the SCAQMD thresholds of significance of 10 in one million for cancer risks and 1.0 for non-cancer risks.
- I-91** Web link to the OEHHA publication is acknowledged; no response is necessary.
- I-92** This comment correctly cites the information from the DEIR with respect to GHG emissions associated with the Primary Land Use Plan. No response is necessary.



- I-93** The commenter incorrectly refers to DEIR Mitigation Measure “MM GHG-1,” which the County interprets to instead refer to DEIR Mitigation Measure MM 4.8-1. Mitigation Measure MM 4.8-1 in the DEIR stated that prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance, the Project Applicant must demonstrate that appropriate building construction measures are applied to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project included enhanced building efficiency improvements applied to building insulation, windows, roofs (cool roofs), air filtration systems, heating/cooling systems, water heating, and faucets/toilets (as was noted in DEIR *Technical Appendix B*). The mitigation presented in the DEIR allowed for the conceptual measures to be replaced with other measures as listed in the CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update. As stated by the CAP Update, “[i]f a project can obtain 100 points from the screening table, the mitigated project will implement pertinent reduction measures such that it meets the reduction goals of the CAP and a less than significant finding can be made for the project. The menu of options in the screening table is tied to the R2 Measures in the CAP Update and the Implementation Measures (IMs) in the General Plan such that 100 points would meet the emission reductions associated with the R2 Measures and IMs. This menu allows for maximum flexibility for projects to meet its reduction allocation” (CAP Update at p. 7-8). Mitigation Measure MM 4.8-1 from the DEIR was intentionally designed to provide flexibility for future implementing developments within the Project site by allowing for a range of potential options to achieve the required 100 points. In the event that future implementing developments could not achieve the required 100 points, then additional technical analyses would be required to determine whether the implementing development would result in any of the conditions listed in CEQA Guidelines § 15162 calling for the preparation of a Subsequent EIR. Notwithstanding, the Project’s Greenhouse Gas Analysis (GHGA) and analysis in RDEIR Subsection 4.8 (Greenhouse Gas Emissions) have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. The revised analysis continues to show that with the implementation of mitigation measures requiring compliance with the CAP Update, the Project’s impacts due to GHG emissions would be less than significant.
- I-94** The County disagrees with the commenter’s assertion that all of the proposed buildings within the Project should be required to include on-site generation of at least 20 percent of each building’s energy demands. CAP Update Measure R2-CE1 was specifically limited to buildings larger than 100,000 s.f. in size because buildings smaller than 100,000 s.f. may not be able to include sufficient roof or site area to provide for 20 percent of the building’s energy demands. Additionally, Mitigation Measures MM 4.8-1 and MM 4.8-2 from the DEIR were imposed to ensure full Project compliance with the County’s CAP Update. As noted in the response to Comment I-93, projects that are determined to be consistent with the CAP Update are presumed to have a less-than-significant impact due to GHG emissions. The CAP Update does not require on-site renewable energy production for buildings smaller than 100,000 s.f. in size; thus, the County rejects the commenter’s assertion that the Project evaluated in the DEIR should have been conditioned to require on-site energy production



for all buildings, regardless of size, in order to ensure the Project's GHG impacts are less than significant. The County finds that the DEIR's conclusion that the Project's impacts due to GHGs would be less than significant with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 was supported by substantial evidence. Notwithstanding, the Project's GHGA and analysis in RDEIR Subsection 4.8 have been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. The revised analysis continues to show that with the implementation of mitigation measures requiring compliance with the CAP Update, the Project's impacts due to GHG emissions would be less than significant.

**I-95** Web link to the AEP's CEQA Portal Topic Paper Mitigation Measures is acknowledged; no response is necessary.

**I-96** For the reasons noted in Responses I-82 through I-94, the County disagrees with the commenter's assertion that the Project evaluated in the DEIR would have resulted in potentially significant health risk and GHG impacts that would have required further mitigation. Rather, the analysis in the DEIR and the responses to Comments I-82 through I-94 provide substantial evidence that the health risk and GHG impacts associated with the Project evaluated in the DEIR would have been less than significant with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2. As disclosed by the DEIR, the Project evaluated in the DEIR would have resulted only in significant and unavoidable impacts to air quality due to operational emissions of NO<sub>x</sub> and ROG<sub>s</sub>. As also was noted in DEIR Subsection 4.3, Project impacts due to construction-related emissions would have been reduced to less-than-significant levels with implementation of DEIR Mitigation Measures MM 4.3-1 and MM 4.3-2; thus, no additional mitigation was required to address the construction-related emissions evaluated for the Project by the DEIR. Notwithstanding, and based on revisions incorporated into the Project as described above in Subsection R.3, the Project's AQIA, GHGA, and HRA have been revised. Commenter is referred to the revised analysis of impacts as presented in RDEIR Subsections 4.3 and 4.8. The revised analysis of the Project's air quality impacts in this RDEIR demonstrates that the Project's construction-related impacts to air quality would be below the SCAQMD thresholds of significance for all criteria pollutants. As such, the County finds that the following mitigation measures suggested by the commenter to address construction-related air quality emissions are not warranted, as they would not serve to reduce or avoid any of the Project's significant environmental effects:

- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L. (It also is noted that the Project would be subject to compliance with SCAQMD Rule
- Providing information on transit and ridesharing programs and services to construction employees.



With respect to the commenter's suggested mitigation measures for operational air quality impacts, commenter is referred to the response to Comment I-63. More specifically, with respect to the recommended mitigation requiring all trucks to meet or exceed 2010 model-year emissions equivalent engine standards, commenter is referred to DEIR Mitigation Measure MM 4.3-7, which already incorporated this requirement (and this requirement continues to be imposed as part of this RDEIR). With respect to the commenter's suggestion that tenants should be required to use zero-emission light- and medium-duty vehicles during operations, the vast majority of the significant and unavoidable air quality impacts identified in the DEIR for operations was due to passenger vehicles (i.e., employee vehicles) and heavy trucks, and were not due to tenant-owned light- and medium-duty vehicles; thus, requiring future tenants to utilize zero-emission light- and medium-duty vehicles would not measurably reduce the emissions of NO<sub>x</sub> or ROG<sub>s</sub> as disclosed by the DEIR. In addition, the analysis in DEIR Subsection 4.3 demonstrated that the Project's localized air quality impacts, including impacts due to DPM emissions, cancer, and non-cancer health risks, would have been less than significant, and CEQA does not require mitigation for impacts determined to be less than significant (see CEQA Guidelines § 15126.4(a)(2)). Accordingly, commenter's requests to include mitigation requiring the installation and maintenance of filtration systems at nearby sensitive receptors, and to require air quality monitoring, were not required by CEQA. With respect to solar, commenter is referred to DEIR Mitigation Measure MM 4.8-2, which required that buildings larger than 100,000 s.f. in size must provide on-site renewable energy production equal to 20% of the building's energy demand. No further mitigation is feasible with respect to solar. The County also rejects the commenter's assertion that the Project evaluated in the DEIR should have been required to meet Tier 2 green building standards, as the Project already is required to comply with the CEC 2022 Building Energy Efficiency Standards, which incorporate a number of measures included in LEED Tier 2 in addition to energy efficient requirements that go beyond LEED Tier 2 requirements. Furthermore, LEED Tier 2 standards only address area and energy source emissions, while the majority of the CO and NO<sub>x</sub> emissions disclosed by the DEIR were the result of vehicular traffic, and in particular truck traffic. Thus, LEED Tier 2 standards would not have adequately addressed the significant and unavoidable operational impacts due to ROG and NO<sub>x</sub> emissions as disclosed by the DEIR. With respect to employee options for meals, commenter is referred to DEIR Mitigation Measure 4.3-7, which required the posting of signs and/or the provision of handouts showing the location of the nearest food options and other similar convenience services (some of which may occur on site within the Project's proposed Commercial Retail areas). The County disagrees with the commenter's suggestion to require all future tenants to comply with the EPA's SmartWay program, which would not mitigate any significant and unavoidable impact to a less-than-significant level, although DEIR Mitigation Measure 4.3-6 required the developer/successor-in-interest to provide future tenants with information regarding the EPA's SmartWay program, in addition to providing information about other programs and equipment that also would serve to promote the use of alternative fuels. Notwithstanding, this RDEIR has been revised to account for changes that have been made to the Project, as summarized above in Subsection R.3. Commenter is referred to the revised analyses of the Project's air quality and GHG impacts as disclosed in RDEIR Subsections 4.3



and 4.8 and the revised list of mitigation measures identified to address the Project's significant air quality and GHG impacts.

- I-97** Web link to the publication cited in Comment I-96 is acknowledged; no response is necessary.
- I-98** Disclaimer comments are acknowledged; no response is necessary.





COMMENT LETTER J



Santa Margarita Group

June 17, 2020

Mr. Russell Brady  
Riverside County Planning Dept.  
Rbrady.rivco.org

Re: Stoneridge SPA No. 1 EIR

Dear Mr. Brady,

The Santa Margarita Group of the Sierra Club focuses on wildlife habitat and connectivity. The Stoneridge Development (SPA No.1) gives us great concern, in this respect. Plans to make this 582.9-acre site into light industry, a business park and commercial retail will remove forage and habitat for endemic as well as migratory wildlife.

J-1

Biological/habitat mapping is needed for the Ramona Expressway/Nuevo Rd. region including adjacent parcels so that connectivity and diverse habitat is part of the project plan. There are two very important sites that are set aside for wildlife conservation nearby, the River-Park Mitigation Bank and the San Jacinto Wildlife Area. Wildlife corridor mapping and crossing sites need to be included so that fragmentation of this region can be remedied and the conservation areas identified can serve their purposes. How will the project impact current and future linkages/connectivity with its noise, vibration, odor, air, light/glare and water runoff pollution? The Final EIR must show how the project's direct, indirect, cumulative and growth inducing impacts during construction and operation of the project will impact existing wildlife and vegetation over the next five and ten years compared with baseline data. Wildlife crossings based on regional studies must be added due to the increase in traffic caused by the project.

The new River-park Mitigation Bank is sited adjacent to the proposed project. The proposed project must consider the goals of this important conserved area.

<https://ecosystempartners.com/region/riverpark/> A current hydrological study that considers the impacts of this site on the fragile surrounding habitat is critical. New hardscape and grading must be minimized. Cumulative effects of run-off, herbicides or pesticides used on-site and sediment movement will need to be considered. The use of native plants/trees is recommended with enhancement for pollinators.

J-2

The San Jacinto Wildlife Area (SJWA) with its threatened and endangered species as well as species of concern will be impacted. Where is the analysis on the project's air, noise, vibration, light and glare pollution impacts on the SJWA biological resources — some of which may also rely on the project site? The SJWA includes those lands between the Lake Perris Dam and the Ramona Expressway. These important lands will be impacted by vehicles during construction and afterwards with their headlights/glare, noise, vibration and exhaust emissions. The Final EIR must fully analyze all this impacts. An analysis of the project's vehicle traffic must be done on the current Ramona Expressway route and the already approved new route which impacts people, parks, and schools in the City of Perris as explain the following link:



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<https://www.pe.com/2022/04/25/after-20-years-and-150-million-will-mid-county-parkway-ever-be-built-in-riverside-county>.

The Inland Empire is now famous for poor air quality, as noted in the link: <https://www.kcet.org/shows/earth-focus/inland-empire-once-again-ranks-as-worst-in-nation-for-air-quality> April 21, 2022 — Inland Empire Once Again Ranks As Worst in Nation for Air Quality | Earth Focus | News & Community | KCET

The quality of life of the region is at stake. Diligence must be the word of operation for any new construction. The Draft EIR for the Stoneridge project has failed to include the following from the California Air Resources Board (CARB) (April 26, 2022) in the project's analysis, text, and conditions of approval. When you include them in the Final EIR and staff report you must use words like "shall", "will" and "must" which require action and are verifiable — do not use weak words like, "may", "can", "should" and similar words which require nothing of the project. The following is needed in the Final EIR:

**Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers**

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

**Recommended Construction Measures**

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model

Page 1  
year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022.<sup>1</sup>

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

**Recommended Operation Measures**

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRUs) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion





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engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.<sup>2</sup>

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project-site be plug-in capable.
4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
5. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).<sup>3</sup>
6. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2023. A list of commercially available zero-emission trucks can be obtained from the Hybrid

1. In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards>

2. CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: [https://www.arb.ca.gov/msprog/tech/techreport/tru\\_07292015.pdf](https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf)

3. Clean Off-Road Equipment Voucher Incentive Project. Accessible at: <https://californiacore.org/how-to-participate/> Page 2

and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).<sup>4</sup> Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.<sup>5</sup>

7. Include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,<sup>6</sup> Advanced Clean Trucks Regulation,<sup>7</sup> Periodic Smoke Inspection Program (PSIP),<sup>8</sup> and the Statewide Truck and Bus Regulation.<sup>9</sup>
8. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
9. Include roof top solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

10. Include contractual language in tenant lease agreements, requiring the installing of vegetative walls<sup>10</sup> or other effective barriers that separate loading docks and people living or working nearby.

11. Include contractual language in tenant lease agreements, requiring all emergency generators to be powered by a non-diesel fuel.

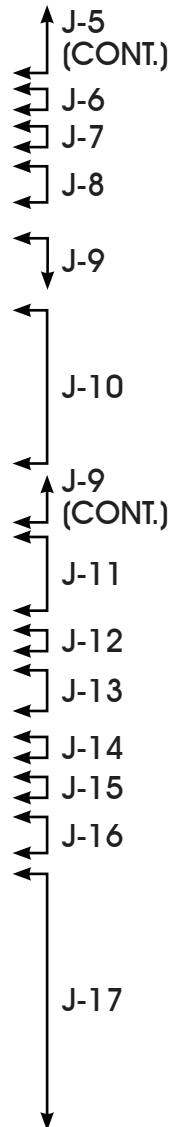
12. The project should be constructed to meet CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking, and achieve a certification of compliance with LEED green building standards.

4. Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

5. Carl Moyer Program and Voucher Incentive Program. <https://ww2.arb.ca.gov/carl-moyer-program-apply>

6. In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. 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 heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://ww2.arb.ca.gov/our-work/programs/ttghg>

7. On June 25, 2020, CARB approved the Advanced Clean Trucks Regulation. The regulation requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 electric trucks in California by the end of 2030 and about 300,000 by 2035. CARB is expected to consider a fleet regulation in 2021 that would be compatible with the Advanced Clean Trucks regulation, requiring fleets to purchase a certain percentage of zero-emission trucks and vans for their fleet operations. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>





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8. The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvip/hdvip.htm>  
9. The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm> 10. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>

J-17  
(CONT.)  
J-18

Thank you for considering our comments and please keep us posted on this project.

Sincerely,  
Pam Nelson  
Chair, Santa Margarita Group/Sierra Club



**Letter J Sierra Club**

**J-1** The County acknowledges and appreciates the comments provided by the Santa Margarita Group of the Sierra Club. A detailed analysis of the Project's potential impacts to biological resources was previously presented in DEIR Subsection 4.4, *Biological Resources*. Revisions to the Project as described previously in Subsection R.3 do not affect the analysis presented in RDEIR Section 4.4, although additional analysis has been added to this Subsection to address comments received on the public review DEIR and to address potential impacts associated with the Project's three Alternative Truck Routes. Please refer to the individual responses to the comments identified by this comment letter, below.

**J-2** The Project Applicant has thoughtfully designed the Project to avoid impacts to both the Riverpark Mitigation Bank (Riverpark) and the San Jacinto Wildlife Area (SJWA) through the conservation of approximately 81 acres of land, a majority of which buffer Riverpark and the SJWA from the proposed development. This open space buffer land use is a revision to the previously approved land use which eliminates areas that were previously proposed for Community Center, Medium Density Residential, and Medium High Density Residential Land Use from areas in close proximity to the SJWA and Riverpark in the original EIR. Additionally, it should be noted that the SJWA is separated from the Project site by Ramona Expressway which is a six-lane, 220-foot wide Expressway which presents a sizable barrier between the SJWA on the north side of Ramona Expressway and the Project located southerly of Ramona Expressway. Minimization measures also are being proposed and are required by the Western Riverside County Multiple-Species Habitat Conservation Plan (MSHCP) to address the Urban/Wildlands Interface Guidelines (UWIG) under this plan. These minimization measures were described on Pages 4.4-47 through 4.4-50 of the DEIR. The measures included the following:

- Minimization of drainage/drainage pattern impact;
- Toxics;
- Minimization of lighting impact;
- Minimization of noise;
- Control of, and control of the spread of non-native plant species; and
- Barriers to minimize impact between the development and preserved conservation lands including Riverpark and the SJWA.

It should be noted that the Project is avoiding approximately 94 percent of total California Department of Fish and Wildlife (CDFW) and MSHCP Riparian/Riverine jurisdiction and 99 percent of riparian habitat, and all sensitive/rare plants which are located adjacent to the San Jacinto River are being preserved and avoided. The Project Applicant is seeking regulatory permits from the resource agencies, including the CDFW, and concurrence from the County of Riverside and the Wildlife Agencies that the Project is consistent with the MSHCP. Previous Project findings issued by the Regional Conservation Authority (RCA) concluded that the on-site Project met the goals and requirements of the MSHCP. The revised Project is contained within the same on site footprint as



previously analyzed and approved (with exception of expanded areas of open space); therefore, it is expected that the revised Project would receive the same biological determination under the MSHCP due to existing site conditions and the past MSHCP analysis. As the Project Applicant does not control all of the land between the SJWA and Riverpark, only areas within the Proponent's control can be identified for this EIR without trespassing on other properties without landowner permission. The RCA website contains vegetation mapping from 1994, 2005, and 2012. Biological vegetation mapping for areas from the SJWA to Riverpark from 2012 includes the following vegetation categories:

- Agricultural Land;
- Playas and Vernal Pools;
- Grassland; and
- Coastal Sage Scrub.

As the Project Applicant does not have permission to access these off site properties, it must be assumed that the vegetation mapping for these areas is accurate as presented in the MSHCP. As previously noted, biologically-sensitive revisions to the Project, as presented in the DEIR, included the addition of approximately 81 acres of conservation open space habitat located in the north/northeastern portion of the site as well as the southern portion of the site adjacent to the San Jacinto River, Riverpark, and the SJWA. These areas support agricultural land, playas and vernal pools, and grassland habitats based on 2012 MSHCP vegetation mapping. GLA's 2022 vegetation mapping indicates the avoidance of agricultural land, playas and vernal pools, ruderal, southern willow scrub, and Riversidean sage scrub habitats will act as a buffer from development and the San Jacinto River. There are also two parcels totaling approximately 60-65 acres just east of the Project boundary which are adjacent to Riverpark but not owned by the Project Applicant which further buffer development from the mitigation bank. The approximate 81 acres of land will be either dedicated in fee title to the RCA as part of the Project's MSHCP JPR conservation process and/or a conservation easement will be recorded over this habitat area for conservation/habitat preservation and enhancement purposes. With the incorporation of the avoidance and minimization measures discussed above and Mitigation Measures 4.4-1 through 4.4-6 in the DEIR (and that still are included as part of this RDEIR), the Project has minimized impacts to biological resources to the maximum feasible extent, which includes minimizing impact to the SJWA and Riverpark. No revision to the EIR is warranted pursuant to this comment.

- J-3** The County acknowledges that the South Coast Air Basin (SCAB) is designated as nonattainment for ozone (1- hour and 8-hour standards), PM<sub>10</sub>, and PM<sub>2.5</sub> under State standards, and is designated as nonattainment for ozone (8-hour standard) and PM<sub>10</sub> under federal standards. An analysis of the Project's impacts to air quality previously was presented in DEIR Subsection 4.3, *Air Quality*. Please refer to Subsection 4.3 of the RDEIR for an updated evaluation of the Project's potential air quality impacts. Refer also to the response to Comment J-4.



- J-4** The County acknowledges the various recommended mitigation measures identified by commenter. Commenter suggests several mitigation measures to address construction-related air quality emissions. However, the analysis in DEIR Subsection 4.3, *Air Quality*, demonstrated that Project-related construction emissions would have been less than significant with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2. The analysis presented in RDEIR Subsection 4.3 has been updated based on a revised Air Quality Impact Analysis (AQIA), which is included as *Technical Appendix B1* to this RDEIR. The revised analysis in RDEIR Subsection 4.3 continues to show that the Project’s construction-related emissions would be less than significant. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, the County finds that commenter’s suggested mitigation measures per items 1, 3, 4, and 5 are not needed to reduce the Project’s construction-related air quality emissions to less-than-significant levels. With respect to commenter’s suggested construction mitigation measure 2, commenter is referred to DEIR Mitigation Measure MM 4.3-4 (also included as RDEIR Mitigation Measure MM 4.3-3), which already requires the installation of infrastructure to accommodate the future use of electric-powered trucks. With respect to commenter’s suggested construction-related mitigation measure 6, pursuant to Division 26, Part 2 of the California Health and Safety Code (HSC), CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations. Accordingly, no revision to the RDEIR has been made pursuant to these comments as the recommended construction-related mitigation measures either already were included in the DEIR as mitigation and continue to be included in this RDEIR, or are otherwise not needed to reduce the Project’s construction-related air quality emissions to below a level of significance.
- J-5** The County also has reviewed the commenter’s recommended mitigation measures for operational air quality emissions. With respect to recommended operational measures 1 and 2, imposing a requirement for tenants to “use the cleanest technologies available” would be ambiguous and unenforceable (refer also to the response to Comment A-20). With respect to infrastructure supporting zero-emission vehicles, commenter is referred to DEIR Mitigation Measure MM 4.3-4 (also included as RDEIR Mitigation Measure MM 4.3-3), which requires the installation of electrical panels and conduit to serve future electric-powered trucks, and further requires that charging units must be installed if any future uses on site would be served by electric trucks. This also would ensure that any future buildings that include cold storage and transport refrigeration units (TRUs) must provide charging units to ensure TRUs can be powered by electricity rather than fossil fuels. Accordingly, no revision has been made as part of this RDEIR based on commenter’s suggested recommended operational measures 1 and 2.
- J-6** Commenter suggests that mitigation be imposed to require contractual language in tenant lease agreements requiring all TRUs to be plug-in capable. The proposed Project would be subject to compliance with the 2022 Amendments to the *Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate*. These updates require that, beginning December 31, 2023, TRU owners shall turnover at least 15 percent of their truck TRU fleet (defined as truck TRUs operating in California) to Zero



Emissions (ZE) technology each year (for seven years). Pursuant to these regulations, all truck TRUs operating in California shall be ZE by December 31, 2029. Given that the Project (as revised and described by this RDEIR) would not be fully built out and occupied until approximately 2031, all future uses associated with the Project's Light Industrial land uses would be subject to compliance with the 2022 Amendments, and all TRUs associated with the Project would be required to be ZE no later than December 31, 2029. Because the ZE requirements for TRUs are mandatory, no additional mitigation has been added to RDEIR Subsection 4.3 pursuant to this comment, although the Project's requirement to comply with the 2022 Amendments to the Airborne Toxic Control Measure has been noted in RDEIR subsection 4.3.7. Other than the mitigation measures already imposed, no additional mitigation exists that is both feasible and legally enforceable.

- J-7** Commenter suggests requiring all light- and medium-duty delivery trucks must consist of zero-emission vehicles. The vast majority of the Project's significant and unavoidable air quality impacts during operations is due to passenger vehicles (i.e., employee vehicles) and heavy trucks, as indicated in RDEIR Tables 4.3-7 and 4.3-8; thus, requiring zero-emission light- and medium-duty vehicles would not measurably reduce the Project's emissions of NO<sub>x</sub>, VOCs, or CO. Furthermore, it would not be feasible for the Project Applicant or future Project tenants to control emissions associated with delivery vehicles, as the Project's proposed uses are not associated with large numbers of light- and medium-duty delivery vans and trucks. No revision to the RDEIR has been made pursuant to this comment.
- J-8** Commenter suggests requiring all service equipment to consist of zero-emissions equipment. Based on the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses), Mitigation Measure MM 4.3-5 has been revised and requires all on-site equipment, such as forklifts, to be electrically powered.
- J-9** The County respectfully disagrees with the commenter's assertion that mitigation should be imposed requiring all trucks accessing the Project site to be model year 2014 or newer, and should be zero-emission beginning in 2023, and in particular, the proposed mitigation measure is not feasible because zero emission heavy trucks (or trucks enabling net zero emissions) are not currently commercially available. As a result, there is no evidence in the record that the proposed mitigation is technologically or financially feasible for the Project. However, as previously shown on DEIR pp. 4.3-61 through 4.3-63, Project operations would be required to implement mitigation very similar to that recommended by this comment, thereby planning accordingly for the infrastructure to support zero and near-zero emission vehicles, for use when such vehicles are commercially available and feasible to utilize for Project operations, as will eventually be required by California regulations at the appropriate time. All feasible mitigation to reduce criteria air pollutant emissions has been mandated of the Project. For instance, DEIR Mitigation measure MM 4.3-4 promoted the cleanest technologies available by providing the necessary infrastructure to support zero-emission vehicles. In addition to providing the minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations Title 24, this mitigation required the facilitation of future installation of infrastructure that would charge the batteries that power the motors of electric-powered trucks.





DEIR Mitigation measure MM 4.3-7.b required that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines. The DEIR further required records to be maintained on-site and be made available for inspection by the County. The mitigation identified in the DEIR is consistent with the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). DEIR Mitigation measure MM 4.3-7 also required that future Project applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. The funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted communities in the Project vicinity. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NO<sub>x</sub> reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses. The mitigation measures identified in this RDEIR with respect to air quality emissions have been revised, and include requirements that are equal to or more stringent than the mitigation measures identified in the DEIR. RDEIR Mitigation Measure MM 4.3-1 restricts the amount of cold storage warehouse uses to a maximum of 20% of the Project’s Light Industrial building area, unless it can be demonstrated that TRUs associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements). Mitigation Measure MM 4.3-2 restricts the lengths of idling for TRUs. RDEIR Mitigation Measure MM 4.3-3 promotes the use of electric trucks by requiring the installation of appropriate charging infrastructure. Mitigation Measure MM 4.3-5 requires that all on-site equipment, such as forklifts, must be electric with the necessary electrical charging stations provided. Mitigation Measure MM 4.3-7 and MM 4.3-8 require compliance with the County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). The County finds that the requirement to achieve net-zero emissions from heavy-duty trucks by 2023 is infeasible for all of the reasons set forth herein, specifically including that net zero in 2023 is not currently technologically feasible, and that the mitigation measures identified in RDEIR Subsection 4.3 provide the maximum feasible mitigation for the Project’s heavy-truck-related emissions. After detailed analysis, the County finds no other feasible mitigation measures exist that would further reduce the Project’s air quality impacts.

- J-10** These footnote references are acknowledged. Please refer to Responses J-4, J-5, and J-8, which responds to the comments referencing these footnotes.
- J-11** Commenter suggests including mitigation requiring compliance with applicable CARB rules and regulations. The Project would be required to comply with all applicable CARB rules and regulations



as a matter of State law. Pursuant to Division 26, Part 2 of the California HSC, CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations, including the regulations cited by this comment. Because compliance with State law is mandatory, no revision has been made as part of the RDEIR pursuant to this comment.

- J-12** The County finds that the commenter’s suggestion to restrict idling of trucks and support equipment to a maximum of two minutes is infeasible. DEIR Mitigation Measure MM 4.3-7, which implemented the requirements of County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses), required the following: “Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations.” The County finds that a requirement to restrict idling to a maximum of two minutes may not be adequate to allow for normal loading and unloading of trucks, and enforcement of a two-minute requirement also would be infeasible. The Project would, however, be subject to RDEIR Mitigation Measure 4.3-7, which incorporates the same requirements as DEIR Mitigation Measure 4.3-7 restricting idling to a maximum of five (5) minutes. Even assuming such a short time period could be effectively enforced, restricting idling to two (2) minutes, instead of five (5) minutes, also would not materially or meaningfully reduce emissions, and would not reduce any significant impact to a less-than-significant level. Accordingly, no new or revised mitigation measures for air quality have been added to the RDEIR in response to this comment.
- J-13** Commenter requests mitigation be added requiring the provision of roof top solar panels. Commenter is referred to DEIR Mitigation Measure MM 4.8-2 (which continues to be imposed on the Project as part of RDEIR Mitigation Measure MM 4.8-2), which requires that all buildings that involve more than 100,000 gross s.f. of commercial, office, industrial, or manufacturing development must accommodate renewable energy production equal to 20% of the building’s energy demand. Onsite renewable energy production typically would be provided through solar panels, although other renewable energy production measures also are allowed. Accordingly, because the DEIR already required renewable energy production, no revision has been incorporated into this RDEIR pursuant to this comment.
- J-14** Commenter requests mitigation requiring appropriate barriers between loading docks and people living or working nearby. The proposed Project is subject to the requirements of the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses), pursuant to DEIR Mitigation Measure MM 4.3-7 (and included in this RDEIR as Mitigation Measure MM 4.3-8). Section 3.2 of Policy F-3 requires that warehouse/distribution facilities larger than 250,000 square feet be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door. This distance may be reduced if the site design includes berms or other similar features to



appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design. Section 3.6 of Policy F-3 states that warehouses larger than 250,000 square feet be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced at no less than 50 feet on center. Fifty percent of the landscape screening must include a minimum of 36-inch box trees. Facility operators are responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan. Furthermore, Section 3.7 of Policy F-3 requires that dock doors shall be located where they are not readily visible from sensitive receptors or major roads. This section further states that if it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented and shall include a combination of landscaping, berms, walls, and similar features. Riverside County would review future implementing developments (e.g., plot plans, conditional use permits, etc.) for compliance with Policy F-3. Because compliance with Policy F-3 is mandatory and was required pursuant to DEIR Mitigation Measure MM 4.3-7 (included as RDEIR Mitigation Measure MM 4.3-8), no additional mitigation is necessary to ensure sufficient barriers are provided between loading docks and people living or working nearby.

- J-15** The County disagrees with the commenter's suggestion that mitigation should be added requiring emergency generators to be powered by non-diesel fuel. The use of emergency generators only would be necessary during emergencies or black outs, and as such would not be a substantial contributor to the Project's operational air quality emissions, and this suggested measure would not reduce any of the Project's significant and unavoidable impacts. Because this suggested requirement would fail to measurably reduce the Project's operational air quality emissions, no revision has been made pursuant to this comment as part of this RDEIR.
  
- J-16** The County disagrees with the commenter's suggestion to require that all future buildings on site meet LEED Tier 2 standards. The Project already is required to comply with the CEC 2022 Building Energy Efficiency Standards, which incorporate a number of measures included in LEED Tier 2 in addition to energy efficient requirements that go beyond LEED Tier 2 requirements. Furthermore, LEED Tier 2 standards only address area and energy source emissions, while the majority of the Project's NO<sub>x</sub> and CO emissions are the result of vehicular traffic, and in particular truck traffic. Thus, LEED Tier 2 standards would not adequately address the Project's significant and unavoidable operational impacts due to CO and NO<sub>x</sub> emissions. This measure also would not serve to measurably reduce the Project's unavoidable operational impacts of VOCs, as a majority of the VOCs would be generated as a result of on-going architectural coatings and other organic solvents associated with household products (paints, varnishes, and wax). Accordingly, no revision has been made to this RDEIR in response to this comment.
  
- J-17** Footnotes and web links referenced by this comment are acknowledged. Please refer to Responses J-5J-8, J-9, J-11, and J-14, which include responses to the comments that incorporate these footnote references.



- J-18** The County appreciates the comments provided by the Santa Margarita Group of the Sierra Club. No further response is necessary.



**COMMENT LETTER K**

**Brady, Russell**

**From:** George Hague <gbhague@gmail.com>  
**Sent:** Thursday, May 26, 2022 1:36 PM  
**To:** Brady, Russell  
**Subject:** Comments on Stoneridge Commerce Center (SCC) environmental documents SPA No. 1 EIR

**CAUTION:** This email originated externally from the Riverside County email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

To: Mr Russell Brady,

RE: Comments on the Stoneridge SPA No. 1 EIR and Stoneridge Commerce Center environmental documents

The plan to revise the path of the approved Ramona Expressway (RE)/Mid County Parkway (MCP) could open the County and RCTC to renegotiate the legal settlement they have made with the environmental community on the project. Therefore the option to change the approved MCP plan to accommodate this project should be further explored.

K-1

The Wold Logistic Center (WLC) 's traffic analysis showed some of its more than 11,000 daily diesel truck trips will pass this project site and must be part of the traffic analysis. The Villages of Lakeview (VOL) has an approved project with at least 7,000 housing units near the RE and there are homes between the project site and Perris Blvd which will be impacted by the Diesel trucks from the project. The California Air Resources Board (CARB) recommends a distance of 1,000 feet from warehouses and their diesel truck traffic from sensitive receptors. There is also Lakeside Middle School and its playground along the same path which will be impacted by this project's diesel trucks — especially if the City of Perris will not allow diesel trucks as part of the MCP as mentioned in their March 23, 2022 letter. The Draft EIR must analyze the projects direct, indirect, cumulative and growth inducing impacts on the children and others on these sensitive receptors. This must also include nearby lands to the project as well as its diesel truck traffic with already approved housing projects. Failing to do this will make the Environmental Impact Report (EIR) inadequate.

K-2  
K-3  
K-4

The San Jacinto Wildlife Area (SJWA) is very close to this project and will have its biological resources negatively impacted. The SJWA is also the land between Perris Lake Dam and the RE as well as elsewhere for a total of about 10,000 acres.

The biological impacts the EIR from light, noise, vibration, odor, and runoff were measured as to what problems they would cause to people senses. Never taking into account that animals have much keener senses of smell, eye sight, hearing and taste. The Stoneridge Commerce Center (SCC) environmental documents also fail to realize each animal has a different level of each sense and analyze impacts based on that knowledge as well as mitigations to reduce the direct, indirect and cumulative impacts. The project doesn't even analyze the increase in pollution caused by the increase in traffic the county knows will result from the proposed improvements, but fails to fully acknowledge this in the environmental documents — this must include all the equipment around the project like diesel Auxiliary Power Units (APU) used by diesel truck drivers, hostlers, yard goats, forklifts, sweepers, generators, ground/yard keeping maintenance equipments and other polluting equipment.

K-5

<https://www.pnas.org/doi/10.1073/pnas.1504710112>

Noise and habitat degradation.

<https://academic.oup.com/beheco/article/27/5/1370/1743471?login=false>

Road noise causes earlier predator detection and flight response in a free ranging mammal



The two links found above are just a few of the studies that prove the damage noise and especially traffic noise will cause significant impacts to wildlife and their habitat. What happens to all of the species of concern/threatened/endangered? Each species of animals has their own unique hearing ability which can be impacted differently by different levels of noise/vibration. This is also true for light pollution and how different levels impact different animals differently. Noise/vibration and light pollution can also impact communication between animals which can/will impact their viability and survival. The Draft EIR/environmental documents fail to have studies on each species to understand these impacts in both the short and long term. The noise//light levels from two-six lanes and caravans of diesel trucks is lacking in these studies.

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Not enough is done to protect the San Jacinto River and its resources from impacts caused by this project. It is very appropriate that much of the zoning is "Light Industrial" because it will be the light pollution from the project that will impact habitat and all the wildlife within at least 1,000 ft in addition to the other pollutions mentioned above. The project must adopt the International Dark Sky Standards and make sure all light standards as well as those on the sides of structures are limited to not more than 18 feet in height. Pollution run off from this site could/will eventually reach the San Jacinto River and much more must be done to prevent such disasters. The project doesn't seem to want to deal with the Perris Dam Inundation which could be more than one foot at the project site with all the on site's toxic pollution sent to habitat well beyond its boundaries.

K-6

K-7

The project does nothing to enable connectivity/linkages to/from the San Jacinto River to/from west side of the SCC. More open space is needed beyond what is shown on the maps to help accomplish this. It is this project's responsibility and not another developer's.

K-8

The state Attorney General has provide the warehouse guidelines found below for "Warehouse Project: **Best Practices and Mitigation Measures** to Comply with the California Environmental Quality Act" beginning with section IV on page 4. This Stoneridge project has significantly failed to incorporate these Best Practices and Mitigation measure in all environmental documents and therefore they will be inadequate unless they are included in the final project. There needs to be full analysis of all of this Best Practices and Mitigations and how they will make the project much better for people, wildlife and the environment — especially in our non-attainment area.

**IV. Warehouse Siting and Design Considerations**

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local

K-9

Page 4

communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.<sup>14</sup>



- • Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- • Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- • Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- • Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- • Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- • Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- • Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

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K-9  
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**V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation**

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers

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<sup>14</sup> California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB’s website and is entitled: “California Sustainable Freight Initiative: Concept Paper for the Freight Handbook” (December 2019).

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Page 5

should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility’s emissions and local impact now, but it can also save money as regulations tighten and demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects’ emissions.

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K-10  
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Examples of best practices when studying air quality and greenhouse gas impacts include:

- • Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials’ personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are



permitted by a site’s applicable zoning and/or general plan land use designation. CEQA Guidelines § 15369.

- • When analyzing cumulative impacts, thoroughly considering the project’s incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project’s individual impacts alone do not exceed the applicable significance thresholds.
- • Preparing a quantitative air quality study in accordance with local air district guidelines.
- • Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- • Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is a baseline expectation.
- • Fully analyzing impacts from truck trips. CEQA requires full public disclosure of a project’s anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin. Emissions beyond the air basin are not speculative, and, because air pollution is not static, may contribute to air basin pollution. Moreover, any contributions to air pollution outside the local air basin should be quantified and their significance should be considered.
- • Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California’s Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable

Page 6

bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

- • Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- • Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- • Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- • Limiting the amount of daily grading disturbance area.
- • Prohibiting grading on days with an Air Quality Index forecast of greater than 100

for particulates or ozone for the project area.

- • Forbidding idling of heavy equipment for more than two minutes.
- • Keeping onsite and furnishing to the lead agency or other regulators upon request,

all equipment maintenance records and data sheets, including design

specifications and emission control tier classifications.

- • Conducting an on-site inspection to verify compliance with construction

K-10 (CONT.)





mitigation and to identify other opportunities to further reduce construction impacts.

- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all

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dock and delivery areas, identifying idling restrictions and contact information to

report violations to CARB, the air district, and the building manager.

- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.

- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not

K-10  
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mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

- • Constructing electric truck charging stations proportional to the number of dock doors at the project.
- • Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- • Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- • Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building’s projected energy needs.
- • Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- • Requiring facility operators to train managers and employees on efficient

scheduling and load management to eliminate unnecessary queuing and idling of trucks.

- • Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- • Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- • Achieving certification of compliance with LEED green building standards.
- • Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- • Posting signs at every truck exit driveway providing directional information to the truck route.
- • Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- • Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB- approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

**K-10  
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- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.

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- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

**VI. Noise Impacts Analysis and Mitigation**

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities’ typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and

setting system volume at a level not readily audible past the property line.

**VII. Traffic Impacts Analysis and Mitigation**

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if

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truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- • Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- • Installing signs in residential areas noting that truck and employee parking is prohibited.
- • Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- • Consulting with the local public transit agency and securing increased public transit service to the project area.
- • Designating areas for employee pickup and drop-off.
- • Implementing traffic control and safety measures, such as speed bumps, speed

limits, or new traffic signs or signals.

- • Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.

- • Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.

- • Constructing roadway improvements to improve traffic flow.
- • Preparing a construction traffic control plan prior to grading, detailing the

locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

**VIII. Other Significant Environmental Impacts Analysis and Mitigation**

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- • Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- • Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- • Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- • Directing all lighting at the facility into the interior of the site.

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- • Using full cut-off light shields and/or anti-glare lighting.
- • Using cool pavement to reduce heat island effects.
- • Installing climate control in the warehouse facility to promote worker well-being.
- • Installing air filtration in the warehouse facility to promote worker well-being.

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(CONT.)

As I read the environmental documents for the project it appears the developer never read the Attorney General’s (AG) letter on Best Practices and Mitigations for warehouse projects like the Stoneridge Commerce Center (SCC). The Final EIR/future environmental documents must make sure what you read above from the AG’s office is incorporated into this possible warehouse project to protect current and future nearby residents as well as warehouse workers from both the project site as well as from the project’s diesel equipment/truck traffic.. The impacts to the environment will be significantly be reduced in our non-attainment area if the project’s Final EIR includes what the AG wrote above — but currently doesn’t.

K-15

The Draft EIR also fails to incorporate what Stanley Armstrong wrote for the California Air Resources Board (CARB) in their Notice of Preparation (NOP) comments as you can read in the following:

**"III. Conclusion**

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already disproportionately impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and oxides of nitrogen (NO<sub>x</sub>) emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the County and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project’s construction and operational air pollution emissions."

The CARB’s Attachment A mentioned above is found below, but the Draft EIR again fails to address and incorporate CARB’s NOP letter’s concerns and strongly worded recommendations. It is important that the Final EIR/future environmental documents doesn’t make the same omissions as is very apparent in the environmental documents/Draft EIR by incorporating both the AG’s and CARB’s letter/attachment A into the Stoneridge Commerce Center (SCC) project....otherwise it will be inadequate.

K-16

All future SCC documents must analyze the projects’ impacts on the residents of the City of Perris as expressed in the Press-Enterprise April 25, 2022 article found below by Perris officials as expressed in their March 23, 2022 letter which is mentioned in the article and incorporated by reference. The SCC’s traffic analysis must be done as if the project will not allow trucks through the City of Perris as they expresses in the article and in their letter. The SCC’s cumulative traffic analysis must be done as if the Mid County Parkway (MCP) will not be built in the area of the project which is also mentioned as a possibility in the article.



Please keep me informed of all documents and meetings related to this project.

Sincerely,

George Hague

**ATTACHMENT A**

**Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers**

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

**Recommended Construction Measures**

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO<sub>x</sub>) standard starting in the year 2022.<sup>1</sup>

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<sup>1</sup> In 2013, CARB adopted optional low-NO<sub>x</sub> emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO<sub>x</sub> emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model year 2010 and later. CARB's optional low-NO<sub>x</sub> emission standard is available at: <https://www.arb.ca.gov/msprod/onroad/optionnox/optionnox.htm>.

Attachment - 1

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

**Recommended Operation Measures**

6. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
7. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.<sup>2</sup>
8. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.
9. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
10. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.
11. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.
12. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

<sup>2</sup> CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: [https://www.arb.ca.gov/msprod/tech/techreport/tru\\_07292015.pdf](https://www.arb.ca.gov/msprod/tech/techreport/tru_07292015.pdf).

Attachment - 2

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,<sup>3</sup> Periodic Smoke Inspection Program (PSIP),<sup>4</sup> and the Statewide Truck and Bus Regulation.<sup>5</sup>
9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than 5 minutes while on site.

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10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

<sup>3</sup> In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. 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 heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://www.arb.ca.gov/cc/hdghg/hdghg.htm>.

<sup>4</sup> The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>.

<sup>5</sup> The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprod/onrdiesel/onrdiesel.htm>.

K-16  
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## After 20 years and \$150 million, will Mid-County Parkway ever be built in Riverside County?

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K-17

By **JEFF HORSEMAN** | [jhorseman@scng.com](mailto:jhorseman@scng.com) | The Press-Enterprise

PUBLISHED: April 25, 2022 at 6:04 p.m. | UPDATED: April 25, 2022 at 6:15 p.m.

It's taken almost 20 years and more than \$150 million to build a parkway between Perris and San Jacinto.

Despite that, most of the [Mid-County Parkway](#) remains on the drawing board — unhelpful to drivers whose limited east-west options include an expressway notorious for fatal crashes.





It's unclear when the 16-mile parkway will ever be finished. Officials with the city of Perris and the Riverside County Transportation Commission are trying to resolve the city's concerns about the project's impact on the city, a situation that frustrates commissioners who thought the parkway was a done deal.

"This is pretty much the big punch in the eyeball when you come back at this stage, \$150 million into it and decide now is the time to raise a bunch of issues," Jurupa Valley City Council Member Brian Berkson, a commission member, said at a March 28 meeting.



Perris officials contend the current version of the parkway isn't what the city agreed to, and the city wasn't told of the changes until work started on the first phase, an interchange being built at the 215 Freeway and Placentia Avenue in Perris.

"The concerns related to traffic, air quality, and noise impacts on nearby residential areas, city streets, a fire station, and a local park, remain of great concern for us," Perris City Manager Clara Miramontes wrote in an April 18 letter to the commission, the county's main transportation-planning body. Earlier, Perris raised concerns about the parkway cutting off access to a nearby high school. On Monday, April 25, a subcommittee of the 34-member transportation commission, which has elected leaders from every city in Riverside County, agreed to delay work on the parkway's Perris segment "until such time that the project is financially and technically feasible," a commission report states. It's not clear when that might be.

Money and staff time for the parkway would be shifted toward another segment of the project as well as work to improve safety on the Ramona Expressway, one of the east-west linkages between the San Jacinto Valley and the county's western half and the subject of heightened traffic enforcement after a series of deadly crashes, including at least four in the past three months. The subcommittee's vote must be approved by the full commission. That might happen in May.

Home to 2.4 million people, Riverside County is the 10th most populated county in the United States and one of California's fastest growing counties.

Infrastructure has struggled to keep pace with that rapid growth, leading to gridlock as residents lured by the county's cheaper housing commute to jobs beyond the county line.

A longtime challenge has been adding another link between the San Jacinto Valley and the county's western half. Right now, drivers' main options between Hemet/San Jacinto and the 215 are Highway 74 and the Ramona Expressway.

**RELATED ARTICLES**

- o **Truck lanes open on 60 Freeway east of Moreno Valley**
  - o **60 Freeway closures canceled in Riverside County's Badlands**
  - o **What lanes can semi trucks legally drive in on Southern California freeways?**
  - o **Westbound 60 Freeway to close three nights in Riverside County's Badlands**
- 
- o **Temecula's Winchester Road to close three nights at 15 Freeway**

The parkway concept sprang from a regional planning effort in the late 1990s that developed a long-term blueprint for growth in the county's unincorporated areas, including a network of reserves to protect endangered species and a vision for new and expanded transportation arteries. At first, the parkway would have one or two lanes in each direction but eventually would have three lanes each way, a commission fact sheet states.

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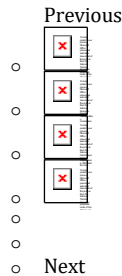
Originally, the parkway would have stretched from the 15 Freeway in Corona to Highway 79 in San Jacinto. But facing rising costs and concerns about building in Lake Mathews and Gavilan Hills, the transportation commission in 2009 cut the parkway from 32 to 16 miles. That meant it would run between the 215 and the 79 and the portion between the 15 and 215 would be scrapped.

The parkway project also required an extensive environment impact report and settled two lawsuits challenging the project on environmental grounds. In all, more than \$150 million has been spent so far on the parkway, which includes the cost of getting permits and buying land to offset environmental impacts.

In all, it could cost \$1.1 billion to finish the project. [The Placentia interchange](#), which is 70% complete, will cost \$42 million.

The commission was set to move forward with the parkway when it received [a Feb. 28 letter from Perris](#). In it, Perris officials expressed concern the parkway would send traffic through residential streets to connect with the 215. Officials also worried the parkway would sever access to Orange Vista High School, [which opened in 2016](#) after the parkway’s environment study wrapped up. Commission staff agreed to build a bridge undercrossing so students could get to Orange Vista, preserve a local trail and guide trucks to Perris’ preferred truck routes, commission Executive Director Anne Mayer said [at the March 28 meeting of the commission’s subcommittee dealing with road projects in western Riverside County](#).

[But in a March 23 letter](#) to the commission, Perris officials said they would support the parkway — only if trucks weren’t allowed on it.



1 of 3

Riverside County Transportation Commission Executive Director Anne Mayer, seen in 2016, told commissioners that “it would be very difficult” to build the Mid-County Parkway without the city of Perris’ support. (File photo by Kurt Miller, The Press-Enterprise/SCNG)

“That is certainly not something that is within the purview of (the commission),” Mayer said.

At the March subcommittee meeting, officials recommended stopping all work on the parkway, except for the Placentia interchange, and shifting parkway funding to other projects.

“At this point, I don’t see a path forward given the city of Perris’ requirements and issues related to truck traffic,” Mayer said. “So it is a difficult recommendation and not one that we make lightly. But we do not believe that we should continue to expend funds on the project if there’s not going to be support within the community for it.”

Commissioners urged the staff to continue talking with Perris to find a solution.

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“To not build what we’ve spent this amount of money on is crazy,” commissioner and Eastvale Mayor Clint Lorimore said. “It is unconscionable to walk away from the investment of \$150 million in taxpayer money.”

In letters sent to the commission since March, Perris — as a condition of supporting the parkway — wants either a series of improvements to Placentia Avenue or upgrades around Redlands, Morgan and Indian avenues.

Commission staff said it could cost \$25 million to \$40 million to make the improvements Perris wants. Twelve homes would have to be bought from willing sellers — they likely couldn’t be acquired through eminent domain — and Perris’ option for diverting truck traffic could require more environmental studies, officials [wrote in a report to commissioners](#).

As a result, the commission should focus on other “(parkway) construction packages along the 16-mile corridor to determine if a less complex, less controversial, and less expensive option is feasible,” the commission report read, noting the Ramona Expressway’s safety problems.

In order for the project to keep its environmental approvals, work must start on a new portion of the parkway every five years, Mayer said Monday.

Berkson, the Jurupa Valley council member, asked last month if the parkway could be built without Perris’ permission. Mayer said that the commission could move forward with the parkway because of the project’s environmental report, but the commission eventually would need Perris permits to connect to city streets.

“With this level of opposition, it would be very difficult to proceed without the city of Perris’ support,” she said.

Miramontes and Perris Mayor Michael Vargas, who sits on the commission, said Perris supports the parkway and that measures the city is seeking, such as walls, traffic barriers and landscape signals, are typical for such projects.

“The bottom line is that this project has changed. It’s not the original,” Vargas said in a telephone interview Friday, adding the city continues to work with the commission.

Last month, Vargas told fellow commissioners: “Times have changed. The high school’s now in place. We were able to mitigate that issue. We’re basically just stumped with the trucks.”

When the parkway was first designed, no one anticipated the Inland Empire would have the truck traffic it has today, Vargas said Monday. He also has noted the project started when most of the current Perris City Council was not in office.

**RELATED LINKS**

- [Perris bridge over 215 Freeway to close 10 months in first phase of new freeway construction](#)
  - [Riverside County’s first new freeway in years could break ground in 2020](#)
  - [TRANSPORTATION: Mid County Parkway moves forward](#)
  - [15 Freeway, Railroad Canyon Road expansion project wraps up in Lake Elsinore](#)
- 
- [Temecula ‘smart freeway’ project could improve 15 Freeway commute](#)

Commissioner and Riverside County Supervisor Karen Spiegel on Monday said she was “very disappointed and frustrated that after 20 years ... this project was moving forward and there was never a comment made until recently.”

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"You can't because of city council changes and new people .... take a regional project and change the whole direction of it," Spiegel said, adding that without the parkway, the Placentia interchange, which was meant to benefit the region, instead will mainly benefit Perris.

If the parkway is scrapped, Berkson and Spiegel last month raised the prospect of whether Perris could be forced to reimburse the commission for money spent on the project. Mayer replied the commission "doesn't have any mechanisms" to force reimbursement.

The possibility of the parkway not being built "comes as a real shock," Hemet City Council Member Linda Krupa said in March.

"Moving forward, we do need increased access and safer access (for) traffic into the San Jacinto Valley," she said. "... And we're growing. And we are growing. And we are growing. And everything that's happening in Winchester, in Hemet, in Menifee, in San Jacinto, all brings more traffic onto two-lane roads."

*Staff Writer David Downey contributed to this report.*

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**Letter K George Hague**

- K-1** The commenter incorrectly states that the proposed Project would result in modifications to the plans for the Mid-County Parkway (MCP). The Project would not affect the MCP, but rather would accommodate the MCP through the northern portions of the Project site. The Project does not propose any direct connections to the MCP, beyond providing roadway access to on and off ramps currently proposed as part of the MCP project. Accordingly, no revisions have been made as part of this RDEIR in response to this comment.
- K-2** The County disagrees with the commenter's assertion that the DEIR failed to include the cumulative projects identified by this comment. The Villages of Lakeview project was included in the Cumulative Development project list (refer to DEIR Table 4.0-1) and the traffic volumes from that project were included in the analysis presented throughout the DEIR. The Villages of Lakeview project continues to be included as a cumulative project evaluated in this RDEIR. The World Logistics Center project is located south of the SR-60 Freeway, along Redlands Boulevard. Traffic from this project is anticipated to utilize the local streets in the area, while regional traffic is anticipated to utilize the adjacent SR-60 Freeway/Redlands Boulevard interchange. As such, traffic from the World Logistics Center project is not anticipated to utilize the roadways where the Project would contribute substantial amounts of traffic (i.e., 50 or more peak hour trips), and therefore would not affect operations within the Project's traffic study area. As such, the DEIR properly excluded the World Logistics Center project from the list of cumulative developments, although full buildout of the Riverside County General Plan and the general plans of other jurisdictions within the County were evaluated as part of the cumulative impact analyses presented in the DEIR, as was described in the introduction section to DEIR Section 4.0. For these reasons, the World Logistics Center project also is not included in the list of cumulative development presented in RDEIR Section 4.0, although the analysis continues to evaluate cumulatively-considerable impacts associated with full buildout of the Riverside County General Plan and the general plans of other jurisdictions within the County. Accordingly, no revision has been made in this RDEIR pursuant to this comment.
- K-3** The County acknowledges that the California Air Resources Board (CARB) recommends a buffer distance of 1,000 feet between industrial uses and sensitive receptors, which is not enforceable and is not based on the most recent science or data (refer to the discussion provided in RDEIR subsection 4.3.1.G and the discussion presented in RDEIR *Technical Appendix U*). Nonetheless, the Project site is located more than 2,000 feet from the nearest existing sensitive receptor. Additionally, the analysis that was included in DEIR Subsection 4.3, *Air Quality*, demonstrated that the Project as evaluated by the DEIR would not expose any sensitive receptors to substantial pollutant concentrations. Commenter is referred to the revised analysis of the Project's air quality impacts, including localized air quality impacts, as presented in RDEIR Subsection 4.3, *Air Quality*. As demonstrated in RDEIR Subsection 4.3, the Project as revised would not result in any localized impacts to air quality with the implementation of mitigation measures.



**K-4** Cancer risk and non-cancer risk at Lakeside Middle School as a result of the Project were calculated as part of the analysis conducted for the DEIR, and the results were included in DEIR Tables 4.3-12, 4.3-13, 4.3-15, 4.3-16, 4.3-17, 4.3-18, 4.13-19, and 4.3-20. As shown in these tables of the DEIR, the Project evaluated by the DEIR, including the Primary and Southern Truck Routes, would not have exposed sensitive receptors to cancer risks exceeding 10 per one million or non-carcinogenic hazards exceeding a chronic hazard index of 1.0 during either construction or long-term operation, and as such the DEIR concluded that cancer risk and non-cancer risk impacts, including potential impacts to the nearby schools, would be less than significant. Commenter is referred to the revised analysis of the Project's air quality impacts, including health risk impacts, as presented in RDEIR Subsection 4.3, *Air Quality*. As demonstrated in RDEIR Subsection 4.3, with the implementation of mitigation measures the Project as revised would not expose nearby sensitive receptors, including nearby school children, to cancer or non-cancer health risks exceeding the thresholds of significance identified by the SCAQMD.

**K-5** The County disagrees with the commenter's assertion that the Project would result in significant indirect impacts to biological resources. First, it should be noted that the SJWA is separated from the Project site by Ramona Expressway which is a six-lane, 220-foot wide Expressway which presents a sizable barrier between the SJWA on the north side of Ramona Expressway and the Project located southerly of Ramona Expressway. While the Riverpark Mitigation Bank occurs immediately east of the Project site, the Project accommodates 81.6 acres of preserved open space along the eastern boundary of the site, and there are two parcels totaling approximately 60-65 acres just east of the Project boundary that are adjacent to Riverpark but not owned by the Project Applicant and that further buffer development from the mitigation bank. The approximate 81.6 acres of land either would be dedicated in fee title to the RCA as part of the Project's MSHCP JPR conservation process and/or a conservation easement would be recorded over this habitat area for conservation/habitat preservation and enhancement purposes. In addition, the Project site already is targeted for urban development based on the site's existing General Plan and Specific Plan land use designations and zoning classifications, and areas proposed for development with urban uses as part of the Project occur in the areas already planned for urban development based on the site's existing General Plan and Specific Plan land use designations. Commenter also is referred to DEIR Subsection 4.4, *Biological Resources*, which included a discussion and analysis of potential indirect impacts to biological resources, and demonstrated that such impacts would be less than significant. As noted therein, minimization measures also are being proposed and are required by the Western Riverside County Multiple-Species Habitat Conservation Plan (MSHCP) to address the Urban/Wildlands Interface Guidelines (UWIG) under this plan. These minimization measures were described on Pages 4.4-47 through 4.4-50 of the DEIR. The measures included the following:

- Minimization of drainage/drainage pattern impact;
- Toxics;
- Minimization of lighting impact;
- Minimization of noise;
- Control of, and control of the spread of, non-native plant species; and



- Barriers to minimize impact between the development and preserved conservation lands including Riverpark and the SJWA.

With respect to Project lighting, the Project would be subject to compliance with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), which requires that “[a]ll outdoor luminaires in shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way.” With mandatory compliance with Ordinance No. 915, the Project’s lighting elements would not expose nearby preserved open space areas to excessive lighting, and impacts would be less than significant. With respect to noise, commenter is referred to the revised analysis presented in RDEIR Subsection 4.13, *Noise*, which demonstrates that the Project would not expose any nearby biological receptors to noise levels exceeding the County’s residential noise standards (refer specifically to RDEIR Tables 4.13-7, 4.13-10, and 4.13-15). With respect to traffic-related noise, commenter is referred to revisions that have been incorporated into the Project as described in Subsection R.3. As noted therein, prior to completion of the Mid-County Parkway (MCP), all Project westbound truck traffic would be routed to the south and west and away from sensitive biological resources, and thus would not significantly affect sensitive biological resources. While under long-term conditions Project truck traffic all would be routed along the MCP, which occurs in close proximity to the Riverpark Mitigation Bank and SJWA, the analysis in RDEIR Subsection 4.13 (refer specifically to RDEIR Table 4.13-9) demonstrates that Project-related traffic (including trucks and passenger vehicles) only would result in a nominal 0.1 dBA CNEL increase in noise levels along the segments of Ramona Expressway that abut the Project site. Thus, and based on the analysis presented in this RDEIR, the County finds that the proposed Project’s indirect impacts to biological resources would be less than significant with implementation of the mitigation measures identified throughout this RDEIR.

- K-6** The County disagrees with the commenter’s assertion that the Project would result in significant impacts due to lighting and polluted runoff. The Project would be subject to compliance with Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), which requires that “[a]ll outdoor luminaires in shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way.” With mandatory compliance with Ordinance No. 915, the Project’s lighting elements would not expose nearby preserved open space areas to excessive lighting, and impacts would be less than significant. With respect to water quality, commenter is referred to the analysis presented in DEIR and RDEIR Subsection 4.10, *Hydrology and Water Quality*, which provides substantial evidence demonstrating that the Project’s water quality impacts would be less than significant.
- K-7** The County disagrees with the commenter’s assertion that inundation hazards associated with the Perris Dam were not evaluated in the DEIR. Commenter is referred to the analysis of Thresholds e. and g. in DEIR Subsection 4.10, *Hydrology and Water Quality*, which provided substantial evidence demonstrating that impacts to water quality associated with dam inundation would be less than significant with implementation of DEIR Mitigation Measure MM 4.10-3. Notwithstanding, an updated analysis was conducted using the California Department of Water Resources, Division of



Safety of Dams (DSOD) Dam Breach Inundation Map Web Publisher mapping portal. The limits of inundation associated with the Lake Perris dam were overlaid on the Project's proposed land use plan. As a result of this analysis, it was determined that the dam inundation areas affecting the Project site occur primarily within the Project's planned Open Space - Conservation Habitat uses, and no portion of the dam inundation area would affect any future buildings on site (refer to RDEIR *Technical Appendix R*). Furthermore, any inundation that may occur at the edges of future parking lots would be controlled by the Project's drainage system, which incorporates measures to preclude significant water quality impacts. No further revisions to the RDEIR are warranted pursuant to this comment.

**K-8** The County disagrees with the commenter's assertion that the Project would result in impacts to wildlife connectivity/linkages because there is no linkage between the San Jacinto River and lands west of the Project site. Lands to the west of the Project site are located within the McCanna Hills Specific Plan, which is planned for the future development with a mixture of residential and commercial retail land uses. Furthermore, the Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area, which is a habitat conservation plan that plans for regional wildlife movement corridors throughout western Riverside County. The MSHCP identifies Criteria Cells and associated conservation criteria to enable implementation of the MSHCP Reserve System. Lands to the west of the Project site are not included in any Criteria Cells or Cell Groups, indicating that these areas are not targeted for long-term conservation and are not needed to facilitate regional wildlife movement/linkages. Therefore, the County finds that the DEIR's conclusion that the Project's impacts to wildlife movement/linkages would be less than significant is supported by substantial evidence, and no revision to the RDEIR is warranted pursuant to this comment.

**K-9** The County disagrees with the commenter's assertion that the DEIR failed to provide sufficient design and mitigation measures to address the Project's potential environmental effects. As was shown in DEIR Tables 4.3-15 through 4.3-18, DPM emissions (including PM<sub>10</sub> and PM<sub>2.5</sub>) associated with implementation of the Primary Land Use Plan or Alternative Land Use Plan would not have exposed any nearby sensitive receptors to cancer risks exceeding the identified threshold of significance of 10 per one million people. DEIR Tables 4.3-18 through 4.3-20 showed that Project-related DPM emissions associated with either the Primary Land Use Plan or Alternative Land Use Plan also would not have exposed nearby sensitive receptors to non-cancer health risks exceeding the identified threshold of significance of 1.0. Pursuant to CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found to be significant." Notwithstanding, there are no existing sensitive receptors within 1,000 feet of the Project site under existing conditions. Additionally, no site-specific design was included as part of the Project evaluated by the DEIR. As part of future implementing developments (e.g., plot plans), Riverside County will review the implementing developments to ensure that adequate distance is provided between future warehouse buildings on site and nearby sensitive receptors. With respect to buffers, the Project evaluated in the DEIR would have been subject to the requirements of the Riverside County Board of Supervisors Policy F-3 ("Good Neighbor Policy" for Logistics and Warehouse/Distribution Uses), pursuant to DEIR Mitigation Measure MM 4.3-7. Section 3.2 of Policy F-3 requires that





warehouse/distribution facilities larger than 250,000 square feet be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design. Section 3.6 of Policy F-3 states that warehouses larger than 250,000 square feet be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced at no less than 50 feet on center. Fifty percent of the landscape screening must include a minimum of 36-inch box trees. Facility operators are responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan. Furthermore, Section 3.7 of Policy F-3 requires that dock doors shall be located where they are not readily visible from sensitive receptors or major roads. This section further states that if it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented and shall include a combination of landscaping, berms, walls, and similar features. Riverside County would review future implementing developments (e.g., plot plans, conditional use permits, etc.) for compliance with Policy F-3. With respect to parking and queuing, DEIR Mitigation Measure 4.3-7 already required that warehouse/distribution facilities "...greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas." With respect to driveway access locations, DEIR Mitigation Measure MM 4.3-7 required compliance with Riverside County Board of Supervisors Policy F-3. Provision 3.3 of Policy F-3 requires that "[t]ruck driveways shall generally be placed, on streets that do not have fronting sensitive receptors." With respect to signage for entry and exit points, Provision 5.2 of Policy F-3 requires that signs "...should be posted in the appropriate locations that clearly show the designated entry and exit points for trucks and service vehicles." With respect to parking and maintenance, Provision 5.3 requires the posting of signs "...in the appropriate locations that state parking and maintenance of all trucks is to be conducted within designated areas and not within the surrounding community or on public streets." Riverside County would review future implementing developments (e.g., plot plans, conditional use permits, etc.) for compliance with Policy F-3. Notwithstanding, the analysis of air quality impacts has been revised based on the changes to the Project's design as described previously in Subsection R.3. The revised analysis in RDEIR Subsection 4.3 continues to require measures similar to those described above. Commenter is referred to the revised analysis and mitigation measures presented in RDEIR Subsection 4.3.

- K-10** The Project's emissions-related impacts identified in Subsections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*, of the DEIR adequately analyzed cumulative impacts and were prepared in conformance with the recommendations and requirements of the South Coast Air Quality Management District (SCAQMD). Additionally, an analysis of cumulative effects was provided in each Subsection within DEIR Section 4.0. The cumulative impact analyses contained in the Project's DEIR fully complied with all applicable CEQA requirements, including § 15130 of the State CEQA



Guidelines. The Air Quality Impact Assessment and Health Risk Assessment (HRA), included as *Technical Appendices B1 and B2* to the DEIR, were prepared in full compliance with SCAQMD guidelines. The HRA included with the DEIR was prepared in accordance with the guidance available from the California Office of Environmental Health Hazard Assessment (OEHHA) and SCAQMD. The mitigation measures in the DEIR did not rely solely on compliance with CARB or SCAQMD regulations. Impacts associated with the Project's heavy-duty truck trips were fully evaluated in DEIR Subsection 4.3, and this comment does not identify any deficiencies in the analysis that was provided. The analysis of greenhouse gas (GHG) emissions provided in EIR Subsection 4.8 provided a full analysis of the Project's foreseeable GHG emissions, and the mitigation in Subsection 4.8 does not rely on California's Cap-and-Trade Program as mitigation. Rather, the mitigation to address the Project's GHG emissions as presented in the DEIR required compliance with the County's Climate Action Plan (CAP) Update. The County disagrees with the commenter's assertion that additional mitigation measures should have been included in the DEIR to address the Project's emissions during near-term construction activities. As concluded in DEIR Subsection 4.3, with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project's construction-related air quality emissions would not have exceeded any of the SCAQMD thresholds of significance. Pursuant to CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found to be significant." With respect to the commenter's recommended mitigation measures for operational activities, commenter is referred to DEIR Mitigation Measure MM 4.3-7, which already imposed a requirement that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty Trucks ("HHD") accessing the site use year CARB 2010 or newer engines. The County disagrees with the commenter's suggestion to require that all heavy-duty vehicles associated with the Project should be zero-emission by year 2030. The County cannot ensure that economically viable zero-emission heavy-duty trucks will be readily available by 2030, and as such it would not be feasible to require truck operators to replace their entire fleets by 2030 in order to operate on the Project site. With respect to on-site equipment, commenter is referred to revised RDEIR Mitigation Measure MM 4.3-5, which requires that "[a]ll on-site equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts) shall be required to be powered by electricity, and an appropriate numbers of charging stations for the on-site equipment shall be accommodated on site. With respect to the commenter's suggestion that tenants should be required to use zero-emission light- and medium-duty vehicles during operations, the vast majority of the Project's significant and unavoidable air quality impacts during operations is due to passenger vehicles (i.e., employee vehicles) and heavy trucks; thus, requiring zero-emission light- and medium-duty vehicles would not measurably reduce the Project's emissions of CO, NO<sub>x</sub>, or ROG<sub>s</sub>. The County also finds that the commenter's suggestion to restrict idling of trucks to a maximum of two minutes is infeasible, as set for in the responses to Comment A-22 and J-12. Commenter also is referred to DEIR Mitigation Measure MM 4.3-7, which required the following: "Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations." With respect to contact information for violations,



DEIR Mitigation Measure MM 4.3-7 already required that “[e]ach Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community.” With respect to the commenter’s suggested mitigation requiring air filtration systems, the analysis in DEIR Subsection 4.3 (refer to the analysis of Threshold c.) demonstrated that the Project would not result in any significant localized air quality impacts, including localized impacts due to Diesel Particulate Matter (DPM). As the recommended air filtration systems only would address potential localized air quality impacts, and because the Project as evaluated in the DEIR would not have resulted in any significant localized air quality impacts, the use of air filtration systems is unnecessary and is not required pursuant to CEQA Guidelines § 15126.4(a)(3). Similarly, because the DEIR found that localized air quality impacts would not occur, the County finds that it is not necessary to impose a requirement to conduct regular air quality monitoring. With respect to electric vehicles, the commenter is referred to DEIR Mitigation Measure 4.3-3, which already required electric hookups for Transport Refrigeration Units (TRUs), and to DEIR Mitigation Measure 4.3-4, which requires the provision of appropriate infrastructure to support electric vehicles (including trucks), and further requires the installation of charging stations for any future tenants that would utilize electric trucks. With respect to solar photovoltaic systems, the commenter is referred to DEIR Mitigation Measure 4.8-2, which required future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development. The on-site renewable generation may include solar, or other measures to offset the energy demand of future buildings on site. In addition, the County disagrees with the commenter’s suggestion that mitigation should be added requiring emergency generators to be powered by non-diesel fuel. The use of emergency generators only would be necessary during emergencies or blackouts, and as such would not be a substantial contributor to the Project’s operational air quality emissions. Thus, mitigation requiring non-diesel generators would fail to measurably reduce the Project’s significant and unavoidable impacts due to CO, ROG, and NO<sub>x</sub> emissions. With respect to efficient scheduling and load management, the Project evaluated in the DEIR would have been required to comply with Policy F-3. Provision 4.3 of Policy F-3 requires that “[f]acility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.” With respect to ridesharing, DEIR Mitigation Measure MM 4.3-8 already required compliance with Policy F-3, while provision 4.8 of Policy F-3 already requires, “[f]acility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.” Although Mitigation Measure MM 4.3-8 already required compliance with provision 4.8, RDEIR Mitigation Measure 4.3-8 has been revised to specifically require compliance with provision 4.8. The County also disagrees with the commenter’s suggestion to require that all future buildings on site meet LEED Tier 2 standards. The Project already is required to comply with the CEC 2022 Building



Energy Efficiency Standards, which incorporate a number of measures included in LEED Tier 2 in addition to energy efficient requirements that go beyond LEED Tier 2 requirements. Furthermore, LEED Tier 2 standards only address area and energy source emissions, while the majority of the Project's CO and NO<sub>x</sub> emissions are the result of vehicular traffic, and in particular truck traffic. This measure also would not serve to measurably reduce the Project's unavoidable operational impacts of VOCs, as a majority of the VOCs would be generated as a result of on-going architectural coatings and other organic solvents associated with household products (paints, varnishes, and wax). Thus, LEED Tier 2 standards would not adequately address the Project's significant and unavoidable operational impacts due to VOC and NO<sub>x</sub> emissions. With respect to meal options, the commenter is referred to DEIR Mitigation Measure 4.3-7, which required signage indicating the locations of the nearest food options, thereby reducing the distance of employee trips associated with food service. With respect to signage for entry and exit points, Provision 5.2 of Policy F-3 requires that signs "...should be posted in the appropriate locations that clearly show the designated entry and exit points for trucks and service vehicles." It is unclear from this comment how "improving" and "maintaining" vegetation and tree canopy for residents in and around the Project area would serve to reduce any of the Project's impacts, as the only significant and unavoidable impact to air quality identified in the DEIR was related to regional air quality emissions, while localized air quality emissions were found to be less than significant with mitigation. With respect to compliance with CARB regulations, DEIR Mitigation Measure 4.3-7 already required that "[e]ach facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community." Additionally, pursuant to Division 26, Part 2 of the California Health and Safety Code (HSC), CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations. The County disagrees with the commenter's suggestion to require all future tenants must comply with the EPA's SmartWay program, although DEIR Mitigation Measure 4.3-6 required the developer/successor-in-interest to provide future tenants with information regarding the EPA's SmartWay program, in addition to providing information about other programs and equipment that also would serve to promote the use of alternative fuels. Although the DEIR did not include all of the mitigation measures identified by the commenter, the CEQA Guidelines do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the mitigation consistent with the in which other impact areas are handled in CEQA. The County of Riverside, in their discretion, has selected a robust program of feasible mitigation to reduce criteria air pollutants, air toxics, and GHG emissions (see pages 4.3-61 through 4.3-63 and 4.8-36 through 4.8-37 of the DEIR for a complete list of the robust emission-reducing mitigation program required of the Project). The mitigation measures identified in the DEIR were feasible, enforceable, and proven to be effective in reducing emissions, and represented the maximum feasible mitigation available to address the Project's significant and unavoidable impacts due to CO, ROG, and NO<sub>x</sub> emissions. Notwithstanding, the analysis of air quality and greenhouse gas impacts has been revised based on the changes to the Project's design as described previously in Subsection R.3. The revised analysis



in RDEIR Subsections 4.3 and 4.8 continue to require the measures described above. Commenter is referred to the revised analysis and mitigation measures presented in RDEIR Subsections 4.3 and 4.8.

- K-11** Footnote referencing CARB’s Air Quality and Land Use Handbook is acknowledged; no response is necessary.
- K-12** This comment provides a number of measures intended to address operational noise impacts associated with light industrial developments. Commenter is referred to DEIR Subsection 4.13, *Noise*, which demonstrated that the Project’s noise impacts would be reduced to less-than-significant levels with the implementation of mitigation, with exception of vehicular-related noise impacts along the segment of Nuevo Road between the between the Project’s entrance (Antelope Road) and Dunlap Drive. Noise Impact Assessments (NIA) were prepared for the Project and were included as DEIR *Technical Appendices J1 through J4*. Additionally, the analysis of Project impacts due to traffic-related noise in the DEIR did consider the existing ambient noise environment, and the threshold of significance is lower where the ambient noise levels already exceed 65 dBA CNEL (refer to DEIR p. 4.13-26). With respect to mitigation measures recommended by this comment in relation to construction and operational (i.e., on site) noise, the analysis in DEIR Subsection 4.13 demonstrated that such impacts would be less than significant with the implementation of the mitigation measures identified in DEIR subsection 4.13.7. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, none of the recommended mitigation to address the Project’s operational noise have been included in this RDEIR, nor are they necessary to reduce any of the Project’s significant environmental effects to less-than-significant levels. No revision or additional mitigation has been made to the RDEIR pursuant to this comment, although the commenter is referred to the revised discussion and analysis in EIR subsection 4.13.10, which continues to demonstrate why mitigation is not available to address the Project’s significant impacts due to traffic-related noise.
- K-13** The County disagrees with the commenter’s assertion that the DEIR should have included additional mitigation to address traffic-related impacts. Regardless, commenter is referred to the revisions that have been made to the Project as described in RDEIR Subsection R.3. As indicated therein, prior to completion of the MCP, all westbound Project-related truck traffic would be routed to the south and west and away from sensitive receptors to the extent feasible. Following completion of the MCP, all Project-related truck traffic would utilize the MCP to access the I-215 freeway. With respect to the enforceability of truck routes, for purposes of analysis, it is assumed that all future tenants and associated truck traffic would be required to follow all applicable laws, including the requirement to utilize established truck routes, such as those identified by Chapter 10.40 (Truck Routes) of the City of Perris Municipal Code. Notwithstanding, Mitigation Measure MM 4.18-4 has been added in RDEIR Subsection 4.18, *Transportation*, which requires the County to condition future implementing applications (i.e., plot plans, conditional use permits, etc.) to require that future lease agreements require all Project-related truck trips to utilize the appropriate Alternative Truck Route, and also requires the posting of signage in appropriate locations directing truck traffic to the appropriate Alternative Truck Route. The remaining measures recommended by this comment either



are not needed to address the Project’s significant environmental effects, or already are addressed by the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses), compliance with which would be assured by Mitigation Measures MM 4.3-7 and MM 4.3-8.

- K-14** Please refer to the analysis of the Project’s impacts to aesthetics, cultural resources, energy, geology, and hazards/hazardous materials as was presented DEIR Subsections 4.1, 4.5, 4.6, 4.7, and 4.9, respectively. As demonstrated throughout the DEIR, all impacts of the proposed Project under these Subsections were shown to be mitigated to the maximum feasible extent. Notwithstanding, revisions have been incorporated into the Project, as described previously in Subsection R.3. However, this RDEIR demonstrates that the revisions to the Project still would not result in significant and unavoidable impacts to cultural resources, energy, geology, and hazards/hazardous materials after the implementation of mitigation measures. Although the County acknowledges that the Project as revised would have a significant and unavoidable impact to aesthetics as a result of the changes from the Project’s site’s vacant/undeveloped condition to that of a master-planned light industrial/commercial center, none of the mitigation measures identified by this comment would serve to reduce the Project significant and unavoidable impacts to aesthetics. Accordingly, no revision has been made to this RDEIR in response to this comment.
- K-15** Commenter is referred to the responses to Comments K-9 through K-14, which are responsive to this comment.
- K-16** The County disagrees with the commenter’s assertion that the DEIR failed to incorporate recommendations from the California Air Resources Board (CARB). Commenter is referred to the responses to Comments A-43 through A-63, which address all of the recommended measures included in Attachment A to the CARB’s comment letter on the Project’s Notice of Preparation (NOP).
- K-17** Article questioning the viability of the Mid-County Parkway (MCP) is acknowledged. The DEIR fully accounted for the potential that the MCP ultimately may not be constructed, and this continues to be the case with this RDEIR. Specifically, all analyses of the “Primary Land Use Plan” in the DEIR assumed that the MCP would not be constructed, and that Ramona Expressway and/or Nuevo Road would serve as the Project’s primary access roadways. This RDEIR continues to evaluate the Primary Land Use Plan, which assumes the MCP will not be constructed. In addition, and as indicated above in Subsection R.3, this RDEIR also evaluates a total of three different feasible Alternative Truck Routes, with Alternative Truck Routes 1 and 2 specifically addressing the circumstance in which the MCP is not constructed. Only Alternative Truck Route 6 assumes that the MCP is constructed. As this article does not directly address the Project or the Project’s potential impacts to the environment, no revision to the EIR is warranted pursuant to this comment.



**COMMENT LETTER L**

**Jer Harding**

**To:** Brady, Russell  
**Subject:** RE: Notice of Completion (NOC) for Stoneridge SPA No. 1 EIR - Comment Period April 8, 2022 to May 23, 2022

**From:** Marshall Locke <[mlockekelly@roadrunner.com](mailto:mlockekelly@roadrunner.com)>  
**Sent:** Monday, May 23, 2022 4:15 PM  
**To:** Brady, Russell <[rbrady@RIVCO.ORG](mailto:rbrady@RIVCO.ORG)>  
**Subject:** Notice of Completion (NOC) for Stoneridge SPA No. 1 EIR - Comment Period April 8, 2022 to May 23, 2022

**CAUTION:** This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Russell Brady, this is Marshall Locke.

This is to make a matter of public record my comments to the Notice of Completion (NOC) for Stoneridge SPA No. 1 EIR:

During the Riverside County Board of Supervisors meeting on Tuesday April 12th 2022, Riverside County 1<sup>st</sup> District Supervisor Kevin Jeffries made the following comments:

*"I wanted to share with my colleagues sort of an astonishing item that we learned in a meeting with Juan Perez and Charissa Leach and with Southern California Edison...The area of the 215 Corridor...from Alessandro down to Menifee, Southern California Edison is out of power...They can no longer provide power – and some people applaud this – that they can no longer provide power to the warehouses that are going in...One warehouse is 1.1 million square feet, and Target is preparing to move in and they will have no power...And there are 15 other warehouses behind them that may or may not also have power...Edison didn't tell us of this problem, we learned about it from a developer who was preparing to have their tenet move in this summer and couldn't get power from Edison...This is not across the County, it is limited to that corridor where their circuits have been overwhelmed with demand...And for some reason, they didn't think to tell the County of that, and so we have all these permits, applications going through the process, and we were caught – what the heck is going on here? – I mean, do we stop issuing permits? What do we do now? And so I don't think that's been fully vetted where we're going next, but they have a very, very, serious problem, and it's going to take at least 2 years to figure out how they're going to fix it...It also impacts beyond that corridor, because the power station off of Highway 74 – I think it's called the Romoland or the Homeland power station there off of 74, behind Menifee – that is the source, and that location also serves the Temescal Valley, and if the Temescal Valley can't get on its own power station, there may be ramifications down that valley as well...It's a really odd and challenging development and we're going to have ramifications come of that."*

Supervisor Jeffries' comments can be viewed in this link to a video clip of the above meeting (watch from 2:09:45 to 2:12:55):

[http://riversidecountyca.igam2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2647&fbclid=IwAR3BF3i\\_R9mSNwC1bZzQoLnn5rhJQKJpCLscjibZUuGirfZNZE-yE0gi4BJc](http://riversidecountyca.igam2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2647&fbclid=IwAR3BF3i_R9mSNwC1bZzQoLnn5rhJQKJpCLscjibZUuGirfZNZE-yE0gi4BJc)

In his May 2022 newsletter, Supervisor Jeffries wrote (under the title, "A Growing Rage"):

*"We have a beautiful County that offers diverse settings(mountains, desert, Wine Country, lakes, historic downtown areas, etc.)  
And while our communities keep growing, unfortunately so does the level of frustration. It really boils down to a quality of life question: How much is enough?!"*





*Quality of life concerns include crime, homelessness, the cost of living (to name just a few) and of course the other big one, our endless gridlock!*

*Gridlock on our state-owned highways (91, 15 & 215 & Ortega Hwy) is never ending, and Caltrans has mostly been converted away from building freeway capacity and instead into a highway maintenance agency. The gridlock is not confined to our freeways, but also overwhelms many local roads such as Cajalco, Temescal Canyon Rd, Van Buren, Alessandro, Bundy Canyon, and Washington, etc. To make things even more challenging, the State mandates that counties and cities MUST provide for more affordable housing to be constructed. Across our County, we must add 167,351 more houses, including 40,000 in unincorporated/non-city areas. An example of what some cities are required to add: 18,458 in Riverside City, 13,627 in Moreno Valley, 7805 in Perris, 6681 in Lake Elsinore, and 2715 in Wildomar. During my community meetings the same question is always asked of me. That being: How much is enough? How many more homes (affordable or not) must we add? How many more warehouses, how many more vehicles, how much more water (the biggest water district in Southern California just announced dramatic restrictions on water use)? Will our infrastructure needs ever catch up?*

*I recently had a respected friend suggest that our county (and cities) need to implement a “pause” in issuing permits until we can get on a path towards resolving our quality of life challenges. He’s not wrong, but the paths (solutions) won’t be easy. I doubt that a “pause” will happen (mainly because of our private property rights), but clearly, we are in trouble and need to rethink – How much is enough?”*

Supervisor Jeffries speaks not only for his constituents in the 1<sup>st</sup> District of Riverside County, but for a great many citizens throughout Riverside County.

Ramona Expressway is already well known as one of the most dangerous roadways in Riverside County. Recently, the Los Angeles affiliate of ABC reported on the deaths on Ramona Expressway:

<https://abc7.com/riverside-county-ramona-expressway-215-freeway-nuevo/11722512/>

Increases in traffic (particularly trucks) from the proposed Stoneridge project on a Ramona Expressway not fully expanded and improved would make existing hazardous driving conditions all the more dangerous on Ramona Expressway.

Piecemeal improvements of Ramona Expressway simply transfers the problem of traffic congestion, bottlenecks, and gridlock to other points on Ramona Expressway, including worsening the existing dangerous driving and pedestrian conditions on Cajalco Road west of Interstate of 215.

Industrial speculations and ventures like Stoneridge are compatible for urban areas and incompatible for residential and rural areas known and valued for equestrian trails, wildlife sanctuaries, agriculture, hiking/walking areas, the absence of light and noise pollution, and overall quality of life.

The Nuevo-Lakeview community does not oppose development in and of itself – however, they strongly oppose development that is incompatible with and does violence to sustaining and preserving the unique integrity and character of the Nuevo-Lakeview community through the imposition of developments that are better planned and located in urban settings.

Sincerely,

Marshall P. Locke  
31025 Electric Avenue  
Nuevo, CA. 92567  
Cell: 951-961-8443

L-2  
(CONT.)

L-3

L-4

L-5

L-6





**Letter L Marshall Locke**

- L-1** The County acknowledges the comments from Supervisor Jeffries. However, there is no evidence at this time that there would be insufficient power to serve the proposed Project. As noted by this comment letter, Supervisor Jeffries in April 2022 estimated it would “take at least 2 years to figure out how they’re going to fix it.” The proposed Project, as described in this RDEIR, is not anticipated to be fully built out until approximately 2031. There is no evidence at this time that there would be inadequate power supplies to serve the Project. Accordingly, no revision has been made in the RDEIR in response to this comment.
- L-2** Comment quoting Supervisor Jeffries is acknowledged; however, it is unclear from this comment how the comments from Supervisor Jeffries relates to the analysis that was presented in the DEIR. Commenter is referred to the analysis throughout this RDEIR, which addresses the Project’s potential impacts to the environment, including potential impacts to transportation, population/housing, and water supply. As this comment does not identify any deficiencies with the DEIR, no revisions have been made in this RDEIR in response to this comment.
- L-3** Commenter’s description of safety issues associated with the Ramona Expressway are acknowledged. Commenter is referred to the revisions that have been incorporated into the Project, as described above in Subsection R.3. As indicated therein, all Project-related westbound truck trips either would be routed to the south to access the I-215 freeway via Alternative Truck Routes 1 or 2, or would be routed along the Mid-County Parkway once complete (Alternative Truck Route 6). No westbound truck traffic would utilize Ramona Expressway to access the I-215. As the article referenced by this comment letter specifically refers to the segment of Ramona Expressway between the Nuevo community and the I-215, this article is not relevant to the proposed Project as revised since no Project-related truck traffic would be routed along this segment of Ramona Expressway. No revisions have been made in this RDEIR in response to this comment.
- L-4** Please refer to the response to Comment L-3 with respect to safety issues. As noted therein, no Project-related truck traffic would be routed along westbound Ramona Expressway. In addition, the Project would be conditioned to make fair-share contributions or fee payments towards improvements required along this portion of Ramona Expressway to accommodate the Project’s passenger vehicle traffic. Furthermore, pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), “...a project’s effect on automobile delay shall not constitute an environmental impact.” As such, for purposes of CEQA, the Project’s contribution to the projected Level of Service (LOS) deficiencies at study area facilities, including along the portion of Ramona Expressway between the Project site and the I-215 freeway, would be less than significant.
- L-5** The County disagrees with the commenter’s assertion that the Project area comprises a “rural” area or that the Project area comprises a “residential” area. The Project site and all areas surrounding the Project site are designated within the Riverside County General Plan’s “Community Development” Foundation Component. As stated on General Plan page LU-4, the Community Development



Foundation Component “identifies those areas appropriate for urban or suburban development, including areas for single family and multiple family residential uses, commercial, industrial, business park, public facilities, and a mix of uses.” As such, the Project occurs in an area that is planned for urban development, and does not comprise a planned “rural” area. Furthermore, there are no existing residential uses that abut the Project site, and the Project’s potential impacts to existing and planned nearby sensitive receptors were evaluated throughout the Project’s DEIR under the appropriate subject headings. DEIR Subsections 4.1, 4.2, 4.4, 4.13, and 4.17 included a discussion of the Project’s potential impacts to lighting, agriculture, wildlife sanctuaries, noise, and recreation, respectively. As this comment does not identify any deficiencies with the DEIR, no revisions to the RDEIR are warranted pursuant to this comment.

- L-6** Commenter’s opposition to the Project is acknowledged. Local community concerns regarding the proposed Project will be considered by the Riverside County Planning Commission and Board of Supervisors as part of their deliberations as to whether to approve, conditionally approve, or deny approval of the proposed Project.



**COMMENT LETTER M**



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Boulevard, Suite C-220  
Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*GAVIN NEWSOM, Governor*  
*CHARLTON H. BONHAM, Director*



June 15, 2022  
Sent via email

Mr. Russell Brady  
Project Planner  
Riverside County Planning Department  
4080 Lemon Street, 12<sup>th</sup> Floor, PO Box 1409  
Riverside, CA 92502- 1409

Subject: Draft Environmental Impact Report, Stoneridge Commerce Center Project,  
State Clearinghouse No. 2020040325

Dear Mr. Brady:

The California CDFW of Fish and Wildlife (CDFW) received and reviewed the Draft Environmental Impact Report (DEIR) from the County of Riverside for the Stoneridge Commerce Center Project (Project), State Clearinghouse No. 2020040325, pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

M-1

Thank you for the opportunity to provide comments and recommendations by providing an extension to the review period and allowing our comments to be submitted by June 15<sup>th</sup>, 2022 regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

M-2

**CDFW ROLE**

CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency regarding any discretionary actions under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381, such as the

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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issuance of a Lake or Streambed Alteration Agreement (Fish & G. Code Sections 1600 et seq.), a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (Fish & G. Code Sections 2080 and 2080.1) and/or for administering the Natural Community Conservation Planning Program (NCCP). CDFW also administers the Native Plant Protection Act, Natural Community Conservation Program, and other provisions of the Fish and Game Code that afford protection to California’s fish and wildlife resources.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, et seq., of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. The County of Riverside is a permittee to the MSHCP and is responsible for implementation of the MSHCP and its associated Implementation Agreement. CDFW is providing the following comments as they relate to the project’s consistency with the MSHCP and CEQA.

M-2  
(CONT.)

**PROJECT DESCRIPTION SUMMARY**

*Project Location*

The approximately 614-acre Project site is in unincorporated Riverside County, California, within Sections 13, 14,16, and 23 of Township 4 South, Range 3 West, of the U.S. Geological Survey (USGS) 7.5” Perris, California topographic quadrangle map. The Project is located south of Ramona Expressway, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road in Riverside County.

M-4

In addition, proposed Northerly and Southerly Off Site Road Improvement and Use Areas are located along Dunlap Drive, San Jacinto Avenue, Nuevo Road, and Redlands Avenue within the existing paved portion of each roadway. It also includes a small expansion of the roadway at the intersection of Nuevo Road and Dunlap Drive, and the intersection of Dunlap Drive and San Jacinto Avenue to accommodate the use of the area for truck traffic located south of the Project site (see Exhibit 2B of the DEIR).

*Project Description*

The Project includes two separate land use plans for the Project site. The “Primary Land Use Plan” anticipates that the Project would encompass 582.9 acres with Ramona Expressway providing primary access from the north and Nuevo Road providing access from the south. The Project site would be developed with up to 389.2 acres of Light Industrial land use, 49.1 acres of Business Park land use, 8.0 acres of Commercial Retail land use, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 37.3 acres of major roadways. However, depending on construction of the Riverside County Transportation Commission’s Mid-County

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Parkway, which is proposed for construction through the northwest portion of the Project site an "Alternative Land Use Plan" is also identified, encompassing a smaller footprint of 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, 8.5 acres of Commercial Retail land uses, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways.

M-5  
(CONT.)

**COMMENTS AND RECOMMENDATIONS**

CDFW is concerned that the DEIR fails to adequately address MSHCP implementation, specifically amending the JPR 06-08-18-01 to include new project impacts, completion of Determination of Biologically Equivalent or Superior Preservation prior to adoption of the DEIR, and does not provide Project measures that address Guidelines Pertaining to the Urban/Wildlands Interface (Section 6.1.4). CDFW requests that the DEIR be revised and recirculated pursuant to CEQA Guidelines §15088.5(a). The revised DEIR should include a commitment to complete implementation of the MSHCP prior to adoption and approval of the Project, and specific measures that address drainage, lighting, toxics, and noise-related impacts on adjacent Conservation Areas including Riverpark Mitigation Bank, among other items included in the discussion below. Additional details on these comments are provided below.

M-6

**Western Riverside County Multiple Species Habitat Conservation Plan**

*Western Riverside MSHCP Implementation*

*Joint Project Review*

CDFW appreciates that the DEIR clearly identifies that the County of Riverside implemented the MSHCP Joint Project Review (JPR) for the onsite portion of the Project in 2006. The DEIR and Appendix C1 Biological Technical Report (Appendix C1) provides the approved JPR 06-08-18-01 as Exhibit 13 and indicates that the current onsite Project has remained unchanged since that time. The onsite Project is located within the Lakeview/Nuevo Plan Area in Proposed Extension of Existing Core 4 and will contribute 80 acres on the eastern boundary to conservation for the MSHCP. However, the DEIR and Appendix C1 Section 1.4.2 identify that the Northerly and Southerly Off Site Road Improvements occurring within Criteria Cells were not originally proposed within the approved JPR 06-08-18-01 and that an amendment to the JPR may be required. Implementation of MSHCP Section 6.6.2 requires that if the Project changes, in this case the offsite road improvements result in a change, then the County of Riverside should consult with the Western Riverside County Regional Conservation Authority (RCA) to submit an application to amend JPR 06-08-18-01. The amendment should include all off-site impacts that occur within Criteria Cells, a complete analysis of the functions and values within the impact areas, and how Reserve Assembly may be affected. Completion of the Joint Project Review process for Project would ensure that the Project is consistent with the MSHCP. CDFW recommends that an amendment to JPR 06-08-18-01 occur prior to adoption of the final Environmental Impact Report for

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completion of MSHCP implementation (6.6.2.E.2). To complete MSHCP JPR implementation, CDFW recommends that the City revise MM 4.4-6 and condition the measure to include the following (edits are in **bold** and ~~strikethrough~~):

MM 4.4-6 Prior to ~~approval of grading permits or improvement plans~~ **the adoption of the final Environmental Impact Report** for the ~~Southern Truck Route Stoneridge Commerce Center~~, and if required by the Regional Conservation Authority (RCA), the Project Applicant shall prepare a HANS application to amend the previously approved HANS 269 determination to include required improvements to Dunlap Drive and San Jacinto Avenue, which traverse MSHCP Criteria Cells 2969 and 3069 in Cell Group G. The HANS application shall be submitted to the RCA and shall be subject to the Western Multiple Species Habitat Conservation Plan (MSHCP) Joint Project Review (JPR) process. Prior to issuance of grading permits or improvement plans for the Southern Truck Route, the Project Applicant shall provide a copy of the approved amended HANS 269 determination. These requirements shall not apply in the event that the RCA does not require an amendment to HANS 269 for the Southern Truck Route, ~~or in the event that the Southern Truck Route is not implemented.~~

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(CONT.)

*Western Riverside MSHCP Covered Roads Analysis*

The DEIR and Appendix C1 describes the Northerly and Southerly Off Site Road Improvements as being a Covered Activity under Section 7.3.5 of the MSHCP. The purpose of MSHCP Section 7.3.5 is to identify circulation elements within the Criteria Area that were proposed as part of the General Plan Circulation Element at the conception of the MSHCP. These Covered Activities are fully described within the MSHCP as being existing facilities that may require improvements or planned facilities to improve circulation. The MSHCP Section 7.3.5 further identifies each classification of circulation roads and their associated rights-of-way:

“Seven types of roadways are proposed as part of the General Plan Circulation Element: expressways (184' ROW), urban arterials (152' ROW), arterials (128' ROW), major roads (118' ROW), mountain arterials (110' ROW), secondary roads (100' ROW) and collector roads (74' ROW). The improvement/ construction of circulation element roadways shown on Figure 7-1 are Covered Activities within the Criteria Area, as well as the operation and Maintenance Activities conducted for these facilities. (MSHCP Section 7.3.5, p.g. 7-31)”

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The DEIR and Appendix C1 identifies that there are potentially road improvements resulting in impacts to associated biological resources along Nuevo Road, San Jacinto Avenue, and Dunlap Drive but fails to provide an analysis of the how these Covered Activities will be implementing the MSHCP. The County is required to implement the requirements and to fulfill the purposes of the Permits, the MSHCP and the Implementing Agreement for its Covered Activities (Section 6.1.6).



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For example, the DEIR and Appendix C1 indicate road improvements are proposed to Nuevo Road that will cross the San Jacinto River. Nuevo Road is described in MSHCP Section 7.3.5 as an Urban Arterial Road with an allotted right-of-way width of 152-feet and include specific considerations of a full span bridge. This means that road improvements to Nuevo Road should be analyzed based on the description provided within MSHCP Section 7.3.5. If the improvements are unable to meet the parameters described, then the Project is not consistent with MSHCP, and a Minor Amendment is required. A full analysis of the proposed roads including allotted road widths, acreage and location of road coverage, culvert sizing requirements for wildlife movement, and wildlife fencing should be included within the DEIR for the Northerly and Southerly Off Site Road Improvements proposed to occur within Criteria Cells 2762, 2865, 2867, 2970, 2969, and 3069 (Section 7.3.5). This analysis should also be provided to the RCA as part of the JPR amendment process.

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(CONT.)

*Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*

The MSHCP Protection of Species Associated with Riparian/Riverine and Vernal Pool Resources Section 6.1.2 indicates that if avoidance of onsite impacts to Section 6.1.2 resources is not feasible, then the impacts should be identified and mitigated for through the Determination of Biologically Equivalent or Superior Preservation (DBESP) process prior to or in parallel to CEQA. MSHCP Section 6.1.1 describes this purpose for this as implementation of the requirements of MSHCP Section 6.0 are intended to provide full mitigation under CEQA by mitigating Project impacts to the extent feasible and ensures that there is no conflict with a the MSHCP, a requirement of CEQA Environmental Impact Report, Biological Resources, Section 4 subitem f.

The DEIR and Appendix C1 identifies unavoidable impacts to approximately 1.7 acres of MSHCP riparian/riverine resources (Section 6.1.2) and indicates that the impacts will be mitigated at a minimum of a 3 to 1, mitigation to impact ratio, by way of purchasing mitigation credits from the adjacent Riverpark Mitigation Bank. CDFW recommends that the County of Riverside complete a DBESP prior to adoption of the final Environmental Impact Report for completion of MSHCP implementation. Also, process CDFW, Regional Water Quality Control Board, and/or U.S. Army Corp of Engineer regulations regarding state or federal water resources are separate regulatory processes and should be addressed separately from the DBESP process. To complete MSHCP DBESP implementation, CDFW recommends that the City revise MM 4.4-1 and condition the measure to include the following (edits are in **bold** and ~~strikethrough~~):

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MM 4.4-1 Prior to ~~approval of any implementing developments within the Project site (e.g., plot plans, conditional use permits)~~ **the adoption of the final Environmental Impact Report**, the Project Applicant shall contract with a qualified biologist to prepare a Determination of Biologically Equivalent or Superior Preservation (DBESP), in accordance with Section 6.1.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The required DBESP shall address Project impacts to ~~approximately 1.694 acres of~~



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~~riverine/riparian/jurisdictional features resources (including impacts to 0.29 acre of Southern Riparian Scrub habitat) that comprise MSHCP riparian/riverine habitat, California Department of Fish and Wildlife (CDFW) jurisdiction, . In the event that the Southern Truck Route is implemented (as described in EIR subsection 3.6.2), then the required DBESP also shall address impacts to an additional 0.04 acre of MSHCP riparian/riverine habitat, CDFW, and RWQCB jurisdiction. The required DBESP shall identify compensatory mitigation for the loss of up to 1.691 acres of riparian/riverine resources (1.701 acre of riparian resources if the Southern Truck Route is implemented) at a minimum 3:1 ratio, and the required mitigation shall consist of the following:~~

- ~~• Purchase of 2.536 acres of rehabilitation credits at the Riverpark Mitigation Bank (2.551 acres of rehabilitation credits are required if the Southern Truck Route is implemented); and~~
- ~~• Purchase of 2.537 acres of re-establishment credits at the Riverpark Mitigation Bank (2.552 acres of rehabilitation credits are required if the Southern Truck Route is implemented).~~

~~Prior to approval of the implementing development(s) the adoption of the final Environmental Impact Report, the required DBESP shall be subject to review and approval by the Riverside County Environmental Programs Department (EPD), and also shall be subject to a 60-day review and response period by the Wildlife Agencies as required by the MSHCP. Following approval of the DBESP by County EPD and the Wildlife Agencies, and prior to issuance of grading permits, the Project Applicant shall provide evidence to Riverside County that the required compensatory mitigation has been achieved in accordance with the approved DBESP. Should compensatory mitigation credits be unavailable at the Riverpark Mitigation Bank, the Project Applicant shall coordinate with the regulatory agencies, Riverside County, and MSHCP Wildlife Agencies to secure alternate mitigation totaling a minimum of 5.073 acres (5.103 acres if the Southern Truck Route is implemented) at another approved mitigation bank or in lieu fee program.~~

*Additional Survey Needs and Procedures: Los Angeles Pocket Mouse (LAPM)*

In 2006, a JPR was processed for the onsite portion of the Project which identified that the easterly boundary of the Project was within the MSHCP Section 6.3.2 Additional Survey Needs and Procedures for Los Angeles pocket mouse (*Perognathus longimembris brevinasus*). LAPM surveys were conducted for the 2006 JPR and found negative within the survey area, but LAPM were found outside of the survey area within the westerly portion of the Project site. The JPR deemed the Project consistent with MSHCP Section 6.3.2 as surveys had been conducted to protocol and were negative. However, the DEIR and Appendix C1 identify that the Project site has since been

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(CONT.)

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resurveyed and is occupied by LAPM along the eastern boundary within the designated survey area (see Exhibit 7 of Appendix C1). The DEIR identified the LAPM-occupied areas within the survey area as not having long-term conservation value and thus did not need to be conserved under terms of MSHCP Section 6.3.2.

The DEIR fails to adequately address the functions and values of the occupied LAPM habitat and why it does not meet the terms for long-term conservation value. Based on the Project's adjacency to known LAPM occupied MSHCP Conservation Areas and to the Riverpark Mitigation Bank, the easterly portions of the Project does have potential long-term conservation value for LAPM. Thus, CDFW recommends that the following occur prior to adoption of the final Environmental Impact Report:

1. The DEIR includes a functions and values analysis of the long-term conservation value of LAPM-occupied areas within the Project site.
2. If the LAPM-occupied area will be impacted then a DBESP shall be prepared for the Project that clearly identifies a mitigation strategy that is biologically equivalent or superior to avoidance for LAPM-occupied habitat within the survey areas on the Project site.
3. If the LAPM-occupied areas within the Project site will be avoided, then the LAPM-occupied areas should be protected for long-term conservation through a legal mechanism such as a conservation easement.

M-11  
(CONT.)

**Mitigation Measures for Project Impacts to Biological Resources**

*Guidelines Pertaining to the Urban/Wildlands Interface*

*Riverpark Mitigation Bank*

The MSHCP section for Guidelines Pertaining to the Urban/Wildlands Interface (Section 6.1.4) requires that development address indirect effects such as drainage, toxics, lighting, noise, and invasives associated with development in proximity to the MSHCP Conservation Areas. CDFW is concerned the DEIR did not identify potential Project-related impacts to the recently established Riverpark Mitigation. The cumulative impacts discussion within the DEIR indicates that the Project's indirect impacts to MSHCP Conservation Areas will be a cumulatively considerable impact but fails to clearly identify any indirect impacts or cumulative impacts to the adjacent Riverpark Mitigation Bank. Riverpark Mitigation Bank is within an MSHCP Criteria Area and described for conservation under the MSHCP. The DEIR should include a complete and thorough evaluation of all potential Project-related impacts to the Riverpark Mitigation Bank. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or conservation/mitigation lands, including preserved lands associated with the MSHCP, and the Riverpark Mitigation Bank should be included in the DEIR. The potential impacts from lighting, noise, toxics, human activity (e.g., recreation), defensible space,

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and wildlife-human interactions created by Project activities on the Riverpark Mitigation Bank, exotic and/or invasive species, and effects on drainage should also be included.

*Toxics and Hydrology*

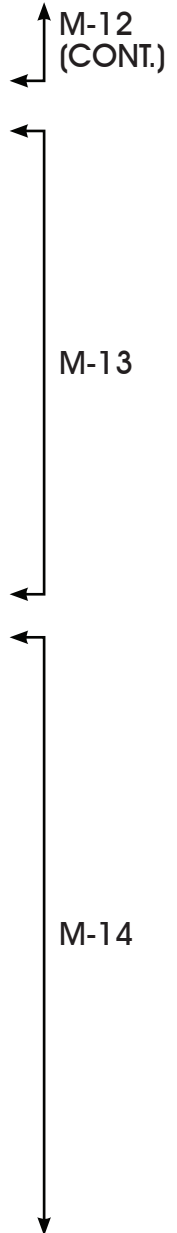
CDFW is also concerned about the potential impacts of runoff and air pollution from the proposed Project site on the surrounding area and San Jacinto River watershed. Increased nitrogen deposition into wetland systems has been shown to cause systems to become more eutrophic and cause increased frequency of harmful algal blooms in aquatic systems. Environmental factors (such as climate change) and the addition of excess nitrogen has been shown to alter the soil's physical and chemical properties, microbial diversity, and key carbon and nitrogen cycling genes in wetlands (Yin et al. 2022). In addition, correlations have been documented between nitrogen enrichment in waters and pathogen abundance and diseases of both humans and wildlife (Johnson et al. 2010).

To address MSHCP requirements for indirect effects on adjacent conservation areas, the DEIR should provide an analysis of Project-related changes to drainage patterns, soil chemistry, and water quality within, upstream, and downstream of the Project site, including but not limited to: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

*Noise*

The MSHCP identifies that proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. CDFW is concerned noise associated with light industrial use could exceed these thresholds and negatively impact wildlife use of the conservation areas. CDFW requests the incorporation of the following measure to help protect wildlife from development impacts:

**MM 4.4-3:** Prior to approval of implementing developments (i.e., plot plans, building permits, etc.) affecting lands adjacent to the on-site MSHCP Conservation Areas (i.e., proposed Conservation Areas within Planning Areas 10 and 11 of the Stoneridge Commerce Center Specific Plan No. 239, Amendment No. 1) **and the Riverpark Mitigation Bank**, the Project Applicant shall prepare and Riverside County shall review and approve an acoustical analysis to determine whether long-term operational noise associated with the implementing development would expose the proposed MSHCP Conservation Areas to noise levels exceeding 65 I CNEL. **To reduce noise-related impacts to wildlife using the MSHCP Conservation Areas**





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**and the Riverpark Mitigation Bank, acoustical analysis shall include monitoring noise level measurements during Project construction and post-construction operations to determine if noise levels exceed 65 I CNEL. This will inform if additional avoidance and minimization measures are required to meet the specified thresholds.** In the event that the analysis shows that future site operations would expose the Conservation Areas, **including Riverpark Mitigation Bank**, to noise levels exceeding 65 I CNEL, the required acoustical analysis shall incorporate recommendations to reduce Project-related operational noise affecting the Conservation Areas to below 65 I CNEL during construction and post-construction. Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms or solid walls). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.

M-14  
(CONT.)

*Lighting*

A significant source of artificial nighttime lighting with the potential to impact wildlife the adjacent conservation area and Riverpark Mitigation Bank may come from lighting associated with the Project. Although the CEQA document indicates that all lightning will be shielded and directed away from wildlife areas, CDFW recommends that lightning analysis before Project construction and operations is needed to determine that existing lighting levels and to demonstrate that potential lightning impacts to wildlife using adjacent conserved area will be less than significant. To determine if artificial nighttime lighting associated with Project construction and operations will result in minimal to no increase from existing lighting levels to all areas of Conservation Area, CDFW recommends that lighting and glare impacts are evaluated before, during, and after Project construction and operations. CDFW requests the inclusion of the following new measures in the DEIR:

M-15

**MM-[XX]: To reduce nighttime artificial lighting-related impacts to wildlife using conservation areas including Riverpark Mitigation Bank, the Project shall take lightning measurements before, during, and post construction operations to determine impacts of nighttime artificial lightning on adjacent conservation areas and the wildlife it supports. To protect wildlife using conserved areas, project construction and operations shall result in not net increase to pre-construction ambient night-time levels to all areas of conservation areas. If light or glare impacts to conservation areas exceed this threshold, the Project shall make changes to their operations and/or adopt landscape shielding, dimming, lighting curfews or other appropriate measures that result in the Project causing minimal to no glare to all conserved.**



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*Barriers*

Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area. CDFW was unable to evaluate the effectiveness of proposed barriers along the project perimeter because specific details on the type and placement of fencing were not provided in the DEIR. Section 6.1.4 of the MSHCP requires that development address indirect effects associated with development in proximity to the MSHCP Conservation Areas. Due to the proximity of the proposed Project to Riverpark Mitigation Bank, CDFW recommends that solid walls be installed along the Project boundary to minimize the Project effects (i.e., noise, lighting, trespass, etc.) on MSHCP Conservation Area resources and to prevent incidental impacts on wildlife species. Glass walls should not be used because of the mortality risk to birds from striking the clear glass.

In addition, the DEIR analysis should clearly identify the minimization and mitigation measures that will be implemented as part of their Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with section 2081(b) of the Fish and Game Code and section 21081.6 of the Public Resources Code. The following should be included for each mitigation measure: Mitigation Measure, Source, Implementation Schedule, Responsible Party, and Status/Date/Initials.

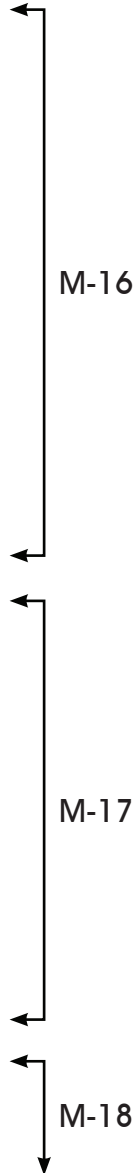
**Lake and Streambed Alteration Program**

Completion of the DBESP is an MSHCP process and is not an appropriate mechanism to address Fish and Game Code Section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. To address Fish and Game section 1602, CDFW recommends inclusion of the following measure:

**MM -[X]: Prior to initiation of construction activities and/or ground disturbance activities, the Project Applicant shall receive written correspondence from the California Department of Fish and Wildlife (CDFW) confirming that CDFW has either executed a Streambed Alteration Agreement (Agreement), or informed the Project that an Agreement is not needed.**

**ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make





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subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

M-18  
(CONT.)

**CONCLUSION**

CDFW appreciates the opportunity to comment on the Stoneridge Commerce Center Project to assist in identifying and mitigating Project impacts on biological resources. Our review and analysis of the DEIR identified a number of significant new Project impacts and recommend providing additional minimization measures to lessen significant Project impacts on the biological resources in the area. Therefore, CDFW requests that the County revise and recirculate the DEIR, for disclosure to the public. Once the requested additional analyses have been prepared and the additional mitigation and minimization measures have been added to the Project, and all of these substantial modifications have been documented in the revised Draft EIR for review and comment by the citizens of California and interested public agencies.

M-19

CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. We request a meeting to discuss our comments at your earliest convenience. Questions regarding this letter or further coordination should be directed to Carly Beck, Senior Environmental Scientist Specialist, at [carly.beck@wildlife.ca.gov](mailto:carly.beck@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Heather Pert*  
DF423498814B441...

Heather Pert,  
Acting Environmental Program Manager

ec:

Office of Planning and Research, State Clearinghouse  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

U.S. Fish and Wildlife Service  
Karin Cleary-Rose  
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Western Riverside County Regional Conservation Authority  
Tricia Campbell  
[tcampbell@rctc.org](mailto:tcampbell@rctc.org)

#### REFERENCES

- Johnson P.T., Townsend A.R., Cleveland C.C., Glibert P.M., Howarth R.W., McKenzie V.J., Rejmankova E., and M.H.Ward. 2010 Linking Environmental Nutrient Enrichment and Disease Emergence in Humans and Wildlife. *Ecological Applications*. 20(1):16–29. <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/08-0633.1>
- Yin, Z., Yu, X., Zou, Y. Ding, S. and J. Zhang. Nitrogen Addition Effects on Wetland Soils Depend on Environmental Factors and Nitrogen Addition Methods: A Meta-Analysis. *Water* 2022, 14, 1 748. <https://doi.org/10.3390/w14111748>.



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ATTACHMENT 1

**MITIGATION MONITORING AND REPORTING PROGRAM**

**Mitigation Monitoring and Reporting Program (MMRP)**

**Purpose for the MMRP**

The purpose of the MMRP is to ensure compliance with mitigation measures during Project implementation. Mitigation measures must be implemented within the time periods indicated in the table below.

**TABLE OF MITIGATION MEASURES**

The following items are identified for each mitigation measure: Mitigation Measure, Implementation Schedule, and Responsible Party for implementing the mitigation measure. The Mitigation Measure column summarizes the mitigation requirements. The Implementation Schedule column shows the date or phase when each mitigation measure will be implemented. The Responsible Party column identifies the person or agency that is primarily responsible for implementing the mitigation measure.

Mitigation Measure	Implementation Schedule	Responsible Party
<p>MM 4.4-1 Prior to approval of any implementing developments within the Project site (e.g., plot plans, conditional use permits) the adoption of the final Environmental Impact Report, the Project Applicant shall contract with a qualified biologist to prepare a Determination of Biologically Equivalent or Superior Preservation (DBESP), in accordance with Section 6.1.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The required DBESP shall address Project impacts to approximately 4.691 acres of riverine/riparian/jurisdictional features resources (including impacts to 0.29 acre of Southern Riparian Scrub habitat) that comprise MSHCP riparian/riverine habitat, California Department of Fish and Wildlife (CDFW) jurisdiction. In the event that the Southern Truck Route is implemented (as described in EIR subsection 3.6.2), then the required DBESP also shall address impacts to an additional 0.01 acre of MSHCP riparian/riverine habitat, CDFW, and RWQCB jurisdiction. The required DBESP shall identify compensatory mitigation for the loss of up to 4.691 acres of riparian/riverine resources (4.701 acre of riparian resources if the Southern Truck Route is implemented) at a minimum 3:1 ratio, and the required mitigation shall consist of the following:</p> <ul style="list-style-type: none"> <li>• Purchase of 2.536 acres of rehabilitation credits at the Riverpark Mitigation Bank (2.551 acres of rehabilitation credits are required if the Southern Truck Route is implemented); and</li> <li>• Purchase of 2.537 acres of re-establishment credits at the Riverpark</li> </ul>	<p>Prior to adoption of the final Environmental Impact Report</p>	<p>County of Riverside and Project Applicant</p>



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<p>Mitigation Bank (2.552 acres of rehabilitation credits are required if the Southern Truck Route is implemented).</p> <p>Prior to approval of the implementing development(s) <b>the adoption of the final Environmental Impact Report</b>, the required DBESP shall be subject to review and approval by the Riverside County Environmental Programs Department (EPD), and also shall be subject to a 60-day review <b>and response</b> period by the Wildlife Agencies as required by the MSHCP. Following approval of the DBESP by County EPD and the Wildlife Agencies, and prior to issuance of grading permits, the Project Applicant shall provide evidence to Riverside County that the required compensatory mitigation has been achieved in accordance with the approved DBESP. Should compensatory mitigation credits be unavailable at the Riverpark Mitigation Bank, the Project Applicant shall coordinate with the regulatory agencies, Riverside County, and MSHCP Wildlife Agencies to secure alternate mitigation totaling a minimum of 5.073 acres (5.103 acres if the Southern Truck Route is implemented) at another approved mitigation bank or in-lieu fee program.</p>		
<p>MM 4.4-6 Prior to approval of grading permits or improvement plans <b>the adoption of the final Environmental Impact Report</b> for the Southern Truck Route Stoneridge Commerce Center, and if required by the Regional Conservation Authority (RCA), the Project Applicant shall prepare a HANS application to amend the previously-approved HANS 269 determination to include required improvements to Dunlap Drive and San Jacinto Avenue, which traverse MSHCP Criteria Cells 2969 and 3069 in Cell Group G. The HANS application shall be submitted to the RCA and shall be subject to the Western Multiple Species Habitat Conservation Plan (MSHCP) Joint Project Review (JPR) process. Prior to issuance of grading permits or improvement plans for the Southern Truck Route, the Project Applicant shall provide a copy of the approved amended HANS 269 determination. These requirements shall not apply in the event that the RCA does not require an amendment to HANS 269 for the Southern Truck Route, or in the event</p>	<p>Prior to adoption of the final Environmental Impact Report</p>	<p>County of Riverside and Project Applicant</p>





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<p>that the Southern Truck Route is not implemented.</p>		
<p><b>MM4.4-3:</b> Prior to approval of implementing developments (i.e., plot plans, building permits, etc.) affecting lands adjacent to the on-site MSHCP Conservation Areas (i.e., proposed Conservation Areas within Planning Areas 10 and 11 of the Stoneridge Commerce Center Specific Plan No. 239, Amendment No. 1) <b>and the Riverpark Mitigation Bank</b>, the Project Applicant shall prepare and Riverside County shall review and approve an acoustical analysis to determine whether long-term operational noise associated with the implementing development would expose the proposed MSHCP Conservation Areas to noise levels exceeding 65 I CNEL. <b>To reduce noise-related impacts to wildlife using the MSHCP Conservation Areas and the Riverpark Mitigation Bank, acoustical analysis shall include monitoring noise level measurements during Project construction and post-construction operations to determine if noise levels exceed 65 I CNEL. This will inform if additional avoidance and minimization measures are required to meet the specified thresholds.</b> In the event that the analysis shows that future site operations would expose the Conservation Areas, <b>including Riverpark Mitigation Bank</b>, to noise levels exceeding 65 I CNEL, the required</p>	<p>Prior to adoption of the final Environmental Impact Report</p>	<p>Project Applicant</p>



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<p>acoustical analysis shall incorporate recommendations to reduce Project-related operational noise affecting the Conservation Areas to below 65 I CNEL during construction and post-construction. Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms or solid walls). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.</p>		
<p><b>MM-[XX]: To reduce nighttime artificial lighting-related impacts to wildlife using conservation areas including Riverpark Mitigation Bank, the Project shall take lightning measurements before, during, and post construction operations to determine impacts of nighttime artificial lightning on adjacent conservation areas and the wildlife it supports. To protect wildlife using conserved areas, project construction and operations shall result in not net increase to pre-construction ambient night-time levels to all areas of conservation areas. If light or glare impacts to conservation areas exceed this threshold, the Project shall make changes to their operations and/or adopt landscape shielding, dimming, lighting curfews or other appropriate measures that result in the Project causing minimal to no glare to all conserved.</b></p>	<p>Prior to adoption of the final Environmental Impact Report</p>	<p>Project Applicant</p>
<p><b>MM -[X]: Prior to initiation of construction activities and/or ground disturbance activities, the Project Applicant shall receive written correspondence from the California Department of Fish and Wildlife (CDFW) confirming that CDFW has either executed a Streambed Alteration Agreement (Agreement), or informed the Project that an Agreement is not needed.</b></p>	<p>Prior to adoption of the final Environmental Impact Report</p>	<p>Project Applicant</p>



## Letter M California Department of Fish and Wildlife (CDFW)

- M-1** The County appreciates the comments provided by the California Department of Fish and Wildlife (CDFW). Please refer to the individual responses to the comments included in this letter, provided below.
- M-2** The descriptions of CDFW's roles as a Trustee Agency under CEQA and in issuing permits for impacts to sensitive biological resources are acknowledged; no response is necessary.
- M-3** Footnote citing the California Public Resources Code is acknowledged; no response is necessary.
- M-4** This comment accurately describes the location of the proposed Project and the off-site improvement areas described in the DEIR. Commenter is referred to the discussion provided above in Subsection R.3, which describes changes that have been incorporated into the Project since the DEIR was circulated for public review.
- M-5** This comment accurately describes the proposed Project consistent with the description provided in the DEIR. Although changes have been incorporated into the Project as described in above in Subsection R.3, the total acreage of the various land uses as described in this comment have not changed, and thus this comment accurately describes the Project evaluated by this RDEIR.
- M-6** Please refer to the responses to Comments M-8 through M-18, which address the CDFW's comments in relation to the Project's MSHCP compliance. In addition, the County acknowledges that an amendment to JPR 06-08-18-01 is necessary as part of the Project, as is a need for the DBESP. Section 6.4 of the Project's Biological Technical Report (RDEIR *Technical Appendix C*) includes a discussion regarding the Project's measures to protect and comply with the Urban/Wildlife Interface Guidelines [UWIG]. Appropriate revisions also have been made in RDEIR Subsection 4.4, *Biological Resources*, to reflect these changes.
- M-7** The County agrees that the JPR for the on-site portions of the Project were completed in 2006, and this comment accurately describes the Project site's relationship to the MSHCP. No further response is necessary.
- M-8** The County agrees with the commenter's suggested revision to Mitigation Measure MM 4.4-6, and these revisions have been made in RDEIR Subsection 4.4.
- M-9** The County disagrees with the commenter's assertion that the DEIR failed to adequately address off-site roadway improvements pursuant to MSHCP Section 7.3.5. As noted in the DEIR:

*Nuevo Road is designated as an Urban Arterial Highway by the General Plan Circulation Element and proposed SP 239A1, with an ultimate 152-foot ROW and six (6) vehicular travel lanes. Under existing conditions, Nuevo Road adjacent to the southern Project boundary*



*consists of a two-lane roadway (one lane in each direction). As part of the Project, the Project Applicant would improve this facility to its ultimate half-width standard. The Project Applicant would dedicate approximately 76 feet of ROW along the site's frontage with this roadway, and would improve Nuevo Road between Antelope Road and Pico Avenue to provide 48 feet of paving, 7 feet of the ultimate 14-foot wide landscaped median, and a 5-foot wide meandering sidewalk within a 21-foot wide landscaped parkway.*

*The remaining half of this roadway would be constructed by others in the future. It should be noted that this segment of Nuevo Road would require the construction of a bridge over the San Jacinto River, although bridge is identified for improvement as part of the County's Transportation Uniform Mitigation Fee (TUMF) program. Impacts associated with improvements to Nuevo Road are evaluated throughout this EIR, including impacts associated with the bridge, although it is anticipated that some or all of the required improvements to Nuevo Road would be implemented as part of the TUMF program.*

Based on this information, improvements to this Urban Arterial road would only be half width, or a maximum of 76 feet wide including 48 feet of paving, 7 feet of median, and 5 feet of meandering sidewalk. The Project includes negligible frontage improvements only along Nuevo Road within the existing right-of-way which would allow trucks to turn onto Dunlap Drive. The Nuevo Road crossing of the San Jacinto River will be constructed by the County as part of the TUMF Program and not this Project. No expansion of the Nuevo Road Bridge is proposed as part of the Project. Improvements along Nuevo Road, San Jacinto Avenue, and Dunlap Drive within the existing right-of-way would occur, once again, to allow for trucks to be able to safely navigate turns from or onto these roadways. Once the County moves forward with CEQA for the proposed widening of Nuevo Road, they will be providing the more specific analysis requested by this comment, which would be a full analysis of the proposed roads including allotted road widths, acreage and location of road coverage, culvert sizing requirements for wildlife movement, and wildlife fencing (if applicable). No revision to the RDEIR is warranted pursuant to this comment.

- M-10** The County acknowledges that the Project will require an amendment to JPR 06-08-18-01 and a DBESP to address potential Project impacts to MSHCP-related resources, and agrees with the suggested revisions to Mitigation Measure MM 4.4-1. These revisions have been incorporated into RDEIR Subsection 4.4.
- M-11** Additional analysis has been conducted by Philippe Vergne of ENVIRA based on CDFW's comments for the Los Angeles Pocket Mouse (LAPM), the results of which are presented in Appendix D of the Project's Biological Technical Report, included as RDEIR *Technical Appendix C*. The updated analysis notes the following:

*Fourteen (14) individuals of the LAPM were captured during the current surveys. The LAPM were distributed on the North and Eastern portion of the property not currently under*



*agriculture, and along dirt roads and power easements. The LAPM does not currently occur within the highly impacted agricultural fields on site.*

*Densities within the occupied habitat are consistent with documented densities for this species of less than 2 animals per hectare.*

*The MSHCP species account for LAPM depicts portions of the property as a potential core habitat area.*

*Based on current and past surveys and data base records the LAPM on site occurs sporadically in the area in trace densities.*

*Based on the survey, of the 14 animals captured only a small number (4) would be impacted by project implementation. The majority of the LAPM occur along dirt roads, on the development boundaries and away from the active agricultural fields. This road network might allow a tenuous, connectivity to other potential and documented LAPM habitat in the Double Butte area from the eastern occupied habitats.*

*The Double Butte area is isolated from identified core populations of LAPM. Such isolation can result in genetic drift and loss of heterogeneity in the populations, leaving small local populations at high risk of extirpation. The estimated 227.4 acres of potentially suitable LAPM habitat for Double Butte, noted in the Golder Associates 2014 report is significantly larger than the habitat patch requirements for small mammals long-term survival which varied from one hectare to 10 hectares.*

*The connectivity to the Northern populations have been pretty much eliminated by construction of the Ramona Expressway.*

*Therefore, in our professional opinion, the LAPM population within the Project footprint site is small, limited in area of distribution, and of limited value to the population in the less disturbed core habitat. The animals on the eastern and northern end of the study area will not be impacted by Project implementation. Movement of these animals will not be affected by Project implementation anymore than they have been by ongoing agricultural activities.*

Based on the information noted above, the Project site does not have long-term conservation value for LAPM. Refer to the revised analysis presented in RDEIR Subsection 4.4, which incorporates the additional information provided by ENVIRA.

- M-12** The County acknowledges the MSHCP's requirements related to the Urban/Wildlife Interface Guidelines (UWIG). Please refer to the responses to Comments M-13 through M-16, which address the specific comments related to the Project's consistency with the UWIG.



- M-13** DEIR Subsection 4.10, *Hydrology and Water Quality*, included a detailed analysis of potential water quality impacts that could result from Project implementation. As noted therein, although the Project's drainage system, which includes water quality basins, is not anticipated to result in significant impacts to water quality, the analysis also acknowledges that the specific design of measures to be incorporated in the future to address potential water quality impacts under long-term operational conditions are not known at this time, and would be identified as part of future implementing developments on site (i.e., tentative tract maps, plot plans, etc.). As such, in the absence of any specific measures to address water quality in site runoff, the DEIR disclosed that the project evaluated in the DEIR would have had the potential to adversely affect surface and groundwater quality during long-term operations. Mitigation measures were identified to reduce these impacts to less-than-significant levels by requiring the preparation of future hydrology and water quality studies in conjunction with implementing plot plans/conditional use permits. It is not possible at this time to conduct a detailed evaluation of potential effects the Project may have on the San Jacinto River, as such an analysis would require site-specific development applications that are not available at this time. In the absence of such site-specific applications, any such detailed analysis would be speculative at this time (see CEQA Guidelines § 15145). At the time applications for plot plans and/or conditional use permits are filed with the County in the future, the County would review the implementing applications to ensure that they incorporate appropriate measures to preclude water quality impacts affecting the San Jacinto River. As part of the review process, additional analysis of the implementing applications also would be conducted to evaluate consistency with all applicable MSHCP requirements, including requirements specified by the UWIG. Because the Project does not include any site-specific applications as would be needed to conduct a detailed and thorough analysis of potential water quality and hydrology impacts to the San Jacinto River, no revision has been made to the RDEIR pursuant to this comment.
- M-14** The County agrees with the suggested revisions to Mitigation Measure MM 4.4-3. These revisions have been incorporated in Subsection 4.4 of the RDEIR.
- M-15** The County agrees with the suggested mitigation for indirect lighting impacts. The requested mitigation has been incorporated in Subsection 4.4 of the RDEIR.
- M-16** Figure 4-13 of proposed SP 239A1 depicts the Conceptual Wall and Fence Plan included as part of the Project. As shown, tubular steel fencing is proposed along the entire eastern boundary between on-site development and on- and off-site open space areas to the east. A copy of proposed SP 239A1 is included as RDEIR *Technical Appendix Q*. Because the Project does not include any residential uses, the Project would not be associated with indirect effects with domestic animals (e.g., cats), the proposed tubular steel fencing would adequately protect on- and off-site open space areas from encroachment from future Project employees. Notwithstanding, mitigation has been added to RDEIR Subsection 4.4 requiring compliance with Figure 4-13 of proposed SP 239A1, thereby ensuring that the required tubular steel fencing is installed prior to final building inspection.



- M-17** The Project Applicant already has submitted a 1602 Streambed Alteration Notification Package to the CDFW. This notification is Notification Number EPIMs-RIV-31922-R6. The notification was deemed incomplete pending the provision of the information noted in the incomplete letter. The Project team is currently reviewing this information request and is securing the necessary information. Although the County disagrees with the commenter's suggested mitigation since the 1602 SAA process already is underway, this mitigation measure has nonetheless been added to RDEIR Subsection 4.4.
- M-18** Comment is noted. The Project biologist will report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB) at the web location identified by this comment.
- M-19** The County appreciates the comments provided by the CDFW regarding the Project's potential impacts to biological resources and the Project's compliance with the MSHCP. Although none of the comments provided by the CDFW warranted recirculation, the County has nonetheless opted to recirculate this RDEIR in its entirety for an additional 45-day public review period, and the County will ensure that the CDFW receives notice of the public review period for this RDEIR. Any questions regarding this comment letter will be addressed to the individual noted in this comment.



COMMENT LETTER N

ROB BONTA  
Attorney General

State of California  
DEPARTMENT OF JUSTICE



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July 11, 2022

Mr. Russell Brady  
Riverside County Planning Department  
4080 Lemon Street, 12th Floor  
Riverside, CA 92501

RE: Draft Environmental Impact Report for the Stoneridge Commerce Center Project (SCH #2020040325)

Dear Mr. Brady:

Thank you for the opportunity to provide comments on Riverside County’s Draft Environmental Impact Report (DEIR) for the Stoneridge Commerce Center (the Project). The Project would site over 9.5 million square feet of total warehouse space just east of the City of Perris on and adjacent to several Native American tribes’ Traditional Cultural Landscape. Because the Project is located more than six miles away from the nearest highway via the preferred truck route, the Project would result in thousands of daily truck trips passing homes and a middle school in Perris. The County should consider other truck routing options to minimize the Project’s impacts to sensitive receptors. The DEIR also does not properly analyze the Project’s impacts to sensitive receptors, as it commits several material errors in the air quality analysis, and fails to disclose and sufficiently analyze significant traffic noise impacts. Moreover, the DEIR fails to adequately analyze the Project’s cumulative impacts on tribal cultural resources, or to adequately incorporate the information provided by impacted tribes during the Assembly Bill (AB) 52 consultation process. Finally, the DEIR fails to adopt all feasible mitigation for the Project’s significant impacts. The County should revise the DEIR to comply with the California Environmental Quality Act (CEQA) and minimize the Project’s environmental impacts.<sup>1</sup>

N-1

<sup>1</sup> The Attorney General respectfully submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D’Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14–15.)

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**I. THE PROJECT WOULD SITE 9.5 MILLION SQUARE FEET OF NEW WAREHOUSE SPACE FAR FROM TRANSPORTATION CORRIDORS, CAUSING TRUCKS TO IMPACT EXISTING RESIDENTIAL COMMUNITIES.**

The Project would construct one of the largest single warehouse complexes in California: over 9.5 million square feet of total warehouse space<sup>2</sup> and over 120,000 square feet of new retail commercial space on 582.6 acres.<sup>3</sup> The DEIR projects that the Project will generate 3,916 daily heavy-duty truck trips—an average of one truck every 22 seconds over the expected 24/7 operation of the warehouse complex.<sup>4</sup> The DEIR analyzes two different truck routing plans, each of which would involve a lengthy path to the highway past homes and other sensitive receptors. The Primary Truck Route plan would direct 98 percent of the Project’s truck traffic along a six-mile route to the highway via Ramona Expressway, which borders Lakeview Middle School and a substantial residential community in Perris.<sup>5</sup> The Southern Truck Route plan would still direct 60 percent of trucks (2,350 trucks daily) along Ramona Expressway, but 38 percent (1,488 trucks daily) would take a four-mile path via Nuevo Road, passing a planned residential development called McCanna Hills, two smaller residential communities, a church, and a public park.<sup>6</sup> Annotated satellite images showing the truck routes and Project vicinity are attached to this letter as Exhibits A and B.

The Project would primarily impact three communities in Perris: the community bordering Ramona Expressway, the communities along the Southern Truck Route, and the planned McCanna Hills community. Ramona Expressway forms the northern border of a large residential community in Perris. Homes back up to Ramona Expressway along the entire 1.5-mile stretch from Rider Street to Avalon Parkway. The homes are slightly recessed into the ground, such that Ramona Expressway is approximately level with the homes’ second stories. A short wall separates the homes from the road, but the wall does not shield second story windows

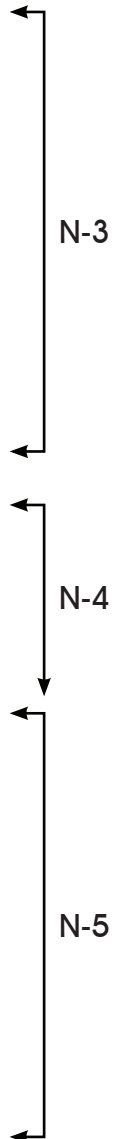
<sup>2</sup> The warehouse space consists of 8,461,530 square feet of light industrial uses and 1,069,398 square feet of business park uses. DEIR at 3-4.

<sup>3</sup> *Id.* at 3-1, 3-4. The DEIR analyzes two slightly different land use plans for the site, depending on whether the Riverside County Transportation Commission (RCTC) constructs the Mid County Parkway (MCP) through the northwestern portion of the project site. The MCP would be a 16-mile transportation corridor that is designed to relieve east-west traffic congestion between the San Jacinto and Perris areas. The RCTC approved the final EIR for the MCP in 2015. Construction began in summer 2020 on one interchange that was contemplated for the MCP (Interstate 215/Placentia Avenue), which is planned for opening in August 2022. However, the RCTC has not secured funding for segments of the MCP that would traverse the Project area, so it is possible that the RCTC may not ultimately construct the MCP through the Project site. Several Native American tribes provided extensive reports under the AB 52 consultation process for the MCP regarding its potential impacts to the Tribal Cultural Landscape, and provided parts or all of those reports to the County during consultation on the Stoneridge Project.

<sup>4</sup> DEIR at 3-28.

<sup>5</sup> *Id.* at 3-28, 3-29 Fig. 3-12.

<sup>6</sup> *Id.* at 3-28, 3-30 Fig. 3-13.





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from traffic. Lakeside Middle School also backs to Ramona Expressway, with recreational facilities, including a baseball field and running track, adjacent to the road. Other sensitive receptors within 1,000 feet of the Primary Truck Route include Sierra Vista Elementary School, Avalon Elementary School, Frank Eaton Memorial Park, and hundreds of homes. According to CalEnviroScreen 4.0, CalEPA’s screening tool that ranks each census tract in the state for pollution and vulnerability,<sup>7</sup> while this community is not currently heavily polluted besides the region’s extreme ozone pollution, it scores highly (73rd percentile) on population characteristics indicating greater vulnerability to pollution. For example, the community has greater rates of cardiovascular disease than 91 percent of other census tracts in California, and it has higher than average rates of asthma and newborns with low birth weight. The community also ranks in the upper half of all but one of CalEnviroScreen’s socioeconomic vulnerability factors.<sup>8</sup> About 81 percent of students enrolled at Lakeside Middle School are eligible for the Free or Reduced-Price lunch programs, meaning that these students come from families whose income are below CalEnviroScreen’s poverty threshold, and 95 percent of the student population identify as persons of color.<sup>9</sup> Among all residents of this community, the majority (64 percent) identified as Hispanic, and 86 percent of residents identified as a race/ethnicity other than white.

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(CONT.)

The communities along the Southern Truck Route include sensitive receptors on Nuevo Road, Dunlap Drive, and San Jacinto Avenue. Sensitive receptors on Nuevo Road include a handful of rural-style homes and a small suburban development at the intersection of Nuevo Road and Dunlap Drive. More suburban homes border Dunlap Drive, along with St. James the Less Catholic Church. Near Interstate 215, several suburban homes and Bob Long Park are adjacent to East San Jacinto Avenue. Because these communities span several census tracts, precise data on their pollution burden and demographic vulnerability to pollution do not exist, but the CalEnviroScreen data for these census tracts are relatively similar to one another. All suffer from significant ozone pollution and above average amounts of other pollutants—for example, pesticides in some census tracts, diesel particulate matter and traffic in others. Like the community bordering Ramona Expressway, the communities along the Southern Truck Route have high rates of cardiovascular disease, asthma, and low birth weight babies, and they rank in the upper half of all CalEnviroScreen measures of socioeconomic vulnerability except unemployment. These communities have a similar racial/ethnic makeup to the community bordering Ramona Expressway, with a majority of residents identifying as Hispanic, and the overwhelming majority identifying as non-white.

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<sup>7</sup> See Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40> (last visited July 9, 2022).

<sup>8</sup> The one CalEnviroScreen socioeconomic vulnerability factor in which this community scores better than average is unemployment, indicating that residents already possess sufficient job opportunities.

<sup>9</sup> Lakeside Middle, National Center for Education Statistics (2021-2022), [https://nces.ed.gov/ipeds/data/ipedssearch/school\\_detail.asp?Search=1&DistrictID=0691135&ID=069113511243](https://nces.ed.gov/ipeds/data/ipedssearch/school_detail.asp?Search=1&DistrictID=0691135&ID=069113511243) (last visited July 9, 2022).

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Finally, the McCanna Hills Specific Plan is an approved but unconstructed development that would be sited west of the Project site and south of the community bordering Ramona Expressway (see Exhibit C). The McCanna Hills development shares its eastern edge with the western border of the Project site. Active permits exist to build on several planning areas, including two that would construct new housing north of Antelope Road and Nuevo Road, adjacent to the Project site and along the first section of the Southern Truck Route.<sup>10</sup> If those units are ultimately constructed and occupied, the Project would impact a substantial number of additional sensitive receptors. The Project would also directly affect several other planning areas in the McCanna Hills Specific Plan without active permits, including a third planning area along Nuevo Road, designated open space bordering the Project, and higher-density residential and open space along Ramona Expressway.<sup>11</sup>

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**II. THE DEIR CONCLUDES THAT THE PROJECT WOULD HAVE SIGNIFICANT AND UNAVOIDABLE IMPACTS TO AIR QUALITY, NOISE, TRANSPORTATION, AGRICULTURE AND FORESTRY, AND AESTHETICS, AS WELL AS IMPACTS TO THE VIEWSHED OF TRIBAL TRADITIONAL CULTURAL LANDSCAPE.**

The DEIR concludes that the Project would have significant and unavoidable impacts in five areas: air quality, noise, transportation, agriculture and forestry, and aesthetics. Regarding air quality, the DEIR calculated that the Project’s daily operational air emissions would include 1,137 pounds of nitrogen oxides (NO<sub>x</sub>), 2,004 pounds of carbon monoxide (CO), and 160 pounds of volatile organic compounds (VOCs).<sup>12</sup> These emissions drastically exceed the applicable CEQA significance thresholds by factors of 21 (NO<sub>x</sub>), 4 (CO), and 3 (VOCs) in an air basin already in “extreme” nonattainment for several ozone standards and “serious” nonattainment for multiple fine particulate matter standards.<sup>13</sup> As to noise, the DEIR discloses significant noise and vibration impacts during construction—both on-site and off-site at Lakeside Middle School—and significant traffic noise impacts on Nuevo Road.<sup>14</sup> On transportation, because the Project site is isolated from existing transportation corridors, the DEIR finds that the Project would exceed the County’s average vehicle miles traveled (VMT) per employee threshold by 26.22% and that the Project’s retail uses would increase total VMT in the County.<sup>15</sup> On agriculture, the DEIR finds that the Project would convert 506.7 acres of important farmland, including 297.8 acres designated by the state as Prime Farmland, to non-agricultural uses.<sup>16</sup> And as to aesthetics, the DEIR notes that the existing character of the Project site is rural and

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<sup>10</sup> See Exhibit C, Planning Areas 46 and 47.

<sup>11</sup> See, e.g., Exhibit C, Planning Areas 28A, 28B, 28C, 29, 44, 45, and 48.

<sup>12</sup> DEIR at 4.3-29 Table 4.3-9.

<sup>13</sup> *Ibid.*

<sup>14</sup> *Id.* at 4.15-39 to -40.

<sup>15</sup> *Id.* at 4.18-22 to -23.

<sup>16</sup> *Id.* at 4.2-9.

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agricultural, and that the Project’s industrial land uses would substantially alter the area’s character and views.<sup>17</sup>

Furthermore, the DEIR concludes that there would not be significant and unavoidable impacts to tribal cultural resources because mitigation measures would reduce the impacts of the Project on tribal cultural resources to below a level of significance.<sup>18</sup> The DEIR acknowledges that there would be impacts to the viewshed of the area, in a manner that would obstruct the San Jacinto River, the villages of Páyve and Páavo, and Mystic Lake—places of historical and cultural significance to several tribes that are designated as part of a Tribal Cultural Landscape<sup>19</sup>—defined as a tribal cultural resource because it is a landscape with cultural value to a California Native American tribe that is included or eligible for inclusion in the California Register of Historical Resources.<sup>20</sup> But the DEIR concludes that because there is currently very little development in the area, the development associated with the Project would not significantly impact the viewshed of the Tribal Cultural Landscape.<sup>21</sup> However, notably, the DEIR’s conclusions on Project impacts to the aesthetics of the area—that the Project’s industrial land uses would substantially alter the area’s character and views—is in direct conflict with its conclusion that the viewshed of the Tribal Cultural Landscape would not be significantly and unavoidably impacted.<sup>22</sup>

**III. THE DEIR FAILS TO APPROPRIATELY ANALYZE AND DISCLOSE ALL SIGNIFICANT ENVIRONMENTAL IMPACTS.**

The purpose of CEQA is to ensure that a lead agency fully evaluates, discloses, and, whenever feasible, mitigates a project’s significant environmental effects.<sup>23</sup> An EIR serves as an “informational document” that informs the public and decisionmakers of the significant environmental effects of a project and ways in which those effects can be minimized.<sup>24</sup> Accordingly, an EIR must clearly set forth all significant effects of a project on the environment.<sup>25</sup> Here, the DEIR fails to properly analyze and/or disclose the significant air quality, noise, transportation, and tribal cultural resources impacts of the Project.

**A. The DEIR Fails to Properly Analyze and Disclose Significant Air Quality Impacts.**

As noted above, the DEIR finds that Project operations would cause significant and unavoidable criteria pollutant emissions. The DEIR’s health risk assessment (HRA) also

<sup>17</sup> *Id.* at 4.1-15.

<sup>18</sup> *Id.* at 4.19-8.

<sup>19</sup> *Id.* at 4.19-6.

<sup>20</sup> Pub. Resources Code, § 21074, subd. (a)(1)(A).

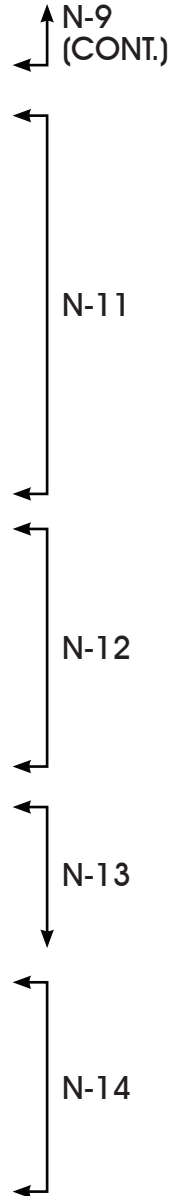
<sup>21</sup> DEIR at 4.19-6.

<sup>22</sup> *Id.* at 4.1-15.

<sup>23</sup> Pub. Resources Code, §§ 21000-21002.1.

<sup>24</sup> CEQA Guidelines, § 15121, subd. (a).

<sup>25</sup> Pub. Resources Code, § 21100, subd. (b)(1); CEQA Guidelines, § 15126.2, subd. (a).





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concludes that the Project’s diesel particulate matter (DPM) emissions would cause 9.81 cancer cases per million people, just under the significance threshold of 10 cases per million. The California Air Resources Board’s (CARB) comment letter, dated May 26, 2022, identifies several flaws in the HRA and an important omission from the criteria pollutant emissions analysis. When corrected, the HRA will likely find significant cancer risk from the Project’s operational DPM emissions. The County must revise the DEIR to accurately reflect the Project’s air quality impacts and recirculate it for public review.

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(CONT.)

The HRA of cancer risk from operational DPM emissions suffers from at least four flaws. First, it assumes an improperly low daily breathing rate for individuals aged 16-70. The DEIR uses a daily breathing rate for individuals aged 16-70 of 209 liters per kilogram per day.<sup>26</sup> Guidance from the California Office of Environmental Health Hazard Assessment (OEHHA) recommends using a daily breathing rate of 290 liters per kilogram per day for this demographic—nearly 40 percent higher than the DEIR assumed.<sup>27</sup> The DEIR does not explain why it departs from OEHHA guidance. (*See Golden Door Properties, LLC v. Cnty. of San Diego* (2018) 27 Cal. App. 5th 892, 905 (requiring substantial evidence to support methodology for CEQA impact analysis).) Because daily breathing rate is a critical component of an individual’s estimated DPM exposure, recalculation of the cancer risk using the correct daily breathing rate will reveal substantially higher cancer risk than the DEIR previously disclosed.

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Second, the HRA appears to omit emissions from off-site TRUs. While the HRA includes emissions from TRUs located at the Project site, it seemingly does not account for TRU emissions that occur along roadways near the Project.<sup>28</sup> These emissions will increase nearby sensitive receptors’ overall DPM exposure, and thus must be included to accurately estimate cancer risk from Project operations.

N-16

Third, the HRA underestimates on-site TRU emissions. The HRA assumes that TRUs will idle on-site for fifteen minutes.<sup>29</sup> However, data collected by CARB demonstrate that TRUs spend an average of 3.3 hours at a facility.<sup>30</sup> For diesel-powered TRUs—which make up the vast

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<sup>26</sup> See, e.g., DEIR, Appendix B1 at .pdf pg. 483.

<sup>27</sup> OEHHA Guidance at 5-23 to -24 (recommendation to use 95th percentile daily breathing rates), 5-25 Table 5.6 (95th percentile breathing rate for 16<70 years of 290 L/kg-day).

<sup>28</sup> See, e.g., DEIR, Appendix B1 at .pdf pg. 482 (including on-site TRU emissions but not off-site TRU emissions).

<sup>29</sup> See, e.g., *id.*, Appendix B1 at .pdf pg. 482.

<sup>30</sup> CARB, Staff Report, *Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate*, Appendix F (“Applicable Facility Determination Methodology”), at 18 (citing CARB, *2011 Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate* (August 31, 2011); CARB, *Cold Storage Food/Distribution Questionnaire* (2018)).

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majority of TRUs currently in operation<sup>31</sup>—the HRA should assume on-site idling time is equivalent to total facility visit time.<sup>32</sup> The HRA should therefore consider on-site TRU emissions from 3.3 hours of idling per truck visit. Alternatively, the DEIR should adopt mitigation measures, along with robust enforcement mechanisms, limiting on-site TRU idling to fifteen minutes.

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(CONT.)

Fourth, the HRA does not substantiate its assumption that the Project would receive 630 daily visits by trucks with TRUs under the Primary Land Use Plan.<sup>33</sup> The DEIR must support this assumption with substantial evidence. Pub. Resources Code § 21168.5. As diesel-powered TRUs emit considerable amounts of DPM, the number of truck trips with TRUs strongly influences projected DPM emissions and thus the overall estimated cancer risk.

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Finally, the DEIR’s calculation of operational criteria pollutant emissions omits emissions from TRUs. The DEIR estimates criteria pollutant emissions using CalEEMod. However, as CARB’s comment explains, CalEEMod does not account for air pollutant emissions from TRUs.<sup>34</sup> Accordingly, the DEIR underestimates the Project’s criteria pollutant emissions. The DEIR must separately model those emissions and add them to the Project’s other operational emissions to accurately assess the Project’s total criteria pollutant emissions from operation.

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**B. The DEIR Fails to Properly Analyze and Disclose Significant Noise Impacts.**

The DEIR’s noise analysis suffers from two flaws. First, the DEIR fails to disclose significant traffic noise impacts along Ramona Expressway. The DEIR states that the Project would have four significant noise impacts: (1) significant construction noise impacts at Lakeside Middle School from construction of a water main and tanks adjacent to the school, (2) significant construction vibration impacts at Lakeside Middle School, Sierra Vista Elementary School, and nearby residences from the water infrastructure construction; (3) significant on-site construction vibration impacts from blasting; and (4) significant increases in traffic noise along Nuevo Road between the Project site and Dunlap Drive.<sup>35</sup> However, the DEIR’s analysis identifies a fifth significant noise impact: operational traffic noise increases on Ramona Expressway behind Lakeside Middle School and residences. Specifically, the DEIR finds that the Project would

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<sup>31</sup> According to data reported in the CARB Equipment Registry, approximately 15 percent of trailer TRUs are equipped with electric-standby capability.

<sup>32</sup> CARB, Staff Report, *Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate*, Appendix I (“Health Analyses: Transport Refrigeration Units”) at 39. Note that CARB’s HRA assumes that total loading and unloading time is 4 hours rather than 3.3 hours, which would be a less conservative assumption in the context of the Project’s HRA.

<sup>33</sup> See, e.g., DEIR, Appendix B1 at .pdf pg. 482.

<sup>34</sup> See, e.g., *id.*, Appendix B1 at .pdf pg. 104 (omitting any reference to calculating emissions from TRUs).

<sup>35</sup> *Id.* at 4.15-39 to -40.

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increase traffic noise under year 2030 conditions by 2.2 dBA CNEL<sup>36</sup> (from 66.9 to 69.1) on Ramona Expressway south of Rider Street and by 1.9 dBA CNEL (from 67.0 to 68.9) on Ramona Expressway between Bradley Road and Evans Road.<sup>37</sup> As baseline traffic noise exceeds the County’s 65 dBA CNEL standard for acceptable noise at a sensitive land use, the DEIR uses a significance threshold of a 1.5 dBA CNEL increase.<sup>38</sup> Thus, projected increases of 2.2 dBA CNEL and 1.9 dBA CNEL are significant. While the DEIR identifies these impacts as significant at Table 4.13-13, it omits these significant impacts from the narrative portions of the DEIR, including its discussion of significant impacts in the executive summary and summary portions of the noise section.<sup>39</sup> The DEIR also does not consider any mitigation for these significant impacts. The DEIR’s failure to disclose these significant impacts and consider all feasible mitigation are CEQA violations.<sup>40</sup> Particularly as these significant noise impacts would affect sensitive receptors—students and teachers at Lakeside Middle School and numerous Perris residents—the County must revise the DEIR to fully disclose these impacts and consider all feasible mitigation measures, including routing the nearly 4,000 daily truck trips away from this community.

Second, the DEIR’s noise analysis is also insufficient. The DEIR uses 24-hour average noise levels as the sole indicator of a significant operational traffic noise impact. However, the DEIR reports that a diesel truck traveling 50 mph produces between 80 and 90 dBA of noise at 50 feet away.<sup>41</sup> The routes used by trucks visiting the Project would take trucks within 50 feet of dozens of sensitive receptors, particularly the homes bordering Ramona Expressway, which under the Primary Truck Route would be passed by a diesel truck an average of once every 23

<sup>36</sup> The community noise equivalent level (CNEL) weights 24-hour average noise levels to account for additional noise sensitivity in evening and night hours. *See id.* at 4.13-4.

<sup>37</sup> *Id.* at 4.13-43 Table 4-13.13. Table 4-13.13 also includes a line purporting to estimate the increase in traffic noise on Ramona Expressway between Rider Street and Bradley Road, but the corresponding data are not plausible. While the DEIR projects the ambient baseline noise levels along the surrounding two sections of Ramona at 66.9 and 67.0 dBA CNEL, the DEIR lists ambient baseline noise on Ramona Expressway between Rider Street and Bradley Road as 58.7 dBA CNEL. Equally implausibly, the DEIR also estimates the traffic noise increase at this portion of Ramona Expressway to be 0.0 dBA CNEL, even though this portion of Ramona Expressway would host the same number of truck trips and nearly identical numbers of passenger car trips. The County should correct this apparent error in the DEIR.

<sup>38</sup> *Id.* at 4.13-20, 4.13-26.

<sup>39</sup> Curiously, the DEIR section analyzing land use impacts references a potential noise wall along Ramona Expressway to mitigate significant noise impacts (*id.* at 4.11-21), but neither the significant impact along Ramona nor a potential noise wall are mentioned anywhere in the relevant summary or noise sections of the DEIR.

<sup>40</sup> Pub. Resources Code, § 21100, subd. (b)(1), (b)(3).

<sup>41</sup> DEIR at 4.13-2 Fig. 4.13-1; *see also* Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (last accessed July 6, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

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seconds.<sup>42</sup> The DEIR projects that 24-hour average sound levels, including noise from passing trucks, would stay below 70 CNEL along Ramona Expressway, so the Project’s heavy-duty trucks would therefore cause substantial noise spikes at sensitive receptors as they pass. Indeed, the DEIR notes that “[t]wo sound levels 10 dB apart differ in acoustic energy by a factor of 10,”<sup>43</sup> and that a “10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.”<sup>44</sup>

The DEIR does not consider whether temporary noise spikes from diesel trucks would result in a significant noise impact. Especially pertinent is whether these noise spikes would cause health effects—such as sleep disturbance, stress, long-term hearing loss, or other impacts—yet the DEIR does not analyze these issues at all. Longstanding methodologies exist to study these impacts.<sup>45</sup> Instead, the DEIR leaves basic questions of interest to ordinary community members unanswered: for example, how loud is it at someone’s home when the project’s trucks pass, how often will they experience that noise, and will that noise affect their health? In light of evidence in the DEIR itself that the Project would subject sensitive receptors to large, temporary noise spikes, the DEIR’s failure to consider whether significant noise impacts could result violates CEQA.<sup>46</sup>

**C. The DEIR’s Analysis Regarding Truck Routes Makes a Major Error in Assumption, and Thus Should Consider Alternative Routes and Analyze Their Impacts.**

The DEIR proposes two alternative truck routes to accommodate the Project’s nearly 4,000 expected daily truck trips, both of which would lead to thousands of daily truck trips passing residences and sensitive receptors.<sup>47</sup> The Primary Truck Route plan would direct 98 percent of the Project’s truck traffic along a six-mile route to the highway via Ramona Expressway, which borders Lakeview Middle School and a large residential community in

<sup>42</sup> Ninety-eight percent of 3,916 daily truck trips equals approximately 3,838 daily truck trips, or one truck trip every 22.5 seconds.

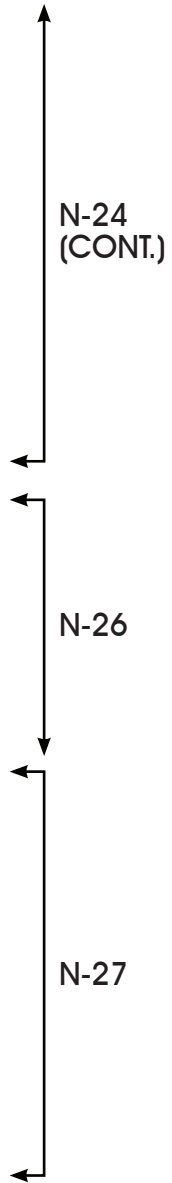
<sup>43</sup> *Id.* at 4.13-1.

<sup>44</sup> *Id.* at 4.13-5.

<sup>45</sup> See, e.g., *Berkeley Keep Jets Over the Bay Comm. v. Bd. of Port Comm’rs*, 91 Cal. App. 4th 1344, 1382 (2001) (“The probability of being repeatedly awakened by multiple single-event sounds can be calculated, given sufficient data.”); United States Environmental Protection Agency, *Protective Noise Levels: Condensed Version of EPA Levels Document* (1978) at 12 (explaining the “typical use” of the A-weighted sound exposure level metric is “[t]o describe noise from a moving source such as an airplane, train, or truck”); Barbara Griefahn, *Noise Control During the Night: Proposals For Continuous and Intermittent Noise*, 20 *Acoustics Australia* 43 (1992) (noting that “ $L_{eq}$  alone is not generally suitable for the prediction of sleep disturbance” and that nighttime traffic noise disrupts sleep and contributes to concrete health impacts, including cardiovascular disease).

<sup>46</sup> See, e.g., *Berkeley Keep Jets*, 91 Cal.App.4th at 1378.

<sup>47</sup> See Exhibits A & B.







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Perris.<sup>48</sup> The Southern Truck Route plan would still direct 60 percent of trucks (2,350 trucks daily) along Ramona Expressway, but 38 percent (1,488 trucks daily) would take a four-mile path via Nuevo Road, passing the planned residential development of McCanna Hills, two smaller residential communities, a church, and a public park.<sup>49</sup>

In addition to inadequately analyzing the adverse impacts to air quality and noise that these truck routes pose for sensitive receptors, as described above, the DEIR has incorrectly assumed that trucks on the Primary Truck Route would use the Ramona Expressway to access Interstate 215 in the east. The City of Perris, through which that stretch of Expressway traverses, has removed that portion of the Expressway as a truck route. According to Perris, the City removed the “entire stretch of Ramona Expressway as a truck route” under the Perris Valley Commerce Center Specific Plan, which the City adopted in January 2012, thus removing an approximately 2.5-mile stretch of Primary Truck Route located within Perris’s city limits along the Ramona Expressway.<sup>50</sup> As such, in accordance with Perris’s restriction, 98 percent of the Project truck traffic based on the Primary Truck Route plan, or 60 percent of the Project truck traffic based on the Southern Truck Route plan, is not viable.

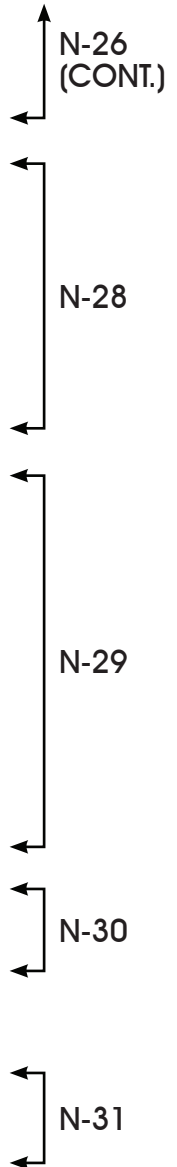
The DEIR should therefore reconsider the truck routes it proposes to service the Project site to avoid the Ramona Expressway. One alternative is to redirect most of the truck traffic to the south; but instead of using the path planned under the Southern Truck Route, a new southern route could be used to divert trucks away from the sensitive receptors along the Southern Truck Route (the planned residential development of McCanna Hills, the two smaller residential communities, the church, and the public park). The alternative southern route would require the expansion in capacity of existing roads and the construction of a new highway interchange. For example, Dawson Road, whose northern terminus does not intersect any existing roads, could be extended to intersect with Nuevo Road to divert truck traffic south along Dawson Road immediately after departing the Project site. Trucks could then head west on San Jacinto Avenue, south on Dunlap Drive, followed by west on Ellis Avenue. To accommodate truck traffic onto Interstate 215 without routing trucks past major sensitive receptors, the County could consider the construction of an Interstate 215 highway interchange at Ellis Avenue, subject, of course, to approvals from Riverside County Transportation Commission and other relevant municipalities and agencies.

The alternative route described above is just one of several possible alternatives that could divert trucks away from the Ramona Expressway and the sensitive receptors along the Primary and Southern Truck Routes. In considering these alternative routes, the DEIR should further analyze the impacts to other environmental resources.

<sup>48</sup> DEIR at 3-28, 3-29 Fig. 3-12.

<sup>49</sup> *Id.* at 3-28, 3-30 Fig. 3-13.

<sup>50</sup> See City of Perris Comment Letter to Riverside County Planning Regarding Stoneridge Commerce Center DEIR (May 20, 2022) at 5.





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**D. The DEIR Fails to Properly Analyze and Disclose Significant Impacts to Tribal Cultural Resources.**

Pursuant to AB 52, CEQA requires a lead agency, in consultation with traditionally and culturally affiliated tribes, to analyze project impacts to tribal cultural resources, which includes resources of tribal cultural value as well as scientific and archaeological value.<sup>51</sup> The lead agency has a duty to analyze impacts to tribal cultural resources early in the CEQA process.<sup>52</sup> AB 52 is intended to ensure that all stakeholders, including local and tribal governments, public agencies, and project proponents, will be informed about potentially impacted tribal cultural resources early in the development process and to identify and address potential adverse impacts to tribal cultural resources.<sup>53</sup> AB 52 explicitly recognizes that consultation between a lead agency and a tribal government is government-to-government consultation, and therefore can take place throughout the CEQA process and is not limited in time to any public commenting periods for the general public.<sup>54</sup> If the lead agency determines that a project may cause substantial adverse impacts to tribal cultural resources, the lead agency must consider measures to mitigate that impact.<sup>55</sup> The lead agency may finalize and certify an EIR only if tribal consultation has concluded, either through an agreement between the lead agency and the tribal government to measures that mitigate or avoid any significant effects on tribal cultural resources, or through the good faith conclusion by either the tribe or the lead agency that a mutual agreement cannot be reached.<sup>56</sup>

Furthermore, CEQA requires the analysis of cumulative impacts because, as courts have explained, “[o]ne of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources.”<sup>57</sup>

The DEIR analysis of Project impacts to tribal cultural resources is insufficient. The DEIR concludes in its analysis of Project impacts to aesthetic resources that “the Project vicinity exhibits a rural and agricultural character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Impacts would therefore be significant.”<sup>58</sup> Yet, in direct conflict with this conclusion on aesthetic impacts, the DEIR concludes that the Project will not significantly adversely impact the viewshed of the tribes’ Traditional Cultural Landscape. It is unclear how the Project could

<sup>51</sup> AB 52, § 1.

<sup>52</sup> *Id.* § 1, subd. (b)(7).

<sup>53</sup> *Id.* § 1.

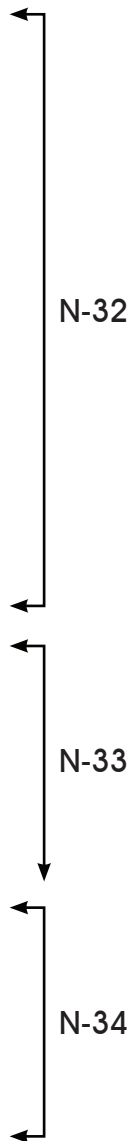
<sup>54</sup> State of California Governor’s Office of Planning and Research, AB 52 and Tribal Cultural Resources in CEQA, Technical Advisory (June 2017), at 7 n.6.

<sup>55</sup> Pub. Resources Code, § 20184.3, subd. (b)(2).

<sup>56</sup> Pub. Resources Code, §§ 20180.3.3 & 20180.3.2(b).

<sup>57</sup> *Kings Cty. Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720; CEQA Guidelines, Appendix G, §§ 15130, 15355.

<sup>58</sup> DEIR at 4.1-19.





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adversely and unavoidably impact aesthetic resources in the manner described in the DEIR, but not adversely impact the tribal viewshed. At least one tribe voiced concerns to the County that the Project may impact the viewshed of the Tribal Cultural Landscape, and the DEIR itself acknowledges that the views to the San Jacinto River, the villages of Páyve and Páavo, and Mystic Lake would all be obstructed.<sup>59</sup>

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(CONT.)

CEQA requires the County to analyze whether the Project would cause a substantial adverse change in the significance of a tribal cultural resource.<sup>60</sup> The viewshed of an area is a component of landscape, in this case, a designated Tribal Cultural Landscape. The viewshed is therefore a protected tribal cultural resource that holds significance and continuity through tribal oral history; if the viewshed is obstructed or changed, the significance and meaning of a Tribal Cultural Landscape could be decimated. Substantial changes to this area’s character and views, as the DEIR’s own aesthetics analysis raises, could therefore significantly and adversely impact this tribal cultural resource.

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The DEIR fails to include any technical analysis to evaluate impacts to the viewshed of the Tribal Cultural Landscape. In contrast, the DEIR’s analysis of aesthetics impacts includes “field observations and site photographs, analysis of aerial photography,” as well as information from the County GIS database.<sup>61</sup> Impacts to tribal cultural resources are entitled under CEQA to the same level and rigor of technical analysis as other environmental resources. Pursuant to AB 52, the DEIR, with input from tribes, should analyze the impacts to the viewshed by conducting additional field surveys and site and aerial photography with specific analysis of how the Project would impact the character and views of the Tribal Cultural Landscape. In particular, recognizing that tribes have special knowledge and expertise with regards to their tribal cultural resources, the analysis should incorporate testimonials from tribal elders and representatives.<sup>62</sup> Once more information and analysis are produced regarding impacts to the viewshed, the County, again with input from the tribes, should then consider all feasible mitigation to avoid adversely impacting the character and views of the landscape.

N-36

Furthermore, the DEIR, without substantiation, concludes that “future development is not anticipated to obstruct views of any scenic vistas or views.”<sup>63</sup> The DEIR appears to be dismissing the need for a cumulative analysis of Project impacts to viewshed, without having sufficiently analyzed potential visual impacts from any other relevant anticipated developments. Pursuant to CEQA, the County must determine whether the Project’s impacts are cumulatively considerable by considering relevant past, present, and future projects.<sup>64</sup> Here, the DEIR fails to identify any relevant projects. Notably, the Mid County Parkway is an anticipated development

N-37

<sup>59</sup> *Id.* at 4.19-6.

<sup>60</sup> OPR Technical Advisory, *supra* note 54, at 10.

<sup>61</sup> DEIR at 4.1-1.

<sup>62</sup> See AB 52, § 1; OPR Technical Advisory, *supra* note 54, at 5-6 (listing types of evidence relevant to the significance of tribal cultural resources).

<sup>63</sup> DEIR at 4.19-6.

<sup>64</sup> CEQA Guidelines, § 15065, subd. (a)(3).

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that, as the DEIR raises, would be in the Project’s vicinity and provide crucial infrastructure and access to the Project.<sup>65</sup> Because of its size, the Mid County Parkway could significantly alter the character and views of the landscape adjacent to the Project and as such, also alter the same viewshed. As part of the Mid County Parkway environmental review and planning process, several tribes prepared reports on the visual resources associated with the Tribal Cultural Landscape at the Stoneridge Project site—and provided parts or all of those reports relevant to viewshed to the County during AB 52 consultation for the Project.<sup>66</sup> Despite those reports’ availability to the County, the DEIR fails to incorporate information from those reports or identify the Parkway as a potential source of adverse cumulative impacts on viewshed. The DEIR should be revised to incorporate and analyze the information that tribes provided, and conduct a cumulative impacts analysis inclusive of impacts from the Mid County Parkway, among other relevant anticipated developments.

N-37  
(CONT.)

**IV. THE DEIR DOES NOT INCORPORATE ALL FEASIBLE MITIGATION MEASURES.**

CEQA prohibits agencies from approving projects with significant adverse environmental effects where there are feasible mitigation measures that would substantially lessen or avoid those effects.<sup>67</sup> “Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified.”<sup>68</sup> The lead agency is expected to develop mitigation in an open public process,<sup>69</sup> and mitigation measures must be fully enforceable and cannot be deferred to a future time.<sup>70</sup>

N-39

The DEIR finds significant and unavoidable impacts to air quality, noise, transportation, and agriculture and forestry. In addition, as discussed above, there are several additional significant impacts, including to air quality, noise, and tribal cultural resources, that are not sufficiently analyzed or disclosed in the DEIR. However, the DEIR fails to adopt all feasible measures to mitigate these significant impacts.

<sup>65</sup> See *supra* note 3; DEIR at 4.18-1.

<sup>66</sup> See Mid County Parkway Final EIR/EIS and Final Section 4(f) Evaluation at 3.8-26 (March 2015), <https://rctc.org/midcountyparkway/uploads/eir3/Volume%20I%20-%20Chapters%201%20-%202%20and%20Chapters%204%20-%207/Volume%20I%20-%20Chapter%203/3.8%20Cultural%20Resources.pdf> (last accessed July 10, 2022) (confirming a Cultural Landscape Study in consultation with tribes and various government agencies for areas around the Mid County Parkway).

<sup>67</sup> Pub. Resources Code, § 21100, subd. (b)(3).

<sup>68</sup> CEQA Guidelines, § 15126.4, subd. (a)(1)(B).

<sup>69</sup> *Cmtys. for a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

<sup>70</sup> CEQA Guidelines, § 15126.4.

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**A. The DEIR Fails to Adopt All Feasible Measures to Mitigate the Project’s Significant Air Quality, Noise, and Transportation Impacts.**

The Project suffers from substantial design issues that contribute to its significant environmental impacts. As discussed above, the Project is sited far from established transportation corridors, meaning that trucks visiting the Project’s warehouses must drive long distances and pass sensitive receptors to reach the nearest highways. Compounding this problem, the City of Perris’s comment letter notifies the County that Ramona Expressway—a road the DEIR estimates will handle thousands of additional daily truck trips once the Project is operational—is not a truck route within Perris city limits. The DEIR must consider design changes to mitigate or remove these impacts. For example, the DEIR should evaluate alternative truck routes, including construction of a new route to Interstate 215 that would route trucks away from sensitive receptors, as described in section III.C, above. Furthermore, the DEIR concludes that the Project would have significant transportation impacts, adding nearly 24,000 vehicle trips a day to the area.<sup>71</sup> As a result, out of the 69 traffic intersections in the Project vicinity analyzed by the DEIR, 19 are expected to operate at a highly deficient or unacceptable “Level of Service” with regards to traffic flow (e.g., speed, travel time, delay, and freedom to maneuver) during AM and/or PM peak hours for 2030 traffic conditions, thus increasing vehicle emissions and hazards to residents.<sup>72</sup> The DEIR finds that because of the suburban nature of the Project site and surroundings, mitigation measures cannot reduce traffic impacts to a level of less than significant. The DEIR should incorporate mitigation measures recommended below to reduce adverse Project-related traffic impacts, even if these impacts cannot be reduced to a level of less than significant.

The DEIR states that the Project will follow Riverside County’s Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (“Good Neighbor Policy”).<sup>73</sup> However, the Project’s compliance with the Good Neighbor Policy is questionable. For example, MM 4.3-2 and MM 4.3-7 purport to require the Project to follow the Good Neighbor Policy’s construction and operational requirements, respectively. But at least three of the Good Neighbor Policy’s construction provisions are missing from MM 4.3-2’s list of measures,<sup>74</sup> and a fourth measure is not implemented in full.<sup>75</sup> Similarly, MM 4.3-7 states “applicable feasible provisions” of the

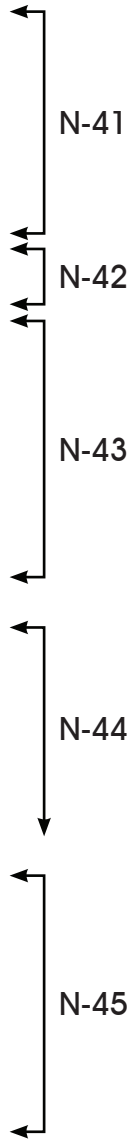
<sup>71</sup> DEIR at 3-28.

<sup>72</sup> *Id.* at 4.18-31.

<sup>73</sup> *See, e.g., id.* at 4.3-20, 4.3-27, 4.11-21 to -22, S-13 to -14 (MM 4.3-2), S-16 to -18 (MM 4.3-7), S-47 (CRDR 4.13-2).

<sup>74</sup> For example, Provisions 2.5, 2.8, and 2.10 of the Good Neighbor Policy do not appear in MM 4.3-2’s list of measures or elsewhere in the DEIR. *Compare* Riverside County Board of Supervisors Policy F-3 at 3-4 with DEIR at S-13 to -14.

<sup>75</sup> Provision 2.2 of the Good Neighbor Policy requires large off-road, diesel-fueled construction equipment to be “equipped with CARB Tier 4 Compliant engines,” providing an exception only if “the operator lacks Tier 4 equipment, and it is not available for lease or short-term rental within 50 miles of the project site.” Riverside County Board of Supervisors Policy F-3 at 3.





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Good Neighbor Policy “include, but are not limited to,” an enumerated list of provisions.<sup>76</sup> But it is unclear whether any Good Neighbor Policy provisions were omitted from the Project as “infeasible” and whether any provisions that are not in the enumerated list are also incorporated into the Project. The DEIR should list each item in the Good Neighbor Policy that MM 4.3-2, MM 4.3-7, CRDR 4.13-2, or any other binding measure incorporates so that the public can understand whether the Project in fact complies with the Good Neighbor Policy as the DEIR asserts.

N-44  
(CONT.)

Moreover, the Good Neighbor Policy alone does not comprise all feasible mitigation measures for this Project. The Attorney General’s Office published a document entitled “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” (Warehouse Best Practices Document) to help lead agencies identify all feasible mitigation for projects of this kind.<sup>77</sup> Nearly all of the example mitigation measures in the Warehouse Best Practices Document have been adopted in a warehouse project in California, demonstrating their feasibility. Yet, the DEIR does not incorporate several basic measures from the Warehouse Best Practices Document that would substantially reduce the Project’s impacts on adjacent residential communities. At minimum, the County should consider the following mitigation measures to reduce the adverse impacts of the Project to air quality, noise, and transportation:

N-46

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Forbidding idling of heavy equipment for more than three minutes.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

However, MM 4.3-2 only requires this equipment to have “CARB Tier 3 Certified engines or better.” DEIR at S-13.

<sup>76</sup> DEIR at S-16.

<sup>77</sup> <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf> (last accessed July 10, 2022).

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- Increasing physical, structural, and/or vegetative buffers along projected truck routes to reduce pollutant dispersal and noise between trucks visiting the Project and adjacent sensitive receptors;
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets;
- Placing facility entry and exit points from the public street away from future residents of the McCanna Hills Specific Plan development;
- Constructing electric truck charging stations proportional to the number of dock doors at the project;
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project;
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building’s projected energy needs, including all electrical chargers.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel;
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks;
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking;
- Designing to LEED green building certification standards;
- Posting signs at every truck exit driveway providing directional information to the truck route;
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request;
- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Paving roads on the truck routes with low noise asphalt.

All of these measures are feasible, and they would reduce the Project’s significant air quality, noise, and transportation impacts. The County should include these common sense measures in the Project.

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N-46  
(CONT.)  
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**B. The DEIR Fails to Adopt All Feasible Measures to Mitigate the Project’s Significant Impacts to Agricultural Land.**

The DEIR finds that the Project would have significant and unavoidable direct and cumulative impacts to agricultural resources, due to the conversion of nearly 550 acres of farmland to non-agricultural use.<sup>78</sup> However, the DEIR contains no mitigation measures to reduce these impacts to a level of less than significant, citing *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 (“*KG Farms*”) for the proposition that agricultural conservation easements are not feasible mitigation measures.<sup>79</sup>

DEIR errs in its legal interpretation of *KG Farms*. *KG Farms* does not stand for the proposition that agricultural conservation easements are legally infeasible to mitigate the conversion of agricultural lands.<sup>80</sup> Rather, the case holds that, on a one-to-one ratio (e.g., conserving one acre of agricultural land under an easement for every one acre of agricultural land converted in the development), agricultural conservation easements are not alone sufficient to adequately mitigate a project’s conversion of agricultural lands. In accordance with CEQA’s requirement to adopt all feasible mitigation for significant impacts, a feasible measure that substantially lessens an impact, without avoiding the impact in whole, must nonetheless be included as mitigation prior to project approval.<sup>81</sup> Indeed, the holding in *KG Farms* indicates that to the extent that conservation easements are considered for mitigation, they could be applied at a greater than one-to-one ratio, or combined with other forms of mitigation (such as restoration into farmland of some land not currently used as such).

Because conservation easements are feasible and would lessen the effects of the Project’s conversion of agricultural land to industrial uses, the County should include them as mitigation.

**C. The DEIR Should Mitigate the Project’s Significant Impacts to Tribal Cultural Resources.**

As the County has been informed through consultation with the tribes, the Project site is on and adjacent to a landscape that holds tangible and intangible connections for the tribes. Not only does this landscape contain known and unknown archaeological resources and biological resources important to the tribes’ history and traditional practices, the landscape also holds cultural significance through oral history that connects descendants of the tribes to that landscape.<sup>82</sup> The Project site overlaps with the tribes’ traditional trails and traditional harvesting

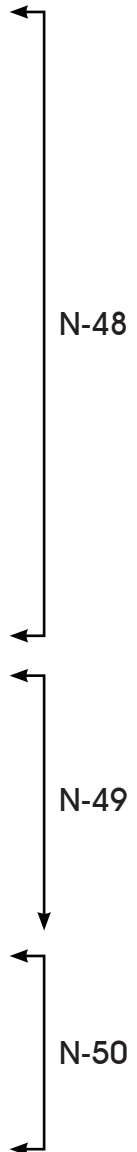
<sup>78</sup> DEIR at 4.2-4 Figure 4.2-1; 4.2-12 to -13.

<sup>79</sup> *Id.* at 4.2-13 to -15.

<sup>80</sup> A recent decision in a case related to *KG Farms* rejected this exact reasoning in the DEIR and concluded that the Court of Appeals in *KG Farms* did not preclude as a matter of law the use of conservation easements as mitigation. (*See Vaquero Energy v. County of Kern* (Super. Ct. Kern County, 2022, No. BCV-15-101645) at 9.)

<sup>81</sup> Pub. Resources Code, § 21100, subd. (b)(3).

<sup>82</sup> DEIR at 4.19-5 to -6.







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and gathering areas. The Project would impact that connection by preventing access by the tribes to areas that would become warehouses or other structures. Although the DEIR allows access for the tribes to continue gathering and visiting within the Project site’s designated 20-acre “Preservation Area,”<sup>83</sup> this area is limited to only a small portion of the nearly 600-acre Project site, and overlaps with only a small portion of the Tribal Cultural Landscape and other surrounding areas of historical and cultural significance that was once accessible to the tribes. The DEIR should therefore include additional areas in which the tribes have access for educational, cultural, and ceremonial practices, as well as for the harvesting and gathering of native plant species, so that traditional practices and connections to the land may be maintained.

N-49  
(CONT.)

Furthermore, because construction of the Project includes ground disturbing activities that could harm known and currently unknown tribal cultural resources potentially significant to the tribes, culturally appropriate mitigation is necessary. For instance, if it is determined that reburial or relocation of tribal cultural resources is necessary, then the relocation and/or reburial should be conducted in a culturally appropriate manner. Culturally appropriate preservation of these tribal cultural resources may require reburial or relocation close to their original site(s), within the same viewshed and geological conditions that keep the resources within their historical context so as to maintain the tribes’ traditions and connections to these resources, and to preserve their indigenous footprint. Currently, the DEIR mitigates the impacts to both currently known tribal cultural resources and potentially inadvertently discovered resources by providing for their relocations and reburials in an open space area of approximately 20 acres.<sup>84</sup> However, because this open space is constrained to one small portion of the Project site, it may not have the requisite topological and geological diversity to allow resources relocated from a vast geographic area to maintain their contextual integrity or be treated in a culturally appropriate manner. Thus, more than one open space area should be made available to provide more options for tribal cultural resources to be reburied close to their original contexts or relocated in a culturally appropriate place and manner, or for other culturally appropriate mitigation measures to be considered. The County should consult with tribes to determine additional areas for the preservation of these resources and work with the tribes on measures to ensure their security.

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**V. CONCLUSION**

CEQA promotes public health and thoughtful governance by requiring evaluation, public disclosure, and mitigation of a project’s significant adverse environmental impacts before project approval. When implemented well, CEQA builds public trust and encourages sustainable development that will serve the local community for years to come. We urge the County to revise the DEIR to fully analyze and disclose all significant impacts and adopt all feasible mitigation and recirculate the revised DEIR for further public review and comment. Furthermore, pursuant to the County’s obligations under AB 52, we urge the County to continue consultation with the tribes up until the Final EIR for the Project is certified, in case any pre-certification changes to the Project cause further significant impacts to tribal cultural resources that would require measures to mitigate or avoid the impacts. We are available to provide

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<sup>83</sup> *Id.* at 4.5-36.

<sup>84</sup> *Ibid.*; *id.* at 2-8.

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assistance to the County as it works to comply with CEQA. Please do not hesitate to contact us if you have any questions or would like to discuss.

↑ N-52  
← (CONT.)

Sincerely,

ROBERT SWANSON  
Deputy Attorney General

YUTING CHI  
Deputy Attorney General

For ROB BONTA  
Attorney General

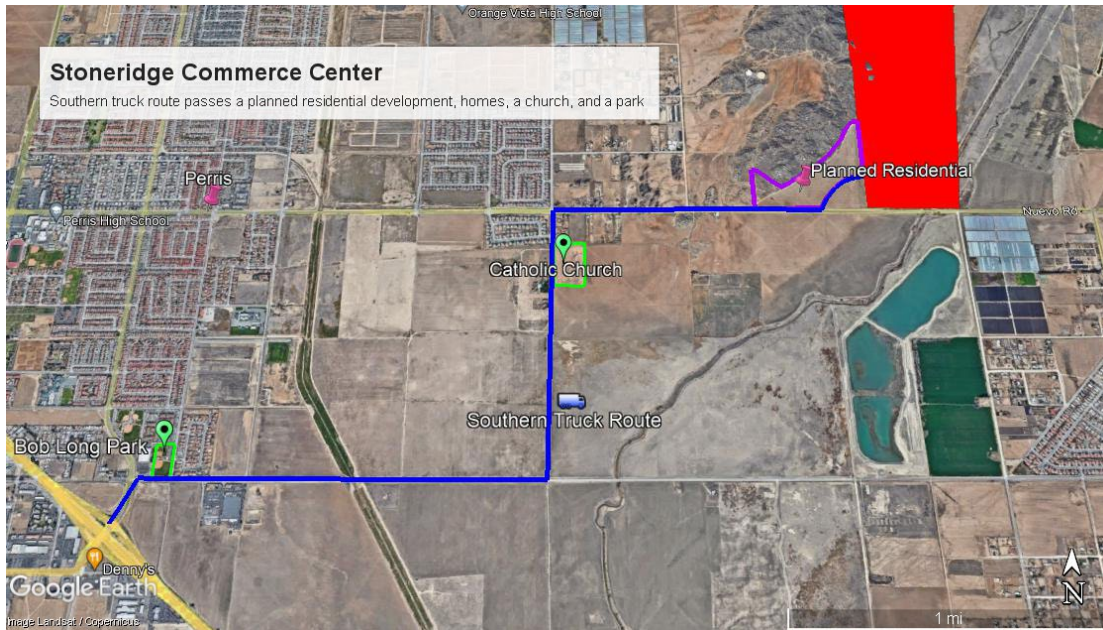


**Exhibit A: Annotated Maps of the Primary and Southern Truck Routes**





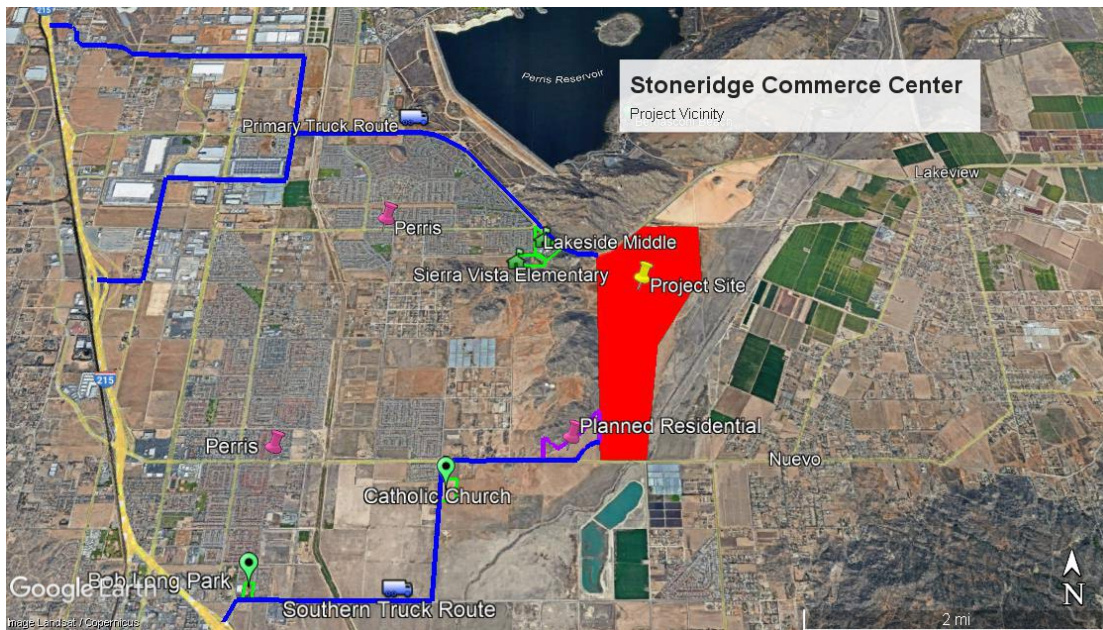
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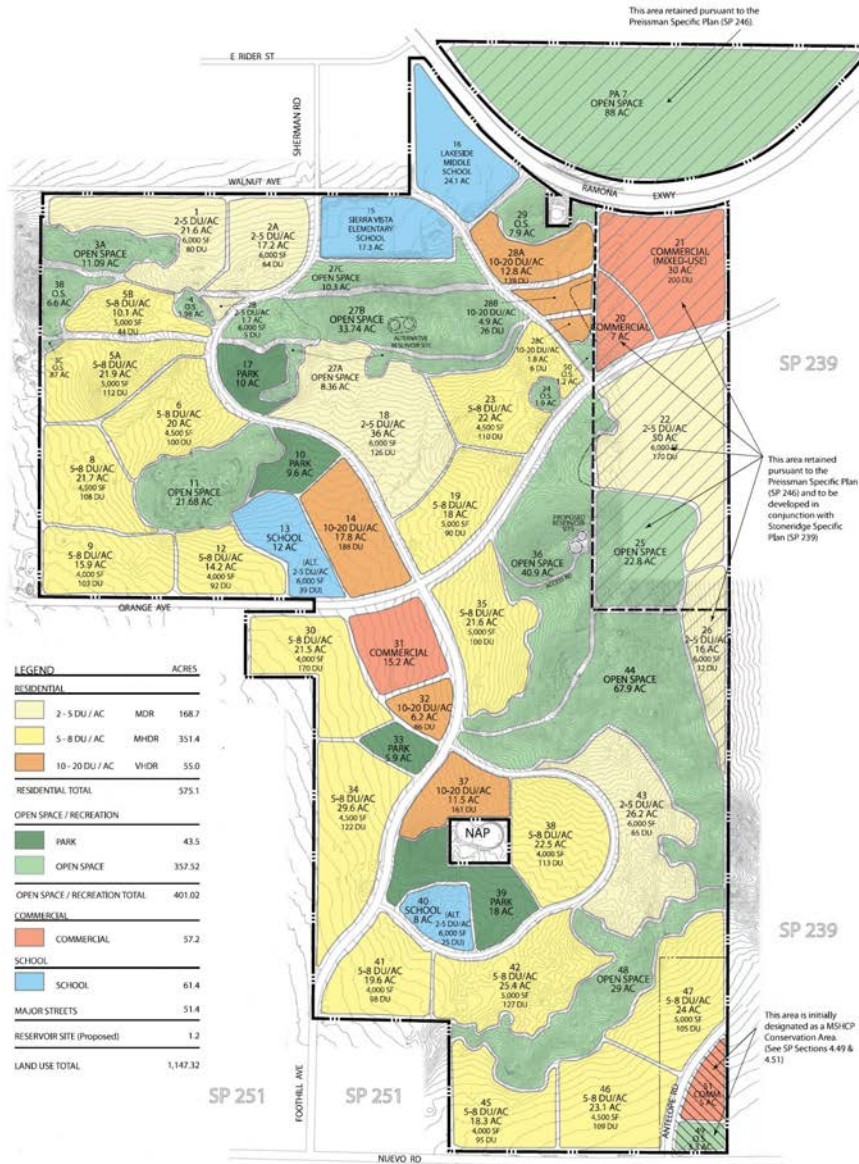
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**Exhibit B: Annotated Map of the Project Vicinity**





**Exhibit C: McCanna Hills Specific Plan Map**



NOTE: Planning areas are approximated. Acreages noted include possible slopes, open space, roadways and trails between areas as well as development area.



## Letter N California Attorney General

- N-1** The County appreciates the comments provided in response to the Project's DEIR. However, it should be noted that the Project site is located only 2.6 miles northeast of I-215, not the "more than six miles" as referenced by this comment. In addition, commenter is referred to Subsection R.3, above, which describes revisions that have been incorporated into the Project and that are evaluated as part of this RDEIR. Based on the revised Alternative Truck Routes, the Project would no longer route westbound Project-related truck traffic along Ramona Expressway to access I-215. Rather, all westbound truck trips would be routed to the south to access the I-215 via Alternative Truck Routes 1 or 2, or would be routed to the west along the Mid-County Parkway (once complete) to access the I-215. For the reasons cited in the individual responses to the comments provided in this letter, the County disagrees that the DEIR did not properly analyze the Project's impacts to sensitive receptors, impacts to tribal cultural resources, and that the DEIR did not include all feasible mitigation for the Project's significant impacts. Although the County finds that none of the comments provided by the Attorney General's office warranted recirculation, the County has nonetheless opted to recirculate this RDEIR in its entirety for an additional 45-day public review period, and the County will ensure that the Attorney General's office receives notice of the public review period for this RDEIR.
- N-2** Footnote describing the powers and duties of the Attorney General is acknowledged; no response is necessary.
- N-3** This comment generally correctly cites the information provided in the Project's DEIR, and Exhibits A and B to this comment letter are noted. Commenter is referred to Subsection R.3, above, which describes revisions that have been incorporated into the Project and that are evaluated as part of this RDEIR. Based on the revised Alternative Truck Routes, the Project would no longer route Project-related truck traffic along Ramona Expressway to access I-215. Rather, all westbound truck trips would be routed to the south to access the I-215 via Alternative Truck Routes 1 or 2, or would be routed to the west along the Mid-County Parkway (once complete) to access the I-215. Please refer to the revised analysis of the Project's potential impacts as presented in this RDEIR.
- N-4** The County acknowledges that the Project evaluated in the DEIR routed truck trips near sensitive receptors, including residences and schools. However, the DEIR included a full analysis of the Project's potential impacts to sensitive receptors, and only identified one traffic-related noise impact affecting sensitive receptors that could not be mitigated to below a level of significance. The County also acknowledges that the Project site occurs within a disadvantaged community. Commenter is referred to the revised analysis of the Project's potential impacts to the environment, including potential impacts to sensitive receptors, as identified by this RDEIR. While the Southern Truck Route continues to be evaluated as part of this RDEIR (referred to herein as Alternative Truck Route 1), as described in Subsection R.3, above, four additional truck routes to the south of the Project site were considered as part of this RDEIR (referred to as Alternative Truck Routes 2 through 5), of which one was determined to be feasible, in addition to a sixth truck route alternative (Alternative Truck Route



6) that would route all westbound traffic along the Mid-County Parkway (MCP) once constructed and operational.

- N-5** Footnotes to Comment N-3 are acknowledged. However, please note the changes to the maximum allowable Light Industrial building area, as described above in Subsection R.3.
- N-6** The County acknowledges the presence of sensitive receptors along the Southern Truck Route that was evaluated in the DEIR. However, the DEIR included a full evaluation of potential impacts to sensitive receptors, including an analysis of potential cancer and non-cancer health risks. The analysis in the DEIR demonstrated that localized air quality impacts would be less than significant. Notwithstanding, revisions have been incorporated into the Project, as described above in Subsection R.3, and this RDEIR considers a total of six Alternative Truck Routes (of which three were determined to be feasible), and includes truck routes that were suggested by this comment letter. Commenter is referred to the revised analysis presented in this RDEIR, which continues to show that the Project's localized air quality impacts would be less than significant with mitigation.
- N-7** Footnotes to Comment N-4 are acknowledged. In addition, while it is true that the Project's census tract scores better than average on unemployment, it is important to note that surrounding census tracts do suffer from high levels of unemployment. For example, the level of unemployment for Census Tract 6065042706, located to the southwest of the Project site, is higher than 85% of the census tracts in California. Similarly, the level of unemployment for Census Tract 6065042720, located to the southeast of the Project site, is higher than 87% of the census tracts in California. (OEHHA, 2022)
- N-8** The County acknowledges that future residential receptors may occur within the adjacent McCanna Hills Specific Plan. Commenter is referred to the revised analysis of the Project's impacts as presented in this RDEIR. Specifically, the Project's air quality, health risk assessment, and noise technical reports have been revised and now account for future sensitive receptors in the surrounding area, including within the McCanna Hills Specific Plan, and also accounts for nearby preserved biological habitat. As demonstrated in the revised analysis, Project impacts to future sensitive receptors would be less than significant with mitigation, with exception of significant and unavoidable near-term traffic-related noise impacts that would occur prior to completion of the MCP.
- N-9** This comment accurately describes the significant and unavoidable impacts that were disclosed by the DEIR. As noted in prior comments, revisions have been incorporated into the Project since the public review period for the DEIR. Please refer to the revised analysis of the Project's potential impacts to the environment as evaluated by this RDEIR.
- N-10** Footnote references to Comments N-8 and N-9 are acknowledged; no response is necessary.
- N-11** The County disagrees with the commenter's assertion that impacts to Tribal Cultural Landscapes (TCLs) should have been identified as a significant impact in the DEIR. First, commenter is referred





to the discussion presented in DEIR and RDEIR subsection 4.19.4 under the analysis of Threshold a., which includes the following discussion:

*“Planning Department staff have determined that the Project would impact the viewshed (aesthetics) but would not significantly damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features. Although the Project site and surrounding areas would be developed in the long-term with a mixture of urban and rural land uses, future development is not anticipated to obstruct views of any scenic vistas or views. The future development in the area would not adversely affect views of the existing hill forms that occur on and off site near the Project’s western boundary or the Bernasconi Hills that surround the Lake Perris State Recreation Area. However, while the viewshed to the peaks may not be impacted by development, the views to the San Jacinto River, the large village of Páyve and Páavo, Mystic Lake would be obstructed. This viewshed is important to the tribes and connects the area with other important places within the viewshed. Currently, there is very little development in the area and although development of the Project would add to obstruction of the viewshed this would not be a significant impact.”*

Furthermore, Public Resources Code (PRC) Section 21074 defines “tribal cultural resources” as follows:

- (a) *“Tribal cultural resources” are either of the following:*
  - (1) *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
    - (A) *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
    - (B) *Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*
  - (2) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

As more fully documented in RDEIR Subsections 4.4 (Cultural Resources) and 4.19 (Tribal Cultural Resources), the Project would result in less-than-significant impacts to previously-identified significant archaeological resources, as the two archaeological sites that would be impacted by the Project (Sites SR-001 and SR-002) were determined by the Project’s Phase II Cultural Resources Assessment (*Technical Appendix D3*) to not meet the criteria listed in Section 15064.5 of the State CEQA Guidelines (which implement PRC Section 21074). Additionally, Sites SR-001 and SR-002, as well as the Project site as a whole, do not contain archaeological resources that are included or determined to be eligible for inclusion in the California Register of Historical Resources, and do not



contain resources included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. Furthermore, and in full compliance with Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18), the County sent notices to potentially affected Tribes on March 26, 2020, and engaged in a consultation process with Tribes that requested such consultation. As a result of the Project's Native American consultation, the consulting Tribes did not request any modification to the Project's design and did not request any mitigation related to TCLs. Thus, the County made the determination that Sites SR-001 and SR-002, as well as the Project site as a whole, do not comprise "a resource determined...to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1," based on the fact that the consulting Tribes did not indicate concerns over the Project's design and did not request any mitigation measures related to TCLs. Moreover, the County disagrees with the commenter's assertion that because the Project would result in significant and unavoidable impacts to aesthetics, that the DEIR should have identified a significant impact to TCLs. Impacts to aesthetics are fully evaluated in RDEIR Subsection 4.1, which conservatively discloses a significant and unavoidable impact due to the change in land use from undeveloped/vacant land to a light industrial, business park, and commercial retail development. The significant unavoidable impact in RDEIR Subsection 4.1 is unrelated to the Project's potential impacts to Tribal Cultural Resources, which are instead evaluated in RDEIR Subsection 4.19. As noted above, the resources on the Project site (including the Project site itself) do not meet the definitions of PRC Section 21074, based on the results of the County's consultation with affected Tribes; thus, the County finds that the RDEIR correctly concludes that Project impacts to Tribal Cultural Resources would be reduced to less-than-significant levels with implementation of the mitigation measures identified in RDEIR Subsection 4.4. Accordingly, no revision to the RDEIR is warranted pursuant to this comment.

**N-12** The County acknowledges the requirements of CEQA as described by this comment, but the County disagrees with the commenter's assertion that the DEIR failed to properly analyze and disclose significant air quality impacts for the reasons stated in the responses to Comments N-13 through N-20. Regardless, commenter is referred to the revised analysis throughout this RDEIR, which evaluates revisions that have been incorporated into the Project as described above in Subsection R.3.

**N-13** The County acknowledges that the DEIR disclosed a potential cancer risk of 9.81 cases per one million people. Please refer to the responses to Comments A-1 through A-63, which address each of the comments received from CARB. While the County disagrees with the commenter's assertion that localized cancer health risks would have been greater than disclosed by the DEIR, the commenter is referred to the revised analysis presented in RDEIR Subsection 4.3, *Air Quality*, which was updated to address the revisions that have been incorporated into the Project as described above in Subsection R.3. As part of the changes to the Project, the amount of high-cube cold storage uses within the Project's proposed Light Industrial areas has been increased from 20% to 40%. The Project's revised Health Risk Assessment (HRA), included as RDEIR *Technical Appendix B2*, concludes that with 40% of the Project's Light Industrial uses consisting of high-cube cold storage uses, and assuming implementation of Alternative Truck Route 2 (which was not considered in the DEIR that was circulated for public review), the Project would expose the Maximally Exposed Individual Resident (MEIR) to a cancer risk of 10.59 in one million, which was found to exceed the SCAQMD's



significance threshold of 10 in one million. Mitigation Measure MM 4.3-1 has been identified as part of this RDEIR to reduce this potentially-significant impact to less-than-significant levels by restricting the maximum amount of high-cube cold storage uses to a maximum of 20% of the total Light Industrial building area, unless it can be demonstrated that Transport Refrigerated Trucks (TRUs) associated with the existing or proposed high-cube cold storage warehouses include a certain percentage of fully electrified trucks (refer to RDEIR Mitigation Measure MM 4.3-1 for a specific list of requirements). Localized health risk impacts, including cancer risks, for Alternative Truck Routes 1 and 6 were determined to be less than significant, requiring no mitigation, as more fully discussed in RDEIR Subsection 4.3.

- N-14** Footnotes referenced by Comments N-11 and N-12 are acknowledged; no response is necessary.
- N-15** The commenter is correct that the 2015 Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidance Manual*, Table 5.6, recommends a daily breathing rate of 290 for the 16-70 age group. Therefore, the diesel particulate matter (DPM) dispersion results from the DEIR were run through the Hot Spots Analysis & Reporting Program (HARP2 v21081) software accounting for a daily breathing rate of 290 for the 16-70 age group. The HARP2 model implements the latest regulatory guidance to develop inputs for pollutant dispersion and as the inputs for calculations for the various health risk levels using the standardized equations contained in the OEHHA *Guidance Manual for Preparation of Health Risk Assessments* (2015). Regardless, the Project's revised HRA technical report, included as RDEIR *Technical Appendix B2*, evaluates discrete variants for daily breathing rates, exposure frequency, and exposure duration, all of which were obtained from relevant distribution profiles presented in the 2015 OEHHA Guidelines. Please refer to Tables 2-11 through 2-14 of the Project's revised HRA for a summary of the breathing rates assumed in the analysis. Furthermore, it is noted that the CARB-adopted diesel exhaust Unit Risk Factor (URF) of 300 in one million per  $\mu\text{g}/\text{m}^3$  is based upon the upper 95<sup>th</sup> percentile of estimated risk for each of the epidemiological studies utilized to develop the URF. Using the 95<sup>th</sup> percentile URF represents a very conservative (health-protective) risk posed by DPM because it represents breathing rates that are high for the human body (95% higher than the average population). (Urban Crossroads, 2023b, p. 15)
- N-16** The County respectfully disagrees with commenter's assertion that the DEIR underestimated health risk impacts associated with TRUs traveling along local roadways that abut sensitive receptors. The Project's operational Health Risk Assessment (HRA) analysis, which was included in *Technical Appendix B2* to the DEIR, was based on the best available information and data. Specifically, emission rates for heavy-duty trucks were obtained from the latest version of CARB's Emission FACTor model (EMFAC). EMFAC's emission rates for heavy-duty truck travel is provided in "grams per mile traveled." However, CARB's EMFAC model does not provide emission rates for TRUs. In order to obtain emission rates for idling TRUs on-site for use in the Project's DEIR, CARB's OFFROAD model was employed. However, like EMFAC the OFFROAD model also does not identify an emission rate for a traveling TRU, and therefore there is no available emission rate data associated with a traveling TRU. As discussed in the response to Comment A-12, onsite emissions



for TRUs were calculated in the DEIR as comprising 33% of all traffic for the Project's Light Industrial uses, which represents a conservative assumption. The highest risk values for all categories (MEIR, MEIW and PMI) were all located on or close to the Project boundary and were the result of the on-site operations and vehicle movements. Thus, it can be assumed that the onsite emissions disclosed by the DEIR captured the worst-case health risks associated with TRU emissions, and that health risks along roadway segments within the Project's study area would be less than that disclosed by the DEIR for the MEIR, MEIW, and PMI. Regardless, the Project's HRA technical report has been revised and is included as RDEIR *Technical Appendix B2*, and the results of the analysis are documented in EIR Subsection 4.3, *Air Quality*. The revised HRA and the analysis in RDEIR Subsection 4.3 fully account for health risk impacts associated with Project truck trips along study area roadways, including along roadway segments studied as part of the Project's three feasible Alternative Truck Routes, and demonstrates that with the implementation of mitigation measures the Project would not expose any sensitive receptors to health risk impacts exceeding SCAQMD's significance thresholds of 10 in one million for cancer risks or 1.0 for non-cancer risks.

**N-17** The County disagrees with the commenter's assertion that the Project's TRUs would idle for the full duration of site visits. The DEIR assumed that every truck visiting the site would idle on-site for an average of 15 minutes, which is based on guidance provided by the South Coast Air Quality Management District (SCAQMD). In addition, the Project would be subject to compliance with California Air Resources Board (CARB) Rule 2485 (13 CCR 2485), Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits idling to a maximum of five minutes. Pursuant to Division 26, Part 2 of the California Health and Safety Code (HSC), CARB would have enforcement authority to ensure the Project complies with all applicable CARB rules and regulations, including Rule 2485. Furthermore, DEIR Mitigation Measure 4.3-2 required that construction contractors must prohibit truck drivers from idling more than five minutes and required trucks to turn off engines when not in use, consistent with CARB Rule 2485. It is also noted that DEIR Mitigation Measure MM 4.3-3 required that prior to issuance of building permits for tenant improvements involving cold storage warehouse uses, Riverside County must review the plans to ensure that electrical hookups are provided to eliminate idling of main and auxiliary TRU engines during the loading and unloading process. Riverside County would verify the installation of electrical hookups prior to final building inspection. DEIR Mitigation Measure MM 4.3-7 required the posting of signage instructing drivers of diesel trucks to restrict idling to no more than five minutes, while DEIR Mitigation Measure MM 4.3-4 required the installation of infrastructure on site to provide for charging units at each truck docking station, thereby enabling TRUs to shut engines off and obtain power from the electric grid. Accordingly, the County finds that the DEIR's assumption that trucks, including TRUs, would only idle for a maximum of 15 minutes was supported by substantial evidence. Notwithstanding, revisions have been incorporated into the Project as described above in Subsection R.3, and the analysis of Project impacts has been revised throughout this RDEIR. Consistent with the methodology presented in Appendix F of CARB's *Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRU and TRU Generator Sets, and Facilities Where TRUs Operate*, the Project's revised HRA estimates that each TRU would spend approximately 3.3 hours per load at the facility, and that the TRU engine would operate 62.5% of the



time. Thus, it was estimated that for each two-way truck trip servicing the refrigerated warehouse portion of the Project, the TRU engines would operate for approximately 2.1 hours while parked at the loading docks, resulting in a total of up to 4 hours of idling when considering both on-site and off-site/regional travel. Thus, the revised HRA includes a highly conservative assumption regarding idling time for TRUs, particularly given that the Project would be subject to the maximum 5 minutes of idling required by CARB Rule 2485.

- N-18** Footnotes referenced in Comments N-15 through N-17 are acknowledged; no response is necessary.
- N-19** The commenter is referred to the revised analysis in RDEIR Subsection 4.3, which is based on the Project’s updated Air Quality Impact Analysis (“AQIA”; RDEIR *Technical Appendix B1*), updated Health Risk Assessment (“HRA”; RDEIR *Technical Appendix B2*), and a Supplemental HRA (“Supplemental HRA”; RDEIR *Technical Appendix B3*). Consistent with the Project’s updated Traffic Analysis (“TA”; RDEIR *Technical Appendix L3*), the Project’s AQIA and HRA assumed that there would be a total of 2,208 two-way truck trips associated with TRUs (Urban Crossroads, 2023a, p. 52). Please refer to the revised analysis included in RDEIR Subsection 4.3, *Air Quality*, which demonstrates that the Project’s localized air quality and health risk impacts would be less than significant with the incorporation of mitigation measures.
- N-20** The County disagrees with the commenter’s assertion that the DEIR underestimated the Project’s criteria pollutant emissions from TRUs. As noted in the appendices to the Air Quality Study that was circulated for public review with the DEIR, the emission factors for TRUs were derived from CARB’s “Off-road Diesel Emission Factors,” and did not rely on CalEEMod defaults (ECORP, 2020b, Appendix A). Regardless, the commenter is referred to the Project’s revised AQIA (RDEIR *Technical Appendix B1*). As noted in subsection 3.5.5 of the revised AQIA, the “...TRU calculations [in the revised AQIA] are based on EMISSIONS FACTOR MODEL version 2021 (EMFAC2021), developed by the CARB...the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with Project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations” (Urban Crossroads, 2023a, p. 52) Accordingly, and consistent with the analysis in the DEIR, the analysis of the Project’s criteria pollutant emissions in this RDEIR does not underestimate emission levels associated with the Project’s TRUs.
- N-21** For the reasons noted in the responses to Comments N-22 and N-24, the County disagrees with the commenter’s assertion that the noise analysis presented in the DEIR was flawed. This comment correctly cites the findings of the DEIR with respect to noise impacts; no further response is necessary.
- N-22** The commenter is referred to the revised analysis of the Project’s noise impacts in RDEIR Subsection 4.13, *Noise*. The revised analysis now discloses significant and unavoidable traffic-related noise



impacts along several roadway segments, depending on which Alternative Truck Route is implemented.

- N-23** Footnotes referenced in Comments N-17 through N-21 are acknowledged; no response is necessary.
- N-24** The County disagrees with the commenter’s assertion that the DEIR should have evaluated peak traffic-related noise levels, and not noise levels based on a 24-hour average (CNEL). The analysis of traffic-related noise impacts as presented in the DEIR was based on the Riverside County General Plan Noise Element standard, which identifies a threshold of significance of 65 dBA CNEL (Riverside County, 2019a, p. N-5). The thresholds of significance identified in the General Plan Noise Element and in the Noise Impact Analysis (NIA) that was circulated for public review with the DEIR are based on guidance from the Federal Interagency Committee on Noise (FICON). The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL). The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with the *State of California General Plan Guidelines* published by the Governor’s Office of Planning and Research (OPR), and guidance provided by both the Federal Highway Administration (FHWA) and Caltrans (OPR, 2017, Appendix D; FHWA, 2011, p. 9; Caltrans, 2009, p. 2-48). Accordingly, the noise analysis presented in Subsection 4.13 of the RDEIR continues to utilize thresholds of significance based on CNEL, consistent with the County’s General Plan and guidance from OPR, the FHWA, and Caltrans.
- N-25** Footnotes referenced in Comments N-22 and N-24 are acknowledged; no response is necessary.
- N-26** This comment correctly describes the truck routes as evaluated in the DEIR. Commenter is referred to the discussion of the Project’s current Alternative Truck Routes, summarized briefly above in Subsection R.3 and described in more detail in RDEIR Subsection 3.6.2.B. As noted, a total of six Alternative Truck Routes have been considered as part of this RDEIR, of which only three were found to be feasible (refer also to the discussion in RDEIR Subsection 3.6.2.B).
- N-27** Footnotes referenced in Comments N-24 and N-26 are acknowledged; no response is necessary.
- N-28** The commenter is correct that the DEIR that was circulated for public review did describe Ramona Expressway as an officially adopted City of Perris truck route. At the time the Project’s Notice of



Preparation (NOP) was circulated for public review in April 2020, Chapter 10.40 (Truck Routes) of the City of Perris Municipal Code identified Ramona Expressway as a truck route. The County understands that the City of Perris City Council adopted Ordinance No. 1413 in January 2022, which changed the list of designated truck routes within the City of Perris and eliminated Ramona Expressway as a designated truck route within the City. Please refer to Subsection R.3, which describes the six Alternative Truck Routes that are considered as part of this RDEIR, of which three Alternative Truck Routes were determined to be feasible. As indicated in Subsection R.3, prior to completion of the MCP all Project-related westbound truck traffic would be routed to the south and only would utilize officially-designated truck routes within the City of Perris, including San Jacinto Avenue and Redlands Avenue. Following completion of the MCP, all Project-related westbound truck traffic would utilize the MCP to access the I-215 freeway. Project-related truck traffic no longer would utilize Ramona Expressway to access I-215.

- N-29** An alternative truck route that would route truck traffic west along Nuevo Road and south along Dawson Road was considered, however it was rejected from detailed consideration as part of this RDEIR because the segment of Dawson Road between Nuevo Road and San Jacinto Avenue does not currently exist and would result in significant impacts to the San Jacinto River and would require an expansive bridge structure over the river that would not be financially feasible for the Project Applicant to construct. Moreover, this suggested alternative truck route is similar to what is described above in Subsection R.3 for Alternative Truck Route 5, except that Project-related truck traffic would be routed to the east along Nuevo Road and south on Menifee Road to access San Jacinto Avenue. Alternative Truck Route 5 was determined to be infeasible because it would require the Project Applicant to construct the I-215 Freeway/Evans Avenue interchange, which is not currently identified for funding or improvements by Caltrans. It would not be financially feasible for the Project Applicant to construct an entire interchange at this location, and as such Alternative Truck Route 5 was rejected from detailed consideration as part of this RDEIR. Commenter is referred to Alternative Truck Route 2, which is similar to Alternative Truck Route 5 except that it would route truck traffic south along Redlands Avenue to access the I-215 Freeway.
- N-30** Commenter is referred to the description of the Alternative Truck Routes considered as part of this RDEIR, as summarized above in Subsection R.3. As shown, a total of six Alternative Truck Routes have been considered, of which three were determined to be feasible. Impacts associated with Alternative Truck Routes 1, 2, and 6 are evaluated throughout relevant sections of this RDEIR (e.g., air quality, biological resources, etc.).
- N-31** Footnotes referenced in Comments N-26 and N-28 are acknowledged; no response is necessary.
- N-32** Comments describing the requirements under Assembly Bill 52 (AB 52) are acknowledged; please refer to the responses to Comments N-33 through N-37 for responses to the individual issues raised in these comments.



- N-33** Commenter is referred to the response to Comment N-11, which is responsive to this comment. As noted therein, the County made the determination that the Project would not result in significant impacts to TCLs based on the results of the County’s consultation with affected Tribes that did not result in requests for modification to the Project’s design or in the identification of any mitigation measures related to TCLs. Additionally, and as noted in the response to Comment N-11, the Project site does not meet the definition of a Tribal Cultural Resource pursuant to PRC Section 21074. Moreover, the County disagrees with the commenter’s assertion that because the Project would result in significant and unavoidable impacts to aesthetics, that the DEIR should have identified a significant impact to TCLs. Impacts to aesthetics are fully evaluated in RDEIR Subsection 4.1, which conservatively discloses a significant and unavoidable impact due to the change in land use from undeveloped/vacant lands to a light industrial, business park, and commercial retail development. The significant unavoidable impact in RDEIR Subsection 4.1 is unrelated to the Project’s potential impacts to Tribal Cultural Resources, which are instead evaluated in RDEIR Subsection 4.19. As noted above, the resources on the Project site (including the Project site itself) do not meet the definitions of PRC Section 21074, based on the results of the County’s consultation with affected Tribes; thus, the County finds that the RDEIR correctly concludes that Project impacts to Tribal Cultural Resources would be reduced to less-than-significant levels with implementation of the mitigation measures identified in RDEIR Subsection 4.4. Accordingly, no revision to the RDEIR is warranted pursuant to this comment.
- N-34** Footnotes referenced in Comments N-32 and N-33 are acknowledged; no response is necessary.
- N-35** Commenter is referred to the responses to Comments N-11 and N-33, which are responsive to this comment. As noted therein, and based on the results of the County’s SB 18 and AB52 consultation efforts with affected Tribes, the County finds that the Project site does not comprise a culturally-significant TCL. Accordingly, no revision to the RDEIR is warranted pursuant to this comment.
- N-36** Commenter appears to conflate reference sources used to evaluate potential impacts to aesthetics with the reference sources used to evaluate the Project’s potential impacts to cultural resources and tribal cultural resources. As documented in RDEIR Subsections 4.4 (Cultural Resources) and 4.19 (Tribal Cultural Resources), the analysis of potential impacts to cultural and tribal cultural resources was based on several site-specific technical studies prepared by ECORP and Brian F. Smith and Associates (BFSA), which are included as RDEIR *Technical Appendices D1* through *D5*, and also was based on consultation efforts between Riverside County and potentially affected Tribes pursuant to SB 18 and AB 52. The County finds that the Project’s potential impacts to Tribal Cultural Resources was conducted at the same level of analysis as was conducted for all issue areas, including Aesthetics, and further finds that the conclusion that Project impacts to TCLs would be less than significant is based on the substantial evidence presented in RDEIR Subsections 4.4 and 4.19 and based on the results of the Project’s Tribal consultation efforts pursuant to SB 18 and AB 52. Accordingly, no revision to the RDEIR is warranted pursuant to this comment. Please refer also to the response to Comment N-11.





- N-37** The County disagrees with the commenter’s assertion that the DEIR did not provide adequate analysis of potential cumulatively-considerable impacts to tribal cultural resources. First, and as discussed in detail in DEIR subsection 4.0.2, the cumulative study area for the issue of Tribal Cultural Resources was (and continues to be) based on the “summary of projections” approach, which considers full buildout of western Riverside County in conformance with the applicable general plans of agencies within western Riverside County. The analysis presented in the DEIR provided substantial evidence that impacts to Tribal Cultural Resources, including TCLs, would be less than significant, based on the results of consultation with local Native American Tribes and the results of the Project’s site-specific archaeological resources assessments (*Technical Appendices D1 through D5*). Notwithstanding, the analysis in RDEIR subsection 4.19.5 has been modified to include additional information demonstrating that impacts to Tribal Cultural Resources, including TCLs, would be less than significant with implementation of the mitigation measures identified in RDEIR Subsection 4.4.
- N-38** Footnotes referenced in Comments N-33 and N-35 through N-37 are acknowledged; no response is necessary.
- N-39** The County disagrees with the commenter’s assertion that the DEIR failed to incorporate all feasible mitigation measures. The County acknowledges the requirements of CEQA as described in this comment. Commenter is referred to the responses to Comments N-41 through N-44, N-46, N-49, and N-51, which address this comment.
- N-40** Footnotes referenced in Comments N-37 and N-39 are acknowledged; no response is necessary.
- N-41** The County disagrees with the commenter’s assertion that the Project site is “sited far from established transportation corridors,” as the Project site is located only 3.6 roadway miles from the I-215 Freeway and is situated along the Ramona Expressway, a major east-west thoroughfare within the County that ultimately is planned to be supplemented with the Mid-County Parkway (MCP). Commenter is referred to the response to Comment N-28, which provides an explanation as to why the project evaluated in the DEIR considered routing all westbound truck trips along Ramona Expressway to access the I-215 Freeway. As indicated therein, the Project evaluated in this RDEIR would not route any westbound truck traffic along Ramona Expressway, and would instead route westbound truck traffic to the south and along City of Perris designated truck routes, or along the MCP once constructed and operational.
- N-42** For the reasons noted in the response to Comment N-29, the County determined Alternative Truck Route 5 was rejected from detailed consideration in this RDEIR because it would require the Project Applicant to construct an interchange at I-215 Freeway and Evans Avenue, which would not be financially feasible.
- N-43** The County acknowledges that the proposed Project would generate a substantial amount of traffic. However, this comment appears to conflate the significant and unavoidable impacts due to Vehicle Miles Traveled (VMT) identified in the DEIR with the Level of Service (LOS) effects that would



have resulted from the project evaluated in the DEIR. The DEIR did not identify any significant and unavoidable impacts due to LOS. Pursuant to SB 743 and State CEQA Guidelines § 15064.3(a), "...a project's effect on automobile delay shall not constitute an environmental impact." As such, for purposes of CEQA, the projected LOS deficiencies at study area facilities identified by the Traffic Analysis included with the DEIR were not identified as significant impacts by the DEIR. The Traffic Analysis (TA) prepared in conjunction with this RDEIR (refer to RDEIR *Technical Appendix L3*) includes a full evaluation of the Project's effects on LOS, and identifies appropriate improvements, fair-share contributions, and fee program payments as necessary to achieve an acceptable LOS at all study area facilities. The County would condition the Project to implement all of the recommendations identified by the Project's TA. Thus, the County disagrees with the commenter's assertion that mitigation measures should have been identified in the DEIR to address the Project's effects on LOS, and no mitigation measures related to LOS have been incorporated as part of this RDEIR.

- N-44** The commenter asserts that Mitigation Measures MM 4.3-2 and MM 4.3-7 improperly omitted certain components of the Riverside County Board of Supervisors' Policy F-3 in DEIR Subsection 4.3, *Air Quality*. DEIR Subsection 4.3 evaluated potential impacts to air quality, and thus the mitigation in DEIR Subsection 4.3 was tailored to address the significant air quality impacts identified by the DEIR. Provision 2.5 of Policy F-3 was omitted from Mitigation Measure MM 4.3-2 because this provision is specifically related to noise impacts, and not air quality impacts. The requirements of Provision 2.8 of Policy F-3 were implicit in the monitoring requirements of Mitigation Measure MM 4.3-2 as such records are necessary for future contractors to ensure compliance with the provisions specified in Mitigation Measure MM 4.3-2. Similarly, the monitoring provisions of DEIR Mitigation Measure MM 4.3-2 required future construction contractors to permit periodic inspection of the construction site by the County of Riverside to ensure compliance with the measures identified in Mitigation Measure MM 4.3-2. Mitigation Measure MM 4.3-2 also implemented the requirements of Provision 2.2 of Policy F-3 by requiring all excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be CARB Tier 3 Certified engines or better. In addition, Mitigation Measure MM 4.3-7 included all applicable provisions of Policy F-3 relating to site operations, but excludes those items that already are mandatory pursuant to State laws and regulations (e.g., compliance with the CalGreen Code). Regardless, the analysis and mitigation presented in RDEIR Subsection 4.3 have been revised. Mitigation Measure MM 4.3-8 in RDEIR Subsection 4.3 has been revised to ensure full compliance with Policy F-3.
- N-45** Footnotes referenced in Comments N-41 through N-44 are acknowledged; no response is necessary.
- N-46** The County disagrees with the commenter's assertion that the DEIR failed to incorporate all feasible mitigation measures to address the Project's significant and unavoidable impacts due to regional emissions of criteria pollutants. The first seven bullet points for this comment describe mitigation measures for construction activities; however, as noted in the DEIR, with mitigation the Project's construction-related air quality impacts were shown to be less than significant. Pursuant to CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found



to be significant.” The first bullet point on Page 16 of this comment letter specifically relates to noise, and thus is not appropriate mitigation for the Project’s air quality emissions. With respect to bullet points 2 and 3 on Page 16, the Project as proposed does not include any site-specific applications, and DEIR Mitigation Measure MM 4.3-7(a) (RDEIR Mitigation Measure MM 4.3-8(a)) already requires the design of future buildings to provide for on-site parking, queuing, and truck check-in to preclude parking or idling on public streets located outside the Project boundaries. With respect to electric charging stations per bullet points 4 and 5 on Page 16, commenter is referred to DEIR Mitigation Measures MM 4.3-3 and MM 4.3-4, which addressed electric vehicle charging stations at docking stations, while all future plot plans within the Project site would be required to accommodate electric vehicle charging stations as required pursuant to the CalGreen electric vehicle requirements. With respect to bullet point 6, commenter is referred to DEIR Mitigation Measure MM 4.3-5, which included specifications to address air quality emissions from on-site cargo handling equipment. The County disagrees with the recommended measure in bullet point 7 on Page 16, as the majority of Project-related truck trips would consist of heavy-duty trucks, and it would not be feasible to implement or enforce a requirement requiring employees and other delivery trucks to use zero-emission vehicles. Moreover, the vast majority of the significant and unavoidable air quality impacts identified in the DEIR for operations was due to passenger vehicles (i.e., employee vehicles) and heavy trucks, and were not due to tenant-owned light- and medium-duty vehicles; thus, requiring future tenants to utilize zero-emission light- and medium-duty vehicles would not measurably reduce the emissions of NO<sub>x</sub> or ROG<sub>s</sub> as disclosed by the DEIR. The County also disagrees with the recommended measure in bullet point 8 on Page 16, as the Project already would have been conditioned to provide for renewable energy sources pursuant to DEIR Mitigation Measure MM 4.8-2, and the Project’s air quality emissions associated with energy sources comprises a very small proportion of the Project’s overall regional air quality emissions. The County finds that bullet point 9 on Page 16 would not serve to measurably reduce the Project’s regional air quality emissions, as emergency generators would be used rarely and only during power outages. The measure requested in bullet point 10 on Page 16 already was included as part of DEIR Mitigation Measure MM 4.3-7. With respect to bullet points 11 and 12 on Page 16, the Project already was required to comply with the CEC 2022 Building Energy Efficiency Standards, which incorporate a number of measures included in LEED Tier 2 in addition to energy efficient requirements that go beyond LEED Tier 2 requirements. Furthermore, CalGreen Tier 2 and LEED standards do not address mobile source emissions, while the majority of the CO and NO<sub>x</sub> emissions disclosed by the DEIR were the result of vehicular traffic, and in particular truck traffic. DEIR Mitigation Measure MM 4.3-7 also included a requirement to designate a Compliance Officer, which implements the requested measures from bullet point 14 on Page 16. The County also finds that mandating compliance with the EPA’s SmartWay program would be infeasible, although DEIR Mitigation Measure MM 4.3-6 did include a requirement to provide tenants with information regarding the availability of various programs, including the SmartWay program. Regardless, the analysis in RDEIR Subsection 4.3 has been revised, and new/modified mitigation measures have been included as part of this RDEIR to ensure the Project reduces its regional air quality impacts to the maximum feasible extent. Based on revisions made to the Project as described above in Subsection R.3, the Project now includes approximately 13.1% less Light Industrial building area than was evaluated in the RDEIR, which in



turn results in a substantial reduction in the Project's emissions of criteria pollutants. Commenter is referred to the revised analysis presented in RDEIR Subsection 4.3, *Air Quality*.

- N-47** Footnotes referenced in Comments N-44 and N-46 are acknowledged; no response is necessary.
- N-48** The County disagrees with the commenter's assertion that mitigation should have been imposed requiring the use of conservation easements to reduce the Project's impacts to important farmlands. The County finds that agricultural conservation easements would not serve to reduce the Project's significant impacts to important farmlands for the reasons cited in DEIR Subsections 4.2.7 and 4.2.8. Furthermore, at the time the Project's DEIR was published and circulated for public review, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) classified the Project site as containing approximately 297.8 acres of "Prime Farmland," approximately 24.6 acres of "Farmland of Statewide Importance," approximately 4.0 acres of "Unique Farmland," and approximately 180.3 acres of "Farmland of Local Importance." However, since that time, the agricultural classifications applied to the Project site have changed. As documented in RDEIR Subsection 4.2, *Agriculture and Forestry Resources*, the Project site now is classified as containing approximately 535.1 acres of "Farmland of Local Importance" and approximately 47.6 acres of "Grazing Land." "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." Thus, the Project site does not contain any "Farmland" as mapped by the FMMP. Furthermore, and based on a site-specific Land Evaluation and Site Assessment (LESA) technical report (RDEIR *Technical Appendix S*), based on the existing conditions of the Project site and surrounding areas, the Project site is determined to have a relatively low value for agricultural production, further demonstrating that the Project site does not contain any areas of important farmland types. The analysis in RDEIR Subsection 4.2 has been revised and now shows a less-than-significant impact to Farmland. Pursuant to CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found to be significant." Thus, mitigation measures are not required for the Project's less-than-significant impacts to Farmland.
- N-49** The County disagrees with the commenter's assertion that mitigation measures should be identified for Project impacts to tribal cultural resources. Commenter is referred to the responses to Comments N-11 and N-33 through N-37, which provide detailed responses and provides additional substantial evidence demonstrating that the Project's impacts to tribal cultural resources, including TCLs, would be less than significant with implementation of the mitigation measures identified in RDEIR Subsection 4.4. Pursuant to CEQA Guidelines § 15126.4(a)(3), "[m]itigation measures are not required for effects which are not found to be significant." Thus, because the RDEIR provides substantial evidence that impacts to tribal cultural resources would be less than significant with the mitigation previously presented in the DEIR, no additional mitigation is warranted to address the Project's less-than-significant impacts (with mitigation) to tribal cultural resources.
- N-50** Footnotes referenced in Comments N-48 and N-49 are acknowledged; no response is necessary.



- N-51** The County disagrees with the commenter’s assertion that the mitigation identified in the DEIR for potential impacts to known and previously-undiscovered archaeological resources was inadequate. DEIR Mitigation Measure MM 4.5-1 already required consultation with Native American tribes on the disposition of any resources identified on site, and the identified mitigation was determined to be appropriate as a result of the County’s Native American consultation efforts pursuant to SB 18 and AB 52. No revision to the RDEIR is warranted pursuant to this comment.
- N-52** For the reasons noted above, the County disagrees with the commenter’s assertion that the DEIR was inadequate and failed to fully evaluate and mitigate the Project’s significant environmental effects. The County will contact the Attorney General’s office with any questions related to this comment letter.



COMMENT LETTER O

July 14, 2022

**Advocates for the Environment**

A non-profit public-interest law firm  
and environmental advocacy organization



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

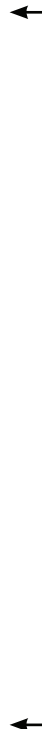
Via U.S. Mail and email to [rbrady@rivco.org](mailto:rbrady@rivco.org)

re: Comments on Stoneridge Commerce Center, SCH Number 2020040325

Dear Mr. Brady:

Advocates for the Environment has reviewed the Draft Program Environmental Impact Report (D-PEIR or DEIR) for the proposed Stoneridge Commerce Center (Project) and now submits the below comments regarding California Environmental Quality Act (CEQA) violations. Advocates for the Environment is a public interest law firm and advocacy organization with the mission to educate the public about the law as it pertains to the environment and provide legal services in support of environmental causes. Therefore, it is within the scope of Advocates for the Environment’s mission to provide comments on the development of this project, especially because the DEIR reflects potential issues of non-compliance with CEQA regarding greenhouse gases (GHGs).

The Project is in the western portion of unincorporated Riverside County. The Project requires a General Plan Amendment (GPA190008), amendment to the Stoneridge Specific Plan No. 239 (SP00239A01), and a Change of Zone (CZ1900024). The DEIR proposes two separate land use plan alternatives for the 582.6-acre site, based upon whether a regional transportation facility, Mid-County Parkway (MCP), will be built through the Project site. The first of the alternatives anticipates that the MCP would not be constructed through the property, in which case the site would be developed with up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail, Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres (Primary Land Use Plan). The second alternative anticipates that the MCP would be constructed through the northwest portions of the site, in which case the site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, 8.5 acres of Commercial Retail land uses, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways (Alternative Land Use Plan).



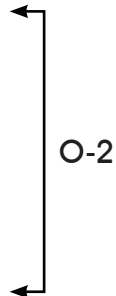
O-1

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 [dw@aenv.org](mailto:dw@aenv.org)



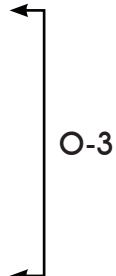
**GHG Significance Analysis**

The Primary Land Use Plan anticipates operational emissions of 179,382 MTCO<sub>2</sub>e, and the Alternative Land Use Plan projects emissions of 177,107 MTCO<sub>2</sub>e/year. Evidence in the record before the County indicates that the Project is inconsistent with applicable plans and policies designed to reduce GHG emissions, and failed to fall within the adopted significance thresholds, and therefore the County should have concluded that the Project has a significant GHG impact. Instead, the County concluded that if 100 points were achieved with the CAP Screening Tables, that there would be no significant GHG impact, without committing to achieving 100 points. The County did not determine significance before mitigation and rather included the effects of mitigation in its determination of significance in order to declare that the Project would have no significant GHG impact.

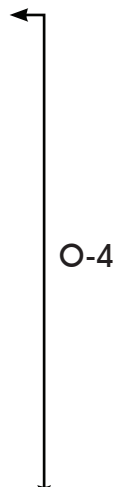


**Inappropriate Deferral of Significance Conclusion**

An EIR must determine significance on the project and its inherent design features alone before incorporating mitigation measures, and it is not permissible to “compress[] the analysis of impacts and mitigation measures into a single issue” (*Lotus v. Dep’t of Transportation* (2014) 223 Cal. App. 4th 645, 656.) Here, the DEIR impermissibly incorporated mitigation before determining significance to conclude that the Project would not have significant GHG impact. The DEIR stated that the project has the “potential” for significant impact if it does not achieve 100 points on the Screening Tables, equivalent to 49% reductions, without committing to actually achieving such emissions reductions. This is not the same as a clear finding of significant impact.



The County of Riverside Climate Action Plan (CAP) aims to reduce GHG emissions from development projects under County jurisdiction. The CAP builds on state and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and statewide post-2030 reduction goals. At 179,382 MT CO<sub>2</sub>e/year of operational emissions for the Primary Land Use Plan, or alternatively 177,107 MT CO<sub>2</sub>e/year for the Alternative Land Use Plan, the Project greatly exceeds the screening threshold of 3,000 MTCO<sub>2</sub>e/year, meaning that additional analysis was required. Accordingly, the county adopted the CAP Update as a significance threshold, by implementing the CAP Update Screening Tables (**Screening Tables**) which establish categories of GHG Implementation Measures to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated in development projects. Under each implementation Measure category, mitigation or project design 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 (purportedly equivalent to an approximate 49 percent reduction in GHG emissions) are considered to be consistent with the GHG emissions reduction quantities anticipated in the County’s GHG Technical Report. To make a finding of no significant GHG impact under this





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adopted threshold, the Project is required to demonstrate how the project would reduce GHG emissions to below 3,000 MTCO<sub>2</sub>e/year if it cannot garner 100 points through the Screening Tables.

Therefore, because the Project exceeds the significance threshold and lacks specification for how it will implement the 100 points necessary to be below the threshold, the DEIR should have concluded that the Project's GHG impacts would be significant.

**Inconsistent with Applicable Plans**

There is second reason why the Project would have a significant GHG impact, and that is because it conflicts with applicable goals, plans, and policies for the reductions of GHG emissions.

First, the County incorrectly concludes that the Project does not conflict with the CAP. To be on track to meet Riverside's emissions targets, because the Project exceeds 3,000 MTCO<sub>2</sub>e per year, it must achieve must demonstrate consistency with the CAP by garnering at least 100 points on the Screening Tables. The Applicant did not commit to any of the point-generating project features. Therefore, there is no showing that the Project will achieve 100 points, or how so. In fact, the DEIR contemplates "if the Project were unable to achieve 100 points," indicating that there is no guarantee that it would do so, especially given the lack of specifying which features it would implement to reach 100 points. Therefore, the Project is inconsistent with the CAP.

Second, the GHG significance analysis compared the Project with AB32 and the CARB 2008 Scoping Plan, but these policies cannot be applicable because the AB32 goal was for 2020 and it has already passed; the goal has been achieved, so that policy is irrelevant.

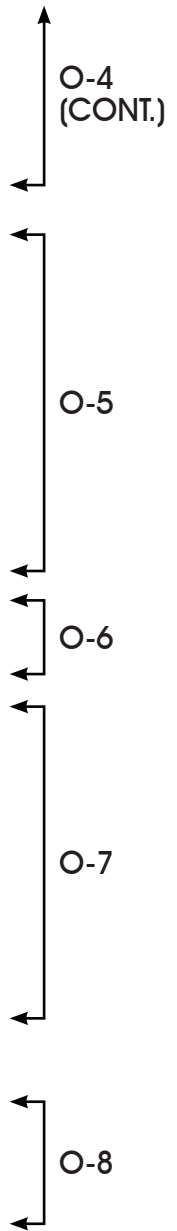
Third, the Project is inconsistent with SB32, which sets out the goal of 40% below 1990 levels by 2030. Riverside county's total emissions amounted to 1,901,458 MTCO<sub>2</sub>e in 1990 (City of Riverside Baseline Greenhouse Gas Emissions 2010, p. ii). This would mean that by 2030, which also happens to be the first operational year of the Project, Riverside County should achieve annual emissions of less than 1,140,874.80 MTCO<sub>2</sub>e to be consistent with SB32. There are approximately a thousand warehouses in Riverside County.<sup>1</sup> So it would be reasonable that the Project's fair share of emissions is no higher than 1,140.87 to be on track with the goal.<sup>2</sup> However, even the lower-emitting Alternative Land Use Plan would exceed this goal 155 times over.<sup>3</sup> In other words, the GHG emissions of the Project make up 15% of Riverside's total emissions,<sup>4</sup> so if there were only six other similar warehouses in the County, it would exceed the goal set out by SB32. There is no showing that SB32 is consistent with the Project.

<sup>1</sup> [https://www.ca-ilg.org/sites/main/files/file-attachments/resources\\_Final\\_Riverside\\_Community\\_GHG\\_Emissions\\_Inventory\\_072610.pdf](https://www.ca-ilg.org/sites/main/files/file-attachments/resources_Final_Riverside_Community_GHG_Emissions_Inventory_072610.pdf)1451431582

<sup>2</sup> 1,140,874.80 / 1000 = 1,140.87. This would be a conservative estimate because it assumes that warehouses make up the entirety of Riverside's emissions. Incorporating other sources would mean that the fair share of the Project is even lower.

<sup>3</sup> 177,107 MTCO<sub>2</sub>/year ÷ 1,140.87 MTCO<sub>2</sub>/year = 155.23

<sup>4</sup> 177,107 MTCO<sub>2</sub> ÷ 1,140,874.80 MTCO<sub>2</sub>/year = 15.52%







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Fourth, although the DEIR included a table which demonstrated how the Project would not conflict with certain provisions in the 2017 CARB Scoping Plan, both the Primary Project and the Alternative Project would be inconsistent with the emissions targets laid out by the 2017 CARB Scoping Plan, including annual emissions of 6 MTCO<sub>2e</sub>/capita by 2030, and 2 MTCO<sub>2e</sub>/capita by 2050 (CARB 2017 Scoping Plan, p. 99). Here, the Primary Land Use Plan anticipates 10,256 employees, whereas the Alternative Land Use Plan accounts for 10,044 employees. The Primary Project’s per-capita emissions would be about 17.86 MTCO<sub>2e</sub>/capita each operating year, and the Alternative Project would be about 17.63 MTCO<sub>2e</sub>/capita each operating year<sup>5</sup> As this is about three times the 2030 goal of 6 MTCO<sub>2e</sub>/capita, there is a fair argument that this inconsistency demonstrates significant GHG impact.

O-9

The DEIR should be updated to reflect consistency not only with the identified applicable plans, but also other applicable plans that it disregarded. Specifically, for the Project’s impacts to be insignificant, the Project must be consistent with B-55-18, because it is an applicable plan which aims to achieve carbon neutrality by 2045. As this Project requires industrial storage and transportation using large vehicles, with no plans of reducing or offsetting emissions to zero by 2045, the County has made no demonstration of consistency with B-55-15.

O-10

This apparent inconsistency with applicable plans demonstrates that the County should make a finding of significant impact.

**“Fair Share” Mitigation**

Cumulative impacts must be analyzed under CEQA using a heightened standard. The finding of Significant Cumulative Impact requires “fair share” mitigation, not “all feasible” mitigation. (*Napa Citizens for Honest Gov’t v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) As applied here, fair share is the entirety of the Project’s emissions. Essentially, rather than mitigating only to the point of “no significant impact,” the DEIR should include mitigation of all Project emissions.

O-11

Building requirements are not sufficient to mitigate to the fair share extent, especially given mobile source emissions. Mitigation 4.8-1 requires the lead agency to incorporate “specific construction measures” in order to achieve 100 points on the Screening Tables, which the DEIR claims would be the rough equivalent of a 49% reduction in GHG emissions. However, because the DEIR did not specify which of the available point-system measures would be done to achieve such reductions, this is improper deferral of mitigation, and it is unknown whether the Project will actually achieve it due to lack of commitment to specific measures. The DEIR leaves open the possibility that the Project is unable to achieve 100 points, indicating that the 100-point reduction is not necessarily going to occur. Therefore, there is no demonstration that the mitigation identified represents the

O-12

<sup>5</sup>179,382 MTCO<sub>2e</sub> ÷ 10,044 people = 17.86 MTCO<sub>2e</sub>/capita  
177,107 ÷ 10,044 people = 17.63 MTCO<sub>2e</sub>/capita

O-13



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Project's fair share, and the Project should adopt further mitigation as feasible to reduce to the fair share extent. At the very least, choosing several of the measures listed in the Screening Tables to commit to as independent Mitigation Measures in the DEIR would be better than leaving it speculative and uncertain.

O-12  
(CONT.)

**Inadequate Discussion of Alternatives**

To be compliant with CEQA, "the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." (CEQA Guidelines § 15126.6 (c).)

**Insufficient Discussion of the Reduced Project Alternative**

Here, there was not a sufficient discussion of the Reduced Project Alternative to be able to evaluate what the impact would be, especially in comparison to the No Project Alternative and the proposed Project itself. The statement that the "level of impact" due to GHGs would be "similar" to the Project itself does not provide enough information from which to make an informed decision. It lacks specificity in how "similar" it would be and what are some of the ways that GHG would be reduced through the reduction in area. Therefore, it is misleading and confusing, and does not contribute to a meaningful analysis of the Reduced Project Alternative.

O-14

**Range of Alternatives Is Unreasonable**

The DEIR did not include a reasonable range of feasible alternatives. (See *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) 47 Cal. 3d 376, 407; CEQA Guidelines § 15126.6(a)). The standard for determining reasonability is "whether the alternatives discussion encourages informed decision-making and public participation" (*Cal. Oak Found. v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 276).

The DEIR contemplated three project alternatives, including a "No Development Alternative," "No Project Alternative," and a "Reduced Project Alternative," which would result in a reduction of building area allowed on site by approximately 30% as compared to the proposed Project. This is an insufficient range of alternatives because there are other feasible alternatives that would be able to achieve certain project goals while also reducing the impact on the environment. In particular, several unique resources exist on the site which are identified but not accounted for in the range of alternatives, including wetland habitat and prime farmland, discussed below.

O-15

**Wetland Preservation Alternative**

The Project site contains 22.45 acres of federal wetland waters. The alternatives discussion should include an alternative that aims to preserve wetland and riparian habitat, to the extent feasible. Most project objectives could still be met in an alternative that aimed to achieve habitat preservation

O-16



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goals or otherwise avoided to develop on the wetland portions of the Project site. Not only would this reduce biological impact, potentially below significant impact, but it could also reduce GHG impact because healthy wetlands can sequester GHGs.

O-16  
(CONT.)

**Farmland Preservation Alternative**

The Project site is located on farmland, including four acres of "Unique Farmland," and 180.3 acres of "Farmland of Local Importance." Given this unique environmental resource, it would be reasonable to have at least one alternative that accounts for the loss of farmland and sets aside at least the four acres of unique farmland and perhaps more farmland as feasible to ensure that it is contributing to California's agricultural production and stabilizes soil health for the long-term.

O-17

**Conclusion**

To conclude, the DEIR should be updated to reflect a finding of significant GHG impact *before* mitigation, and subsequently it should be mitigated to the "fair share" extent (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364). Please put Advocates for the Environment on the list of interested parties to receive updates about the progress of this potential project approval.

O-18

Sincerely,

Dean Wallraff, Attorney at Law  
Executive Director, Advocates for the Environment



## Letter O Advocates for the Environment

- O-1** The County acknowledges and appreciates the comments provided by Advocates for the Environment. While this comment accurately describes the project evaluated in the DEIR, please refer to Subsection R.3, above, for a description of changes that have been incorporated into the Project since the DEIR was circulated for public review.
- O-2** The County disagrees with the commenter's assertion that the project evaluated in the DEIR was inconsistent with applicable plans and policies designed to reduce greenhouse gas (GHG) emissions and failed to fall within the identified thresholds of significance. The analysis in DEIR Subsection 4.8 was based on guidance from the South Coast Air Quality Management District (SCAQMD). Based on guidance from SCAQMD, projects that are consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review are considered to have less-than-significant impacts due to GHG emissions. The analysis in DEIR Subsection 4.8 demonstrated that with implementation of Mitigation Measure MM 4.8-1 and 4.8-2 the Project would be fully consistent with the Riverside County Climate Action Plan (CAP) Update. Thus, the DEIR properly concluded that the project evaluated in the DEIR would result in less-than-significant impacts due to GHGs because it would be required to fully comply with all applicable provisions of the CAP Update. The County also disagrees with the commenter's assertion that the DEIR did not commit the Project Applicant to specific measures identified in the CAP Update screening tables. The project evaluated in the DEIR consisted of applications for a General Plan Amendment (GPA), Change of Zone (CZ), and Specific Plan Amendment (SPA), and did not include any site-specific design elements. As the majority of the measures identified in the CAP Update screening tables relate to design that will not be known until future plot plan or conditional use permit applications are approved by the County, the County finds that DEIR Mitigation Measure 4.8-1 provided an enforceable requirement that all future implementing developments within the Project site must achieve a minimum of 100 points per Appendix D to the CAP Update screening tables. Please refer to the revised analysis of potential impacts due to GHGs as presented in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*. As noted in the revised discussion and analysis, the County's Climate Action Plan (CAP) Update qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although RDEIR Subsection 4.8 acknowledges that the Project would exceed the CAP Update screening threshold of 3,000 MTCO<sub>2</sub>e/yr, Mitigation Measures MM 4.8-1 and MM 4.8-2 have been imposed on the Project and would ensure that the proposed Project is fully consistent with the CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporate measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, the revised analysis concludes that with implementation of



Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the CAP Update and the Project's cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Because impacts would be reduced to less-than-significant levels by the identified mitigation measures, no additional mitigation measures are required (see CEQA Guidelines § 15126.4(a)(3)).

- O-3** The County disagrees with the commenter's assertion that the DEIR improperly deferred providing a significance conclusion for impacts due to GHG emissions. The text in subsection 4.8.6 of the DEIR clearly indicated that impacts under Thresholds a. and b. would comprise a "Significant Cumulatively-Considerable Impact." The text following this statement simply provides a rationale for the County's determination that the impacts would be significant prior to mitigation. Thus, the County finds that the DEIR did include a clear finding of a significant impact (prior to mitigation). The County also disagrees with the commenter's assertion that the mitigation identified in the DEIR did not commit to "actually achieving...emissions reductions" for the reasons noted in the response to Comment O-2.
- O-4** While the County agrees with the commenter that the GHG emissions associated with the project evaluated in the DEIR would have exceeded the CAP Update screening threshold of 3,000 MTCO<sub>2e</sub>/year, this comment grossly distorts the purpose of the CAP Update screening threshold. As clearly stated on Page 1 of the CAP Update, "A threshold level above 3,000 MT CO<sub>2e</sub> per year will be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions." There is no requirement in the CAP Update specifying that all development projects must reduce GHG emissions to below 3,000 MTCO<sub>2e</sub>/year. Rather, the CAP Update is clear that "[p]rojects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions" (Riverside County, 2019a, pp. 1, 7). In addition, the County finds that the mitigation measures presented in the DEIR provided performance-based standards that would have ensured that any future development within the Project site would be required to achieve a minimum of 100 points pursuant to the CAP screening tables, thereby ensuring impacts due to GHGs would be reduced to less-than-significant levels. Commenter also is referred to the revised analysis of potential impacts due to GHGs as presented in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*. As noted in the revised discussion and analysis, the County's Climate Action Plan (CAP) Update qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although RDEIR Subsection 4.8 acknowledges that the Project would exceed the CAP Update screening threshold of 3,000 MTCO<sub>2e</sub>/yr, Mitigation Measures MM 4.8-1 and MM 4.8-2 have been imposed on the Project and would ensure that the proposed Project is fully consistent with



the CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporate measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, the revised analysis concludes that with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the CAP Update and the Project's cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Because impacts would be reduced to less-than-significant levels by the identified mitigation measures, no additional mitigation measures are required (see CEQA Guidelines § 15126.4(a)(3)).

- O-5** For the reasons noted in the responses to Comments O-2 through O-4, the commenter is misrepresenting the requirements of the CAP Update and is incorrect in asserting that the mitigation measures presented in the DEIR did not commit future implementing developments within the Project site to achieve a minimum of 100 points per the CAP Update screening tables. As noted, the CAP Update threshold of 3,000 MTCO<sub>2e</sub> is a screening threshold to identify projects that either need to achieve 100 points per the CAP Update screening tables or that need to provide additional analysis to demonstrate that GHG emissions reductions would be equal to or greater than that which would be achieved through the screening tables. DEIR Mitigation Measures MM 4.8-1 and MM 4.8-2 provided specific and enforceable requirements to ensure full compliance with the CAP Update. As noted by the County's CAP Update, achieving 100 points pursuant to the CAP Screening Tables would assist Riverside County in achieving a reduction in GHG emissions of approximately 49%. In addition, and as noted in the revised discussion and analysis presented in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*, the County's Climate Action Plan (CAP) Update qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions," pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Although RDEIR Subsection 4.8 acknowledges that the Project would exceed the CAP Update screening threshold of 3,000 MTCO<sub>2e</sub>/yr, Mitigation Measures MM 4.8-1 and MM 4.8-2 have been imposed on the Project and would ensure that the proposed Project is fully consistent with the CAP Update by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporate measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Although Mitigation Measure MM 4.8-1 affords flexibility in terms of which measures ultimately would be implemented pursuant to the CAP Update Screening Tables, Table ES-2 of the Project's Air Quality Impact Analysis ("AQIA"; RDEIR *Technical Appendix B1*) identifies a list of potential measures that could be implemented to achieve the required 100 points per the Screening Tables. No future implementing plot plans or conditional use permits would be approved unless it can be demonstrated that a minimum of 100 points has been achieved per the CAP Update Screening Tables, or unless additional analysis and CEQA compliance is conducted. Accordingly,



the revised analysis presented in this RDEIR properly concludes that with implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2, the Project would be fully consistent with the CAP Update and the Project's cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels. Because impacts would be reduced to less-than-significant levels by the identified mitigation measures, no additional mitigation measures are required (see CEQA Guidelines § 15126.4(a)(3)).

**O-6** While the commenter is correct that the DEIR did include an analysis of consistency with AB 32 and the CARB 2008 Scoping Plan, the commenter fails to note that the DEIR also included an analysis of consistency with SB 32 and the CARB 2017 Scoping Plan. While true that the GHG reduction target identified by AB 32 was achieved prior to 2020, it is unclear from this comment how the DEIR's evaluation of consistency with AB 32 and the CARB 2008 Scoping Plan renders the Project inconsistent with any applicable plan, policy, or regulation adopted to reduce emissions of GHGs. Notwithstanding, the analysis of Threshold b. in RDEIR Subsection 4.8, *Greenhouse Gas Emissions*, has been revised to include a discussion and analysis of SB 32/CARB 2017 Scoping Plan, SB 32/CARB 2022 Scoping Plan, and the Riverside County CAP Update.

**O-7** The County disagrees with the commenter's assertion that the Project would be inconsistent with SB 32 based on the level of GHG emissions associated with the Project. The CAP Update establishes a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050. As noted by the CAP Update:

*“Reduction measures provided [in the CAP Update] would ensure that Riverside County meets the reduction target of reducing to 49 percent below 2008 levels (3,576,598 MT CO<sub>2e</sub>) by 2030 and 83 percent below 2008 levels (1,192,199 MT CO<sub>2e</sub>) by 2050....**Even with the anticipated growth**, the modernization of vehicle fleets, combined with the continued implementation of the proposed measures, will reduce GHG emissions by approximately 3,934,131 MT CO<sub>2e</sub> from 2030 levels and 10,742,295 MT CO<sub>2e</sub> from 2050 levels [emphasis added]. Therefore, the implementation of the State measures combined with Riverside County's R2 measures will reduce GHG emissions down to 2,434,649 MT CO<sub>2e</sub> by year 2030, which is 1,141,949 MT CO<sub>2e</sub> below the reduction target, and 562,730 MT CO<sub>2e</sub> by 2050, which is 629,469 MT CO<sub>2e</sub> below the reduction target.”* (Riverside County, 2019a, p. 6-2)

All applications for development projects within Riverside County would be subject to compliance with the CAP Update, or would otherwise be required to demonstrate through a project-level analysis that mitigation measures have been incorporated to achieve or exceed the level of emissions reductions anticipated by the CAP Update. As noted by the CAP Update, the County is expected to achieve the GHG reduction mandates set forth by SB 32 even with growth anticipated with buildout of the Riverside County General Plan. In addition, the commenter's assertion that there is no analysis of consistency with SB 32 is erroneous; commenter is referred to DEIR page 4.8-30 and DEIR Table 4.8-7, which demonstrated that the project evaluated in the DEIR would have been consistent with



the GHG reduction mandates of SB 32 with compliance with the CAP Update. No revision to the RDEIR is warranted pursuant to this comment.

- O-8** Footnotes referenced in Comment O-7 are acknowledged; no response is necessary.
- O-9** The County disagrees with the commenter’s assertion that the project evaluated in the DEIR would have conflicted with the 2017 CARB Scoping Plan for the reasons noted above in the responses to Comments O-2 through O-7. As noted, the CAP Update was designed to achieve the reduction mandates of SB 32 and the goals of the 2017 CARB Scoping Plan. While true that the project evaluated in the DEIR would have resulted in a high GHG emissions on a per capita basis (i.e., by dividing total GHG emissions by the number of employees), it is important to note that the per capita target identified by 2017 Scoping Plan is intended to be applied throughout a local government’s jurisdiction, and is not intended to be applied to an individual development project. Because the project evaluated in the DEIR would have been consistent with the CAP Update after the implementation of mitigation measures, and because the CAP Update demonstrates that the County would achieve the reduction mandates of SB 32, the DEIR properly concluded that impacts due to a conflict with SB 32 and the 2017 CARB Scoping Plan would be less than significant. Notwithstanding, the analysis in RDEIR Subsection 4.8 has been revised, and now also demonstrates that the Project would be consistent with the 2022 version of the CARB Scoping Plan.
- O-10** The County finds that the DEIR included an evaluation of consistency with all applicable plans and policies related to the reduction of GHGs, and disagrees with the commenter’s insinuation that the DEIR “disregarded” consistency with any such plan or policy. Commenter makes reference to Executive Order (EO) B-55-18, which establishes a “goal” to achieve carbon neutrality and is not a plan, policy, or regulation adopted for the purposes of reducing the emissions of GHGs. Furthermore, EO B-55-18 clearly indicates that the goal established by this Executive Order would be achieved, in part, through “future” Scoping Plans developed by CARB, and no such updated Scoping Plan was available at the time the DEIR was circulated for public review. Thus, no analysis of consistency with EO B-55-18 is required pursuant to the State CEQA Guidelines. Commenter also makes reference to Executive Order B-55-15, which is understood to mean EO B-55-18. Notwithstanding, the analysis in RDEIR Subsection 4.8 has been revised and now includes a discussion of the Project’s consistency with the 2022 CARB Scoping Plan Update, which addresses the reduction goal specified by EO B-55-18. Thus, consistency with the 2022 CARB Scoping Plan Update also would demonstrate that a project is consistent with the GHG reduction goal established by EO B-55-18.
- O-11** The County disagrees with the commenter’s assertion that mitigation is required for all emissions generated by a development project, even for projects where impacts were determined to be less than significant. Pursuant to CEQA Guidelines § 15126.4(a)(3), “[m]itigation measures are not required for effects which are not found to be significant.” Thus, the commenter is incorrect in asserting that mitigation measures are required for impacts that are determined to be less than significant (with or without mitigation). Notwithstanding, the analysis in RDEIR Subsection 4.8 has been revised; please refer to the revised list of mitigation measures presented in RDEIR Subsection 4.8.





- O-12** The County disagrees with the commenters assertion that because the DEIR did not identify specific measures from the CAP Update screening tables, the mitigation for GHG emissions was improperly deferred. The project evaluated in the DEIR consisted of applications for a GPA, CZ, and SPA. The project evaluated in the DEIR did not include any site-specific applications. The majority of the measures listed in the CAP Update screening tables relate to site-specific design. For example, the measures listed under Reduction Measure R2-EE10 relate to design features such as insulation and windows that will not be known until applications are filed in the future for implementing Plot Plans. As part of the County’s review of the implementing Plot Plans, the County would require the applicant to provide a list of feasible measures from the CAP Update screening tables that would achieve the minimum 100 points pursuant to the CAP Update screening tables, and future implementing Plot Plans would be conditioned to require that the CAP Update screening table measures have been incorporated into building plans required as part of building permit applications. In the event that future implementing Plot Plan applications are unable to demonstrate the ability to achieve a minimum of 100 points pursuant to the CAP Update, then the County would review the Plot Plan applications against the criteria listed in CEQA Guidelines Section 15164(a) and (b). In the event that the inability to achieve the 100 points pursuant to the CAP Update screening tables would result in new or more severe impacts due to GHGs than disclosed by the DEIR, then the County would have required the preparation of a Subsequent or Supplemental EIR pursuant to State CEQA Guidelines Section 15162(a). Thus, all future developments within the Project site would have been required to achieve the 100 points per the CAP Update screening tables, pursuant to DEIR Mitigation Measure MM 4.8-1, or likely would have triggered the need for a Subsequent or Supplemental EIR. The County further finds that the mitigation identified in the DEIR provided performance-based standards and did not represent “deferred mitigation” under CEQA. No revisions to the RDEIR are warranted pursuant to this comment.
- O-13** Footnotes referenced in Comment O-9 are acknowledged; no response is necessary.
- O-14** The County disagrees with the commenter’s assertion that the analysis of the Reduce Project Alternative (RPA) in DEIR Section 6.0 did not provide sufficient discussion as required by the State CEQA Guidelines, and the commenter misconstrues the analysis presented. The analysis provided sufficient information to enable an analysis and comparison of GHG impacts under the RPA as compared to the project evaluated in the DEIR. As indicated on page 6-27 of the DEIR, “Under the RPA, there would be a reduction in building area on site by approximately 30% as compared to the proposed Project. As such, there would be an approximate 30% reduction in the amount of GHGs produced on site during both construction and long-term operations.” The conclusion statement that indicates that the “level of impact would be similar” is correct because both the RPA and the project evaluated in the DEIR would have resulted in less-than-significant impacts due to GHG emissions with mandatory compliance with the County’s CAP Update, thereby indicating that the level of impact after mitigation would be similar. No revision to the RDEIR is warranted pursuant to this comment.



- O-15** The County disagrees with the commenter’s assertion that the DEIR failed to consider a reasonable range of alternatives. As stated by State CEQA Guidelines Section 15126.6(c), “[t]he range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” As disclosed by the DEIR, the significant and unavoidable impacts were due to aesthetics, agriculture/forestry resources, air quality (regional operational emissions), noise (transportation-related), and transportation (due to Vehicle Miles Traveled [VMT]). The DEIR included a reasonable range of alternatives that meet the requirements of State CEQA Guidelines Section 15126.6(c). Specifically, the RPA would result in reduced impacts to air quality, noise, and transportation as compared to the project evaluated in the DEIR, while the “No Development Alternative (NDA)” would completely avoid all of the Project’s significant and unavoidable impacts to the environment, including unavoidable impacts to aesthetics and agriculture/forestry resources as disclosed by the DEIR. This comment does not identify any additional alternatives that would meet the requirements specified by State CEQA Guidelines Section 15126.6(c) and that would serve to reduce the significant and unavoidable effects. Accordingly, no revision to the RDEIR is warranted pursuant to this comment, although the commenter is referred to the revised analysis of the Project’s impacts as presented in RDEIR Section 4.0, which incorporates revisions to address the changes made to the Project as previously described in Subsection R.3.
- O-16** The County disagrees with the commenter’s suggestion that a Wetland Preservation Alternative (WPA) should have been considered in the DEIR. First, it is noted that this comment implies that impacts to jurisdictional waters and wetlands would be as high as 22.45 acres; commenter is referred to the analysis presented in DEIR Subsection 4.4, *Biological Resources*, which indicates that all 21.30 acres of disturbed alkali playa (i.e., 21.30 acres of the 22.45 acres of wetland referenced by this comment) would be completely avoided by the project evaluated in the DEIR, and the project evaluated in the DEIR would have result in impacts to only 0.16-acre of wetlands. Furthermore, the WPA would not meet the requirement of State CEQA Guidelines Section 15126.6(c), as the WPA would not “...avoid or substantially lessen one or more of the significant effects” of the project evaluated in the DEIR. As demonstrated in DEIR Subsection 4.4, all of the impacts to biological resources, including impacts to wetlands, would have been reduced to less-than-significant levels with implementation of the mitigation measures identified in DEIR Subsection 4.4. Accordingly, the County finds that analysis of a WPA in the DEIR was not necessary, and further rejects detailed consideration of the WPA in this RDEIR for the reasons cited above. Accordingly, no revisions to the RDEIR are warranted pursuant to this comment.
- O-17** The DEIR included a “No Development Alternative (NDA)” in DEIR Section 6.0. The NDA would leave the entirety of the Project site as vacant land. As shown on DEIR Figure 4.2-1 (FMMP Farmland Map), the vast majority of the areas that were proposed for development as part of the project evaluated in the DEIR are mapped as containing Important Farmland types, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Only 75.9 acres of the Project site contain areas that are not categorized as Important Farmland (Grazing Land), and these areas largely are concentrated in areas that were proposed to be conserved



as open space as part of the project evaluated in the DEIR. Thus, there is no feasible alternative available, beyond the NDA that already was evaluated in the DEIR, that would avoid the significant and unavoidable impacts to Important Farmland, and this comment does not identify any such alternative. Notwithstanding, commenter is referred to the revised analysis of potential impacts to agricultural resources as presented in RDEIR Subsection 4.2. As noted therein, at the time the Project's DEIR was published and circulated for public review, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) classified the Project site as containing approximately 297.8 acres of "Prime Farmland," approximately 24.6 acres of "Farmland of Statewide Importance," approximately 4.0 acres of "Unique Farmland," and approximately 180.3 acres of "Farmland of Local Importance." However, since that time, the agricultural classifications applied to the Project site have changed. As documented in RDEIR Subsection 4.2, *Agriculture and Forestry Resources*, the Project site now is classified as containing approximately 535.1 acres of "Farmland of Local Importance" and approximately 47.6 acres of "Grazing Land." "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." Thus, the Project site does not contain any "Farmland" as mapped by the FMMP. Furthermore, and based on a site-specific Land Evaluation and Site Assessment (LESA) technical report (RDEIR *Technical Appendix S*), based on the existing conditions of the Project site and surrounding areas, the Project site is determined to have a relatively low value for agricultural production, further demonstrating that the Project site does not contain any areas of important farmland types. The analysis in RDEIR Subsection 4.2 has been revised and now shows a less-than-significant impact to Farmland. Accordingly, because impacts to agricultural resources would be less than significant, no additional alternatives need to be considered with respect to agricultural resources.

- O-18** Commenter erroneously argues that the DEIR should be updated to reflect a finding of significant GHG impact before mitigation. Commenter is referred to the discussion in DEIR subsection 4.8.6, which identifies impacts to GHGs as a significant impact prior to mitigation. Please refer also to the response to Comment O-11, which explains why CEQA does not require mitigation beyond mitigation necessary to reduce a project's significant environmental effects. The County will ensure that Advocates for the Environment are included on the list of interested parties that will receive all future CEQA-related and public hearing notices.



**COMMENT LETTER P**



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916-462-8886  
916-788-0290 Fax

August 15, 2022

VIA U.S. AND ELECTRONIC MAIL

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**Re: Comment Letter re Stoneridge Commerce Center Project (State Clearinghouse No. 2020040325)**

Dear Mr. Brady:

I represent Ecosystem Investment Partners (“EIP”), bank sponsor of the Riverpark Mitigation Bank (“Bank”), located on the property immediately adjacent to the eastern boundary of the Stoneridge Commerce Center Project (“Project”) site in Riverside County (“County”). On behalf of EIP, I submit these comments on the Draft Environmental Impact Report dated April 7, 2022 (“DEIR”), that has been prepared for the Project.

I apologize for this comment being submitted after the close of the comment period. EIP had not been provided any notice regarding the availability of the DEIR for public comment, and so only became aware of the Project very recently. Please note that EIP does not object to the Project in general. However, for the reasons discussed further below, the DEIR should analyze the Project’s potential impacts on the neighboring Riverpark Mitigation Bank. We appreciate the opportunity to comment on the DEIR and the County’s consideration of EIP’s comments.

**I. Background Information Regarding Riverpark Mitigation Bank.**

As depicted in Figure 2-3 of the DEIR, the Bank is located immediately east of the Project site. The northwestern and southwestern boundaries of the Bank adjoin the Project site, and the mid-section of these boundaries is separated by a small strip of land, identified as a flood plain. (See DEIR, Figure 2-3, p. 2-4.) The Bank was established and is operated and maintained for the purpose of preserving, restoring, and maintaining jurisdictional waters of the United States, waters of the State, and associated alkali habitats. These efforts greatly benefit alkali playa, alkali



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grassland, alkali scrub, vernal pool, and protected plant species such as naverretia, San Jacinto Valley crownscale, smooth tarplant, and Coulter’s goldfields.

The U.S. Army Corps of Engineers, California Department of Fish and Wildlife (“CDFW”), and the Regional Water Quality Control Board release credits for the Bank to EIP, which can then be used by developers to satisfy compensatory mitigation requirements. Without the Bank, many development projects, including those providing housing necessary to combat the State’s critical shortage, may not be able to move forward with construction. Thus, it is imperative that the Bank continue to operate unobstructed by neighboring uses.

**II. Project Impacts To The Neighboring Riverpark Mitigation Bank Must Be Analyzed.**

As correctly noted in CDFW’s comment letter dated May 26, 2020, “[t]he DEIR should include a complete and thorough evaluation of all potential Project-related impacts to the Riverpark Mitigation Bank.” (CDFW Comment Letter, p. 5.<sup>1</sup>) The County is required to, at a minimum, consider CDFW’s comment. (CEQA Guidelines § 15084(c).)

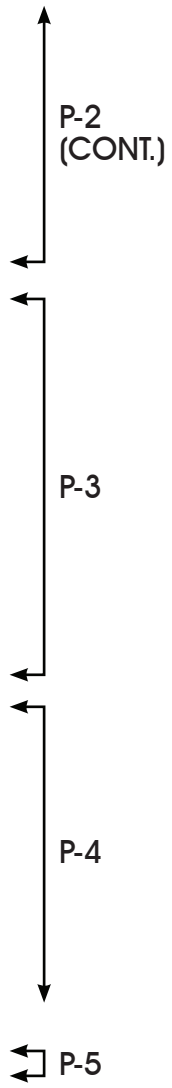
Despite CDFW’s comments being submitted during the scoping period, the DEIR fails to evaluate any potential impacts to the Bank. In fact, the Bank is only mentioned in the DEIR as a way in which potential impacts may be mitigated (*i.e.*, through the purchase of rehabilitation and re-establishment credits). (See DEIR, p. 4.4-65.) The Bank contains sensitive species and habitats and is located immediately adjacent to the Project, and a legally adequate environmental impact report would necessarily analyze potential impacts on the Bank. Accordingly, the DEIR must be revised to adequately address such impacts.

**III. The DEIR Does Not Clearly Or Adequately Analyze The Project’s Potential Hydrological Impacts On The Bank.**

EIP is primarily concerned that the DEIR does not provide sufficient analysis regarding impacts to the Bank, as well as other downstream properties, especially with regard to contaminants in the run-off water from the Project site. In addition, indirect modifications to the timing, volume, and distribution of hydrologic inputs via sheetflow have the potential to affect the viability of native and rare plant species known to occur within the Bank. The DEIR fails to provide meaningful details regarding the detention basins, the effectiveness of any treatment and the eventual release of water down the drainage facilities and into the Bank property. The DEIR

<sup>1</sup> Available at: [https://files.ceqanet.opr.ca.gov/261337-3/attachment/z1N15WGhtUubCqPa2W33oVQk\\_U-ZjU89ZFR7Og8Jutwse2gXnSN\\_qKkg5YNz1MK4wL9GalZBskIEKIEM0](https://files.ceqanet.opr.ca.gov/261337-3/attachment/z1N15WGhtUubCqPa2W33oVQk_U-ZjU89ZFR7Og8Jutwse2gXnSN_qKkg5YNz1MK4wL9GalZBskIEKIEM0).

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must be revised to provide more information and thoughtful analyses regarding these potential impacts.

A. The DEIR Does Not Adequately Analyze Potential Impacts Of Contaminated Run-Off Water Crossing The Bank Property Or Entering The San Jacinto River.

The Project would result in the construction of substantial asphalt and concrete surfaces (approximately 1.5 million square feet not including structural bases<sup>2</sup>). Consequently, these new impervious surfaces could generate substantially more water run-off, at higher rates of flow and velocity, than currently exist at the Project site. The DEIR provides that run-off water on the Project site is generally conveyed in a west-to-east direction, toward the San Jacinto River. (See DEIR, p. 4.10-1-17.) Despite the Bank being located east of the Project site, the DEIR fails to analyze what effect this additional run-off may have on the Bank. (See, e.g., DEIR, p. 4.10-15 [incorrectly stating “the San Jacinto River ... is located immediately adjacent to the site’s eastern boundary.”].)

The Project will likely result in additional pollutants and hazardous materials within run-off water as a result of oil, grease, and other contaminants generated by the nature of the Project (e.g., oil from parked and moving cars, construction equipment, commercial and development uses, etc.). As a result of the run-off water flowing from the Project site easterly toward the San Jacinto River, these contaminants in the run-off water may settle on and/or pass over the Bank property.<sup>3</sup> This has the potential to negatively impact the water quality on the Bank property, as well as downstream, and could have a deleterious impact on the biological habitats located on the Bank property. Stormwater pollutants are known to negatively affect both native and rare plants associated with the Bank’s sensitive habitats. Potential impacts of the contaminated run-off water on the Bank must be analyzed in the DEIR. (See CEQA Guidelines § 15126.2(a); Appendix G.)

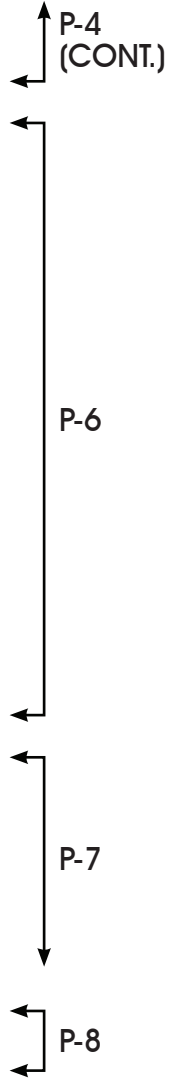
B. The DEIR Fails To Provide Sufficient Detail Regarding How Long Water Will Be Held In The Detention Basins And Whether Water Quality Will Be Sufficiently Improved by the Detention.

As discussed in the DEIR and appendices, on-site flows will be conveyed within the proposed streets of the Project to a series of catch basins and storm water lines, which will then direct storm flows to one of three detention ponds. (DEIR, p. 4.10-15; Appx. H1, p. 1-1.) However, the

<sup>2</sup> See DEIR, pp. 4.6-11 – 4.6-12, 4.6-19.

<sup>3</sup> See DEIR, p. 4.10-14 (stating “under existing conditions all runoff generated on and tributary to the Project site is conveyed directly or indirectly to the San Jacinto River.”).

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DEIR fails to provide sufficient detail regarding how long water will be stored in the detention basins before being released into the San Jacinto River.

The DEIR states that water quality treatment will occur within the detention ponds prior to the water's release,<sup>4</sup> but the DEIR fails to discuss specifically how the water will be treated (*e.g.*, passive settling and aeration, or active treatment, etc.), or how long the treatment will last. The DEIR should be revised to address these aspects of the Project so the public will have a better understanding of the Project's impacts.

Again, EIP does not object to the Project. However, as discussed above, and as expressly stated by CDFW in its comment letter, the DEIR must consider and analyze potential Project-related impacts on the Bank.

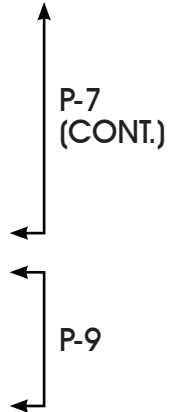
We appreciate the County's consideration of EIP's concerns. Please do not hesitate to contact me with any questions, and direct any updates, notices, or other correspondences to my attention.

Sincerely,

MITCHELL CHADWICK LLP

G. Braiden Chadwick

ec: David Urban, Ecosystem Investment Partners  
Stephanie Freed, Ecosystem Investment Partners  
Ryan Thomason, Mitchell Chadwick LLP



<sup>4</sup> Draft EIR, p. 4.10-15.

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**Letter P Mitchell Chadwick/Riverpark Mitigation Bank**

- P-1** The County acknowledges that these comments were submitted to the County on August 15, 2022, long after the public comment period for the DEIR concluded on May 23, 2022. Notwithstanding, the County appreciates this comment letter on behalf of Ecosystem Investment Partners (EIP), and responses to the individual comments identified in this comment letter are provided below.
- P-2** Background information describing the Riverpark Mitigation Bank is acknowledged; no response is necessary.
- P-3** Commenter is referred to the responses to comments received from the California Department of Fish and Wildlife (CDFW); refer specifically to the responses to Comments M-6 through M-18. As noted therein, mitigation measures have been revised in or added to RDEIR Subsection 4.4 to address the recommended mitigation measures suggested by the CDFW. Commenter is referred to the revised analysis in RDEIR Subsection 4.4, which incorporates the changes requested by CDFW and includes an expanded analysis of potential indirect impacts to off-site open space areas, including the Riverpark Mitigation Bank.
- P-4** DEIR Subsection 4.10, *Hydrology and Water Quality*, included a detailed analysis of potential water quality impacts that could result from Project implementation. As noted therein, although the Project's drainage system, which includes water quality basins, is not anticipated to result in significant impacts to water quality, the analysis also acknowledges that the specific design of measures to be incorporated in the future to address potential water quality impacts under long-term operational conditions are not known at this time, and would be identified as part of future implementing developments on site (i.e., tentative tract maps, plot plans, etc.). As such, in the absence of any specific measures to address water quality in site runoff, the DEIR disclosed that the project evaluated in the DEIR would have had the potential to adversely affect surface and groundwater quality during long-term operations. Mitigation measures were identified to reduce these impacts to less-than-significant levels by requiring the preparation of future hydrology and water quality studies in conjunction with implementing plot plans/conditional use permits. It is not possible at this time to conduct a detailed evaluation of potential effects the Project may have on the San Jacinto River or the Riverpark Mitigation Bank in terms of drainage and water quality, as such an analysis would require site-specific development applications that currently are not available. In the absence of such site-specific applications, any such detailed analysis would be speculative at this time (see CEQA Guidelines § 15145). At the time applications for plot plans and/or conditional use permits are filed with the County in the future, the Riverside County Flood Control and Water Conservation District (RCFCWCD) would review the implementing applications to ensure that they incorporate appropriate measures to preclude water quality impacts affecting the San Jacinto River. As part of the review process, additional analysis of the implementing applications also would be conducted to evaluate consistency with all applicable MSHCP requirements, including requirements specified by the MSHCP UWIG. Because the Project does not include any site-specific applications as would be needed to conduct a detailed and thorough analysis of potential water quality and





hydrology impacts to the San Jacinto River, no revision has been made to the RDEIR pursuant to this comment, beyond those measures that have been added to or revised in RDEIR Subsection 4.4 to more fully address potential indirect effects to biological resources.

- P-5** Footnote referenced in Comment P-3 is acknowledged; no response is necessary.
- P-6** Commenter is referred to the response to Comment P-4, which is responsive to this comment. As noted, the Project includes a proposed drainage system that would include water quality basins to preclude any potential water quality impacts to off-site areas. Furthermore, because the Project does not include any site-specific applications, any further evaluation of potential indirect water quality impacts is not possible at this time and would be speculative (see CEQA Guidelines § 15145). Appropriate analysis of drainage and water quality features would be conducted in the future as part of the County's review of future implementing plot plans/conditional use permits, and would ensure that the water quality features incorporated into the Project design does not result in significant off-site water quality impacts. No revision to the RDEIR is warranted pursuant to this comment.
- P-7** The Project evaluated in the DEIR and in this RDEIR consists of applications for a General Plan Amendment, Specific Plan Amendment, and Change of Zone. No site-specific applications are included as part of the currently-proposed Project. As such, detailed information regarding future drainage and water quality features that may be proposed in conjunction with future implementing plot plans and/or conditional use permits is not available at this time, and it would be speculative at this time to identify precise drainage and water quality features that may be proposed in the future. Regardless, all future drainage and water quality improvements proposed as part of implementing plot plans and/or conditional use permits would be reviewed by the RCFCWCD to ensure full compliance with RCFCWCD's requirements as well as all regulations and requirements promulgated by the Santa Ana Regional Water Quality Control Board (RWQCB). These requirements include a prohibition on increases in flow rates, as well as requirements to prepare and implement site-specific SWPPPs during construction and WQMPs during long-term operations (refer also to the extensive analysis presented in RDEIR Subsection 4.10, *Hydrology and Water Quality*). Accordingly, no revision to the RDEIR is warranted pursuant to this comment.
- P-8** Footnotes referenced in Comment P-6 are acknowledged; no response is necessary.
- P-9** The County acknowledges that EIP does not object to the proposed Project, and appreciates the comments provided in this comment letter. The County will contact the individual identified by this comment with any questions.



## S.0 EXECUTIVE SUMMARY

### S.1 INTRODUCTION

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 physical environment.

This recirculated Draft Program Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2020040325, was prepared in accordance with State CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Project, which consists of General Plan Amendment No. 190008 (GPA 190008), Amendment No. 1 to Specific Plan No. 239 (SP 239A1), and Change of Zone No. 1900024 (CZ 1900024), which are collectively referred to herein as the “Project” or “proposed Project.” This recirculated draft Program EIR does not recommend approval or denial of the proposed Project; rather, this Program EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft Program EIR (DEIR) was initially available for public review for a 45-day public review period that commenced on April 8, 2022 and concluded on May 23, 2022. Riverside County received a total of 15 comment letters during the DEIR’s public review period and postponed preparation of the Final EIR (FEIR) until it could evaluate comments set forth in the letters.

Based on the volume and nature of the comments, the County directed the preparation of this Recirculated Draft EIR (RDEIR). For purposes of this document, the terms “EIR” and “RDEIR” refer to this document which will be recirculated for an additional 45-day public review period, while “DEIR” refers to the initial EIR document that was circulated for public review from April 8, 2022 to May 23, 2022. The Project as originally proposed by the Project Applicant and described in the previously circulated DEIR remains the “proposed Project” for purposes of review in this RDEIR, with exception of the following changes:

- **Maximum Light Industrial Building Area.** Based on comment letters received during the public review period for DEIR, the maximum amount of Light Industrial building area allowed within Planning Areas 1 through 5 of proposed Amendment No. 1 to Specific Plan No. 239 (SP 239A1) has been reduced from 8,461,530 square feet (s.f.) to 7,350,000 s.f. under both the Primary Land Use Plan and Alternative Land Use Plan, representing a reduction in light industrial building area by approximately 13.1%. The maximum building area for the proposed Business Park uses within Planning Areas 6 and 7 of proposed SP 239A1 would remain unchanged at 1,069,398 s.f. under the Primary Land Use Plan and 936,540 s.f. under the Alternative Land Use Plan. Similarly, the maximum building area for the proposed Commercial Retail uses within Planning Areas 8A and 8B of proposed SP 239A1 would remain unchanged at 121,968 s.f. under the Primary Land Use Plan and 126,542 s.f. under the Alternative Land Use Plan.



- **Mix of Light Industrial Use Types.** The DEIR assumed that building area within the SP 239A1 Planning Areas that would be designated for Light Industrial land uses would consist of approximately 20% high-cube cold storage uses, 35% high-cube fulfillment center uses, 35% high-cube warehouse uses, and 10% manufacturing uses. In order to provide a more conservative evaluation of potential air quality and health risk impacts that could result from the Project's Light Industrial uses, the amount of high-cube cold storage uses has been increased to 40% of the Light Industrial building area, with 40% of the Light Industrial building area consisting of high-cube fulfillment center uses, 10% consisting of high-cube warehouse uses, and 10% consisting of manufacturing uses. No changes have been made to the land use assumptions for the Project's Business Park or Commercial Retail land uses.
- **Alternative Truck Routes.** In response to comment letters received during the public review period for the DEIR, a total of six (6) different alternative truck routes have been considered. The alternative truck routes have been identified in order to evaluate alternatives to the use of Ramona Expressway for westbound truck traffic in order to determine if any of the alternative truck routes would reduce the Project's potential impacts to sensitive receptors along the identified truck routes. As described in detail in RDEIR subsection 3.6.2.B, only three of the Alternative Truck Routes were determined to be feasible: Alternative Truck Routes 1, 2, and 6, as described below.
  - Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
  - Alternative Truck Route 2: Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
  - Alternative Truck Route 6: Alternative Truck Route 6 reflects the truck route previously evaluated in the DEIR for the Alternative Land Use Plan. Under near-term conditions and prior to full buildout of the Mid-County Parkway (MCP), truck traffic would utilize one of the alternative truck routes described above (i.e., Alternative Truck Routes 1 or 2). Once the MCP is constructed and operational, all westbound trucks would be routed west along the MCP to the west to access the I-215. Under this alternative, and following completion of the MCP, all eastbound truck traffic would be routed along the MCP to the east.

Three additional Alternative Truck Routes were considered for evaluation in this RDEIR, and are described below. However, for the reasons noted below and in RDEIR subsection 3.6.2.B, Alternative Truck Routes 3, 4, and 5 were determined to be infeasible. Thus, this RDEIR does not include a detailed evaluation of Alternative Truck Routes 3, 4, or 5.



- Alternative Truck Route 3 (Infeasible): Alternative Truck Route 3 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, and west on State Route 74 (SR-74) to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 3 was determined to be infeasible because the segment of Menifee Road between Mapes Road and SR-74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 3 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.
- Alternative Truck Route 4 (Infeasible): Alternative Truck Route 4 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, northwest on Matthews Road/State Route 74 (SR 74), and west on Ethanac Road to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 4 was determined to be infeasible because the segment of Menifee Road between Mapes Road and Matthews Road/SR 74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 4 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.
- Alternative Truck Route 5 (Infeasible): Alternative Truck Route 5 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on future Evans Avenue to access the I-215 freeway. It should be noted that Evans Road south of San Jacinto Avenue and the I-215 Freeway/Evans Avenue interchange do not currently exist and would need to be improved as part of the Project or as part of regional funding programs. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 5 was determined to be infeasible because implementation of this truck route would require use of the future I-215 Freeway/Evans Avenue. There are no publicly-accessible plans or construction schedules available from Caltrans related to the construction of this interchange, and it would not be financially feasible for the Project Applicant to construct the required interchange. As such, Alternative Truck Route 5 has been determined to be infeasible and therefore is not evaluated in detail as part of this RDEIR.

All other components of the proposed Project would be identical to the Project previously evaluated in the DEIR. Specifically, no revisions have been made to SP 239A1 since the DEIR was circulated for public review, with exception of the above-described reduction in the maximum allowable building area for the Project's proposed Light Industrial land uses. Thus, the Project as evaluated in this RDEIR would continue to be subject to the Development Standards and Design Guidelines set forth by SP 239A1 as previously described in the DEIR. The Project's limits of physical impact remains unchanged at approximately 484.9 acres within the Project site. The Project also would continue to result in impacts to approximately 27.9 acres of offsite disturbances associated with water, sewer, and roadway improvements (as previously discussed in the DEIR),



although areas of off-site impacts associated with transportation-related improvements would change depending on which Alternative Truck Route ultimately is implemented. Refer to Tables 1-4, 1-5, and 1-9 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) for a complete description of off-site roadway improvements required in association with Alternative Truck Routes 1, 2, and 6, respectively.

This Recirculated Draft EIR (RDEIR) will be used by Riverside County and other interested parties to identify the significant environmental impacts associated with the proposed Project as revised. This RDEIR includes all sections of the DEIR, because the DEIR is being recirculated for public review in its entirety. This RDEIR, along with any comment letters received by Riverside County during the RDEIR's public review period and written responses thereto, will comprise the FEIR, which will be considered for certification by the Riverside County Planning Commission and Board of Supervisors.

Notice of the RDEIR must be given in the same manner as notice of the previously circulated DEIR (CEQA Guidelines §15088.5[d]). Accordingly, notice of this RDEIR will be provided to all organizations and individuals who previously requested notice in writing and by making available copies of the RDEIR available on the Riverside County Planning Department's web site (<https://planning.rctlma.org/>). Additionally, the Lead Agency will provide notice to every agency, person, or organization that commented on the original DEIR, and will re-notice all surrounding property owners and Responsible and Trustee Agencies who were notified during the initial public review period for the DEIR.

The 45-day public review period for this RDEIR is set forth by CEQA Guidelines § 15088.5(d), which requires that the public review period for a DEIR (or RDEIR) shall not be less than 30 days nor longer than 60 days except under unusual circumstances. When a DEIR (or RDEIR) is submitted to the State Clearinghouse, the public review period must be at least 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. All of the noticing procedures and requirements set forth in CEQA Guidelines § 15088.5(d), § 15086, § 15087, and § 15105 for circulation of a DEIR will be complied with during the 45-day noticing period for this RDEIR.

After consideration of public comment, Riverside County will consider certifying the Final EIR (FEIR) and adopting required findings in conjunction with Project approval. In the case that there are any adverse environmental impacts that cannot be fully mitigated, Riverside County must adopt a Statement of Overriding Considerations, stating why the County is taking action to approve the Project with or without modification despite its unavoidable impacts.

This Executive Summary complies with State CEQA Guidelines Section 15123, "Summary." This RDEIR includes a description of the proposed Project and evaluates the physical environmental effects that could result from Project implementation. The County of Riverside determined that the scope of this EIR should cover 21 subject areas. The scope includes all of the subject areas listed in Appendix G to the State CEQA Guidelines and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP). The NOP, and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. In consideration of public comment on the NOP, the 21 environmental subject



areas that could be reasonably and significantly affected by planning, constructing, and/or operating the proposed Project are analyzed herein, including:

- |                                       |                                   |
|---------------------------------------|-----------------------------------|
| 1. Aesthetics                         | 12. Mineral Resources             |
| 2. Agriculture and Forestry Resources | 13. Noise                         |
| 3. Air Quality                        | 14. Paleontological Resources     |
| 4. Biological Resources               | 15. Population and Housing        |
| 5. Cultural Resources                 | 16. Public Services               |
| 6. Energy                             | 17. Recreation                    |
| 7. Geology and Soils                  | 18. Transportation                |
| 8. Greenhouse Gas Emissions           | 19. Tribal Cultural Resources     |
| 9. Hazards and Hazardous Materials    | 20. Utilities and Service Systems |
| 10. Hydrology and Water Quality       | 21. Wildfire                      |
| 11. Land Use and Planning             |                                   |

Refer to RDEIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the subject matters listed above. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR’s NOP was filed with the California State Clearinghouse (April 27, 2020); 2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause. A summary of the proposed Project’s significant environmental impacts and the mitigation measures imposed by the County of Riverside on the Project to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*. 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 the Project’s impacts; and 5) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

This RDEIR also discusses alternatives to the proposed Project. Alternatives are described that would attain most of the Project’s objectives while avoiding or substantially lessening the proposed Project’s significant adverse environmental effects. A full discussion of Project alternatives is found in Section 6.0, *Alternatives*.

## **S.2 PROJECT SYNOPSIS**

### **S.2.1 LOCATION AND REGIONAL SETTING**

The 582.6-acre Project site is located within the western portion of unincorporated Riverside County, California. EIR Figure 2-1, *Regional Map*, depicts the Project site’s location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. The Project site is located within the western region of unincorporated Riverside County, California. As depicted on EIR Figure 2-2, *Vicinity Map*, the Project site is located in the



Nuevo community, south of Lake Perris, east of the City of Perris, and north of the City of Menifee. More specifically, and as depicted on EIR Figure 2-2, the 582.6-acre Project site is located south of the Ramona Expressway, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road. Access to the Project site is currently available from the Ramona Expressway and Nuevo Road. Interstate 215 (I-215) is located approximately 2.6 miles southwest of the Project site, State Route 74/Ethanac Road occurs approximately 4.0 miles to the south, while State Route 79 (SR 79) occurs approximately 8.8 miles east of the Project site. (Google Earth, 2021) The Project site includes Assessor Parcel Numbers (APNs) 307-070-003, 307-080-(005, 006, 008), 307-090-(001, 002, 004, 005, 006), 307-100-(001, 003, 004, 005), 307-110-(003, 007, 008), 307-220-001, and 307-230-(019, 020). The 582.6-acre Project site occurs within Sections 14 and 23, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian.

### **S.2.2 PROJECT OBJECTIVES**

The fundamental purpose and goal of the Stoneridge Commerce Center Project is to accomplish the orderly development of light industrial, business park, and commercial retail land uses to increase employment opportunities in a housing rich portion of unincorporated Riverside County. This underlying purpose aligns with various aspects of the Southern California Association of Governments' (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) primarily related to accommodating goods movement industries and balancing job and housing opportunities in local areas to reduce long commutes from home to work. SCAG identifies the Inland Empire as a housing rich area and coastal communities as job rich areas and is striving in their policies to achieve more equal balances locally. The Project would achieve its underlying purpose and goal through the following objectives:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses in an area predominately composed of housing.
- B. To assist the SCAG region in achieving jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire.
- C. To attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.



- F. To anticipate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.
- G. To develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.

### S.2.3 PROJECT SUMMARY DESCRIPTION

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this Program EIR has been prepared. For purposes of this Program EIR, the term “Project” refers to the Project’s discretionary applications for the first amendment to the Stoneridge Specific Plan No. 239 (SP 239A1), a General Plan Amendment (GPA 190008), and Change of Zone (CZ 1900024); future implementing discretionary actions required to implement the Project (e.g., tentative tract maps, plot plans, etc.); and all of the activities associated with Project implementation including planning, construction, and long-term operations.

The Project as evaluated herein consists of two separate land use alternatives for the 582.6-acre site, both of which are evaluated herein at an equal level of detail. Two alternatives are considered because the Riverside County Transportation Commission (RCTC) is currently planning for construction of a regional transportation facility, the “Mid-County Parkway” (MCP). A portion of the MCP is currently planned to traverse the northwestern portions of the Project site. It is currently not known when or if the MCP would be constructed by RCTC; thus, for purposes of evaluation in this EIR, the “Primary Land Use Plan” anticipates that the MCP would not be constructed through the property, in which case the site would be developed with up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail, Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres. The “Alternative Land Use Plan” anticipates that the MCP would be constructed through the northwest portions of the site, in which case the site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, 8.5 acres of Commercial Retail land uses, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. However, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. The “Alternative Land Use Plan” only would be implemented in the event that the RCTC constructs the MCP through the northernmost portions of the Project site.

Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project’s construction and operational characteristics):

- **General Plan Amendment No. 190008 (GPA 190008)** is proposed to modify the approved land uses for the Project site in order to reflect changes proposed as part of proposed Amendment No. 1 to the





Stoneridge Commerce Center Specific Plan No. 239 (SP 239A1), which is discussed below. The adopted General Plan designates the Project site for “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium-High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space-Recreation,” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water (OS-W)” land uses. With approval of GPA 190008, the Project site would be designated for “Light Industrial (LI),” “Business Park (BP),” CR, OS-C, and OS-CH land uses in a manner that corresponds to the land use designations proposed for the site as part of SP 239A1 (as discussed below).

- **Amendment No. 1 to Specific Plan No. 239 (SP 239A1)** is proposed to modify the allowed land uses and planning area boundaries within the Stoneridge Specific Plan (SP 239). Under the Primary Land Use Plan, the 582.6-acre site would be designated for “Light Industrial” land uses on 388.5 acres, “Business Park” land uses on 49.1 acres, “Commercial Retail” on 8.0 acres, “Open Space – Conservation” on 18.1 acres, “Open Space – Conservation Habitat” on 81.6 acres, and major roadways on 37.3 acres. As proposed by SP 239A1, areas designated for “Light Industrial” may be developed with up to 7,350,000 square feet (s.f.) of building area (or an FAR of approximately 0.43), “Business Park” uses may be developed with a Floor Area Ratio (FAR) up to 0.50, while areas designated for “Commercial Retail” uses may be developed with a FAR up to 0.35. Accordingly, implementation of the Primary Land Use Plan would allow for up to 7,350,000 s.f. of light industrial building area, up to 1,069,398 s.f. of business park building area, and up to 121,968 s.f. of commercial retail building area. Under the Alternative Land Use Plan, the 582.6-acre site would be designated for “Light Industrial” land uses on 389.2 acres, “Business Park” land uses on 51.5 acres, “Commercial Retail” on 8.5 acres, “Open Space – Conservation” on 18.1 acres, “Open Space – Conservation Habitat” on 81.6 acres, and major roadways on 34.4 acres. It should be noted that approximately 8.5 acres of areas proposed for “Business Park” land uses and approximately 0.2 acre of areas proposed for “Commercial Retail” land uses would occur within the right-of-way of the Mid-County Parkway (MCP), and thus would not be developed with any buildings under the Alternative Land Use Plan. Based on the proposed maximum allowed 7,350,000 s.f. of “Light Industrial” land uses, the allowable FAR of 0.5 for the proposed “Business Park” land uses, and the allowable FAR of 0.35 for “Commercial Retail” land uses, and excluding areas within the planned alignment of the MCP, the Alternative Land Use Plan would allow for up to 7,350,000 s.f. of light industrial building area, up to 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area.
- **Change of Zone No. 1900024 (CZ 1900024)** is proposed to modify the Planning Area boundaries, permitted uses, and development standards throughout the 582.6-acre site in order to reflect the land uses proposed as part of SP 239A1, as described above.

### **S.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED**

State CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (Riverside County) be identified in the Executive Summary. Substantive issues raised in response to the NOP are summarized in Table 1-1 in EIR Section 1.0. The purpose of this table is to present the primary environmental



issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this Program EIR. Based on comments received during the NOP review period, the issue of land use consistency was raised by the City of Perris and is addressed in EIR Subsection 4.11, *Land Use and Planning*. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project's potential environmental effects.

In addition, during the 45-day public review period for the Project's DEIR, the County received a number of comment letters identifying potential areas of concern and controversy. These comment letters are summarized in RDEIR Table 1-2, which also identifies the location within this RDEIR where issues identified by the comment letters are addressed. All of the issues identified by RDEIR Table 1-2 are considered areas of controversy and issues to be resolved for the proposed Project. All of the comments raised during the initial 45-day public review period for the Project's DEIR are discussed and responded to in detail in RDEIR Subsection R.6, *Responses to Comments*. As noted in RDEIR Section R.0, a large number of comments expressed concerns over the Project's intensity and attendant environmental effects, as well as concern regarding the Project's previously-identified truck routes. As more fully explained in RDEIR Subsection R.3, *Summary of Revisions Made to Previously Circulated Draft EIR*, the Project has been revised to reduce the maximum amount of light industrial building area from 8,461,530 s.f. under the previously-proposed Project to 7,350,000 s.f. under the currently-proposed Project that is the subject of this RDEIR and to revise the truck routes previously identified by the DEIR in order to ensure all Project-related truck traffic is routed to designated truck routes, where such designations exist. The Project has also been revised such that the maximum amount of building area within the Light Industrial components of the Project that may contain high-cube cold-storage uses is 40%, although the maximum amount of high-cube cold-storage uses would be further restricted to a maximum of 20% of the total light industrial building area by RDEIR Mitigation Measure MM 4.3-1 (unless it can be demonstrated that a certain percentage of TRUs consist of fully electric vehicles). The County finds that these revisions to the Project's design, as evaluated throughout this RDEIR, have adequately addressed the comments of concern identified during the DEIR public review period.

## **S.4 PROJECT ALTERNATIVES**

### **S.4.1 NO DEVELOPMENT ALTERNATIVE**

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 582.6 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

### **S.4.2 NO PROJECT (EXISTING GENERAL PLAN) ALTERNATIVE**

The No Project (Existing General Plan) Alternative (NPA), assumes development of the 582.6-acre property in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection



2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Stoneridge Specific Plan No. 239 (SP 239) for the portions of the adopted SP 239 that occur within the Project site, the Project site would be developed with approximately 671 "Medium Residential (2-5 du/ac)" dwelling units on approximately 172.9 acres; approximately 903 "Medium-High Residential (5-8 du/ac)" dwelling units on approximately 185.0 acres; approximately 446 "Very High Residential (14-20 du/ac)" dwelling units on approximately 30.0 acres; "Commercial" uses on approximately 68.1 acres, which also would allow for up to 153 dwelling units in Planning Area 1; "Parks" on approximately 33.7 acres; "Open Space – Natural" on approximately 20.8 acres; "Open Space – Recreational" on approximately 8.6 acres; three planning areas designated for "Schools" on approximately 27.0 acres; and approximately 36.5 acres of major circulation facilities. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and SP 239 land use designations.

### **S.4.3 REDUCED PROJECT ALTERNATIVE**

The Reduced Project Alternative (RPA) considers development of the Project site with similar uses as the proposed Project, but at a much lower intensity. Specifically, under the proposed Project, Light Industrial land uses are restricted to a maximum of 7,350,000 s.f. of building area, Business Park land uses may be developed at an FAR up to 0.50, while Commercial Retail land uses can be developed at a FAR up to 0.35. Under the RPA, Light Industrial Uses would be restricted to a maximum of 5,145,000 s.f. of building area, Business Park land uses would be restricted to a maximum FAR of 0.35, while development in the Commercial Retail portions of the site would be limited to a maximum FAR of 0.25. For purposes of evaluation of the RPA, it is assumed that the MCP would not be in place under long-term conditions, thereby allowing for more development on site than would occur if the MCP were to be implemented through the northern portions of the Project site. As summarized in RDEIR Table 6-1, the RPA would allow for a maximum of 5,145,000 s.f. of light industrial building area, 748,579 s.f. of business park building area, and 87,120 s.f. of commercial retail building area. Thus, implementation of the RPA would result in a reduction of building area allowed on site by approximately 30% as compared to the proposed Project. Under the RPA, it is assumed that all areas proposed for grading and development both on and off site would be the same as for the proposed Project. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to aesthetics, air quality, noise, and transportation.

## **S.5 RECIRCULATED DRAFT EIR PROCESS**

As a first step in the CEQA compliance process, Riverside County determined that the proposed Project likely would result in significant environmental effects, and distributed a Notice of Preparation (NOP) for public review on April 27, 2020. An Initial Study was not prepared for the Project, and thus this RDEIR evaluates all of the environmental subjects listed in Appendix G to the State CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. Because the Project would require future discretionary approvals (e.g., tentative tract maps, plot plans, etc.), this RDEIR has been prepared as a Program EIR pursuant to State CEQA Guidelines § 15168. As described by State CEQA Guidelines § 15168(a), a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) are logical parts [*sic*] in the chain of contemplated actions;



3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The Project's DEIR was circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day public review period that extended from April 8, 2022 to May 23, 2022. During the 45-day public review period, public notices announcing availability of the Draft EIR were mailed to interested parties and copies of the Draft EIR and its Technical Appendices were available for review on the County's Planning Department web site (<https://planning.rctlma.org/>). Following the public review period, the County received a total of 16 comment letters and postponed preparation of the Final EIR (FEIR) until it could evaluate comments set forth in the letters.

Based on the volume and nature of the comments, the County directed the preparation of this Recirculated Draft EIR (RDEIR) to address those comments and analyzed the revised version of the proposed Project, the impacts which has been significantly reduced in response to the comments received. For purposes of discussion herein, the terms "EIR," "RDEIR," "Program RDEIR," and "Program EIR" are used interchangeably and refer to this document which will be recirculated for an additional 45-day public review period. The term "DEIR" refers to the initial EIR document that was circulated for public review from April 8, 2022 to May 23, 2022. The Project as originally proposed by the Project Applicant and described in the previously circulated DEIR remains the "proposed Project" for purposes of review in this RDEIR, with exception of the modifications as summarized in Subsections R.3 and S.1, and as more fully described in RDEIR Section 3.0, *Project Description*. This RDEIR will be used by Riverside County and other interested parties to identify the significant environmental impacts associated with the proposed Project. This RDEIR includes all sections of the DEIR, because the DEIR is being recirculated for public review in its entirety. This RDEIR, along with any comment letters received by the County during the RDEIR's public review period and written responses thereto, will comprise the Final EIR, which will be considered for certification by the Riverside County Planning Commission and Board of Supervisors.

Notice of the RDEIR must be given in the same manner as notice of the previously circulated DEIR (CEQA Guidelines §15088.5[d]). Accordingly, notice of this RDEIR will be provided to all organizations and individuals who previously requested notice in writing, and by making available copies of the RDEIR and its technical appendices on the Riverside County Planning Department's web site (<https://planning.rctlma.org/>). Additionally, the Lead Agency will provide notice to every agency, person, or organization that commented on the original DEIR, and will re-notice all surrounding property owners and Responsible and Trustee Agencies who were notified during the initial public review period for the DEIR.

This Program RDEIR represents the independent judgment of Riverside County (as the Lead Agency) and evaluates the physical environmental effects that could result from constructing and operating the proposed Project as revised. Acting as Lead Agency, the County of Riverside will consider the following issues regarding the proposed Project: a) evaluation of this Program RDEIR to determine if the physical environmental impacts are adequately disclosed; b) assessment of the adequacy and feasibility of identified mitigation measures and the potential addition, modification to, or deletion of mitigation measures, standard



conditions of approval, or Project design features; c) consideration of alternatives to the Project that would reduce or eliminate significant environmental effects of the Project; and, if necessary, d) consideration of Project benefits that override the Project's unavoidable and unmitigable significant effects on the environment.

Before taking action to approve the Project, the County of Riverside (serving as the Lead Agency) has the obligation to: (1) ensure this Program RDEIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Program EIR as part of its decision making process; (3) make a statement that this Program EIR reflects Riverside County's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this Program EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines §§ 15090-15093).

## **S.6 SUMMARY OF IMPACTS, MITIGATION MEASURES AND CONCLUSIONS**

### **S.6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT**

An Initial Study was not prepared for the proposed Project, and thus this EIR evaluates all of the environmental subjects listed in Appendix G to the State CEQA Guidelines, as set forth in the County's standard Environmental Assessment Checklist form. There were no issues found to be not significant as a result of the Project's NOP process. Refer to EIR *Technical Appendix A* for a copy of the Project's NOP.

### **S.6.2 IMPACTS OF THE PROPOSED PROJECT**

Table S-1, *Summary of Impacts, Mitigation Measures, and Conclusions*, provides a summary of the proposed Project's environmental impacts, as required by State CEQA Guidelines § 15123(a). Also presented are the mitigation measures recommended by Riverside County to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental effects, as summarized below. It should be noted that the Project's significant and unavoidable environmental effects would occur with implementation of either the Primary Land Use Plan or Alternative Land Use Plan, except as otherwise noted below.

- Aesthetics: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project vicinity exhibits a rural and undeveloped character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Although the Project would be required to comply with the design guidelines and development standards of proposed SP 239A1, the SP 239A1 zoning ordinance, and all other applicable requirements of the Riverside County Municipal Code, which would serve to ensure that the Project site is developed in a manner that is not visually offensive, mitigation measures are not available to address the Project's significant impacts due to substantial changes to the existing visual character and quality of public views of the site and its surroundings. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis.



- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO<sub>x</sub>, VOCs, and CO that exceed the SCAQMD Regional Thresholds. Even with implementation of mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB for O<sub>3</sub>. In addition, regarding VOCs, it is important to note that approximately 43% of the total operational VOC emissions are derived from consumer products. As such, the Project Applicant cannot meaningfully control the use of consumer products by future building users via mitigation. Similarly, the predominance of the Project's operational-source emissions (approximately 41% of VOC emissions, 83% of NO<sub>x</sub> emissions, and 61% of CO emissions by weight) would be generated by passenger cars and trucks accessing the Project site. Neither the Project Applicant nor the County have regulatory authority to control tailpipe or consumer product emissions, and no feasible mitigation measures beyond the measures identified herein exist that would reduce Project operational-source VOC, NO<sub>x</sub>, and CO emissions to levels that are less than significant. Therefore, for both the Primary Land Use Plan and Alternative Land Use Plan, the proposed Project's operational emissions of VOC, NO<sub>x</sub>, and CO would represent a significant and unavoidable impact for which additional mitigation is not available. Due to the level of the Project's regional emissions that would exceed the SCAQMD regional thresholds for VOCs, NO<sub>x</sub>, and CO, and because the Project's land uses are not consistent with the land use inputs utilized in the SCAQMD 2022 AQMP, the Project also would result in significant and unavoidable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP.
  
- Noise: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of Alternative Truck Routes 1 or 2 would result in significant and unavoidable traffic-related noise impacts to the following roadway segments under each of the identified study scenarios:
  - Alternative Truck Route 1:
    - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.



- *Alternative Truck Route 2:*
  - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Feasible mitigation measures are not available to reduce the Project's significant traffic-related noise impacts that would occur with implementation of Alternative Truck Routes 1 and 2. For example, rubberized asphalt was considered to reduce traffic noise levels at the noise source; however, rubberized asphalt is only effective for in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce primary truck-related noise sources (e.g., truck engine noise and exhaust stack noise) due to the height of noise-generating sources associated with heavy trucks. Since the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not a feasible mitigation measure for the Project's traffic-related noise impacts. In addition, off-site noise barriers were considered as a potential measure to reduce the Project's traffic-related noise impacts. While noise barriers are commonly used to reduce the potential traffic noise levels from nearby transportation noise source activities, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance. It would not be practical to construct 11.5 foot-high barriers at off-site locations along the Study Area roadways. Additionally, arguably such barriers would block views from area land uses and would result in aesthetic and visual impacts affecting passersby that would off-set any noise attenuation benefits that may result from such walls. According to FHWA guidance, outdoor living areas are generally limited to outdoor living areas of frequent human use (e.g., backyards of single-family homes). Therefore, front and side yards of residences adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Lastly, the Applicant cannot autonomously unilaterally construct off-site walls or other features at properties owned or controlled by others. As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project, because such barriers are not feasible mitigation for the Project's traffic-related impacts. Accordingly, because mitigation is not available to reduce Project-related traffic noise impacts, the Project's off-site traffic-related noise level increases at adjacent land uses along the above-listed segments for Alternative Truck Routes 1 and 2 would



remain significant and unavoidable prior to construction of the MCP and implementation of Alternative Truck Route 6.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of either the Primary Land Use Plan (without MCP) or Alternative Land Use Plan (with MCP) would exceed the County's threshold of significance for Project work VMT per employee by 26.1%. In addition, under most scenarios, the Project's commercial retail land uses would result in a net increase in VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although not required pursuant to the County Guidelines, the analysis of the Project's total VMT indicates that the Project's total VMT per SP would exceed the County's threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). Additionally, the cumulative analysis of the Project's impacts to VMT demonstrates that the Project, when considered in the context of cumulative development, would result in a net increase in total VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-1 and MM 4.18-2, the future tenants of the proposed Project are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those identified by Mitigation Measures MM 4.18-1 and MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. The inclusion of VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings also is noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. Accordingly, Project impacts due to VMT would be significant and unavoidable on both a direct and cumulatively-considerable basis.







Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>views of the site and its surroundings. Impacts would be significant and unavoidable.</p> <p><b>Threshold d.:</b> Project compliance with the provisions of County Ordinance No. 655 would be assured through future County review of plot plan, conditional use permit, and/or building permit applications. Impacts due to a conflict with Ordinance No. 655 would be less than significant.</p> <p><b>Thresholds e. and f.:</b> Mandatory compliance with the SP 239A1 design guidelines related to lighting, along with compliance with Riverside County Ordinance Nos. 655 and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.</p>	<p>Less than Significant</p> <p>Less than Significant</p>			
<p><b>4.2 Agriculture and Forestry Resources</b></p>				
<p><b>Threshold a.:</b> The Project would result in impacts to approximately 482.9 acres Farmland of Local Importance and Grazing Land, neither of which comprise “Farmland,” as that term is defined by CEQA, the County or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other “Farmland” as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Even if “Farmland” included Farmland of Local Importance and Grazing Land, based on the Project’s LESA Analysis (Technical Appendix S), all of the Project’s impacts on Farmland still would be less than significant. The Project site’s final LESA score is 50.1, with an LE score of 32.1 and an SA score of 18.0. Thus, because the SA score is not greater than or equal to 20, the Project site is determined to</p>	<p>Less than Significant</p>	<p>Impacts to agricultural and forestry resources would be less than significant; thus, mitigation measures are not required.</p>	<p>N/A</p>	<p>N/A</p>





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>not cause development of non-agricultural uses within 300 feet of agriculturally-zoned property, and no impact would occur.</p> <p><b>Threshold d.:</b> The Project would not result in any other changes to the existing environment that could result in the conversion of off-site Farmland to non-agricultural use, and impacts would be less than significant.</p> <p><b>Thresholds e, f and g:</b> There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.</p>	<p>Less than Significant</p> <p>No Impact</p>			
<b>4.3 Air Quality</b>				
<p><b>Threshold a.:</b> The proposed Project’s construction-related air quality emissions would not exceed the SCAQMD regional thresholds or LSTs, and would not conflict with the SCAQMD AQMP. Additionally, the Project’s long-term operational impacts due to LSTs also would be below the SCAQMD thresholds of significance. However, the Project’s long-term emissions of VOCs, NO<sub>x</sub>, and CO would exceed the SCAQMD regional thresholds. Additionally, due to the land use changes proposed as part of the Project, the Project would generate operational-source emissions not reflected within the current 2022 AQMP regional emissions inventory for the SCAB. Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6 and MM 4.3-8 would reduce the Project’s long-term air quality emissions, but would not reduce the Project’s long-term emissions of VOCs, NO<sub>x</sub>, and CO to below the SCAQMD regional thresholds of significance. Additionally, the Project’s proposed land uses are not consistent with the growth forecasts included in the 2022 SCAQMD AQMP. Thus,</p>	<p>Significant and Unavoidable</p>	<p><b>MM 4.3-1</b> Prior to issuance of building permits for Tenant Improvements, in the event that the tenant is proposing high-cube cold storage uses (i.e., warehouse uses involving refrigeration and refrigerated trucks), Riverside County shall review previous uses within the Stoneridge Commerce Center Specific Plan No. 239 to ensure that the total building area dedicated to high-cube cold storage uses does not exceed 20% of the Project’s total Light Industrial building area (or a maximum of 1,470,000 s.f. of high-cube cold storage building area throughout the SP 239 area). Alternatively, if it can be demonstrated that a minimum of 50% of the transportation refrigeration units (TRUs) associated with the Project’s overall high-cube cold storage uses are or would be fully electric, then the maximum amount of building area dedicated to high-cube cold storage uses may increase to 40% of the Project’s total Light Industrial building area (or a maximum of 2,940,000 s.f.). Accordingly, prior to issuance of building permits for Tenant Improvements, the building permit applicant shall provide the following information to Riverside County: 1) the total amount of area dedicated to high-cube cold storage uses within SP 239 prior</p>	<p>Project Applicant/ Riverside County Planning Department</p>	<p>Prior to issuance of building permits for Tenant Improvements</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>Project's direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP would represent a significant and unavoidable impact for which additional mitigation measures are not available.</p> <p><b>Threshold b.:</b> Construction-related emissions associated with the Project would not exceed any of the SCAQMD regional thresholds. However, under long-term operating conditions under both the Primary Land Use Plan and Alternative Land Use Plan, Project-related emissions of VOCs, NO<sub>x</sub>, and CO would exceed the SCAQMD regional thresholds. The SCAB is designated as nonattainment for O<sub>3</sub>, and VOCs and NO<sub>x</sub> are precursors to ozone formation. Thus, the Project's emissions of VOCs and NO<sub>x</sub> would cumulatively contribute to a net increase of a criteria pollutant (O<sub>3</sub>) for which the SCAB is considered nonattainment. Although the SCAB is considered attainment for CO, because the Project would exceed the SCAQMD regional threshold for this pollutant, impacts due to emissions of CO are conservatively evaluated as significant. Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6 and MM 4.3-8 would reduce the Project's long-term air quality emissions, although the exact reduction amount cannot be quantified for most. Thus, even with implementation of these mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB for O<sub>3</sub>. In addition, regarding VOC, it is important to note that approximately 43% of the total operational VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies,</p>	<p>Significant and Unavoidable</p>	<p>to approval of the building permit; 2) the total amount of area dedicated to high-cube cold storage uses with approval of the implementing building permit; and 3) the amount by which the implementing building permit exceeds the allowable maximum of 1,470,000 s.f. of high-cube cold storage uses, if at all. In the event that the total amount of high-cube cold storage uses with approval of the implementing building permit would be less than the maximum 1,470,000 s.f., then no additional requirements shall apply. Any implementing Tenant Improvement building permit applications that include high-cube cold storage uses that would exceed the maximum building area of 1,470,000 shall be conditioned to require that 100% of the TRUs associated with the implementing building permit must be fully electric. The percentage of required electrified TRUs for the implementing building permit may be reduced if the building permit applicant can demonstrate that existing high-cube cold storage uses within SP 239 already include fully electric TRUs, such that the total high-cube cold storage warehouse building area that would be served by non-electric TRUs with approval of the implementing building permit shall not exceed 1,470,000 s.f.</p> <p><b>MM 4.3-2</b> Prior to issuance of building permits for Tenant Improvements involving high-cube cold storage warehouse uses, Riverside County shall review the plans to ensure that electrical hookups are provided to eliminate idling of main and auxiliary engines during the loading and unloading process for Transport Refrigeration Units (TRUs). Signs also shall be posted in the docking areas restricting idling to a maximum of 15 minutes, and prohibiting the use of Transportation Refrigeration Units (TRUs) for more than 30 minutes at a time. Riverside County shall verify the installation of electrical hookups and required signage prior to final building inspection.</p> <p><b>MM 4.3-3</b> The minimum number of automobile electric vehicle (EV) charging stations required by the California Code of</p>	<p>Project Applicant/ Riverside County Planning Department and Building &amp; Safety Department</p> <p>Project Applicant/</p>	<p>Prior to issuance of building permits for Tenant Improvements involving high-cube cold storage warehouse uses</p> <p>Prior to issuance of Shell building</p>





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>with the Project’s combined construction and long-term operational TAC emissions would not exceed the SCAQMD’s thresholds of significance for cancer or non-cancer health risks at the MEIR with implementation of Alternative Truck Routes 1, 2, and 6. Although non-cancer health risks associated with implementation of Alternative Truck Route 2 would be below the SCAQMD threshold of significance, cancer risks associated with Alternative Truck Route 2 would be approximately 10.59 in one million at the MEIR, which would exceed the SCAQMD’s threshold of significance of 10 in one million; thus, health risk impacts associated with implementation of Alternative Truck Route 2 would be significant prior to mitigation. Although there is not yet an established significance threshold for ambient cumulative TAC impacts, the Project-specific analysis demonstrates that implementation of Alternative Truck Route 2 would expose nearby sensitive receptors to cancer-related health risks of up to 10.59 in one million; thus, based on the Project-level cumulative analysis presented herein, cancer-related health impacts associated with Alternative Truck Route 2 also would be cumulatively considerable. With implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 and Alternative Truck Routes 1, 2, or 6, Project-source TACs would incrementally increase the background cancer risk by a maximum of 7.09, 8.38, or 6.53 incidents per million population, respectively. Therefore, with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 and Alternative Truck Routes 1, 2, or 6, the maximum incremental risk resulting from the Project would be less than significant on a cumulatively-considerable basis.</p> <p><b>Threshold d.:</b> The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions</p>	<p>Less than Significant</p>	<p><b>MM 4.3-6</b> In order to promote alternative fuels, and help support “clean” truck fleets, as part of future lease agreements the developer/successor-in-interest shall be required to provide building occupants with information related to SCAQMD’s Carl Moyer Program, or other such programs that promote truck retrofits or “clean” vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the project vicinity; 4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the United States Environmental Protection Agency’s SmartWay program.</p> <p><b>MM 4.3-7</b> All future construction activities associated with the Project shall be subject to adherence with the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses), regardless as to the size of proposed buildings. The following provisions shall apply to all future construction activities on site:</p> <p>a. All diesel fueled off-road construction equipment greater than 50 horsepower, including but not limited to excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be equipped with CARB Tier 4 Compliant engines. If the operator lacks Tier 4 equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to County approval.</p>	<p>Building &amp; Safety Department</p> <p>Project Applicant, Future Building Tenants/ Riverside County Building &amp; Safety Department</p> <p>Project Applicant, Construction Contractors/ Riverside County Building &amp; Safety Department</p>	<p>As part of future lease agreements and during the life of the Project</p> <p>During all construction activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County’s solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.</p>		<ul style="list-style-type: none"> <li>b. All excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be CARB Tier 3 Certified engines or better.</li> <li>c. The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day.</li> <li>d. Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers’ standards.</li> <li>e. The surrounding streets shall be swept on a regular basis to remove any construction related debris and dirt.</li> <li>f. Appropriate dust control measures that meet the SCAQMD standards shall be implemented for grading and construction activity.</li> <li>g. Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.</li> <li>h. Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with the items listed above, shall be kept onsite and furnished to the County upon request.</li> <li>i. During construction, the Transportation &amp; Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.</li> </ul> <p>Project contractors shall be required to ensure compliance with these requirements and permit periodic inspection of the construction site by County of Riverside staff or its designee to</p>		





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>confirm compliance. These requirements also shall be specified in bid documents issued to prospective construction contractors.</p> <p><b>MM 4.3-8</b> All future operations on site shall adhere to the germane policy provisions in the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). Applicable requirements of Policy F-3 shall be specified in future lease agreements with all future tenants, and future tenants shall be required to permit periodic inspection by Riverside County to ensure compliance. In addition, buildings smaller than 250,000 square feet shall comply with applicable policy provisions of the Good Neighbor Policy except as indicated below. Applicable feasible provisions of the Good Neighbor Policy that would serve to measurably reduce Project-related operational emissions include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>a. Warehouse/distribution facilities greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.</li> <li>b. Truck driveways shall generally be placed, on streets that do not have fronting sensitive receptors.</li> <li>c. Sites shall clearly mark entry and exit points for trucks and service vehicles.</li> <li>d. Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36- inch box trees. Facility operators will be responsible to establish a</li> </ol>	<p>Project Applicant, Project Tenants/ Riverside County Building &amp; Safety Department</p>	<p>Prior to issuance of building permits and during long-term site operations</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		<p>long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.</p> <ul style="list-style-type: none"> <li>e. Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County.</li> <li>f. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations.</li> <li>g. Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.</li> <li>h. Signs shall be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services.</li> <li>i. Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer also shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health</li> </ul>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>risks, and trucking regulations.</p> <p>j. Signs shall be posted in the appropriate locations heavy truck drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.</p> <p>k. The future applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County of Riverside to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. Said financial contribution will be determined by the Transportation and Land Management Agency based on the level of NOX emissions estimated to generated. Said supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted community wherein the project is located. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NOX reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses.</p> <p>l. All future warehouse/distribution facilities generally shall be designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.</p> <p>m. Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.</p> <p>Regardless as to whether they are listed above in Mitigation Measure MM 4.3-8, the Project shall comply with all other applicable provisions of Board of Supervisors' Policy F-3.</p>		
<b>4.4 Biological Resources</b>				
<p><b>Threshold a.:</b> The proposed Project would not conflict with the SKR HCP, with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. Although on-site impacts to the MSHCP Reserve Assembly requirements were previously addressed as part of HANS 269, portions of the Offsite areas traverse MSHCP Criteria Cells 2969 and 3069, and these improvements were not addressed as part of HANS 269. Accordingly, prior to mitigation, the Project's potential conflict with the MSCHP Reserve Assembly requirements represents a significant impact for which mitigation would be required. Additionally, Project impacts to 1.36 acres of MSCHP riparian/riverine habitat would represent a potential conflict with Section 6.1.2 of the MSHCP, and impacts would therefore be significant. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. However, Project-related nighttime lighting during construction has the potential to result in indirect impacts to the proposed OS-CH areas, representing a potential conflict</p>	Less than Significant with Mitigation	<p><b>MM 4.4-1</b> Prior to the certification of the Final Recirculated Environmental Impact Report for the Stoneridge Commerce Center Specific Plan Project by the Riverside County Board of Supervisors, the Project Applicant shall contract with a qualified biologist to prepare a Determination of Biologically Equivalent or Superior Preservation (DBESP), in accordance with Section 6.1.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The required DBESP shall address Project impacts to riverine/riparian resources subject to regulation by the USACOE, RWQCB, CDFW, and/or MSHCP. The DBESP shall identify compensatory mitigation for impacts to CDFW/MSHCP riparian/riverine resources (which include USACOE and RWQCB resources) at a minimum 3:1 ratio. Mitigation for impacts are anticipated to include the purchase of a minimum of 4.08 acres of credits from an approved mitigation bank, such as the Riverpark Mitigation Bank, although the final compensation for the loss of 1.36-acres of MSHCP riparian/riverine areas will be determined through the DBESP process. Prior to certification of the Final Recirculated</p>	Project Applicant/ Riverside County Planning Department and Environmental Programs Department	Prior to certification of the Final Recirculated EIR and prior to issuance of grading permits



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>with the MSHCP Urban/Wildland Interface requirements. In addition, although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact due to a conflict with MSHCP Objective 6 for burrowing owls, for which mitigation would be required in the form of pre-construction surveys and avoidance of any nesting burrowing owls. With exception of the Project's indirect construction-related nighttime lighting impacts (which would not be cumulatively considerable), Project impacts due to a potential conflict with the MSHCP would be significant on both a direct and cumulatively-considerable basis. Implementation of Mitigation Measure MM 4.4-5 would ensure that the Project's Offsite areas are subject to a HANS process to determine whether any portion of the Offsite areas would conflict with the MSHCP Reserve Assembly requirement, and would reduce potential impacts due to a conflict with the Reserve Assembly requirements to below a level of significance. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project-related impacts to 1.36 acres of MSHCP riparian/riverine areas within the Offsite areas are subject to a DBESP process prior to public hearings, and would further ensure that Project impacts would be mitigated at a minimum 3:1 ratio in a manner consistent with the approved DBESP, and would ensure that any lighting associated with nighttime concrete pouring activities during construction are directed away from the proposed on-site OS-CH areas, and would reduce Project indirect lighting impacts to less-than-significant levels. Implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl, and would</p>		<p>Environmental Impact Report for the Stoneridge Commerce Center Specific Plan Project by the Riverside County Board of Supervisors, the required DBESP shall be subject to review and approval by the Riverside County Environmental Programs Department (EPD), and also shall be subject to a 60-day review and response period by the Wildlife Agencies as required by the MSHCP. Following approval of the DBESP by County EPD and the Wildlife Agencies, and prior to issuance of grading permits, the Project Applicant shall provide evidence to Riverside County that the required compensatory mitigation has been achieved in accordance with the approved DBESP. Should compensatory mitigation credits be unavailable at the Riverpark Mitigation Bank, the Project Applicant shall coordinate with Riverside County and the Wildlife Agencies to secure alternate mitigation in conformance with the approved DBESP.</p> <p><b>MM 4.4-2</b> In the event that nighttime construction is proposed as part of future building permits, Riverside County shall review the plans to ensure the following note is included on the plans. This note also shall be specified in bid documents issued to prospective construction contractors.</p> <p><i>“During any nighttime construction activities, all lighting shall direct lighting away from the MSHCP conserved lands located along the San Jacinto River in the eastern and southeastern portions of the Project site (i.e., within Planning Areas 10 and 11 of the Stoneridge Commerce Center Specific Plan No. 239, Amendment No. 1).”</i></p> <p>Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.</p> <p><b>MM 4.4-3</b> In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a</p>	<p>Project Applicant/ Riverside County Planning Department and Building &amp; Safety Department</p> <p>Project Applicant, Project Biologist/ Riverside County</p>	<p>Prior to issuance of building permits authorizing nighttime construction activities</p> <p>Prior to issuance of grading permits or other permits</p>







Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>inclusive of 0.29-acre of impact to riparian areas and 1.07 acres of non-riparian ephemeral dry streambeds. Accordingly, prior to mitigation Project impacts to wetlands and jurisdictional waters subject to regulation by the USACOE, RWQCB, CDFW, and/or MSHCP would be significant. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to wetlands and jurisdictional areas are mitigated at a minimum 3:1 ratio in accordance with the DBESP that must be approved prior to Final EIR certification. Accordingly, implementation of Mitigation Measure MM 4.4-1 would address Project impacts to 0.29-acre (275 linear feet) of USACE-defined jurisdictional areas subject to regulation by the USACE and RWQCB, as well as impacts to 1.36 acres of WoS (2,151 linear feet), inclusive of 0.29-acre of impact to riparian areas and 1.07 acres of non-riparian ephemeral dry streambeds, that are regulated by the CDFW and MSHCP. Implementation of the required mitigation would reduce the Project's impacts to below a level of significance.</p> <p><b>Threshold g.:</b> Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation</p>	<p>No Impact</p>	<p>previously-approved HANS 269 determination to include required improvements due to off-site improvements, including improvements to roadways, infrastructure, and intersections, as the Offsite areas traverse MSHCP Criteria Cells 2969 and 3069 in Cell Group G. The HANS application shall be submitted to the RCA and shall be subject to the Western Multiple Species Habitat Conservation Plan (MSHCP) Joint Project Review (JPR) process. Prior to issuance of grading permits or improvement plans affecting areas within the Offsite improvement areas, the Project Applicant shall provide a copy of the approved amended HANS 269 determination. These requirements shall not apply in the event that the RCA does not require an amendment to HANS 269 for the Project's off-site improvements.</p>	<p>Department and Environmental Programs Department; MSHCP Wildlife Agencies; Regional Conservation Authority</p>	







Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>archaeological sites or resources identified on site or within the off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Project Archaeologist, County Archaeologist, and Native American Monitor(s). Implementation of the required mitigation would reduce the Project’s potential impacts to subsurface archaeological sites or resources to below a level of significance.</p> <p><b>Threshold e.:</b> In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.5-9 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.5-9, State law, and applicable regulatory requirements would reduce the Project’s potential impacts to buried human remains to less-than-significant-levels.</p>	<p>Less than Significant with Mitigation</p>	<p>prior to the issuance of a grading permit, the Project Applicant shall enter into a monitoring agreement with a Native American Monitor. In conjunction with the Project Archaeologist, the CRMP shall require the Native American Monitor to attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, the CRMP shall require that an adequate number of Native American Monitor(s) must 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. The CRMP shall require the Project Applicant to submit a fully executed copy of the agreement to the Riverside County Planning Department to ensure compliance.</p> <p>c) <u>Cultural Sensitivity Training.</u> The Project Archaeologist and a representative designated by the consulting Tribe(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training shall include a brief review of the cultural sensitivity of the Project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; 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 sign in sheet for attendees of this training shall be included in a Phase IV Monitoring Report.</p> <p>d) <u>Temporary Construction Fencing.</u> The CRMP shall require that prior to issuance of grading permits, the County shall review the proposed grading plans to ensure that a note is included on the plans requiring the provision of temporary fencing for the protection of cultural Sites P-33-003743, P-33-003744, SR-001,</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		<p>Temp-1, and Temp- 2 during grading activities. In addition, the CRMP shall require that sites located adjacent to the Project boundaries shall have temporary fencing placed to protect them during construction activities. These include Sites P-33-019862 (CA-RIV-10108); P-33-016072 and P-33-016036. Prior to commencement of grading or brushing, the CRMP shall require the Project Archaeologist to confirm the site boundaries and determine an adequate buffer for protection of the site(s). The CRMP shall further require the Project Applicant to direct the installation of fencing under the supervision of the archaeologist and Native American Monitor(s). The CRMP shall require that the fencing can be removed only after grading operations have been completed.</p> <p>e) <u>Site SR-001 Avoidance</u>. The CRMP shall require complete avoidance of disturbance to Site SR-001, and Riverside County shall require that the site be appropriately treated so as to discourage human intrusion (i.e., through fencing or landscape treatments, such as the planting of cactus). Prior to final grading inspection, Riverside County shall ensure that this measure has been implemented to the satisfaction of the County Archaeologist.</p> <p>f) <u>Site SR-002 Relocation</u>. The CRMP shall require that prior to commencement of grading activities, the feature associated with Site SR-002 must be relocated to the planned open space area identified as Planning Area 9 of Specific Plan No. 239, Amendment No. 1. As a component of the relocation and prior to commencement of construction activities in the affected area, any visible artifacts shall be recovered and recorded and the features recorded using professional archeological methods. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which feature was relocated, the process taken, and updated maps using sub-meter GIS technology to document the new location of the feature. The CRMP shall require the preparation of a Phase IV Monitoring Report, which shall document the relocation of Site SR-002 and shall clearly indicate that the feature</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>is not in the original location and why it was relocated.</p> <p>g) <u>Controlled Grading</u>. A controlled grading plan for areas surrounding Site SR-002 shall be developed in coordination with the consulting Tribes and included in the CRMP by the Project Archaeologist. The controlled grading plan shall require, without limitation, the systematic, slow, and deliberate removal of the ground surface to allow for the identification, documentation, and recovery of any subsurface cultural deposits using light scrapers (for example, Caterpillar 623 or 627), dozers (for example D6, D8), and/or front-end loaders. Results of the controlled grading program shall be included in a Phase IV monitoring report.</p> <p>h) <u>Preservation Plan</u>. The Project Archaeologist, with input from the consulting Tribes, shall develop a Preservation Plan for the long-term care and maintenance of Sites P-33-003743, P-33-003744, SR-001, Temp-1, and Temp-2. The plan shall indicate at a minimum, access rights for the Consulting Tribe(s) for educational, cultural, and ceremonial practices, and for the gathering of native plant species, the specific areas to be included in and excluded from long-term maintenance, prohibited activities, methods of preservation to be employed, the party responsible for the long-term maintenance, appropriate protocols, monitoring and necessary emergency protocols. Specifically, the Consulting Tribes shall have access to the Preservation Area, identified as Planning Area 9 of Specific Plan No. 239, Amendment No. 1, for ongoing educational, cultural, and religious practices and gathering of native plant species as defined by the Consulting Tribes. The preservation and maintenance plan shall describe the process for access, including notification timelines, for all such practices and activities. In the event the Project requires creation of a Property Owner's Association, the Association shall include within its Covenants, Conditions, and Restrictions (CC&amp;Rs) the right of the Consulting Tribe to access the Preservation Area for the intended practices and gathering of plant resources. The Project Applicant shall provide</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		<p>the approved CC&amp;R language if required, developed in consultation with the Consulting Tribe(s). The preservation and maintenance plan shall be binding on and inure to the benefit of successor owners and assignees. The preservation and maintenance plan shall be included as an appendix to the CRMP.</p> <p>i) <u>Previously-Undiscovered Resources</u>. In the event that previously unidentified archaeological or historical resources are discovered, the CRMP shall require the Project Archaeologist to contact the Lead Agency (Riverside County) at the time of discovery. The CRMP shall require that the Project Archaeologist, in consultation with the County Archaeologist and Tribal Monitors, shall determine the significance of the discovered resources. The CRMP shall indicate that the Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, the CRMP shall require a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist and approved by the County Archaeologist before being carried out using professional archaeological methods. Before construction activities are allowed to resume in the affected area, the CRMP shall require that the artifacts shall be recovered and features recorded using professional archaeological methods, and shall require that the Project Archaeologist determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. The CRMP shall require that evidence of compliance with the Research Design and Data Recovery Program, if a significant archaeological resource is found, shall be provided to Riverside County upon the completion of a treatment plan as part of a Phase IV Monitoring Report detailing the significance and treatment finding.</p> <p>j) <u>Artifact Disposition</u>. The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>site during any ground disturbing activities, including previous investigations and/or Phase III data recovery.</p> <p>k) <u>Phase IV Monitoring Report</u>. The CRMP shall require that prior to final grading inspection, in the event any resources are found on-site during construction activities, a final report documenting the field and analysis results, and interpreting the artifact and research data within the research context, shall be completed and submitted to the satisfaction of Riverside County. The report shall include (at a minimum) the following: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated Department of Parks and Recreation Primary and Archaeological Site Forms for any new resources identified, and all sites affected by the development; final disposition of the resources including GPS data; artifact catalog; and any additional recommendations as may be determined by Riverside County. A final copy shall be submitted to the Riverside County Planning Department, the Project Applicant, the Eastern Information Center, and the affected Tribe (if Native American resources are uncovered).</p> <p>l) <u>Reduced Monitoring</u>. The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for archaeological and tribal monitoring. The County shall consult with the consulting tribe(s) prior to determining the need for reduced archeological and tribal monitoring.</p> <p><b>MM 4.5-2</b> In the event that human remains are discovered, pursuant to California Health and Safety Code § 7050.5, as well as the Public Resources Code § 5097 et. seq., the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet the area of discovery</p>	<p>Project Applicant, Project Archaeologist/ County Archaeologist,</p>	<p>In the event that human remains are discovered during grading activities</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		to allow for the evaluation of the human remains and the surrounding vicinity. If any human remains are discovered, the County Coroner and lead agency shall be contacted. The County Coroner shall determine that no investigation of the cause of death is required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the NAHC shall be contacted within 24 hours of the discovery. The Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant; the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.	Planning Department, NAHC, County Coroner	
<b>4.6 Energy</b>				
<b>Threshold a:</b> Project construction and operations under both the Primary Land Use Plan and Alternative Land Use Plan would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.	Less than Significant	Impacts due to energy consumption would be less than significant; thus, mitigation measures are not required.	N/A	N/A



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p><b>Threshold b:</b> Energy consumed by the Project’s operation is calculated to be comparable to, or less than, energy consumed by other commercial, business park, and light industrial projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the applicable version of Title 24, which was not in effect when most existing developments were constructed. Moreover, the Project would be subject to compliance with the mitigation measures presented in EIR Subsection 4.3, Air Quality, which would further reduce the Project’s energy demand, and the Project would be required to comply with the Riverside County CAP Update, as described in EIR Subsection 4.8, Greenhouse Gas Emissions. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.</p>	<p>Less than Significant</p>			
<p><b>4.7 Geology and Soils</b></p>				
<p><b>Thresholds a. and c.:</b> The Project site is not subject to fault hazards, as none occur on site. However, the Project as evaluated herein is limited to changes in the land use designations and zoning classifications for the 582.6-acre Project site. Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County</p>	<p>Less than Significant with Mitigation</p>	<p><b>MM 4.7-1</b> Prior to approval of any future implementing developments within the 582.6-acre Project site (e.g., tentative tract maps, plot plans, etc.), updated site-specific geotechnical studies shall be prepared to evaluate grading and site work proposed as part of the future implementing developments. All future implementing projects shall be conditioned to require that the site-specific recommendations of the implementing geotechnical evaluations shall be incorporated into future grading and building permit applications. Future grading or building permits shall not be issued by the County unless the investigations required by Riverside County Ordinance Nos. 457 and 547 have been completed and the site-specific recommendations have been incorporated into the design of grading and/or building permits, as appropriate.</p>	<p>Project Applicant/ Building and Safety Department</p>	<p>Prior to approval of any future implementing developments</p>





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
<p>Building Code. With implementation of the required mitigation, impacts due to strong seismic ground shaking would be reduced to less-than-significant levels.</p> <p><b>Threshold b.:</b> Site soils are not generally susceptible to liquefaction due to a lack of groundwater in the upper 50 feet and generally dense to very dense sandy soils. However, isolated layers may be susceptible to dry sand seismic settlement. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address any localized liquefaction hazards that may be identified in areas subject to grading and development. With implementation of the required mitigation, impacts due to liquefaction hazards would be reduced to less-than-significant levels.</p> <p><b>Threshold d.:</b> Impacts due to landslide hazards, lateral spreading, collapse hazards, and rockfall hazards could occur if proposed grading is not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for landslide hazards. With implementation of the required mitigation, impacts due to landslide hazards would be reduced to less-than-significant levels.</p> <p><b>Threshold e.:</b> Impacts due to subsidence hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building</p>	<p>Less than Significant with Mitigation</p> <p>Less than Significant with Mitigation</p> <p>Less than Significant with Mitigation</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>permit applications to address potential subsidence hazards. With implementation of the required mitigation, impacts due to subsidence hazards would be reduced to less-than-significant levels.</p> <p><b>Threshold f.:</b> The Project site is not subject to volcanic hazards. Due to the lack of an onsite body of water or other bodies of water in the Project vicinity that could subject the site to inundation due to seiches, the potential for the subject site to be impacted by seiches is considered low, and impacts due to seiches would therefore be less than significant. Due to shallow bedrock and the limited nature of soils on the on- and off-site hillforms, it is unlikely that the Project site would be subject to mudflow hazards; thus, impacts due to mudflow hazards would be less than significant.</p> <p><b>Thresholds g. and h.:</b> The Project would not substantially change topography or ground surface relief features, and impacts would be less than significant. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to ensure that any slopes higher than 10 feet or at a gradient steeper than 2:1 would be grossly stable. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels.</p> <p><b>Thresholds i. and l.:</b> There are no subsurface sewage disposal systems on site under existing conditions, and the Project does not propose any septic tanks or alternative waste water disposal systems. As such, no impact would occur.</p> <p><b>Thresholds j. and m.:</b> The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a National Pollutant</p>	<p>Less than Significant</p> <p>Less than Significant with Mitigation</p> <p>No Impact</p> <p>Less than Significant</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>Discharge Elimination System (NPDES) permit for construction activities and adhere to a Storm Water Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457, and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term.</p> <p><b>Threshold k.:</b> Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. With implementation of the required mitigation, impacts associated with expansive soils would be reduced to less-than-significant levels.</p>	<p>Less than Significant with Mitigation</p>			
<p><b>4.8 Greenhouse Gas Emissions</b></p>				
<p><b>Threshold a:</b> The Project would result in approximately 115,953.50 MTCO<sub>2e</sub>/yr under the Primary Land Use Plan and 114,610.50 MTCO<sub>2e</sub>/yr under the Alternative Land Use Plan; thus, the proposed Project would exceed the County’s screening threshold of 3,000 MTCO<sub>2e</sub>/year. If the Project were to fail to achieve 100 points pursuant to the CAP Screening Tables, Project-related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment. Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead</p>	<p>Less than Significant with Mitigation</p>	<p><b>MM 4.8-1</b> Prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table ES-2 of the Project’s Greenhouse Gas Analysis (GHGA), which is appended to this EIR as Technical Appendix T. The conceptual measures may be replaced with other measures as listed in the</p>	<p>Project Applicant/ Riverside County Planning Department</p>	<p>Prior to approval of implementing development applications and prior to issuance of building permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, with implementation of Mitigation Measure MM 4.8-1, the Project would be fully consistent with the CAP Update and the Project’s cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels.</p> <p><b>Threshold b:</b> The Project would be consistent with or otherwise would not conflict with the CARB 2017 Scoping Plan and the CARB 2022 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project. Implementation of Mitigation Measure MM 4.8-1 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that future implementing building permit applications have incorporated measures to achieve a</p>	<p>Less than Significant with Mitigation</p>	<p>CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update.</p> <p><b>MM 4.8-2</b> Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, and in accordance with measure R2-CE1 of the County’s Climate Action Plan (CAP) Update, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.</p>	<p>Project Applicant/ Riverside County Planning Department</p>	<p>Prior to issuance of building permits</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
minimum of 100 points pursuant to the CAP Update Screening Tables. With implementation of Mitigation Measure MM 4.8-1, Project impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels.				
<b>4.9 Hazards and Hazardous Materials</b>				
<p><b>Thresholds a. and b.:</b> Implementation of Mitigation Measure MM 4.9-1 would ensure that appropriate remedial measures are undertaken as part of future site grading activities to address soils on site that may be contaminated with pesticides that exceed regulatory limits. With implementation of the required mitigation, Project hazardous materials impacts due to existing site conditions would be reduced to less-than-significant levels.</p> <p><b>Threshold c.:</b> The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of the Ramona Expressway and Nuevo Road. Moreover, the Project would construct several major new roadways on site (i.e., Antelope Road and Orange Avenue), which would serve to improve emergency access in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.</p> <p><b>Threshold d.:</b> The Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within close</p>	<p>Less than Significant with Mitigation</p> <p>No Impact</p> <p>Less than Significant</p>	<p><b>MM 4.9-1</b> Prior to issuance of any grading permits, the Project Applicant shall have prepared, and the Riverside County Planning Department shall review and approve, a Phase II Environmental Site Assessment (ESA). The Phase II ESA shall be prepared for all areas proposed for development with commercial retail, business park, and/or light industrial land uses. The purpose of the Phase II ESA is to evaluate the near-surface soils on site for evidence of contamination with pesticides. In the event that the results of the Phase II ESA determine that pesticide levels in site soils are below regulatory limits, then no further action is required. In the event that the Phase II ESA identifies levels of pesticide contamination that exceeds regulatory limits, then the Phase II ESA shall identify appropriate remediation measures, which may include, but may not be limited to, the removal of surficial soils and mixing with other on site soils, or disposal at a facility that is approved to handle contaminated soils. Future grading permits shall be conditioned to implement the attenuation measures identified by the Phase II ESA, as appropriate. Prior to final grading inspection, the Project Applicant shall provide evidence that the remediation measures identified by the Phase II ESA have been completed as part of site grading activities to the satisfaction of Riverside County.</p> <p><b>MM 4.9-2</b> Prior to the issuance of any new occupancy permit for a use/user within the proposed Project’s buildings, and to the extent hazardous materials are planned to exist on-site and a Hazardous Materials Business Emergency Plan (HM-BEP) is required by law, the Project Applicant shall provide a copy of its approved</p>	<p>Project Applicant, Project Hazardous Materials Consultant/ Planning Department, Riverside County Department of Environmental Health</p> <p>Project Applicant, Future Tenants/ VVUSD, Riverside County Planning</p>	<p>Prior to issuance of grading permits and as a component of grading operations, if required</p> <p>Prior to issuance of any new occupancy permits for uses involving the use or storage</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>proximity to two existing schools (Lakeside Middle School and Sierra Vista Elementary School), although both schools are located more than 0.25 mile from the Project site. However, impacts would be less than significant with compliance to applicable federal, State, and local regulations. Although impacts would be less than significant, mitigation has been identified herein to require preparation of a Hazardous Materials Business Emergency Plan (HMBEP) for future implementing uses, if required by law (refer to Mitigation Measure MM 4.9-2).</p> <p><b>Threshold e.:</b> Based on the results of the Project’s Phase I ESA (Technical Appendix G), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.</p> <p><b>Threshold f., g., and h:</b> The Project would not result in an inconsistency with an Airport Master Plan, and impacts would be less than significant. The ALUC reviewed the Project on May 5, 2021, which found that the Project would not conflict with the March ARB ALUCP. Therefore, impacts would be less than significant. Moreover, according to the MARB ALUCP, the “Risk Level” for land uses within Compatibility Zone “E” is considered “Low,” and indicates that these areas are within outer or occasionally used portions of flight corridors. Thus, the Project would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.</p> <p><b>Threshold i:</b> There are no private airstrips or heliports within two miles of the Project site, and no such facilities are proposed as part of the Project. No impact would occur.</p>	<p>No Impact</p> <p>Less than Significant</p> <p>No Impact</p>	<p>Emergency Response Plan to the Superintendent’s Office and Facilities Office of the Val Verde Unified School District outlining how the building user(s) will prevent or respond to spills or leaks of hazardous materials related to its facility/facilities and use of the Project site. If so requested, the Project Applicant shall also meet with School District and Fire Department officials to discuss emergency response procedures as contained in the HMBEP for spills or leaks at the Project site in relation to the nearby school facilities. This measure shall be implemented under the supervision of the Riverside County Planning Department, with input from the Val Verde Unified School District Superintendent as appropriate. All meetings shall be documented and documentation shall be provided to the County Planning Department within 30 days of each meeting. Failure to abide by these procedures may be grounds for revocation of any plot plans or other discretionary approvals for specific warehouse uses on the Project site.</p>	<p>Department, Riverside County Fire Department</p>	<p>of hazardous materials on site</p>





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>future implementing developments (i.e., tentative tract maps, plot plans, etc.). The future-required hydrology studies would be required to demonstrate that measures have been incorporated (e.g., bioswales, bioretention basins, etc.) to reduce the rate of runoff from the developed portions of the property in a manner consistent with RCFCWCD requirements, thereby ensuring runoff from the Project site does not exceed the capacity of existing or planned drainage systems or adversely affect the course of a stream or river. The required PWQMPs also would ensure that runoff from the Project site is adequately treated for water quality pollutants prior to discharge from the Project site. Implementation of the required mitigation would reduce Project impacts to less-than-significant levels.</p> <p><b>Threshold d.:</b> Due to mandatory compliance with the applicable NPDES permit and associated requirement to prepare and implement a SWPPP during construction, construction-related impacts due to erosion or siltation would be less than significant. Implementation of Mitigation Measures MM 4.10-1 and MM 4.10-2 would ensure that hydrology studies and PWQMPs are prepared as part of future implementing developments (i.e., tentative tract maps, plot plans, etc.). Measures would be identified as part of the PWQMPs to reduce siltation within runoff from the Project site. The required hydrology studies would ensure that runoff from the Project site does not substantially increase with Project development, thereby reducing the Project’s potential to result in erosion or siltation hazards to downstream areas. Thus, implementation of the required mitigation would ensure that the Project does not result in substantial erosion or siltation on or off site, and impacts would be reduced to less-than-significant levels.</p>	<p>Less than Significant with Mitigation</p>	<p>and shall identify appropriate Best Management Practices (BMPs) as necessary to address the Project’s identified pollutants of concern. Measures identified by the PWQMPs shall be depicted on the development plans associated with future development applications (i.e., tentative tract maps, plot plans, etc.), and also shall be depicted on all future construction plans (e.g., grading permits). The PWQMPs for implementing developments shall be reviewed and approved by the RCFCWCD prior to approval of implementing developments within the Project site, and the future implementing developments shall be conditioned to implement the measures identified in the WQMPs as necessary to preclude substantial amounts of pollutants in runoff from the Project site.</p> <p><b>MM 4.10-3</b> Prior to issuance of grading permits that would encroach into areas mapped as subject to flood hazards by the Federal Emergency Management Agency (FEMA), the Project Applicant shall obtain a Conditional Letter of Map Revision (CLOMR) from FEMA to identify measures that will be undertaken to remove the areas proposed for development from the mapped floodplain on site. Prior to final grading inspection for any grading that would encroach into the mapped floodplain, the Project Applicant shall obtain a Letter of Map Revision (LOMR) from FEMA to verify that the Project site has been graded in such a manner as to remove areas planned for development with light industrial uses from areas subject to flooding hazards.</p>	<p>Project Applicant/ FEMA, Building and Safety Department, Riverside County Flood Control and Water Conservation District</p>	<p>construction activities</p> <p>During construction activities</p>
<p><b>Thresholds e. and g.:</b> According to mapping information</p>	<p>Less than</p>			







Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>occur within the mapped inundation area for the Lake Perris dam, the DWR is planning to complete improvements to the dam in 2023, which would attenuate the risk of dam failure. As such, the Project site would not be subject to inundation hazards associated with the failure of the Perris Dam. Because the Project site would not be subject to inundation due to a failure of the Perris Dam, it also can be concluded that the Project site would not be subject to inundation due to seiches within Lake Perris. The portions of the Project site that are located within mapped floodplains and dam inundation areas associated with the Lake Perris dam primarily are proposed to be conserved as open space as part of SP 239A1, with no development occurring in these areas. However, a small portion of proposed Planning Area 4 of SP 239A1 occurs within the San Jacinto River floodplain. Implementation of Mitigation Measure MM 4.10-3 would ensure that the areas of the Project site that are proposed for development with light industrial uses are removed from the mapped floodplains and would ensure that future development is not subject to inundation during flood events. With implementation of the required mitigation, the Project would not risk the release of pollutants due to Project inundation, and impacts would be reduced to less-than-significant levels.</p>				
<p><b>4.11 Land Use and Planning</b></p>				
<p><b>Threshold a.:</b> The Project would not conflict with the General Plan, LNAP, the SCAG 2020-2045 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, and with exception of the significant and unavoidable impacts to surrounding land uses identified</p>	<p>Less than Significant</p>	<p>Impacts would be less than significant; therefore, mitigation measures are not required.</p>	<p>N/A</p>	<p>N/A</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>in the relevant sections of this EIR, Project impacts due to land use incompatibility would be less than significant.</p> <p><b>Threshold b.:</b> The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.</p>	Less than Significant			
<b>4.12 Mineral Resources</b>				
<p><b>Threshold a.:</b> The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.</p> <p><b>Threshold b.:</b> The Project would not 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, and no impact would occur.</p> <p><b>Threshold c.:</b> The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.</p> <p><b>Threshold d.:</b> The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.</p>	<p>No Impact</p> <p>No Impact</p> <p>No Impact</p> <p>No Impact</p>	Impacts would be less than significant; therefore, mitigation measures are not required.	N/A	N/A
<b>4.13 Noise</b>				
<p><b>Thresholds a. and b.:</b> The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area. Additionally, the Project site is located outside of the 55 dBA noise contour for the MARB and Perris Valley Airport, and therefore has no potential to result in the exposure of future Project employees to excessive airport-</p>	Less than Significant	<b>MM 4.13-1</b> Prior to approval of any plot plans or conditional use permits for proposed light industrial, business park, or commercial retail uses within Planning Areas 1, 2, 3, 4, 5, 6, 7, 8A, or 8B of Specific Plan No. 239, Amendment No. 1, the Project Applicant shall prepare and Riverside County shall review and approve a site-specific noise impact analysis. The analysis shall evaluate the proposed plot plan or conditional use permits application materials	Project Applicant, Project Noise Consultant/ Riverside County Planning Department, Riverside County	Prior to approval of any plot plans or conditional use permits for proposed light industrial, business park, or





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<p>portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</p> <ul style="list-style-type: none"> <li>▪ Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</li> <li>▪ Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</li> <li>▪ San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</li> <li>▪ Alternative Truck Route 2</li> <li>▪ Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</li> <li>▪ Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</li> <li>▪ San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors</li> </ul>		<p>Vibration Abatement Plan shall include the name and qualifications of the person(s) responsible for monitoring and reporting blast vibrations. In addition, the Noise and Vibration Abatement Plan shall require a minimum of three seismographs for monitoring peak ground vibration and air-overpressure. The Noise and Vibration Abatement Plan also shall require that equipment and its use shall conform fully to the standards developed by the Vibration Section of the International Society of Explosive Engineers (ISEE). For all blasts, the Noise and Vibration Abatement Plan shall require monitoring of ground motion and air-overpressure at the nearest residential properties or other structure of concern. The Noise and Vibration Abatement Plan also shall specify a minimum trigger level for monitoring of 0.05 in/s for ground motion and 120 dB for air-overpressure. Additionally, the Noise and Vibration Abatement Plan shall require regular reporting of blasting and measurements to Riverside County, and shall include a copy of the instrument/software-generated blast monitoring report at each instrument location that includes measured peak particle velocity in inches per second, peak air-overpressure in linear-scale decibels, and vibration and air-overpressure event plots, with date and time of event recording. In addition, the Noise and Vibration Abatement Plan shall include the following requirements:</p> <ul style="list-style-type: none"> <li>▪ Prior to commencement of any blasting, a pre-blast survey of the conditions of all existing property and aboveground utilities located within 300 feet of any potential blasting areas shall be conducted. The pre-blast survey shall include a photographic record of all visible and accessible structures, facilities, utilities, or other improvements. The survey shall document the interior and exterior conditions of all residential property and associated structures located within 500 feet of blasting areas. If property owners refuse surveys, provide copies of certified-mail letters documenting attempts to provide the survey by a third-party professional survey</li> </ul>	<p>Riverside County Planning Department, Riverside County Building &amp; Safety Department, Riverside County Sheriff's Department</p>	<p>blasting permit and during blasting activities</p>



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<p>along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.</p> <p><b>Threshold d.:</b> As shown in Table 4.13-22, construction vibration velocity levels are estimated at 0.000 in/sec PPV at the nearest existing noise sensitive receiver locations, and would be below 0.035 PPV at all of the future sensitive residential receptor locations. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all of the noise receiver locations. Additionally, Table 4.13-23 shows that the off-site roadway and utility construction vibration levels would fall below the building damage thresholds. Without vibration controls and measures, blasting activities associated with the off-site water tank construction could exceed thresholds at the areas near existing residential homes surrounding the water tank site, as shown on Figure 4.13-8. Therefore, prior to mitigation, Project-related blasting vibration impacts would be significant requiring mitigation. Implementation of Mitigation Measure MM 4.13-2 would ensure that all future blasting activities occur on site in conformance with a County-approved blasting Noise and Vibration Abatement Plan. The mitigation would ensure that any potentially affected structures or utilities would be subject to inspections prior to commencement of any blasting activities, and additional surveys would be required where damage concerns have been expressed by individual residents, property owners, or other concerned parties. The provisions of the Noise and Vibration Abatement Plan also would impose restrictions on blasting activities within 100 feet and within 500 feet of residential structures, and would require monitoring of vibration levels during blasting. In the event</p>	<p>Less than Significant with Mitigation</p>	<p>company. The required surveys shall include a description of the interior and exterior condition of the various structures examined. Descriptions shall include the locations of any cracks, damage, or other existing defects and shall include information needed to identify and describe the defect, if any, and to evaluate the construction operations on the defect. Survey records shall include photos of all cracks and other damaged, weathered, or otherwise deteriorated structural conditions. If necessary, macro lenses and flash illumination shall be used to ensure defects are shown clearly in the photographs. Photos shall contain an accurate date stamp. No blasting shall occur prior to completion of surveys of surrounding residential properties. Surveys also shall be repeated at facilities or properties where damage concerns have been expressed by individual residents, property owners, or other concerned parties. Details of any observed changes to surveyed structures and documenting photos shall be reported and submitted to Riverside County.</p> <ul style="list-style-type: none"> <li>▪ Blasting only shall be allowed Monday through Friday only between the hours of 8:00 a.m. and 5:00 p.m.</li> <li>▪ No blasting shall occur closer than 100 feet from residential structures. In the event that non-rippable materials are encountered within 100 feet from any residential structure, alternative methods shall be employed to reduce blasting-related noise and vibration impacts. Alternative rock blasting within 100 feet of residential homes may include methods such as the drilling of holes in the largest area of rock, inserting expansive grout or small charges into each whole to fragment the rock into smaller pieces, and then crushing the pieces for transport or other use.</li> <li>▪ No more than a total of 2,000 pounds of explosive shall be detonated each day, excluding detonators.</li> <li>▪ All blasts located within 500 feet of any structures or above</li> </ul>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>that blasting activities exceed the specified vibration limit of 0.05 in/s for ground motion and 120 dB for air-overpressure, then all blasting activities would cease until a revised blasting plan is prepared and approved by Riverside County. Implementation of Mitigation Measure MM 4.13-2 would ensure that vibration-related impacts during construction-related blasting activities do not adversely affect any existing structures, and would reduce blasting-related vibration impacts to less-than-significant levels.</p>	<p>Less than Significant</p>	<p>ground utilities shall be covered with woven steel cable or steel-cable and rubber-tire blasting mats with a minimum weight of 30 pounds per square foot. Woven polypropylene or similar weed-barrier fabric, covered with at least 6 inches of soil or sand shall be placed over blast areas to protect initiators before mats are placed. Mats shall be overlapped at least 3 feet and shall completely cover the blast area and extend at least three feet beyond the blast area in all directions. If any flyrock or blasted material is thrown more than 10 feet or half the distance to the nearest structure, whichever is less, blasting shall be suspended until the County’s has approved a revised blasting plan showing revisions to assure adequate ground movement control.</p> <ul style="list-style-type: none"> <li>▪ Before blasts are covered, all loose soils above the blast shall be removed where feasible. Remaining ground located within 20 feet of the blast shall be thoroughly wetted with water to suppress airborne dust. Sand or soils placed over weed-barrier fabric shall be similarly wetted before placing blast mats.</li> <li>▪ If specified vibration limits are exceeded, blasting operations shall cease immediately and a revised blasting plan shall be submitted to the County. Blasting shall not resume until a revised blasting plan has been reviewed and the Contractor has expressed in writing the conditions that will be applied to further blasting work.</li> </ul> <p>Project grading and blasting contractors shall be required to ensure compliance with the Noise and Vibration Abatement Plan requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The requirements of the Noise and Vibration Abatement Plan also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance with the Noise and Vibration Abatement Plan, and shall have the authority to stop</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>all blasting activities on site if it is determined that blasting activities are not being conducted in conformance with Noise and Vibration Abatement Plan and/or the above-listed requirements.</p> <p><b>MM 4.13-3</b> To minimize the potential construction noise impacts from the off-site roadway and utility improvements, the Project shall implement the following construction noise abatement measures. Project grading and blasting contractors shall be required to ensure compliance with these requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The following requirements also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance.</p> <ul style="list-style-type: none"> <li>▪ All construction activities shall comply with Riverside County Ordinance No. 847 Regulating Noise Section 2i (Code Section 9.52.020[I]), limiting construction activities to the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. (13) Any construction activity within the City of Perris shall comply with the Municipal Code, Section 7.34.060, limiting construction activities to the hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (with the exception of Columbus Day and Washington’s birthday).</li> <li>▪ Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers’ standards).</li> <li>▪ All stationary construction equipment shall be placed in such a manner so that the emitted noise is directed away from any sensitive receivers.</li> <li>▪ Construction equipment staging areas shall be located the</li> </ul>	<p>Project Applicant, Construction Contractors/ Riverside County Building &amp; Safety Department</p>	<p>During construction of off-site roadway and utility improvements</p>





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		<p>greatest distance between the staging area and the nearest sensitive receivers.</p> <ul style="list-style-type: none"> <li>▪ The construction contractor shall limit equipment and material deliveries to the same hours specified for construction equipment outlined above.</li> <li>▪ Electrically powered air compressors and similar power tools shall be used, when feasible, in place of diesel equipment.</li> <li>▪ No music or electronically reinforced speech from construction workers shall be allowed.</li> </ul>		
<b>4.14 Paleontological Resources</b>				
<p><b>Threshold a.:</b> The Project would not impact any known paleontological resources or unique geological features. Implementation of Mitigation Measure MM 4.14-1 would ensure that a PRIMP is prepared prior to issuance of any grading permits that have the potential to affect subsurface paleontological resources. Implementation of a PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project’s direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.</p>	<p>Less than Significant with Mitigation</p>	<p><b>MM 4.14-1</b> Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by the County to create and implement a Project-specific plan for monitoring site grading/earthmoving activities (Project paleontologist). The Project paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:</p> <ul style="list-style-type: none"> <li>▪ Prior to issuance of grading permits, a qualified vertebrate paleontologist (“Project Paleontologist”) shall review the Project grading plans and geotechnical report data, with particular regard to location and depth of earth moving and the rock unit(s) being encountered. The review is for the purpose of assessing potential for fossil remains being encountered by earth moving. If previously undisturbed strata with potential</li> </ul>	<p>Project Applicant, Project Paleontologist/ County Geologist, Planning Department</p>	<p>Prior to the issuance of grading permits and during grading and ground-disturbing activities</p>



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		<p>for containing fossil remains will be encountered by earth moving, the following measures shall be implemented.</p> <ul style="list-style-type: none"> <li>▪ <b>Museum Storage Agreement.</b> The Western Science Center (WSC), Natural History Museum of Los Angeles County (LACM), San Diego Natural History Museum (SDNHM), San Bernardino County Museum (SBCM), or Riverside Municipal Museum (RMM) shall be the designated museum repository for any vertebrate, invertebrate, and plant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered from the site as a result of the PRIMP. Prior to any earth moving at the Project site, the paleontologist shall develop a formal agreement with the museum regarding final disposition and permanent storage and maintenance of the fossil collection and associated data. The agreement shall cover, but not necessarily be limited to, museum requirements regarding: 1) level of treatment of the collection; 2) storage and maintenance fees, if any; 3) purchase of specimen storage cabinets and drawers, as well as specimen trays, vials, specimen data cards, and other curatorial supplies, if required.</li> <li>▪ <b>Discovery Clause/Treatment Plan.</b> As part of the PRIMP, the Project Paleontologist shall develop a discovery clause/treatment plan (DC/TP) to allow for the additional tasks (recovery, geologic mapping, fossiliferous rock sample processing, specimen preparation, identification, curation, cataloguing, data entry, specimen storage, and maintenance by museum) and manpower required to treat a large or productive fossil occurrence that cannot be treated without diverting the monitor from routine monitoring. The DC/TP shall also include approved procedures and lines of communication to be followed by specific individuals if fossil remains are uncovered by earth moving, particularly when a paleontologic monitor is not present at the site. Names and telephone numbers of contact personnel shall be included in the lines of</li> </ul>		



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		<p>communication. The preparation of the required PRIMPs for future grading permits would ensure compliance with these requirements.</p> <ul style="list-style-type: none"> <li>▪ Pre-Construction Meeting. The Project Paleontologist or field supervisor, as well as a paleontologic construction monitor, shall attend a preconstruction meeting to explain the PRIMP to construction contractor and the developer’s construction workers. The presentation shall summarize mitigation procedures to be employed by PRIMP personnel and shall detail procedures and lines of communication to be followed by specific Project personnel when fossil remains are found at the site.</li> </ul> <p>The Project Paleontologist or field supervisor shall inform the construction contractor and the developer’s construction workers of the following items:</p> <ol style="list-style-type: none"> <li>1) Routine mitigation measures (primarily monitoring and test screening) to be employed by a monitor during earth moving.</li> <li>2) The potential for fossil remains being uncovered by earth moving in particular areas of the site and the need to implement specific actions and additional mitigation measures when a fossil occurrence is uncovered by earth moving.</li> <li>3) Functions and responsibilities of the monitor when fossil remains are uncovered by earth moving and can be recovered without diverting the monitor from monitoring (temporarily divert earth moving around fossil site until remains evaluated, recovered, and earth moving allowed to proceed through site by monitor; if approved by construction contractor, enlist assistance of earth-moving equipment and operator to expedite recovery of remains, obviate need for additional personnel, and reduce any potential construction delay).</li> </ol>		



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		<p>4) Functions and responsibilities of the monitor when a fossil occurrence is uncovered by earth moving and is sufficiently large or productive that it cannot be recovered without diverting the monitor from monitoring.</p> <p>4a) Flag the site.</p> <p>4b) Advise construction contractor to avoid fossil site until further notice.</p> <p>4c) Call the Project Paleontologist or field supervisor to site.</p> <p>5) Functions and responsibilities of the Project Paleontologist or field supervisor when notified by the monitor that a large or productive fossil occurrence has been uncovered by earth moving and cannot be recovered without diverting the monitor from monitoring. Evaluate occurrence to determine if recovery is warranted.</p> <p>5a) If recovery is warranted, notify construction contractor and the Project developer of necessity for implementing additional mitigation measures specified in DC/TP initiating increased level of monitoring, if not already in effect, in immediate vicinity of fossil site and assigning additional personnel to PRIMP.</p> <p>5b) Within 24 hours, mobilize recovery crew to recover occurrence; supervise recovery of occurrence and its transport to laboratory facility or to location elsewhere at site approved by construction contractor for initial/field processing of a fossiliferous rock sample or to laboratory facility for preparation of a fossil specimen.</p> <p>5c) If warranted and approved by construction contractor, enlist assistance of the earth-moving equipment and operator to expedite recovery of occurrence.</p> <p>5d) To obviate need for additional personnel and reduce</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>any potential construction delay, after recovery of occurrence, have construction contractor allow earth moving to proceed through fossil site.</p> <p>5e) Notify Project developer of recovery (or of decision not to recover fossil occurrence, if appropriate) and of authorization for earth moving to proceed through fossil site.</p> <p>6) Responsibilities of the construction contractor and earth-moving equipment operators if fossil remains are uncovered by earth moving, particularly if a monitor is not present at the site when the remains are encountered.</p> <p>6a) Avoid disturbance of fossil site by earth moving.</p> <p>6b) Notify monitor, the Project Paleontologist or the field supervisor and Project developer of the fossil occurrence.</p> <p>6c) Avoidance of fossil site by earth-moving activities.</p> <p>6d) Assist with equipment and operator to expedite recovery of occurrence.</p> <p>If warranted, the Project Paleontologist or field supervisor and a monitor shall give a similar presentation to the earth-moving equipment operators at one of their earliest safety meetings. The operators shall be instructed on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor call monitor to fossil site; expedite recovery of occurrence, if requested), and advised that unauthorized collecting of fossil remains is illegal.</p> <ul style="list-style-type: none"> <li>▪ Monitoring Earth Moving. Earth moving shall be monitored by a paleontologic monitor only in those areas of the site where earth moving will disturb soils greater than 5 feet deep (monitoring will not be conducted in areas in which soils will</li> </ul>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>be buried, but not disturbed). Monitoring shall not be implemented until earth moving has reached a depth of 5 feet below current grade. Monitoring shall consist of visually inspecting freshly exposed rock and debris for larger fossil remains and periodically dry test screening a small (25 pound) sample of rock and debris with a 20-mesh box screen for smaller vertebrate fossil remains. Monitoring shall be conducted on a full-time basis. However, if too few or no fossil remains are uncovered by earth moving in areas underlain by a particular rock unit, monitoring can be reduced, generally, to half or quarter time or suspended once 50% of earth moving in the area underlain by the rock unit has been completed. Alternatively, if sufficient fossil remains are uncovered by earth moving, monitoring may be increased in areas underlain by the fossil-bearing rock unit, at least in the immediate vicinity of the fossil site.</p> <ul style="list-style-type: none"> <li>▪ Large-Specimen Evaluation and Recovery Option.               <ol style="list-style-type: none"> <li>1) If a large fossil specimen is found as a result of monitoring earth moving and the specimen can be recovered without significantly diverting the monitor from monitoring, earth moving shall be temporarily diverted around the fossil site and the specimen shall be evaluated, and, if warranted, excavated, covered with a protective plaster-impregnated burlap jacket, if required, and recovered.</li> </ol> <p>If necessary, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen and obviate the need for additional personnel, and the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen. A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen</p> </li> </ul>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
		<p>(field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site.</p> <p>At the end of the day the monitor or (following his next site inspection) the field supervisor shall transport the fossil remains and associated data to a laboratory facility for further treatment. If appropriate, samples of fossil wood will be submitted for carbon-14 dating analysis.</p> <p>2) If a fossil specimen is found and is sufficiently large that it cannot be recovered without significantly diverting the monitor from monitoring, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site, the construction contractor shall be advised to avoid the site until further notice, and the Project Paleontologist or field supervisor shall be called to the site. The grading contractor will notify the Project developer and Project Paleontologist of the occurrence and of the avoidance of the site. The Project Paleontologist or field supervisor in turn shall evaluate the specimen to determine if recovery is warranted.</p> <p>2a) If specimen recovery is not warranted, no further action will be taken to preserve the fossil site or remains, and the construction contractor will be allowed to have earth moving proceed through the site immediately.</p> <p>2b) If specimen recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP, initiating full-time</p>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>monitoring, if not already in effect, at least in the immediate vicinity of the site in areas underlain by the fossil-bearing rock unit, and assigning additional personnel to the PRIMP. Within 24 hours a recovery crew shall be mobilized to recover the specimen. The size of the crew shall reflect the size of the specimen and the need to recover the specimen as quickly as possible.</p> <p>The specimen shall be excavated with hand tools, covered with a protective plaster-impregnated burlap jacket, and recovered. If necessary and approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen, reduce any potential construction delay, and obviate the need for additional personnel. The construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen.</p> <p>A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor’s daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member shall transport the fossil specimen and associated site data to a laboratory facility for further treatment.</p> <ul style="list-style-type: none"> <li>▪ Small-Specimen Sample Evaluation, Recovery, and Processing. If a sufficient number of smaller vertebrate fossil remains are found at one (1) site as a result of test screening</li> </ul>		





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		<p>by the paleontological monitor, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site. The construction contractor shall be advised to avoid the site until further notice, and if requested by the monitor to expedite recovery of a fossiliferous rock sample reduce any potential construction delay and obviate the need for additional personnel, the construction contractor shall have earth-moving equipment and an operator acquire a rock sample from the fossil site and transport the sample, if possible, to a nearby temporary location at the site approved by the construction contractor.</p> <p>If a sample is recovered, the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. The Project Paleontologist or field supervisor shall be called to the fossil/storage site to determine if the fossil site/sample is sufficiently productive to warrant recovery of a large sample of fossiliferous rock to process for additional small remains.</p> <p>1) If the site/sample is determined too unproductive or the remains too poorly preserved or insufficiently diagnostic, no further action will be taken to preserve the fossil site/sample or remains, and the construction contractor will be allowed to have earth moving proceed through the fossil/storage site immediately.</p> <p>2) If sample recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP and assigning additional personnel to the PRIMP.</p> <p>2a) Within 24 hours, a recovery crew shall be mobilized to recover the sample. The size of the crew shall reflect the need to recover the sample as quickly as possible. The field supervisor shall record the size and supervise recovery of</p>		



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		<p>the sample. Up to 3 tons of fossiliferous rock shall be recovered. The sample shall be excavated with hand tools for recovery. If necessary and if approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite transportation of the sample to the processing facility site, obviate the need for additional personnel, and reduce any potential construction delay and the construction contractor will be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample.</p> <p>2b) A temporary field number shall be assigned to the sample; the field number and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor’s daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member will transport the sample to a location elsewhere at the site approved by the construction contractor or to an offsite location for initial/field processing (wet screening) of the sample. The total weight of all samples from each fossil-bearing rock unit at the site shall not exceed 3 tons.</p> <p>2c) If warranted, the field supervisor shall setup a field processing facility for wet screening the sample at a site location approved by the construction contractor. Wet screening shall consist of sieving rock through a 20- (and/or finer) mesh box screen immersed in a tub of water to remove the smaller (clay and silt) particles from the larger (sand and rock) particles and small fossil remains, and could result in a reduction in sample weight/volume in excess of 90%. If necessary, rock shall be soaked in an environmentally safe dispersant (citrus oil) prior to screening to improve the separation of the clay particles</p>		



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		<p>from the rest of the sample during screening. The monitor shall conduct wet screening if screening can be accomplished without diverting the monitor from monitoring. If it is not possible to have the monitor perform the wet screening, a field technician shall be assigned to the task. Following the next site inspection, the field supervisor will transport the concentrate (larger particles and small fossil remains) generated by initial processing to a laboratory facility for final/laboratory processing.</p> <p>2d) If the fossil remains in the concentrate are sufficiently fossilized (dense), an environmentally safe heavy liquid (sodium polytungstate), if appropriate, shall be used by the senior vertebrate paleontologist to separate the remains from the remaining sand and rock particles. When added to a beaker filled with heavy liquid, the concentrate will separate, the particles floating to the surface, and the remains sinking to the bottom, from where they are retrieved. This technique can result in a further sample weight/volume reduction in excess of 90% (less than 1% of original sample size). The final concentrate shall be examined under a microscope and fossil specimens recovered from any remaining sand and rock particles. If the fossil bone in the original concentrate is not sufficiently dense for use of the heavy-liquid separation technique, the entire sample of concentrate shall be sorted under a microscope for fossil remains. Recovered fossil remains shall then be treated as outlined herein.</p> <p>2e) During the final processing of a sample, the senior vertebrate paleontologist shall continually evaluate the results of field and laboratory processing. If the sample is insufficiently productive or the fossil remains, too poorly preserved, the senior vertebrate paleontologist shall have the option of discontinuing further laboratory processing of the sample, having field processing of the remainder of the</p>		



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		<p>sample suspended, and disposing of the remainder of the sample and unprocessed concentrate. Similarly, processing shall be discontinued if, after preliminary identification of some specimens, the remains are determined insufficiently diagnostic or diverse taxonomically, or the species represented are the same as those in another sample from the fossil-bearing rock unit. If appropriate, small splits from one or more samples shall be submitted for palynological analysis.</p> <ul style="list-style-type: none"> <li>▪ Fossil Treatment. Final treatment of all fossil specimens recovered from the site as a result of the PRIMP shall be conducted at a laboratory facility. Larger vertebrate fossil specimens shall be removed from their protective jackets, prepared to the point of identification using hand tools, and hardened or stabilized with a penetrating solution by a preparator. All recovered fossil specimens shall be identified to the lowest taxonomic level possible by knowledgeable vertebrate and invertebrate paleontologists and, if required, other knowledgeable paleontologists (i.e., paleobotanists, micropaleontologists, palynologists). The specimens shall then be curated (assigned and labeled with museum specimen data and corresponding site numbers, placed in specimen trays and, if appropriate, vials with completed specimen data cards), catalogued (specimen and site numbers and specimen data and corresponding geologic and geographic site data, respectively, archived [entered into appropriate catalogs and computerized databases]), and accessioned into the museum fossil collection, where they will be permanently stored, maintained, and, along with associated data, made available for future study by qualified investigators. With the possible exception of those tasks (curation, cataloging) that might be conducted by museum staff, all treatment of the fossil specimens shall be conducted by a laboratory technician. Fossil specimen preparation, identification, curation, and cataloging are now</li> </ul>		



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
		<p>required before a fossil collection will be accepted by most museum repositories, including the WSC, LACM, SDNHM, SBCM, and RMM. Moreover, the scientific importance of a fossil specimen cannot be evaluated until the specimen has been identified to the lowest taxonomic level possible, and specimen identification often is not possible without prior preparation.</p> <ul style="list-style-type: none"> <li>Final Report. A final technical report of findings shall be prepared by the Project Paleontologist and shall describe the site's stratigraphy, summarize field and laboratory methods employed during the PRIMP, include a taxonomic list and an inventory of catalogued fossil specimens recovered as a result of the PRIMP, evaluate the scientific importance of the specimens, and discuss the relationship of the fossil assemblage from any newly recorded fossil site at the project site to relevant fossil assemblages from fossil sites in other areas. The report shall be submitted to the contractor and County Geologist. Submission of the final report will signify completion of the PRIMP and will ensure Project compliance with Public Resources Code Section 21081.6 (mitigation monitoring, reporting, and compliance).</li> </ul> <p>All reports shall be signed by the Project paleontologist and all other professionals responsible for the report's content (e.g. Project Geologist), as appropriate. One original signed copy of the report(s) shall be submitted to the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the Project Planner, Plan Check staff, Land Use Counter or any other County office. In addition, the Project Applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a Project paleontologist for the in-grading implementation of the PRIMP.</p>		
<b>4.15 Population and Housing</b>				
<b>Threshold a:</b> The Project site does not contain any existing	Less than	Impacts to population and housing would be less than significant;	N/A	N/A





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<b>4.16 Public Services</b>				
<p><b>Threshold a.:</b> Although the Project would contribute to a need for new or expanded fire protection facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded fire protection facilities until a specific proposal and design for such facilities are prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities. Additionally, with payment of mandatory DIF fees, the proposed Project’s potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels.</p>	Less than Significant	Impacts to public services would be less than significant; thus, mitigation measures are not required.	N/A	N/A
<p><b>Threshold b.:</b> With payment of mandatory DIF fees, the proposed Project’s potential direct and cumulatively-considerable impacts to the Riverside County Sheriff’s Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.</p>	Less than Significant			
<p><b>Threshold c.:</b> The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the VVUSD, NUSD, and/or PUHSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans</p>	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>detailing where such facilities would be built. As such, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the VVUSD, NUSD, and/or PUHSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees. Furthermore, the payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the VVUSD, NUSD, and/or PUHSD to provide for school services.</p> <p><b>Threshold d.:</b> The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental demand for increased library facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in</p>	<p>Less than Significant</p>			





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>association with any future proposals for new or expanded library facilities. However, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.</p> <p><b>Threshold e.:</b> With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.</p>	<p>Less than Significant</p>			
<b>4.17 Recreation</b>				
<p><b>Thresholds a and d:</b> The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.</p> <p><b>Threshold b:</b> The Project does not propose any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in</p>	<p>Less than Significant</p> <p>Less than Significant</p>	<p>Impacts to recreation would be less than significant; thus, mitigation measures are not required.</p>	<p>N/A</p>	<p>N/A</p>

Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.</p> <p><b>Threshold c:</b> The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to Section 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.</p>	Less than Significant			
<b>4.18 Transportation</b>				
<p><b>Threshold a.:</b> The proposed development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR Technical Appendix I includes a detailed analysis of the proposed Project’s consistency with the Riverside County General Plan and LNAP policies. As demonstrated in the analysis therein, with approval of the Project’s proposed General Plan Amendment No. 190008, the proposed Project would not conflict with any applicable policies of the General Plan or LNAP, including policies within the General Plan Circulation Element and LNAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. In addition, the Alternative Truck Routes as described in RDEIR subsection 3.6.2.B.2 would not conflict with any of the City of Perris truck routes that were adopted pursuant to City of Perris Ordinance No. 1413. Accordingly, impacts would be less than significant.</p> <p><b>Threshold b.:</b> Implementation of either the Primary Land</p>	Less than Significant	<p><b>MM 4.18-1</b> Prior to approval of future implementing projects (i.e., plot plans, conditional use permits, etc.), the Project Applicant shall prepare a project-level Vehicle Miles Travelled (VMT) analysis to identify site-specific Transportation Demand Management (TDM) measures to reduce VMTs associated with the Project’s proposed uses to the maximum feasible extent. TDM strategies that may be applicable at the implementing project level may include:</p> <ul style="list-style-type: none"> <li>▪ Reduced parking supply.</li> <li>▪ Transit Rerouting and Transit Stops.</li> <li>▪ Commute trip reduction (CTR) programs offered by individual building tenants that would encourage the use of vanpools, carpooling, public transit, and biking.</li> <li>▪ Incorporating designated carpool/vanpool parking in desirable locations to encourage employees to carpool/vanpool to work that can lead to reduced commute VMT</li> <li>▪ CTR programs may also provide for alternative work or</li> </ul>	Project Applicant, Project Traffic Engineer/ Riverside County Planning Department, Riverside County Transportation Department	Prior to approval of future implementing projects (i.e., plot plans, conditional use permits, etc.)



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>Use Plan (without MCP) or Alternative Land Use Plan (with MCP) would exceed the County’s threshold of significance for Project work VMT per employee by 26.1%. In addition, under most scenarios, the Project’s commercial retail land uses would result in a net increase in VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although not required pursuant to the County Guidelines, the analysis of the Project’s total VMT indicates that the Project’s total VMT per SP would exceed the County’s threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). Additionally, the cumulative analysis of the Project’s impacts to VMT demonstrates that the Project, when considered in the context of cumulative development, would result in a net increase in total VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-1 and MM 4.18-2, the future tenants of the proposed Project are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those listed above cannot be guaranteed to reduce Project VMT to a level of less than significant. The inclusion of VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings also is noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. Accordingly, Project impacts due to VMT would be significant and unavoidable on both a direct and cumulatively-considerable basis.</p>	<p>Unavoidable</p>	<p>compressed work schedules to reduce the number of days an employee commutes to work.</p> <ul style="list-style-type: none"> <li>▪ Future building designs may include sidewalks to provide non-vehicular connections to existing trails and external pedestrian networks in order to improve pedestrian access.</li> <li>▪ Provision of on-site facilities to provide end of trip services for bicycling such as secure bike parking, storage lockers and showering facilities.</li> </ul> <p>Riverside County shall condition the future implementing projects to implement the TDM strategies identified as part of the future-required VMT analyses.</p> <p><b>MM 4.18-2</b> All owner users and future tenants shall participate in Riverside County’s Rideshare Program. The purpose of this program is to encourage 2+ person occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this mitigation measure.</p> <p><b>MM 4.18-3</b> Prior to the issuance of grading permits or improvement plans affecting Ramona Expressway, Nuevo Road, or any other roadways within the Project site that have been improved, the Project Applicant shall prepare and the County of Riverside shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CA MUTCD). Prior to approval of the temporary traffic control plan by Riverside County, Riverside County shall provide a copy to the Department of Water Resources, Division of Operation and Maintenance, for review and comment to ensure</p>	<p>Future Tenants and Owners/ Riverside County Planning Department</p> <p>Project Applicant, Construction Contractors/ Riverside County Building &amp; Safety Department, Riverside County Transportation Department</p>	<p>Prior to issuance of certificate of occupancy</p> <p>Prior to issuance of grading permits or improvement plans affecting Ramona Expressway, Nuevo Road, or any other roadways within the Project site that have been</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p><b>Threshold c.:</b> Improvements planned as part of the Project would be constructed to County standards, and would not increase hazards due to a geometric design feature. Although the Project’s light industrial and business park land uses have the potential to result in conflicts with traffic from surrounding school, rural residential, and master-planned residential communities, under near-term conditions (i.e., with implementation of Alternative Truck Routes 1 or 2) and in the event that the MCP is never constructed (i.e., the Primary Land Use Plan), all Project-related traffic would be routed to the south of the Project site, and would be directed away from the existing schools and master-planned residential uses within the City of Perris. Alternative Truck Routes 1 and 2 have been designed to route westbound trucks away from existing residential uses to the extent feasible. As such, with implementation of the Primary Land Use Plan, the Project would not result in hazards due to incompatible uses, and impacts would be less than significant. Although Project-related truck traffic would utilize the MCP once constructed (i.e., with implementation of the Alternative Land Use Plan/Alternative Truck Route 6), which would traverse through the City of Perris and near existing residential uses within the City, the Project would not involve any improvements to the MCP and the MCP is planned as a regional transportation corridor for all vehicles, including heavy trucks. Thus, Project-related truck trips along the MCP with implementation of the Alternative Land Use Plan would not result in hazards due to incompatible uses, and impacts would be less than significant. All improvements that would be constructed as part of the Project would be constructed in accordance with applicable Riverside County standards, and there are no components of the Project’s proposed roadway or intersection improvements that would result in hazards due to a geometric design feature. Impacts would therefore be less than significant.</p>	<p>Less than Significant</p>	<p>that the temporary traffic control plan does not interfere with emergency or maintenance access to the Perris Dam. A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.</p> <p><b>MM 4.18-4</b> Prior to approval of any implementing permits or approvals (i.e., plot plans, conditional use permits, etc.), the County shall condition the implementing permits/approvals to require that all Project-related truck traffic shall utilize the appropriate Alternative Truck Route, as described in RDEIR subsection 3.6.2.B. The condition of approval shall require that all future tenant leases shall include language restricting truck traffic to the appropriate Alternative Truck Route, and the condition of approval shall further the keeping of records demonstrating compliance with these requirements. Furthermore, the condition of approval shall require the posting of signs in appropriate locations directing Project truck traffic to the appropriate Alternative Truck Route, and Riverside County shall verify that the signs have been installed prior to final building inspection.</p>	<p>Project Applicant, Future Occupants/ Riverside County Building &amp; Safety Department, Riverside County Transportation Department</p>	<p>improved and during construction of the same</p> <p>Prior to approval of any implementing permits or approvals (i.e., plot plans, conditional use permits, etc.) and during long-term operations</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
<p><b>Threshold d.:</b> There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.</p> <p><b>Threshold e.:</b> Although it is unlikely that improvements planned to Ramona Expressway and Nuevo Road would adversely affect circulation during the Project’s construction phase, a significant impact is nonetheless identified requiring mitigation in the form of a traffic control plan for implementing developments. Additionally, a significant impact could occur if roadways planned on and abutting the Project site are improved prior to the commencement of Project construction activities. Mitigation Measure MM 4.18-3 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project’s construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.</p> <p><b>Threshold f.:</b> Due to temporary lane closures that may occur during the Project’s construction phase, Project-related construction activities may conflict with emergency access routes and access to nearby uses during frontage improvements to Ramona Expressway, Nuevo Road, and other roadways on or abutting the site that may be improved prior to the start of Project construction. Although it is anticipated a less-than-significant impact would occur, out of an abundance of caution, a temporary significant impact is identified. Mitigation Measure MM 4.18-3 requires the</p>	<p>Less than Significant</p> <p>Less than Significant with Mitigation</p> <p>Less than Significant with Mitigation</p>			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.</p> <p><b>Threshold g.:</b> Impacts associated with the construction of on-site trails and bicycle facilities are inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.</p>	<p>Less than Significant</p>			
<p><b>4.19 Tribal Cultural Resources</b></p> <p><b>Impact Threshold a.:</b> Although Project impacts to Tribal Cultural Resources on site, including the San Jacinto River, Mystic Lake (Perris Lake), and the village of Páyve and Páavo would be less than significant, based on the results of the County's consultation efforts with local Native American tribes, the Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. As such, Project impacts to Tribal Cultural Resources represent a potentially significant impact for which mitigation would be required.</p>	<p>Less than Significant with Mitigation</p>	<p>Mitigation Measure MM 4.5-1 and MM 4.5-2 shall apply.</p>	<p>As specified by Mitigation Measures MM 4.5-1 and MM 4.5-2</p>	<p>As specified by Mitigation Measures MM 4.5-1 and MM 4.5-2</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<b>4.20 Utilities and Service Systems</b>				
<p><b>Threshold a.:</b> Although the Project would require construction of new or expanded water, wastewater conveyance, and storm water drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project’s impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project’s proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project’s wastewater generation would represent approximately between approximately 10.1% and 10.3% of the PVRWRF’s current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the PVRWRF of 100 million gpd. Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF, and impacts would therefore be less than significant.</p>	Less than Significant	The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources, etc.) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.	N/A	N/A
<p><b>Threshold b.:</b> Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. Accordingly, sufficient water supplies are</p>	Less than Significant			



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project’s effect on EMWD’s regional water network would be less than significant. In addition, the Project would result in an increase in demand for potable water, which has the potential to contribute to the need for expansion of EMWD and/or MWD facilities. However, the EMWD has adequate capacity for desalination and wastewater treatment requiring no expansion of any existing facilities; the EMWD has adequate capacity to treat wastewater generated by the Project and other cumulative developments; and the MWD is implementing programs to reduce its import of water from the Colorado River and via the SWP. As such, the Project’s demand for potable water sources also would not result in significant physical environmental effects.</p> <p><b>Thresholds c. and d.:</b> Impacts associated with proposed wastewater conveyance facilities are inherent to the Project’s construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project’s impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project’s proposed sewer/wastewater improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant. Additionally, the Project’s wastewater generation would represent between approximately 10.1% and 10.3% of the PVRWRF’s current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the</p>	<p>Less than Significant</p>			





Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/Monitoring Parties	Implementation Stage
<p>PVRWRF of 100 million gpd (for both land use plans). Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF, and impacts would therefore be less than significant.</p> <p><b>Threshold e.:</b> Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project’s construction and operational phases. The Project would not 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. Accordingly, impacts would be less than significant.</p> <p><b>Threshold f.:</b> With mandatory compliance to AB 939, AB 341, and RCDWR’s programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.</p> <p><b>Threshold g.:</b> Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.</p>	<p>Less than Significant</p> <p>Less than Significant</p> <p>Less than Significant</p>			
<p><b>4.21 Wildfire</b></p>				
<p><b>Threshold a.:</b> The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>Impacts due to wildfire-related hazards would be less than significant; thus, mitigation measures are not required.</p>	<p>N/A</p>	<p>N/A</p>



Potential Environmental Impact	Significance Determination	Mitigation Measures (MMs)	Responsible/ Monitoring Parties	Implementation Stage
<p><b>Threshold b. and e.:</b> The Project would be subject to the fire abatement requirements specified by SP 239A1, which includes requirements for the provision of a 100-foot wide FMZ around all buildings, and specifies additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. With mandatory compliance with the fire abatement requirements of SP 239A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires with implementation of the Project’s proposed fire protection measures, and the Project would accommodate adequate circulation facilities to allow for evacuation of the site in the event of wildfires in the area. Impacts would be less than significant.</p>	<p>Less than Significant</p>			
<p><b>Threshold c.:</b> Impacts to areas requiring FMZ zones have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources, etc.), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.</p>	<p>Less than Significant</p>			
<p><b>Threshold d.:</b> Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable</p>	<p>Less than Significant</p>			



<b>Potential Environmental Impact</b>	<b>Significance Determination</b>	<b>Mitigation Measures (MMs)</b>	<b>Responsible/ Monitoring Parties</b>	<b>Implementation Stage</b>
<p>codes and the fuel modification requirements required by SP 239A1 would reduce the site's vulnerability to wildfire to less-than-significant levels. Additionally, with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. In addition, the Project site would not cause or be affected by fire-induced landslides. Therefore, 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, and impacts would be less than significant.</p>				



## 1.0 INTRODUCTION

### 1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY FOR THIS PROGRAM EIR

This Program Recirculated Draft Environmental Impact Report (RDEIR) has been prepared in compliance with the California Environmental Quality Act (Public Resources Code § 2100 et. seq. (CEQA), as amended, and the State CEQA Guidelines (Title 14 California Code of Regulations § 15000 et. seq.) (State CEQA Guidelines), as amended. As stated by State CEQA Guidelines § 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed government actions (including the discretionary approval of land entitlement applications submitted by private parties);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if a project will be approved involving significant environmental effects.

The public agency with the principal responsibility for carrying out or approving a project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the “Lead Agency” pursuant to State CEQA Guidelines §§ 15050-15051. The County of Riverside is the Lead Agency for the proposed Project evaluated in this Program EIR.

Under CEQA, if a Lead Agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an Environmental Impact Report (EIR) (State CEQA Guidelines § 15064(a)(1)). The purpose of an EIR is to inform public agency decision-makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines § 15121(a)).

This Program Recirculated Draft EIR (RDEIR) is an informational document that represents the independent judgment of the County of Riverside (as the Lead Agency) for use by the Riverside County decision-makers, responsible and trustee agencies, and members of the general public to evaluate the physical environmental effects that could result from constructing and operating the proposed Project. The County of Riverside has reviewed and, as necessary, directed revisions to all submitted drafts, technical studies, and reports supporting this Program RDEIR for consistency with County policies and requirements to ensure that this Program RDEIR reflects its own independent judgment. Governmental approvals requested from the County of Riverside by the Project Applicant include:



1. Adoption by resolution of General Plan Amendment No. 190008 (GPA 190008);
2. Adoption of Amendment No. 1 to Specific Plan No. 239 (SP 239A1); and
3. Adoption by ordinance of Change of Zone No. 1900024 (CZ 1900024).

Other related discretionary and administrative actions that are required to construct and operate the Project described in this Program EIR are listed in Section 3.0, *Project Description*. This document complies with all criteria, standards, and procedures of CEQA §§ 21000 *et seq.* and State CEQA Guidelines §§ 15000 *et seq.*

As a first step in the CEQA compliance process, Riverside County determined that implementation of the Project has the potential to result in significant environmental effects and directed preparation of a Program EIR. Because the Project would require future discretionary approvals (e.g., tentative tract maps, plot plans, etc.), the DEIR was prepared as a Program EIR pursuant to State CEQA Guidelines § 15168. As defined by State CEQA Guidelines § 15168(a), a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: 1) geographically; 2) are logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways. The Draft Program EIR (DEIR) was initially available for public review for a 45-day public review period that commenced on April 8, 2022 and concluded on May 23, 2022. Riverside County received a total of 15 comment letters during the DEIR's public review period and postponed preparation of the Final EIR (FEIR) until it could evaluate comments set forth in the letters. Based on the volume and nature of the comments, the County directed the preparation of this RDEIR.

Before taking action to approve the Project, the County of Riverside (serving as the Lead Agency) has the obligation to: (1) ensure this Program RDEIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Program RDEIR as part of its decision making process; (3) make a statement that this Program RDEIR reflects Riverside County's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this Program RDEIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines §§ 15090-15093).

The roles and responsibilities of the County of Riverside Planning Commission and Board of Supervisors for Project-related approvals are as follows.

- **The Planning Commission:** The Planning Commission will recommend to the Board of Supervisors whether the Project's applications, which include GPA 190008, SP 239A1, and CZ 1900024, should be approved, modified, or denied, and will recommend to the Board of Supervisors whether to certify the Final Program RDEIR (Final Program RDEIR) with or without modifications.



- **Board of Supervisors:** The Board of Supervisors will decide whether to approve, modify, or deny GPA 190008, SP 239A1, and CZ 1900024. Project-related approvals will be subject to noticed, public hearings held before the Board of Supervisors, which will include the information contained in the Program EIR, and the associated administrative record. Upon approval or conditional approval of the Project and certification of the Final Program RDEIR by the Board of Supervisors, the County would conduct administrative level reviews and grant the permits and approvals needed to implement the Project.

This Program RDEIR and all supporting technical appendices are available for review at the County of Riverside Planning Department, 4080 Lemon Street, 12<sup>th</sup> Floor, Riverside, CA 92501 during the County’s regular business hours, can be requested in electronic form by contacting the County Planning Department, or can be accessed via the Planning Department’s web site (<https://planning.rctlma.org/>) during the 45-day public review period for this RDEIR.

## **1.2 SUMMARY OF THE PROJECT EVALUATED BY THIS PROGRAM EIR**

The County of Riverside is the Lead Agency for the proposed Project, under whose authority this Program EIR has been prepared. For purposes of this Program EIR, the term “Project” refers to the Project’s discretionary applications for the first amendment to the Stoneridge Specific Plan No. 239 (SP 239A1), a General Plan Amendment (GPA 190008), and Change of Zone (CZ 1900024); future implementing discretionary actions required to implement the Project (e.g., tentative tract maps, plot plans, etc.); and all of the activities associated with Project implementation including planning, construction, and long-term operations.

The Project as evaluated herein consists of two separate land use alternatives for the 582.6-acre site, both of which are evaluated herein at an equal level of detail. Two alternatives are considered because the Riverside County Transportation Commission (RCTC) is currently planning for construction of a regional transportation facility, the “Mid-County Parkway” (MCP). A portion of the MCP is currently planned to traverse the northwestern portions of the Project site. It is currently not known when or if the MCP would be constructed by RCTC; thus, for purposes of evaluation in this EIR, the “Primary Land Use Plan” anticipates that the MCP would not be constructed through the property, in which case the site would be developed with up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail, Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres. The “Alternative Land Use Plan” anticipates that the MCP would be constructed through the northwest portions of the site, in which case the site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses, 8.5 acres of Commercial Retail land uses, 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. For purposes of analysis throughout this EIR, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. The “Alternative Land Use Plan” only would be implemented in the event that the RCTC constructs the MCP through the northernmost portions of the Project site.



Specifically, the Project Applicant is requesting the following governmental approvals from the County of Riverside to implement the Project (refer to Chapter 3.0, *Project Description*, for a complete description of the Project’s construction and operational characteristics):

- **General Plan Amendment No. 190008 (GPA 190008)** is proposed to modify the approved land uses for the Project site in order to reflect changes proposed as part of proposed Amendment No. 1 to the Stoneridge Commerce Center Specific Plan No. 239 (SP 239A1), which is discussed below. The adopted General Plan designates the Project site for “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium-High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space-Recreation,” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water (OS-W)” land uses. With approval of GPA 190008, the Project site would be designated for “Light Industrial (LI),” “Business Park (BP),” CR, OS-C and OS-CH land uses in a manner that corresponds to the land use designations proposed for the site as part of SP 239A1 (as discussed below).
- **Amendment No. 1 to Specific Plan No. 239 (SP 239A1)** is proposed to modify the allowed land uses and planning area boundaries within the Stoneridge Specific Plan (SP 239). Under the Primary Land Use Plan, the 582.6-acre site would be designated for “Light Industrial” land uses on 388.5 acres, “Business Park” land uses on 49.1 acres, “Commercial Retail” on 8.0 acres, “Open Space – Conservation” on 18.1 acres, “Open Space – Conservation Habitat” on 81.6 acres, and major roadways on 37.3 acres. As proposed by SP 239A1, areas designated for “Light Industrial” may be developed with up to 7,350,000 square feet (s.f.) of building area (or an FAR of approximately 0.43), “Business Park” uses may be developed with a Floor Area Ratio (FAR) up to 0.50, while areas designated for “Commercial Retail” uses may be developed with a FAR up to 0.35. Accordingly, implementation of the Primary Land Use Plan would allow for up to 7,350,000 s.f. of light industrial building area, up to 1,069,398 s.f. of business park building area, and up to 121,968 s.f. of commercial retail building area. Under the Alternative Land Use Plan, the 582.6-acre site would be designated for “Light Industrial” land uses on 389.2 acres, “Business Park” land uses on 51.5 acres, “Commercial Retail” on 8.5 acres, “Open Space – Conservation” on 18.1 acres, “Open Space – Conservation Habitat” on 81.6 acres, and major roadways on 34.4 acres. It should be noted that approximately 8.5 acres of areas proposed for “Business Park” land uses and approximately 0.2 acre of areas proposed for “Commercial Retail” land uses would occur within the right-of-way of the Mid-County Parkway (MCP), and thus would not be developed with any buildings under the Alternative Land Use Plan. Based on the proposed maximum allowed 7,350,000 s.f. of “Light Industrial” land uses, the allowable FAR of 0.5 for the proposed “Business Park” land uses, and the allowable FAR of 0.35 for “Commercial Retail” land uses, and excluding areas within the planned alignment of the MCP, the Alternative Land Use Plan would allow for up to 7,350,000 s.f. of light industrial building area, up to 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area.
- **Change of Zone No. 1900024 (CZ 1900024)** is proposed to modify the Planning Area boundaries, permitted uses, and development standards throughout the 582.6-acre site in order to reflect the land uses proposed as part of SP 239A1, as described above.



The proposed Project analyzed in this recirculated Program EIR represents a reduction in proposed development on the same property analyzed in the previously circulated DEIR for the Project. Specifically, the adopted SP 239 allows for up to 718 “Medium Residential (2-5 du/ac)” dwelling units on 185.0 acres; 903 “Medium-High Residential (5-8 du/ac)” dwelling units on 185.0 acres; 446 “Very High Residential (14-20 du/ac)” dwelling units on 30.0 acres; “Commercial” uses on 75.0 acres, which also allows for up to 169 dwelling units in Planning Area 1; “Parks” on 33.7 acres; “Open Space – Natural” on 20.8 acres; “Open Space – Recreational” on 8.6 acres; three planning areas designated for “Schools” on 27.0 acres; and 40.3 acres of major circulation facilities. By comparison, the Project evaluated herein would consist of either up to 7,350,000 s.f. of light industrial building area, up to 1,069,398 s.f. of business park building area, and up to 121,968 s.f. of commercial retail building area with implementation of the Primary Land Use Plan, or up to 7,350,000 s.f. of light industrial building area, up to 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area with implementation of the Alternative Land Use Plan. While the residential uses allowed per the approved SP 239 would generate a substantial number of new residents within Riverside County, the majority of the jobs that would be generated by the proposed Project are anticipated to be filled primarily by existing residents within Riverside County, given the relatively poor jobs-to-housing balance in this portion of Riverside County. In addition, areas planned for physical development by the Project are the same areas that were anticipated to be impacted by the currently-approved SP 239 land uses, meaning that no areas would be disturbed other than those areas already anticipated to be disturbed under the already approved SP 239.

### **1.3 CEQA PROCESS OVERVIEW**

CEQA requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. Such activity is reviewed and monitored through the CEQA process, as provided in the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000-15387). CEQA distinguishes varied levels of documentation and public review based on a project’s anticipated level of effect on the environment.

When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an Environmental Impact Report (EIR) must be prepared. The “scope” of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the proposed project.

Pursuant to State CEQA Guidelines § 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project. The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. The decision-makers must consider the information in an EIR before taking action on the proposed project. The EIR may constitute substantial evidence in the record to support the agency’s action on the project.





The EIR is prepared by or under the direction of the Lead Agency, which for the proposed Project is the County of Riverside. The County of Riverside is the public agency that has the primary responsibility for approving or carrying out the Project. Further, Responsible and Trustee Agencies, which are public agencies that have a level of discretionary approval over some component of the proposed Project, may rely upon the EIR prepared by the County of Riverside.

An EIR normally is prepared in two key stages. First, a Draft EIR is prepared and distributed for public and agency review. Once comments on the Draft EIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR. Both of these documents (i.e., the Draft EIR and the Final EIR), along with any related technical appendices, normally represent the complete record of the EIR. However, and as previously indicated, a Draft Program EIR (DEIR) previously was prepared and was circulated for public review for a 45-day public review period that commenced on April 8, 2022 and concluded on May 23, 2022. Riverside County received a total of 15 comment letters during the DEIR’s public review period and postponed preparation of the Final EIR (FEIR) until it could evaluate comments set forth in the letters. Based on the volume and nature of the comments, the County directed the preparation of this RDEIR to fully respond to these comments, as well as reflect significant changes made to the Project in response to comments, specifically the reduction of more than 1.1 million square feet of light industrial building area, reducing environmental impacts in all impact categories related to long-term Project operations. Thus, for the proposed Project, the DEIR, this RDEIR, and the Final Program EIR, along with the Project’s updated technical appendices, represent the complete record of this EIR. Throughout this document, the terms Final (Program) EIR, Program RDEIR, and RDEIR may be used interchangeable since all are part of the ultimate EIR record; however, “Draft RDEIR” or “Draft Program RDEIR” may be used specifically when referring to information provided in the recirculated volume that will be made available for an additional 45-day public review period.

In accordance with State CEQA Guidelines § 15087, this Program RDEIR will be made available for review by the public and public agencies for a minimum period of 45 days to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (State CEQA Guidelines § 152049(a)). Responses to written comments received during the public review period will be included in the Final Program EIR (FPEIR). During the decision-making process, the Project and its design features, objectives, merits, environmental consequences, and socioeconomic factors, among other information contained in the Project’s administrative record will be considered by Riverside County decision-makers. If the FPEIR is certified and the Project approved, Riverside County and other public agencies with permitting authority over all, or portions, of the Project would be able to rely on the FPEIR as part of their permitting processes to evaluate the environmental effects of the Project as they pertain to the approval or denial of applicable permits.

## **1.4 PROGRAM EIR SCOPE, FORMAT, AND CONTENT**

### **1.4.1 PROGRAM EIR SCOPE**

Pursuant to the procedural requirements of CEQA, on April 27, 2020, the County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) and Riverside County Clerk



to indicate that an EIR would be prepared to evaluate the Project’s potential to impact the environment. The NOP also was distributed to surrounding property owners, responsible and trustee agencies, and other interested parties for a 30-day public review period that commenced on April 27, 2020 and concluded on May 27, 2020. The NOP was distributed for public review to solicit responses to help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR. Comments on the NOP were received from the following agencies:

- California Air Resources Board
- California Department of Fish and Wildlife
- California Department of Conservation
- City of Perris Planning and Economic Development Department, Planning Division
- Endangered Habitats League
- Metropolitan Water District of Southern California
- Native American Heritage Commission
- Pechanga Band of Mission Indians
- Riverside County Department of Waste Resources
- Riverside Transit Agency
- South Coast Air Quality Management District
- Santa Rosa Band of Cahuilla Indians
- State of California Department of Justice/Attorney General

In addition, a publicly-noticed EIR Scoping Meeting was held at the Riverside County Administrative Center, located at 4080 Lemon Street, Riverside, California, 92501 on May 11, 2020, which provided members of the general public an additional opportunity to comment on the scope of environmental issues to be addressed in this Program EIR.

An Initial Study was not prepared for the proposed Project, and as such this Program EIR evaluates all of the environmental topics identified in Appendix G to the State CEQA Guidelines and in the County’s standard Environmental Assessment (EA) Checklist form. Based Appendix G, the County’s EA Checklist form, and in consideration of all comments received by the County on the NOP and during the EIR Scoping Meeting, Section 4.0 of this Program EIR evaluates the Project’s potential to cause adverse effects to the following environmental issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Mineral Resources
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources



- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Utilities and Service Systems
- Wildfire

The Project’s potential to result in growth-inducing impacts are discussed in Section 5.0, *Other CEQA Considerations*, of this Program EIR. The NOP, public review distribution list, and written comments received by the County during the NOP public review period are provided in Technical Appendix A to this EIR. Please refer to Table 1-1, *Summary of NOP Comments*, for summarized comments received during NOP public review period.

**Table 1-1 Summary of NOP Comments**

<b>Commenter</b>	<b>Date</b>	<b>Comment(s)</b>	<b>Location in EIR Where Comment(s) Addressed</b>
California Air Resources Board	May 27, 2020	<ul style="list-style-type: none"> <li>• Evaluate potential cumulative health impacts from air pollution associated with the construction and operation of the Project, particularly impacts affecting disadvantaged communities, including schools and residences</li> <li>• Prepare a Health Risk Assessment to quantify and discuss the potential cancer and health risks from on-site transport refrigeration units, diesel particulate matter, and construction emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Subsection 4.3 (Air Quality)</li> <li>• Subsection 4.3 (Air Quality)</li> </ul>
California Department of Fish and Wildlife (CDFW)	May 26, 2020	<ul style="list-style-type: none"> <li>• Assess direct, indirect, and cumulative impacts to biological resources, including impacts to flora and fauna, with particular emphasis on identifying rare, threatened endangered, and other sensitive species and associated habitat</li> <li>• Identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts to biological resources, to the extent feasible</li> </ul>	<ul style="list-style-type: none"> <li>• Subsection 4.4 (Biological Resources)</li> <li>• Subsection 4.4 (Biological Resources)</li> </ul>
California Department of Conservation (CDC)	May 19, 2020	<ul style="list-style-type: none"> <li>• Consider feasible alternatives or mitigation measures for impacts due to the conversion of agricultural land to non-agricultural use</li> <li>• Disclose the type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.</li> <li>• Evaluate impacts on any current and future agricultural operations in the</li> </ul>	<ul style="list-style-type: none"> <li>• Subsection 4.2 (Agriculture and Forestry Resources)</li> <li>• Subsection 4.2 (Agriculture and Forestry Resources)</li> <li>• Subsection 4.2 (Agriculture and</li> </ul>



**Table 1-1 Summary of NOP Comments**

<b>Commenter</b>	<b>Date</b>	<b>Comment(s)</b>	<b>Location in EIR Where Comment(s) Addressed</b>
		<ul style="list-style-type: none"> <li>vicinity</li> <li>Evaluate incremental impacts leading to cumulative impacts on agricultural land</li> </ul>	<ul style="list-style-type: none"> <li>Forestry Resources)</li> <li>Subsection 4.2 (Agriculture and Forestry Resources)</li> </ul>
City of Perris Planning and Economic Development Department, Planning Division	May 27, 2020	<ul style="list-style-type: none"> <li>Evaluate land use consistency and compatibility with surrounding areas</li> <li>Evaluate air quality and health risks to the surrounding community</li> <li>Evaluate noise impacts associated with truck traffic, construction, and long-term operations</li> <li>Evaluate truck routes and traffic during peak hours</li> <li>Prepare a drainage study to evaluate how drainage will be conveyed to the San Jacinto River in Perris</li> </ul>	<ul style="list-style-type: none"> <li>Subsection 4.11 (Land Use and Planning)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.13 (Noise)</li> <li>Subsection 4.18 (Transportation)</li> <li>Subsection 4.10 (Hydrology and Water Quality)</li> </ul>
Endangered Habitats League (EHL)	April 24, 2020	<ul style="list-style-type: none"> <li>Concerns regarding biological impacts, conformance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), and Greenhouse Gas (GHG) emissions</li> </ul>	<ul style="list-style-type: none"> <li>Subsections 4.4 (Biological Resources) and 4.8 (Greenhouse Gas Emissions)</li> </ul>
Metropolitan Water District of Southern California (MWD)	May 21, 2020	<ul style="list-style-type: none"> <li>Evaluate potential impacts to Metropolitan's Colorado River Aqueduct and Lakeview Pipeline</li> <li>Incorporate water conservation measures and include water efficient fixtures, drought-tolerant landscaping, and reclaimed water</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.0 (Environmental Analysis)</li> <li>Subsection 4.20 (Utilities and Service Systems)</li> </ul>
Native American Heritage Commission (NAHC)	April 27, 2020	<ul style="list-style-type: none"> <li>Project is subject to Native American Consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18</li> <li>Prepare a cultural resources assessment to evaluate potential impacts to archaeological and historical resources</li> </ul>	<ul style="list-style-type: none"> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> </ul>
Pechanga Band of Mission Indians	May 8, 2020	<ul style="list-style-type: none"> <li>Include involvement of and consultation with the Pechanga tribe in the environmental review process</li> <li>Evaluate potential effects to Traditional Cultural Property (TCP), Traditional Cultural Landscapes (TCLs), and tribal cultural resources</li> </ul>	<ul style="list-style-type: none"> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> </ul>



**Table 1-1 Summary of NOP Comments**

<b>Commenter</b>	<b>Date</b>	<b>Comment(s)</b>	<b>Location in EIR Where Comment(s) Addressed</b>
		<ul style="list-style-type: none"> <li>Evaluate potential impacts to surface and subsurface resources during ground-disturbing activities</li> <li>Requests tribal involvement (including tribal monitoring) and mitigation for impacts to TCP, TCLs, and Native American cultural resources</li> </ul>	<ul style="list-style-type: none"> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> <li>Subsections 4.5 (Cultural Resources) and 4.19 (Tribal Cultural Resources)</li> </ul>
Riverside County Department of Waste Resources (RCDWR)	April 28, 2020	<ul style="list-style-type: none"> <li>Assess waste impacts, including the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed land uses</li> <li>Incorporate mitigation measures to reduce solid waste generation</li> </ul>	<ul style="list-style-type: none"> <li>Subsection 4.20 (Utilities and Service Systems)</li> <li>Subsection 4.20 (Utilities and Service Systems)</li> </ul>
Riverside Transit Agency (RTA)	April 28, 2020 and November 20, 2019	<ul style="list-style-type: none"> <li>Requests accommodation of bus turnouts and bus stops along major transportation facilities</li> <li>Requests information regarding signalization and construction of overpass</li> </ul>	<ul style="list-style-type: none"> <li>Subsection 4.18 (Transportation)</li> <li>Subsection 4.18 (Transportation)</li> </ul>
South Coast Air Quality Management District (SCAQMD)	May 5, 2020	<ul style="list-style-type: none"> <li>Requests an analysis of air quality impacts based on South Coast Air Quality Management District (SCAQMD) guidance</li> <li>Requests an analysis of consistency with the 2016 Air Quality Management Plan</li> <li>Incorporate mitigation measures and other features per the California Air Resources Board <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> and the SCAQMD <i>CEQA Air Quality Handbook</i></li> <li>Evaluate air quality emissions against the SCAQMD regional and localized thresholds for both construction and operations</li> <li>Identify feasible mitigation measures to address Project-related air quality impacts</li> <li>Identify alternatives to reduce or avoid air quality impacts</li> </ul>	<ul style="list-style-type: none"> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Section 6.0 (Alternatives)</li> </ul>



**Table 1-1 Summary of NOP Comments**

<b>Commenter</b>	<b>Date</b>	<b>Comment(s)</b>	<b>Location in EIR Where Comment(s) Addressed</b>
Santa Rosa Band of Cahuilla Indians	April 28, 2020	<ul style="list-style-type: none"> <li>No comments on the proposed Project or the scope of the EIR were provided</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
State of California Department of Justice/Attorney General	June 1, 2020	<ul style="list-style-type: none"> <li>Analyze the Project’s impact on the public health and safety of nearby sensitive receptors already exposed to high pollution burdens, including nearby residents and school children</li> <li>Consider the socioeconomic characteristics of the communities of Nuevo and Lakeview, which increase their sensitivity to the health effects of the heavy pollution burdens they experience</li> <li>Disclose and analyze the Project’s foreseeable impacts, including cumulative impacts from nearby industrial projects</li> <li>Relate pollutant data to specific adverse human health effects on the local community</li> <li>Consider all feasible measures to mitigate any potentially significant project impacts</li> <li>Implement the County’s “good neighbor” policy for logistics and warehouse/distribution uses with this Project</li> </ul>	<ul style="list-style-type: none"> <li>Subsections 4.3 (Air Quality), 4.9 (Hazards and Hazardous Materials)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.0 (Environmental Analysis)</li> <li>Subsection 4.3 (Air Quality)</li> <li>Subsection 4.0 (Environmental Analysis)</li> <li>Subsection 4.3 (Air Quality) and 4.8 Greenhouse Gas Emissions)</li> </ul>

In addition, and in response to the 45-day public review period for the original public review Draft Environmental Impact Report (DEIR),

**Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report**

<b>COMMENTER</b>	<b>DATE</b>	<b>COMMENTS</b>	<b>LOCATION IN EIR WHERE COMMENT(S) ADDRESSED</b>
California Air Resources Board	May 26, 2022	<ul style="list-style-type: none"> <li>Expresses concerns regarding Toxic Air Contaminants (TACs) associated with the Project’s diesel trucks.</li> <li>Requests preparation of a Health Risk Assessment (HRA), consideration of the Project’s potential health risks, and use of zero emissions technology to reduce emissions of diesel PM and NO<sub>x</sub>.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> </ul>



**Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report**

<b>COMMENTS</b>	<b>DATE</b>	<b>COMMENTS</b>	<b>LOCATION IN EIR WHERE COMMENT(S) ADDRESSED</b>
		<ul style="list-style-type: none"> <li>Identifies concerns regarding the DEIR’s analysis of and modeling assumptions for potential air quality impacts due to Transport Refrigeration Units (TRUs), including potential health risks.</li> <li>Requests additional mitigation measures to address the Project’s air quality impacts.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> </ul>
Department of Water Resources	May 23, 2022	<ul style="list-style-type: none"> <li>Identifies concerns regarding the Project’s potential traffic effects that could interfere with DWR’s access to the Perris Dam, including during emergencies.</li> <li>Expresses concerns regarding potential dam inundation hazards in the event that planned improvements to the dam are not in place.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6, 3.0, and 4.18</li> <li>RDEIR Subsections R.6 and 4.10</li> </ul>
Department of Conservation	May 10, 2022	<ul style="list-style-type: none"> <li>Indicates concerns over the Project’s potential impacts to significant agricultural resources, requests further discussion and analysis, and requests mitigation for Project impacts to agricultural resources.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.2</li> </ul>
State Water Resources Control Board, Division of Drinking Water	May 26, 2022	<ul style="list-style-type: none"> <li>Identifies requirements related to the proposed off-site water tank improvements.</li> <li>Requests additional discussion and analysis of off-site impacts.</li> <li>Requests analysis of chemicals that may be transported to, used, and/or stored at the booster pump station and tank.</li> <li>Requests additional information regarding the proposed water line in Orange Avenue.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsection R.6</li> <li>RDEIR Subsection R.6 and throughout RDEIR Section 4.0</li> <li>RDEIR Subsection R.6</li> <li>RDEIR Subsection R.6</li> </ul>
Regional Water Quality Control Board	May 23, 2022	<ul style="list-style-type: none"> <li>Identifies potential issues with mitigation acreage as described in the DEIR.</li> <li>Requests biological mitigation be identified for the Alternative Land Use Plan</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.4</li> <li>RDEIR Subsections R.6 and 4.4</li> </ul>
City of Perris	May 20, 2022	<ul style="list-style-type: none"> <li>Indicates concerns over land use compatibility.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 3.0</li> </ul>



**Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report**

COMMENTER	DATE	COMMENTS	LOCATION IN EIR WHERE COMMENT(S) ADDRESSED
		<ul style="list-style-type: none"> <li>• Requests additional detail regarding the proposed Project.</li> <li>• Requests additional analysis and clarification of potential air quality impacts, including localized air quality impacts and health risks.</li> <li>• Identifies concerns with the DEIR’s analysis of potential construction-related noise impacts.</li> <li>• Indicates objections to the truck routes identified by the RDEIR, and requests alternative routes for Project-related truck traffic.</li> <li>• Incorrectly identifies potential conflicts with Senate Bill 330.</li> </ul>	<ul style="list-style-type: none"> <li>• RDEIR Subsections R.6 and 3.0</li> <li>• RDEIR Subsections R.6 and 4.3</li> <li>• RDEIR Subsections R.6 and 4.13</li> <li>• RDEIR Subsections R.6 and 3.0</li> <li>• RDEIR Subsection R.6</li> </ul>
City of Riverside	May 23, 2022	<ul style="list-style-type: none"> <li>• Requests a copy of the Project’s traffic study.</li> <li>• Expresses concerns regarding potential conflicts with Cajalco Road safety widening.</li> <li>• Requests an assessment of Vehicle Miles Traveled (VMT)</li> </ul>	<ul style="list-style-type: none"> <li>• RDEIR Subsection R.6, RDEIR <i>Technical Appendix L3</i></li> <li>• RDEIR Subsections R.6 and 3.0</li> <li>• RDEIR Subsections R.6 and 4.18</li> </ul>
Riverside County Department of Waste Resources	April 18, 2022	<ul style="list-style-type: none"> <li>• Requests an evaluation of potential Project-related impacts due to solid waste.</li> <li>• Provides information regarding area landfills.</li> <li>• Identifies standard RCDWR conditions of approval and regulatory requirements for solid waste during construction and long-term operations.</li> </ul>	<ul style="list-style-type: none"> <li>• RDEIR Subsections R.6 and 4.20</li> <li>• RDEIR Subsection 4.20</li> <li>• RDEIR Subsection 4.20</li> </ul>
Blum Collins and Ho, LLP	May 23, 2022	<ul style="list-style-type: none"> <li>• Identifies concerns with the DEIR’s analysis and conclusions related to potential impacts to environmental justice communities in the surrounding area, including cumulatively-considerable impacts associated with TAC-related health risks.</li> <li>• Indicates concerns with the DEIR’s analysis of potential impacts to the burrowing owl and the</li> </ul>	<ul style="list-style-type: none"> <li>• RDEIR Subsection R.6, throughout RDEIR Section 4.0, and RDEIR Subsection 4.3</li> <li>• RDEIR Subsections R.6</li> </ul>





Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report

COMMENTER	DATE	COMMENTS	LOCATION IN EIR WHERE COMMENT(S) ADDRESSED
		<p>survey methodology conducted as part of biological fieldwork.</p> <ul style="list-style-type: none"> <li>• Identifies a minor inconsistency within the DEIR with respect to how and when the Project was reviewed by the Riverside County Airport Land Use Commission (ALUC).</li> <li>• Indicates concerns over the General Plan Consistency Analysis that was included as DEIR <i>Technical Appendix I</i>.</li> <li>• Identifies concerns related to the Project’s impacts on population and housing, including affordable housing and potential growth and growth-inducing impacts.</li> <li>• Indicates concern that the DEIR’s analysis of potential impacts due to Vehicle Miles Traveled (VMT) did not consider VMT from Project-related heavy truck trips.</li> <li>• Expresses objection to the range of alternatives considered in the DEIR.</li> <li>• Requests consideration of additional mitigation measures to address Project impacts to air quality.</li> <li>• Questions the input parameters and methodology used to calculate Project-related air quality emissions, including concerns related to the amount of high-cube cold storage warehouse uses that were considered.</li> <li>• Indicates concerns related to the modeling parameters used for the DEIR’s analysis of potential energy impacts.</li> <li>• Identifies potential concerns with the DEIR’s analysis of potential impacts due to Greenhouse Gas (GHG) emissions and the mitigation measures identified to reduce potential GHG-related impacts.</li> </ul>	<p>and 4.4</p> <ul style="list-style-type: none"> <li>• RDEIR Subsections R.6 and 4.9</li> <li>• RDEIR Subsection R.6 and RDEIR Technical Appendix I.</li> <li>• RDEIR Subsections R.6, 4.15, and 5.3</li> <li>• RDEIR Subsections R.6 and 4.18</li> <li>• RDEIR Subsection R.6 and Section 6.0</li> <li>• RDEIR Subsections R.6 and 4.3</li> <li>• RDEIR Subsections R.6, 3.0, and 4.3</li> <li>• RDEIR Subsections R.6 and 4.6</li> <li>• RDEIR Subsections R.6 and 4.8</li> </ul>
Sierra Club	June 17, 2020	<ul style="list-style-type: none"> <li>• Indicates concerns regarding the RDEIR’s analysis of potential impacts to the Riverpark Mitigation Bank and San Jacinto Wildlife Area, as well as impacts to wildlife movement.</li> <li>• Identifies recommended mitigation measures to</li> </ul>	<ul style="list-style-type: none"> <li>• RDEIR Subsections R.6 and 4.4</li> <li>• RDEIR</li> </ul>



Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report

COMMENTS	DATE	COMMENTS	LOCATION IN EIR WHERE COMMENT(S) ADDRESSED
		address Project-related air quality impacts during both construction and long-term operation.	Subsections R.6 and 4.3
George Hague	May 26, 2022	<ul style="list-style-type: none"> <li>Indicates concerns over the viability of the Mid-County Parkway (MCP) in light of a legal settlement.</li> <li>Questions the DEIR’s list of cumulatively-considerable projects.</li> <li>Identifies concerns over potential impacts to the San Jacinto Wildlife Area and San Jacinto River and associated biological resources, including indirect impacts due to light, noise, vibration, odor, and runoff.</li> <li>Expresses concerns regarding the DEIR’s analysis of potential air quality impacts.</li> <li>Identifies Attorney General recommendations for warehouse uses.</li> <li>Indicates concerns over the DEIR’s analysis of potential impacts to air quality and due to GHGs, and the adequacy of mitigation measures to address the Project’s air quality and GHG impacts.</li> <li>Identifies concerns related to the Project’s potential noise effects on surrounding sensitive receptors.</li> <li>Expresses concern regarding the Project’s potential impacts to traffic and the mitigation measures identified to address traffic congestion.</li> <li>Requests an analysis of all potential environmental effects associated with the Project’s proposed warehouse uses, and again requests the incorporation of best management practices.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsection R.6</li> <li>RDEIR Subsections R.6 and 4.0.2</li> <li>RDEIR Subsections R.6 and 4.4</li> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6, 3.0, and 4.3</li> <li>RDEIR Subsections R.6, 4.3, and 4.8</li> <li>RDEIR Subsections R.6 and 4.13</li> <li>RDEIR Subsection R.6</li> <li>RDEIR Subsections R.6 and throughout RDEIR Subsection 4.0</li> </ul>
Marshall Locke	May 23, 2022	<ul style="list-style-type: none"> <li>Indicates concerns regarding the availability of electricity in the Project area and provides quotes expressing concern over regional growth and associated effects on traffic.</li> <li>Indicates concern related to vehicular safety from Project-related trucks.</li> <li>Identifies concerns related to land use compatibility with surrounding existing and</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.20</li> <li>RDEIR Subsections R.6 and 4.18</li> <li>RDEIR Subsections R.6</li> </ul>



**Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report**

<b>COMMENTS</b>	<b>DATE</b>	<b>COMMENTS</b>	<b>LOCATION IN EIR WHERE COMMENT(S) ADDRESSED</b>
		planned land uses.	and 4.11
California Department of Fish and Wildlife	June 15, 2022	<ul style="list-style-type: none"> <li>Expresses concerns regarding the Project’s consistency with the MSHCP and the need for an approved Joint Project Review (JPR) and Determination of Biologically Equivalent or Superior Preservation DBESP).</li> <li>Identifies recommended revisions to the mitigation measures presented in the DEIR.</li> <li>Indicates concern over the DEIR’s analysis of consistency with MSHCP Section 6.1.2 with respect to the Protection of Species Associated with Riparian/Riverine and Vernal Pool Resources.</li> <li>Questions the DEIR’s analysis of potential impacts to the Los Angeles Pocket Mouse.</li> <li>Identifies recommended mitigation measures pursuant to the MSHCP Urban-Wildlife Interface Guidelines (UWIG).</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.3</li> </ul>
California Attorney General’s Office	July 11, 2022	<ul style="list-style-type: none"> <li>Indicates concern that the Project Applicant is proposing warehouse uses far from the nearest freeways, resulting in potential impacts to existing residential communities.</li> <li>Questions whether impacts to Tribal Cultural Landscapes (TCLs) should have been identified as a significant and unavoidable impact of the Project.</li> <li>Indicates concerns related to the DEIR’s analysis of potential impacts to air quality.</li> <li>Indicates concerns regarding the adequacy of the DEIR’s analysis of potential noise impacts.</li> <li>Identifies concerns with the truck routes identified in the RDEIR, and provides recommendations for alternative truck routes to be considered.</li> <li>Questions whether the DEIR included all feasible mitigation measures to address the Project’s significant and unavoidable impacts to air quality, noise, transportation, and agriculture and forestry, and provides a list of recommended measures for consideration.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6, 4.3, 4.9, 4.11, and 4.13</li> <li>RDEIR Subsections R.6 and 4.19</li> <li>RDEIR Subsections R.6 and 4.3</li> <li>RDEIR Subsections R.6 and 4.13</li> <li>RDEIR Subsections R.6 and 3.0</li> <li>RDEIR Subsections R.6, 4.2, 4.3, 4.13, and 4.18</li> </ul>



**Table 1-2 Summary of Comments on the Draft Program Environmental Impact Report**

COMMENTS	DATE	COMMENTS	LOCATION IN EIR WHERE COMMENT(S) ADDRESSED
		<ul style="list-style-type: none"> <li>Asserts that the DEIR did not adopt all feasible measures to mitigate the Project’s unavoidable impacts to agricultural resources (as identified by the DEIR).</li> <li>Requests that mitigation be identified for impacts to tribal cultural resources.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.2</li> <li>RDEIR Subsections R.6 and 4.19</li> </ul>
Advocates for the Environment	July 14, 2022	<ul style="list-style-type: none"> <li>Indicates concerns with the DEIR’s analysis and conclusions related to the Project’s GHG impacts.</li> <li>Indicates concerns that the Project may be inconsistent with applicable plans, including the Riverside County Climate Action Plan (CAP), Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and the CARB 2008 and 2017 Scoping Plans.</li> <li>Questions whether the DEIR’s mitigation measures for GHG impacts represented improper deferral under CEQA.</li> <li>Identifies concerns with the adequacy of the discussion of the Reduced Project Alternative and the range of alternatives considered in the DEIR, and identifies two recommended alternatives.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.8</li> <li>RDEIR Subsections R.6 and 4.8</li> <li>RDEIR Subsections R.6 and 4.8</li> <li>RDEIR Subsections R.6 and 6.0</li> </ul>
Mitchel Chadwick/Riverpark Mitigation Bank	August 15, 2022	<ul style="list-style-type: none"> <li>Expresses concerns related to the Project’s potential impacts to the neighboring Riverpark Mitigation Bank, including impacts related to hydrology and water quality.</li> </ul>	<ul style="list-style-type: none"> <li>RDEIR Subsections R.6 and 4.4.</li> </ul>

**1.4.2 CONTENT AND ORGANIZATION OF THIS PROGRAM EIR**

This Program EIR contains all of the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). This Program EIR is organized in the following manner:

- **Section R.0, *Recirculated Environmental Impact Report***, provides a summary of the legal requirements for recirculating a DEIR, a discussion of the Project’s background, an overview of the revisions that were incorporated into the previously circulated DEIR, responses to comments received in response to the DEIR’s initial public review period, and an overview of the environmental review and approval process.
- **Section S.0, *Executive Summary***, provides an overview of the Program RDEIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the



Project site is documented. In addition, the Executive Summary discloses potential areas of controversy related to the Project, including those issues identified by other agencies and the public, and identifies potential alternatives to the proposed Project that would reduce or avoid significant impacts, as required by CEQA. Finally, the Executive Summary provides a summary of the Project’s impacts, mitigation measures, and conclusions, in a table that forms the basis of the RDEIR’s Mitigation, Monitoring, and Reporting Program (MMRP).

- **Section 1.0, *Introduction***, provides introductory information about the CEQA process and the responsibilities of the County of Riverside, serving as the Lead Agency for this RDEIR; a brief description of the Project; the purpose of this RDEIR; applications proposed by the Project Applicant that would require discretionary County approvals; permits and approvals required by other agencies; and an overview of the RDEIR format.
- **Section 2.0, *Environmental Setting***, describes the environmental setting, including an overview of the regional and local setting, as well as descriptions of the Project site’s physical conditions and surrounding context. The existing setting is defined as the condition of the Project site and surrounding area at the approximate date this EIR’s NOP was released for public review on April 27, 2020. The setting discussion also addresses the relevant regional planning documents that apply to the Project site and vicinity.
- **Section 3.0, *Project Description***, serves as the RDEIR’s Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines § 15123. This section provides a detailed description of the Project, including its purpose and main objectives; design features; landscaping; site drainage; utilities; grading and construction characteristics; and operational characteristics expected over the Project’s lifetime. In addition, the discretionary actions required of the County of Riverside and other government agencies to implement the Project are discussed.
- **Section 4.0, *Environmental Analysis***, provides an analysis of the potential direct, indirect, and cumulative impacts that may occur from implementing the proposed Project. The topics analyzed in this section include the topics summarized above under subsection 1.4.1. Topics that were found to have no potential of being significantly impacted are discussed in Section 5.0, *Other CEQA Considerations*. A conclusion concerning significance is reached for each discussion, and mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this RDEIR are referred to as “effects” or “impacts” interchangeably. The State CEQA Guidelines also describe the terms “effects” and “impacts” as being synonymous (State CEQA Guidelines § 15358).

In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the proposed



Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in State CEQA Guidelines § 15355 as “...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”

The analyses in Section 4.0 are based in part upon technical reports that are appended to this Program RDEIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in Section 7.0, *References*. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be “roughly proportional” to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations (SOC) would need to be adopted by the County of Riverside pursuant to State CEQA Guidelines § 15093.

- **Section 5.0, *Other CEQA Considerations***, includes specific topics that are required by CEQA. These include a summary of the Project’s significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the proposed Project.
- **Section 6.0, *Project Alternatives***, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project’s adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. A range of three (3) alternatives is presented in Section 6.0.
- **Section 7.0, *References***, cites all reference sources used in preparing this Program RDEIR and lists the agencies and persons that were consulted during preparation of this Program RDEIR. Section 7.0 also lists the persons who authored or participated in preparing this Program RDEIR.

CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-3, *Location of CEQA Required Topics*, provides a quick reference in locating the CEQA-required sections within this document.



**Table 1-3 Location of CEQA Required Topics**

<b>CEQA Required Topic</b>	<b>State CEQA Guidelines Reference</b>	<b>Location in this EIR</b>
Table of Contents	§ 15122	Table of Contents
Summary	§ 15123	Section S.0
Project Description	§ 15124	Section 3.0
Environmental Setting	§ 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	§ 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented	§ 15126.2(b)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Impacts Which Would be Involved in the Proposed Action Should it be Implemented	§ 15126.2(c)	Subsection 5.2
Growth-Inducing Impacts of the Proposed Project	§ 15126.2(d)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	§ 15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Proposed Project	§ 15126.6	Section 6.0
Effects Not Found to be Significant	§ 15128	Subsection 5.4
Organizations and Persons Consulted	§ 15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	§ 15130	Section 4.0
Energy Conservation	Appendices F and G	Subsection 4.6

**1.4.3 INCORPORATION BY REFERENCE**

State CEQA Guidelines § 15147 states that the “information contained in an EIR shall include summarized... information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public,” and that the “placement of highly technical and specialized analysis and data in the body of an EIR shall be avoided.” State CEQA Guidelines § 15150 allows for the incorporation “by reference all or portions of another document... [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Program EIR. Where this Program RDEIR incorporates a document by reference, the document is identified in the body of the RDEIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this RDEIR.

Therefore, the detailed technical studies, reports, and supporting documentation that were used in preparing this Program RDEIR are bound separately as Technical Appendices. The Technical Appendices are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502, during the County’s regular business hours, can be requested in electronic form by contacting the County’s Planning Department, or can be accessed via the Planning Department’s web site (<https://planning.rctlma.org/>) during the 45-day public review period for this RDEIR. The individual technical studies, reports, and supporting documentation that comprise the Technical Appendices are as follows:



- A. Notice of Preparation and Written Comments on the NOP
- B1. Air Quality Impact Analysis
- B2. Health Risk Assessment
- C. Biological Technical Report
- D1. Cultural Resources Assessment (On Site)
- D2. Cultural Resources Assessment (Off Site)
- D3. Phase II Cultural Resources Significance Evaluation Program
- D4. Supplemental Cultural Resources Assessment
- D5. Cultural Resources Assessment for Off-Site Transportation-Related Improvements
- D6. Supplemental Cultural Resources Assessment for Off-Site Transportation-Related Improvements
- E. Energy Analysis
- F. Updated Geotechnical Evaluation
- G. Phase I Environmental Site Assessment Report
- H1. Preliminary Hydrology Study
- H2. Water Quality Management Plan
- I. General Plan Consistency Analysis
- J. Noise Impact Analysis
- K. Paleontological Resource Monitoring and Mitigation Program
- L1. Vehicle Miles Travelled Analysis
- L2. Supplemental Vehicle Miles Traveled Analysis
- L3. Traffic Impact Analysis
- M. Water Supply Assessment
- N. Fire Protection Plan
- O. Project Application Materials
- P. ALUC Consistency Determination Letter
- Q. Proposed Draft Amendment No. 1 to Specific Plan No. 239
- R. Dam Inundation Memo
- S. LESA Analysis
- T. Greenhouse Gas Analysis
- U. Ramboll Memorandum

Other reference sources that are incorporated into this RDEIR by reference are listed in Section 7.0, *References*, of this RDEIR. In most cases, documents or websites not included in the RDEIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed by the public. All references relied upon by this EIR are included as part of Riverside County's Administrative Record pertaining to the proposed Project, and electronic copies of the Project's Administrative Record can be obtained by contacting the Riverside County Planning Department.





## 1.5 RESPONSIBLE AND TRUSTEE AGENCIES

The California Public Resource Code (§ 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also State CEQA Guidelines § 15082 and § 15086(a)). As defined by State CEQA Guidelines § 15381, “the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” A Trustee Agency is defined in State CEQA Guidelines § 15386 as “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.”

For the proposed Project, the Santa Ana River Basin Water Quality Control Plan is responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that on-site water flows do not result in siltation, other erosional effects, or degradation of surface or subsurface water quality. The United States Army Corps of Engineers (ACOE) is identified as a Responsible Agency for issuance of the Project’s Section 404 Permit. The Santa Ana River Basin Water Quality Control Board is identified as a Responsible Agency for reviewing the Project’s Determination of Biological Equivalent or Superior Preservation (DBESP), which was prepared in accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) to address planned impacts to riparian/riverine areas on site. The California Department of Fish and Wildlife (CDFW) is identified as a Trustee Agency for issuance of a 1602 Streambed Alteration Agreement. There are no other agencies that are identified as Responsible Trustee Agencies for the proposed Project.

## 1.6 AREAS OF CONTROVERSY

Substantive issues raised in response to the NOP were previously summarized in Table 1-1. The purpose of this table is to present the primary environmental issues of concern raised by public agencies and the general public during the NOP review period. The table is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not a comment is listed in the table, all applicable comments received in responses to the NOP are addressed in this Program EIR. Based on comments received during the NOP review period, the issue of land use consistency was raised by the City of Perris and is addressed in EIR Subsection 4.11, *Land Use and Planning*. No other areas of controversy were identified as part of the NOP process, beyond comments regarding the Project’s potential environmental effects.

A number of comments were received on the previously circulated DEIR, which resulted in the Project Applicant making a number of significant changes to the Project to reduce its impacts on the environment, and recirculating the entire DEIR. A detailed discussion of the comments, and responses to comments, are presented in RDEIR Section R.0, which addresses additional areas of potential controversy identified during the public review period for the Project’s DEIR.

## 1.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The primary issues to be resolved by the decision-making body for the proposed Project involves the Project’s significant and unavoidable impacts in the issue areas of Air Quality, Noise, and Transportation, which are addressed in EIR Subsections 4.3, 4.13, and 4.18, respectively. The Riverside County Board of Supervises will



need to evaluate whether the mitigation measures proposed to reduce the Project's unavoidable impacts adequately reduce Project impacts to the maximum feasible extent. The Board of Supervisors also will make a determination as to whether the Project's benefits outweigh these adverse environmental effects in support of adopting a Statement of Overriding Consideration's pursuant to State CEQA Guidelines § 15093. Finally, the Board of Supervisors will decide whether to approve one of the Project alternatives in lieu of the proposed Project, if it is determined that one of the alternatives is feasible and its approval would serve to substantially reduce or avoid significant environmental impacts.



## 2.0 ENVIRONMENTAL SETTING

This Section 2.0 is provided pursuant to State CEQA Guidelines § 15125(a), and includes a description of the physical environmental conditions in the vicinity of the Project site and its off-site improvement areas from both a local and regional perspective as it existed at the time the Notice of Preparation (NOP) was published for this Program EIR, which occurred on April 27, 2020. This section provides a brief overview of resources on and surrounding the Project site; additional detail regarding existing conditions for individual issue areas (e.g., biology, geology, etc.) is provided within the appropriate subsection headings within Section 4.0, *Environmental Analysis*, of this Draft Program EIR.

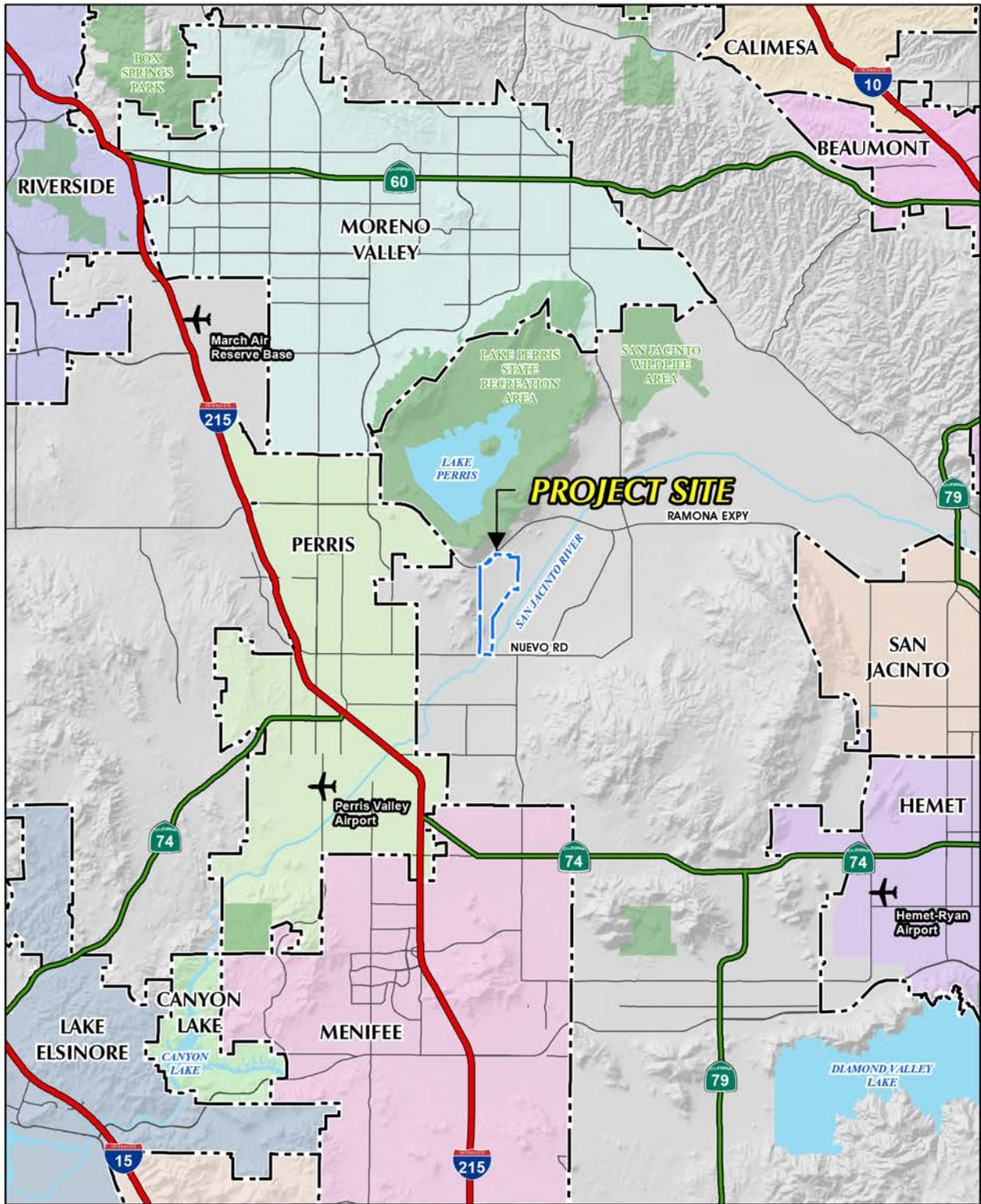
### 2.1 REGIONAL SETTING AND LOCATION

The 582.6-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 2-1, *Regional Map*, depicts the Project site's location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County. As of 2018, SCAG estimates that Riverside County as a whole had a population 2,415,954 (SCAG, 2019b, p. 3). SCAG estimates that the population will increase to 22.1 million by 2040 (SCAG, 2016, p. 48)

### 2.2 LOCAL SETTING AND LOCATION

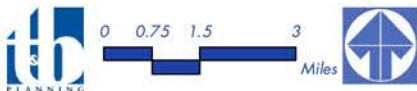
The Project site is located within the western region of unincorporated Riverside County, California. As depicted on Figure 2-2, *Vicinity Map*, the Project site is located in the Nuevo community, south of Lake Perris, east of the City of Perris, and north of the City of Menifee. More specifically, and as depicted on Figure 2-2, the 582.6-acre Project site is located south of the Ramona Expressway, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road. Access to the Project site is currently available from the Ramona Expressway and Nuevo Road. Interstate 215 (I-215) is located approximately 2.6 miles southwest of the Project site, State Route 74/Ethanac Road occurs approximately 4.0 miles to the south, while State Route 79 (SR 79) occurs approximately 8.8 miles east of the Project site. (Google Earth, 2021) The Project site includes Assessor Parcel Numbers (APNs) 307-070-003, 307-080-(005, 006, 008), 307-090-(001, 002, 004, 005, 006), 307-100-(001, 003, 004, 005), 307-110-(003, 007, 008), 307-220-001, and 307-230-(019, 020). The 582.6-acre Project site occurs within Sections 14 and 23, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian. (RCIT, 2020)

The census tract containing the Project site (Census Tract 6065042620) is ranked by the State as being in the 57<sup>th</sup> percentile for pollution burden, which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 69<sup>th</sup> percentile of communities that are disproportionately burdened by multiple sources of pollution. OEHHA relies on reported demographic information of 14,250 persons living in Census Tract 6065042620. Census Tract 6065042620

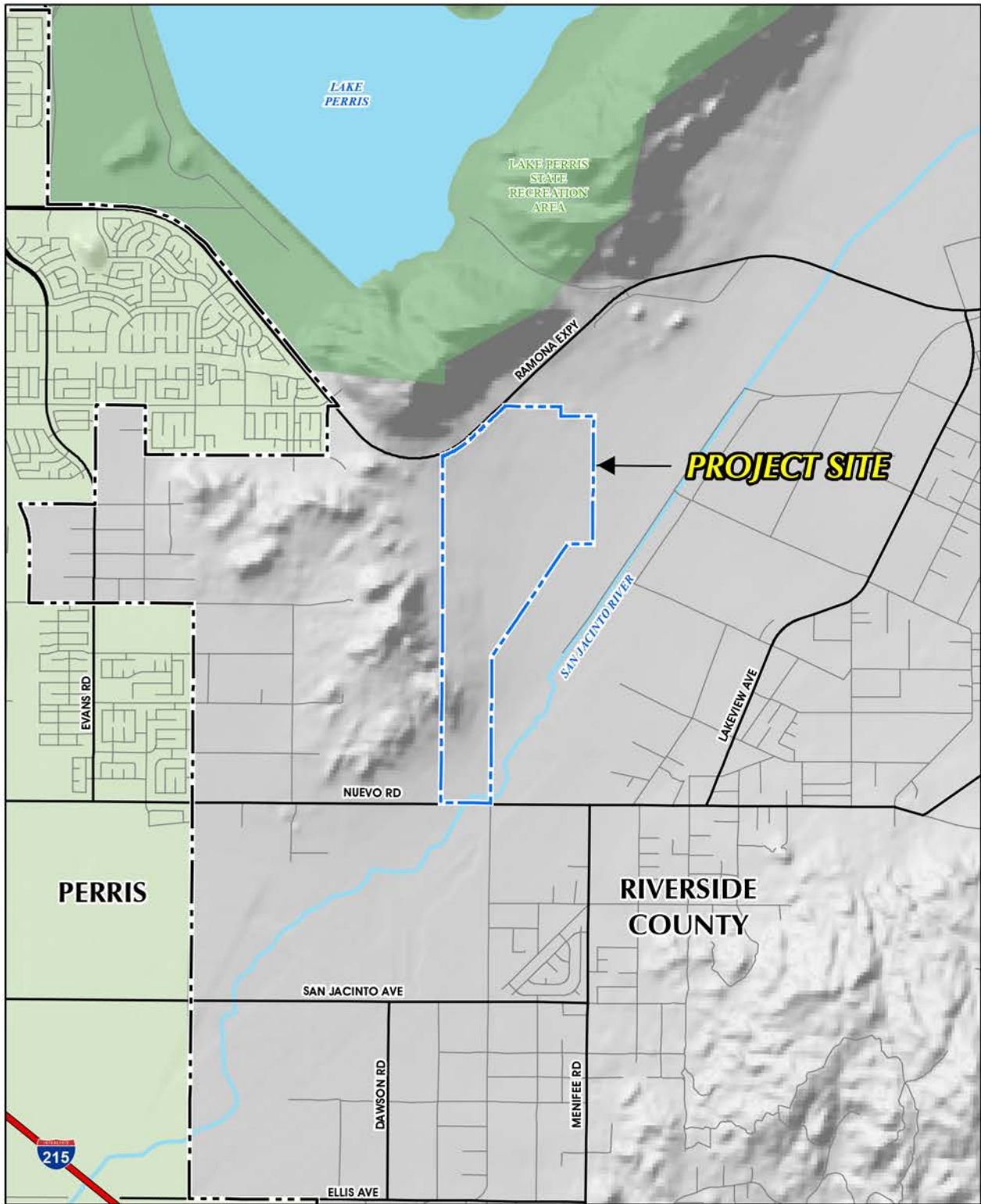


Source(s): ESRI, RCTLMA (2019)

Figure 2-1

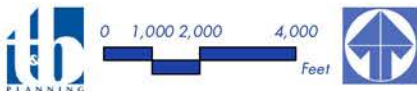


**Regional Map**



Source(s): ESRI, RCLMA (2019)

Figure 2-2



**Vicinity Map**



generally encompasses areas east of I-215, lands generally located south of Oleander Avenue, Ramona Expressway, and Rider Street, lands to the west of the San Jacinto River, and lands to the north of Nuevo Road.

OEHHA’s California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0, is a screening methodology that the State uses to identify California communities that are disproportionately burdened by multiple sources of pollution. The CalEnviroScreen 4.0 indicators for the Project site’s Census Tract are shown below in Table 2-1, *CalEnviroScreen Indicators for Census Tract 6065042620*. (OEHHA, 2023)

**Table 2-1 CalEnviroScreen Indicators for Census Tract 6065042620**

Indicator	% Burden	Indicator	% Burden
<b>Exposures</b>		<b>Sensitive Populations</b>	
Ozone:	98	Asthma	66
PM 2.5:	53	Low Birth Weight	63
Diesel PM:	48	Cardiovascular Disease	91
Pesticides:	59	<b>Socioeconomic Factors</b>	
Toxic Releases:	38	Education	75
Traffic:	82	Linguistic Isolation	53
Drinking Water Contaminants:	10	Poverty	65
Lead in Housing:	22	Unemployment	16
<b>Environmental Effects</b>		Housing Burden	58
Cleanup Sites	69		
Groundwater Threats	0		
Hazardous Waste	54		
Impaired Waters	0		
Solid Waste	40		

(OEHHA, 2023)

Exposure indicators are based on measurements of different types of pollution that people may come into contact with. Environmental effects indicators are based on the locations of toxic chemicals in or near communities. Sensitive population indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health. Socioeconomic factor indicators are conditions that may increase people’s stress or make healthy living difficult and cause them to be more sensitive to pollution’s effects. As indicated in Table 2-1, for the Project site’s Census Tract, the highest environmental exposures (over 80%) are from ozone (O<sub>3</sub>) and traffic. The highest population and socioeconomic factors (over 80%) are compromised health conditions related to cardiovascular disease. None of the other population or socioeconomic factors exceed 80%. It should be noted that the data presented in Table 2-1 are based on air quality measurements collected in 2016 and 2018, and do not necessarily represent current conditions. As discussed in further detail in EIR subsection 4.3.1.G, air quality regulations have become increasingly stringent since the 1970s, which has resulted in a substantial reduction in industrial emission sources, including localized emission sources. Thus, the data presented in Table 2-1 likely overstates the Project area’s level of environmental exposures and the area’s population and socioeconomic factors. (OEHHA, 2023)



In addition, the Project site is located in a SB 535 Disadvantaged Community identified by the California Environmental Protection Agency (CalEPA). The State provides California Climate Investment funding appropriated by the State Legislature from the proceeds of the State’s Cap-and-Trade Program for investment in disadvantaged communities. The funding is used for programs that reduce emissions of greenhouse gases with at least 25% of the funding going to projects that provide a benefit to disadvantaged communities and at least 10 percent of the funding going to projects located within those communities. (CalEPA, 2022)

### **2.3 SURROUNDING LAND USES AND DEVELOPMENT**

The site vicinity and surrounding areas contain a mixture of undeveloped lands/open space, with agricultural uses occurring to the southeast of the Project site and residential and school uses occurring to the west and northwest of the site. Land uses in the immediate vicinity of the Project site are illustrated on Figure 2-3, *Surrounding Land Uses and Development*, and described below.

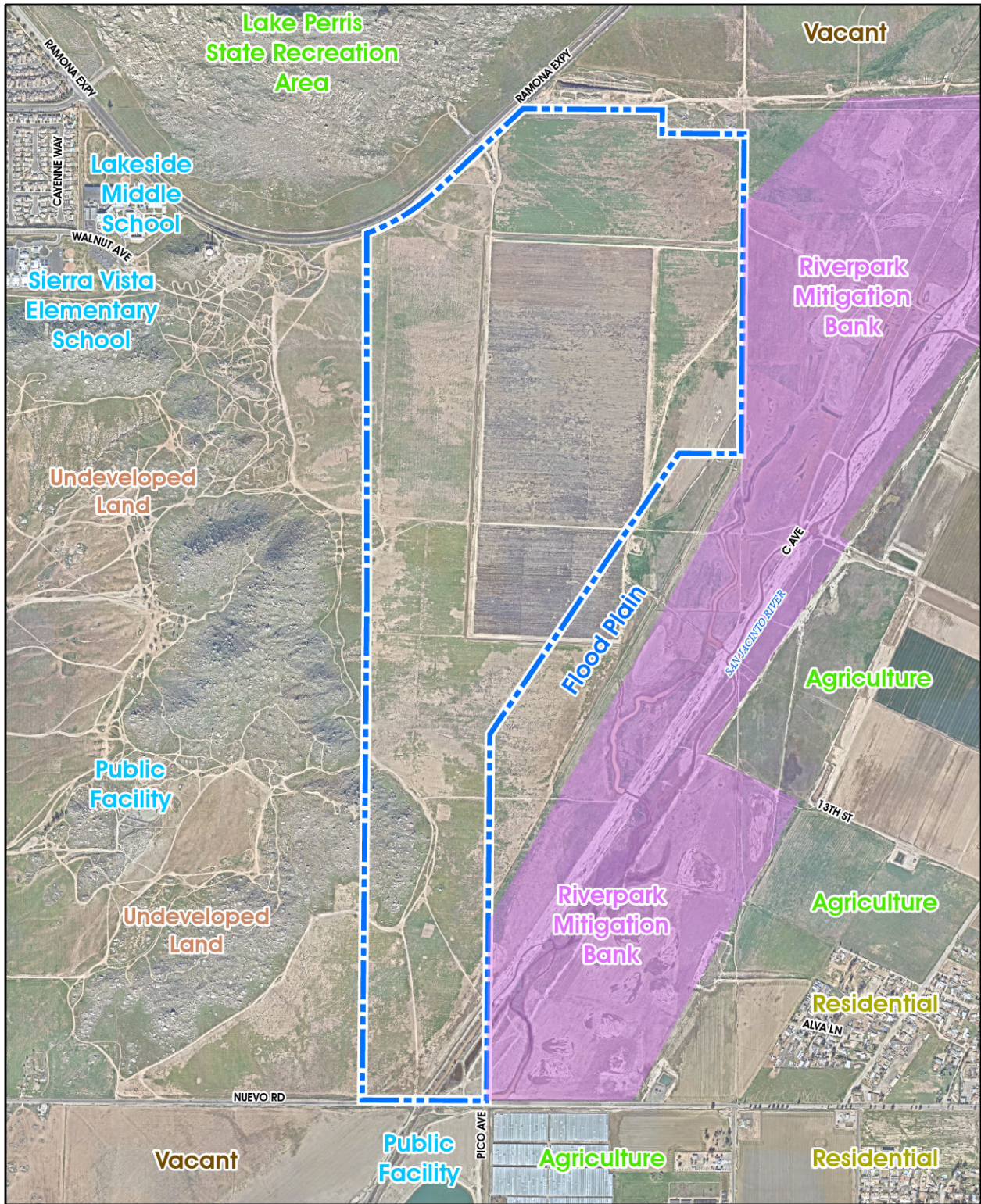
- **North:** To the north of the Project site is the Ramona Expressway, a large hill form, and open space associated with Lake Perris, which is located approximately 0.8-mile north of the Project site.
- **East:** To the east of the Project site are undeveloped open space, the San Jacinto River (a portion of which traverses the southeast corner of the Project site), agricultural uses, and scattered rural residential development.
- **South:** To the south of the Project site are undeveloped lands, the San Jacinto River, Ski Land Lake, and agricultural uses, beyond which are scattered residential communities.
- **West:** To the west of the Project site are several prominent hill forms, undeveloped lands, the Lakeside Middle School, the Sierra Vista Elementary School, rural residential homes, and a master-planned residential community located within the City of Perris.

### **2.4 LOCAL PLANNING CONTEXT**

State CEQA Guidelines § 15125(d) requires that EIRs identify the general plans and regional plans that are applicable to the project under evaluation, and recognize potential inconsistencies. Plans that are applicable to the Project evaluated herein are summarized below, with additional information provided in the applicable resource discussions in Section 4.0, *Environmental Analysis*.

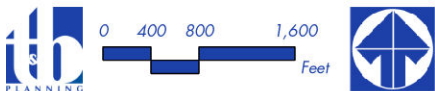
#### **2.4.1 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)**

SCAG is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG’s regional authority. On September 3, 2020, SCAG’s Regional Council approved and adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”). Connect



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 2-3



### Surrounding Land Uses and Development





SoCal is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. The goals of Connect SoCal are to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; 10) Promote conservation of natural and agricultural lands and restoration of habitats. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2020)

#### **2.4.2 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AIR QUALITY MANAGEMENT PLAN (AQMP)**

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the South Coast Air Basin (SCAB). In response, and in conformance with California Health and Safety Code Section 40702 et seq. and the California Clean Air Act, the South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the 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. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act (CAA) requirements. The 2022 AQMP is based on assumptions provided by the Emission FACTor model (EMFAC) developed by the California Air Resources Board (CARB) for motor vehicle information and assumptions provided by SCAG for demographics. The air quality levels projected in the 2022 AQMP are based on the assumption that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2020 RTP/SCS. The 2022 AQMP also assumes that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. (SCAQMD, 2022)

#### **2.4.3 COUNTY OF RIVERSIDE GENERAL PLAN AND LAKEVIEW/NUEVO AREA PLAN (LNAP)**

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Lakeview/Nuevo Area Plan (LNAP) of the Riverside County General Plan. As depicted on Figure 2-4, *Existing General Plan Land Use Designations*, the 582.6-acre Project

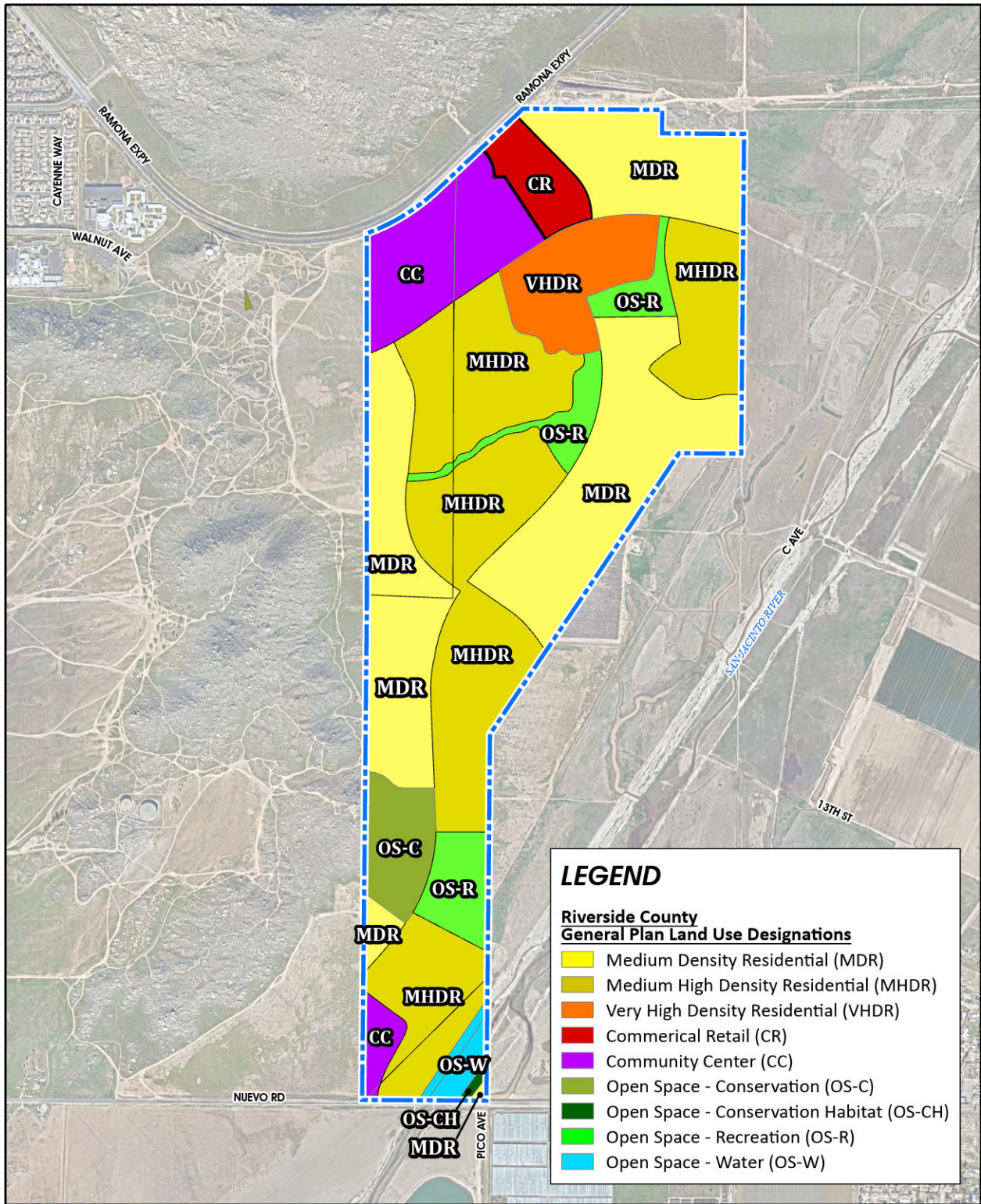


site is located within the boundaries of the Stoneridge Specific Plan (SP 239). The General Plan and LNAP designate the property for “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space – Recreation (OS-R),” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water” land uses. The CC land use designation is intended to accommodate combination of small-lot single family residences, multi-family residences, commercial retail, office, business park uses, civic uses, transit facilities, and recreational open space within a unified planned development area. The CR land use designation is intended to accommodate local and regional serving retail and services uses. The MDR land use designation allows for single-family residential development at a density range of 2 to 5 dwelling units per acre (du/ac). The MHDR land use designation allows for single-family attached and detached residences with a density range of 5 to 8 du/ac. The VHDR land use designation is intended to accommodate single-family attached residences and multifamily dwellings at densities between 14 to 20 du/ac. The OS-R designation is intended to accommodate recreational uses including parks, trails, athletic fields, and golf courses. The OS-C land use designation is intended to provide for the protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. The OS-CH land use designation applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plan (MSHCP) and in accordance with related Riverside County policies. The OS-W land use designation includes bodies of water and natural or artificial drainage corridors. (Riverside County, 2019b, Table 1)

#### 2.4.4 STONERIDGE SPECIFIC PLAN NO. 239 (SP 239)

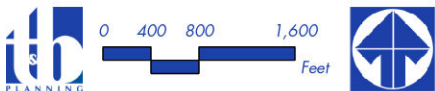
The Stoneridge Specific Plan No. 239 (SP 239) was approved by the Riverside County Board of Supervisors in April 1992. At the time SP 239 was adopted, the Specific Plan encompassed a total of approximately 605.4 acres. However, changes to SP 239 were made as part of an amendment to an adjacent specific plan, the McCanna Hills Specific Plan No. 246 (SP 246). Specifically, Amendment No. 3 to SP 246 removed a 33.0-acre area in the southwestern portion of SP 239 and added this area to the boundaries of SP 246<sup>1</sup>. SP 246 indicates that these changes to the approved boundaries of SP 239 would occur as part of a future amendment to SP 239. Figure 2-5, *Existing Stoneridge Specific Plan Land Use Designations*, depicts the approved SP 239 land use plan, which does not reflect the elimination of the southwestern portions of SP 239. As shown, the adopted SP 239 allows for up to 718 “Medium Residential (2-5 du/ac)” dwelling units on 185.0 acres; 903 “Medium-High Residential (5-8 du/ac)” dwelling units on 185.0 acres; 446 “Very High Residential (14-20 du/ac)” dwelling units on 30.0 acres; “Commercial” uses on 75.0 acres, which also allows for up to 169 dwelling units in Planning Area 1; “Parks” on 33.7 acres; “Open Space – Natural” on 20.8 acres; “Open Space – Recreational” on 8.6 acres; three planning areas designated for “Schools” on 27.0 acres; and 40.3 acres of major circulation facilities. (Riverside County, 1991, Table 3.1 and Figure 3; Riverside County, 2015b)

<sup>1</sup> Based on current calculations of Project site acreage, the amount of land incorporated into the boundaries of SP 246 and to be removed from the boundaries of SP 239 comprises approximately 22.8 acres (SP 239 comprises 605.4 acres per the adopted SP 239 land use plan, while the Project site evaluated herein comprises 582.6 acres; thus, approximately 22.8 acres would be removed from the boundary of SP 239 as part of the Project).



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

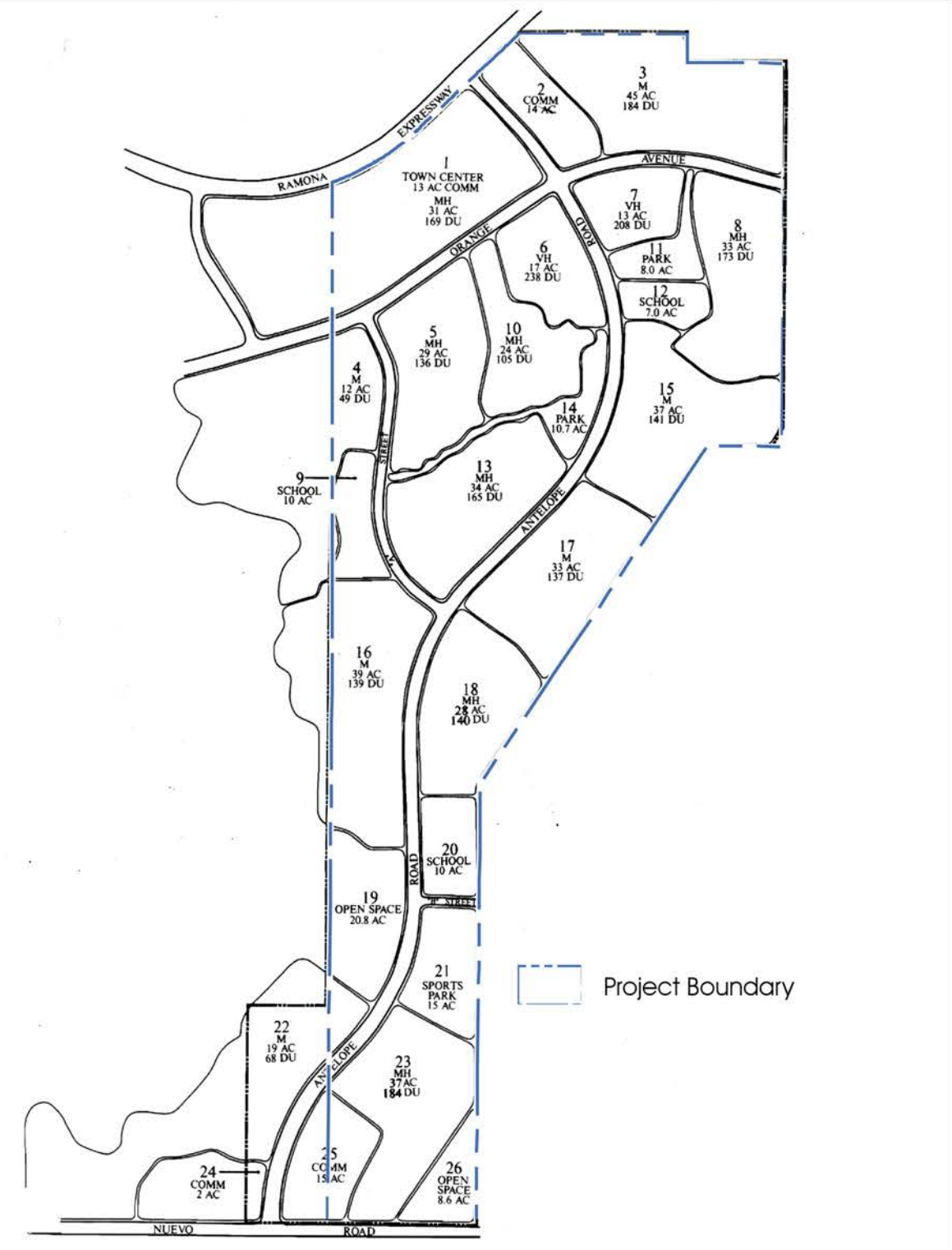
Figure 2-4



**Existing General Plan Land Use Designations**

LAND USE SUMMARY TABLE			
LAND USE DESIGNATION/DENSITY	PLANNING AREA	GROSS ACRES	TOTAL DU'S *
<b>M MEDIUM RESIDENTIAL</b> (2-5 DU/AC) (6,000-7,200 sq. ft. lots)	3	45.0	184
	4	12.0	49
	15	37.0	141
	16	39.0	139
	17	33.0	137
	22	19.0	68
<b>SUBTOTAL</b>		<b>185.0</b>	<b>718</b>
<b>M-H MEDIUM-HIGH RESIDENTIAL</b> (5-8 DU/AC) (5,000 sq. ft. lots average)	5	29.0	136
	8	33.0	173
	10	24.0	105
	13	34.0	165
	18	28.0	140
	23	37.0	184
<b>SUBTOTAL</b>		<b>185.0</b>	<b>903</b>
<b>V-H VERY HIGH RESIDENTIAL</b> (14-20 DU/AC)	6	17.0	238
	7	13.0	208
<b>SUBTOTAL</b>		<b>30.0</b>	<b>446</b>
<b>COMMERCIAL</b>	1	44.0	169
	2	14.0	
	24	2.0	
	25	15.0	
<b>SUBTOTAL</b>		<b>75.0</b>	<b>169</b>
<b>RESIDENTIAL TOTAL</b>			<b>* 2,236</b>
<b>PARKS</b>	11	8.0	
	14	10.7	
	21	15.0	
<b>SUBTOTAL</b>		<b>33.7</b>	
<b>OPEN SPACE</b>			
	• NATURAL	19	20.8
	• RECREATIONAL	26	8.6
<b>SUBTOTAL</b>		<b>29.4</b>	
<b>SCHOOLS</b>	9	10.0	
	12	7.0	
	20	10.0	
<b>SUBTOTAL</b>		<b>27.0</b>	
<b>CIRCULATION</b>		<b>40.3</b>	
<b>GRAND TOTAL</b>		<b>605.4</b>	<b>2,236 D.U.</b>

\* Total dwelling units do not include up to 300 additional units as permitted by an approved affordable housing program. Up to 150 affordable units and a matching number of bonus units may be allocated to planning areas 1 and 29.



Source(s): Florian Martinez Associates (11-02-1991)

Figure 2-5



Existing Stoneridge Specific Plan Land Use Designations



#### 2.4.5 ZONING

Under existing conditions, the 582.6-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of an adopted specific plan. As such, the 582.6-acre Project site is subject to the zoning classifications established by the adopted SP 239, which generally reflect the land use designations applied to the site as part of SP 239 (described above). (RCIT, 2020)

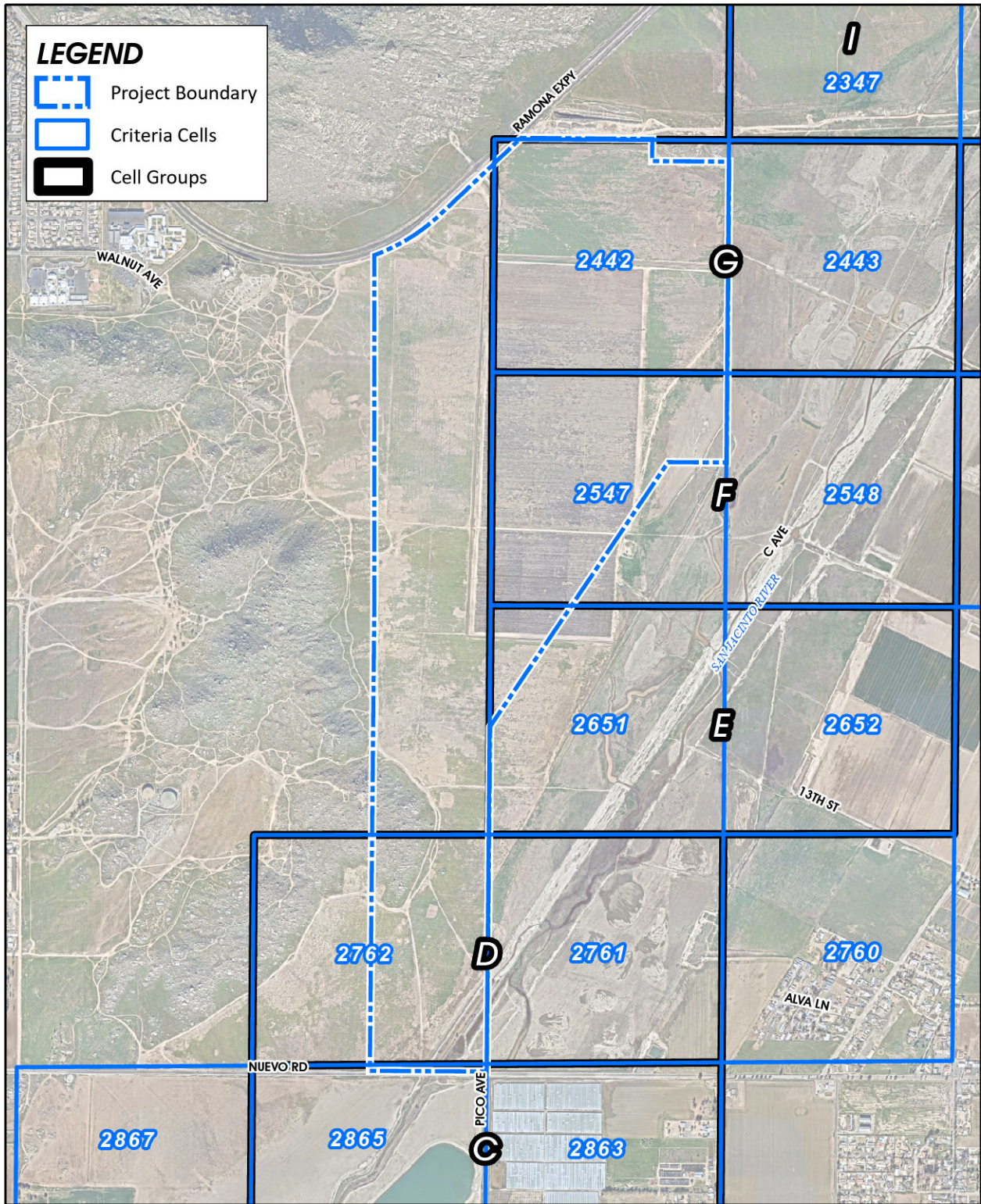
#### 2.4.6 RIVERSIDE COUNTY AIRPORT LAND USE COMPATIBILITY PLAN

The Riverside County Airport Land Use Commission (RCALUC) has jurisdiction over development in the Project area due to the location of the March Air Reserve Base (approximately 4.8 miles northwest of the Project site). 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 (ALUC, 2014). A majority of the western, central, and southern portions of the Project site are located within the Airport Influence Area (AIA) for the March Air Reserve Base and are located within ALUCP Compatibility Zone E (RCIT, 2020). No restrictions are identified by the ALUCP for Compatibility Zone E, other than prohibiting specific types of land uses that can create a hazard to flight (ALUC, 2014). Refer to EIR Subsections 4.9, *Hazards and Hazardous Materials*, 4.13, *Noise*, and 4.18 *Transportation/Traffic*, for additional discussion of the March Air Reserve Base.

#### 2.4.7 WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN

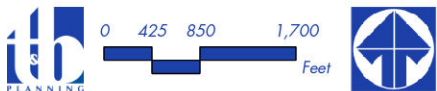
The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. As shown on Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the eastern and southern portions of the Project site are located within MSHCP Criteria Cells. The northeast portion of the Project site is located within Criteria Cell 2442 within Cell Group G of the MSHCP Lakeview/Nuevo Area Plan (LNAP), Criteria Cell 2547 within Cell Group F of the LNAP, and Criterial Cell 2651 within Cell Group E of the LNAP. The southern portions of the Project site are located within Criteria Cell 2762 within Cell Group D of the LNAP. Refer to EIR Subsection 4.4, *Biological Resources*, for a discussion of the conservation criteria for these Criteria Cells and Cell Groups. (RCIT, 2020; Riverside County, 2003)

In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements. The eastern and southern portions of the Project site are located within the Criteria Area Species Survey Area (CASSA) for the San Jacinto Valley crownscale, Parish's brittle scale, Davidson's salt scale, Thread-leaved brodiaea, Round-leaved filaree, Smooth tarplant, Coulter's goldfields, Little mousetail, and Mud nama. The eastern and southern portions of the Project site also are located within the CASSA for the L.A. Pocket Mouse. The eastern and



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 2-6



**MSHCP Cell Groups and Criteria Cells**



southern portions of the Project site also are located within the Narrow Endemic Plant Species Survey Area (NEPSSA) for Munz's onion, San Diego ambrosia, Many-stemmed dudleya, Spreading navarretia, California Orcutt grass, Wright's trichocoronis. Additionally, the entire 582.6-acre Project site is located within the Burrowing Owl Survey Area. (RCA, n.d.)

## 2.5 EXISTING PHYSICAL SITE CONDITIONS

Pursuant to State CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an EIR is the environment as it existed at the time the EIR's NOP was released for public review. The NOP for this RDEIR was released for public review on April 27, 2020. The following subsections provide a description of the Project site's physical environmental condition ("existing conditions") as of that approximate date. The site's current physical conditions and surrounding areas are shown on Figure 2-7, *Aerial Photograph*. More detailed information regarding the Project's site's environmental setting as it relates to a specific environmental issue area is provided in the various subsections of EIR Section 4.0, *Environmental Analysis*.

### 2.5.1 LAND USE

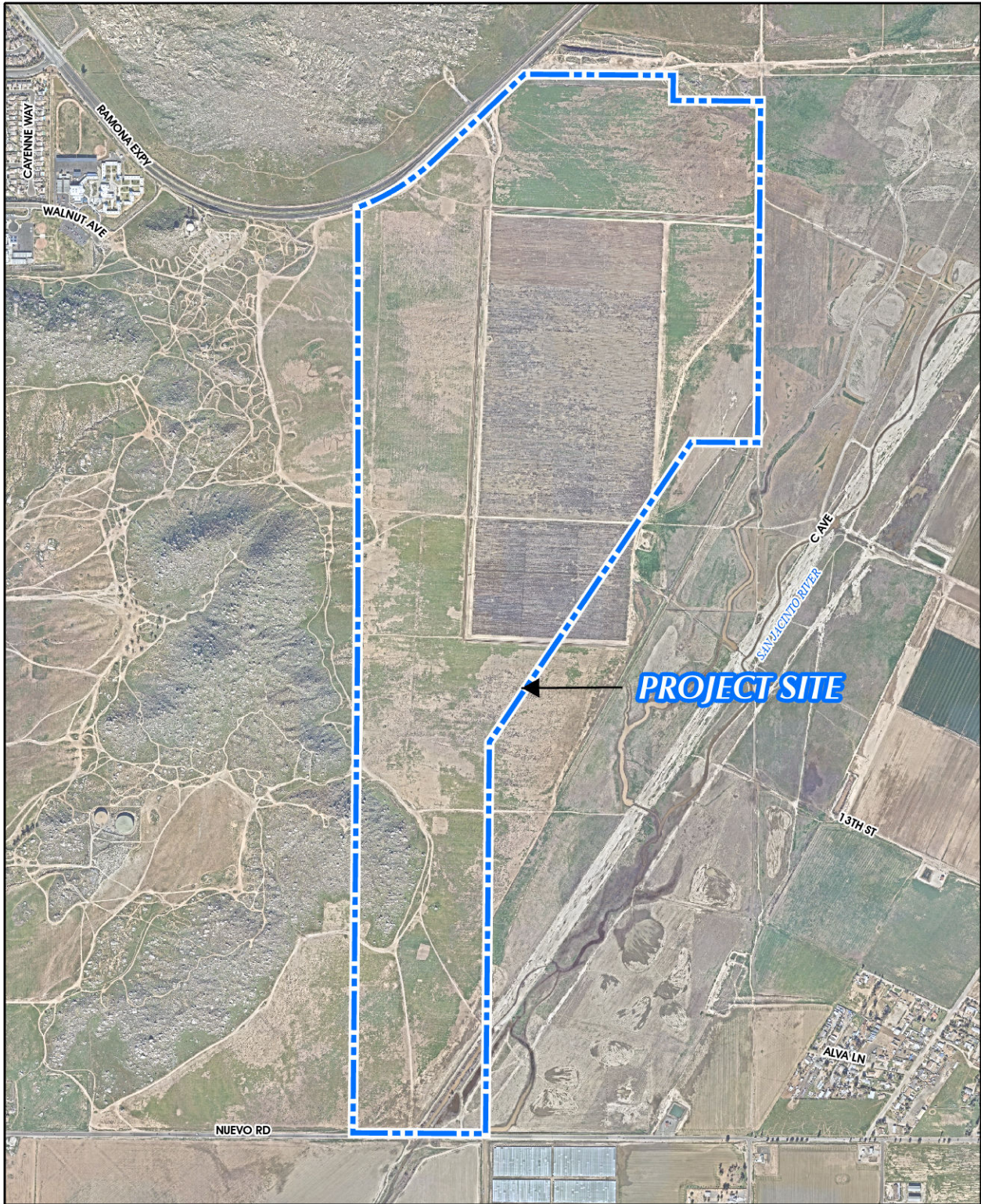
As shown on Figure 2-7, the 582.6-acre Project site is vacant and undeveloped under existing conditions. A majority of the flatter portions of the Project site was previously subject to agricultural activity, and is routinely disced for fire abatement purposes. The hill forms located in the western portions of the Project site were not previously used for agriculture, and contain natural open space that is partially disturbed by pedestrian activity, particularly in the northwest portion of the Project site. The San Jacinto River traverses the southeastern corner of the Project site.

### 2.5.2 SITE TOPOGRAPHY

As shown on Figure 2-8, *USGS Topographic Map*, the topography of the Project site is largely characterized by flat lands throughout most of the site, with several large hill forms occurring along the western Project boundary. In general, the topography of the Project site decreases from west to east, with drainage under existing conditions being conveyed to the San Jacinto River. Elevations on site range from 1,425 feet above mean sea level (amsl) in the southeastern corner of the Project site (i.e., within the San Jacinto River) to 1,695 feet amsl along the western Project boundary. Overall topographic relief is approximately 270 feet.

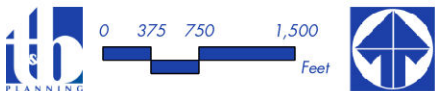
### 2.5.3 AIR QUALITY AND CLIMATE

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east, and San Diego County to the south. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and state air quality standards. As documented in the Project's Air Quality Impact Analysis (*Technical Appendix B* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air



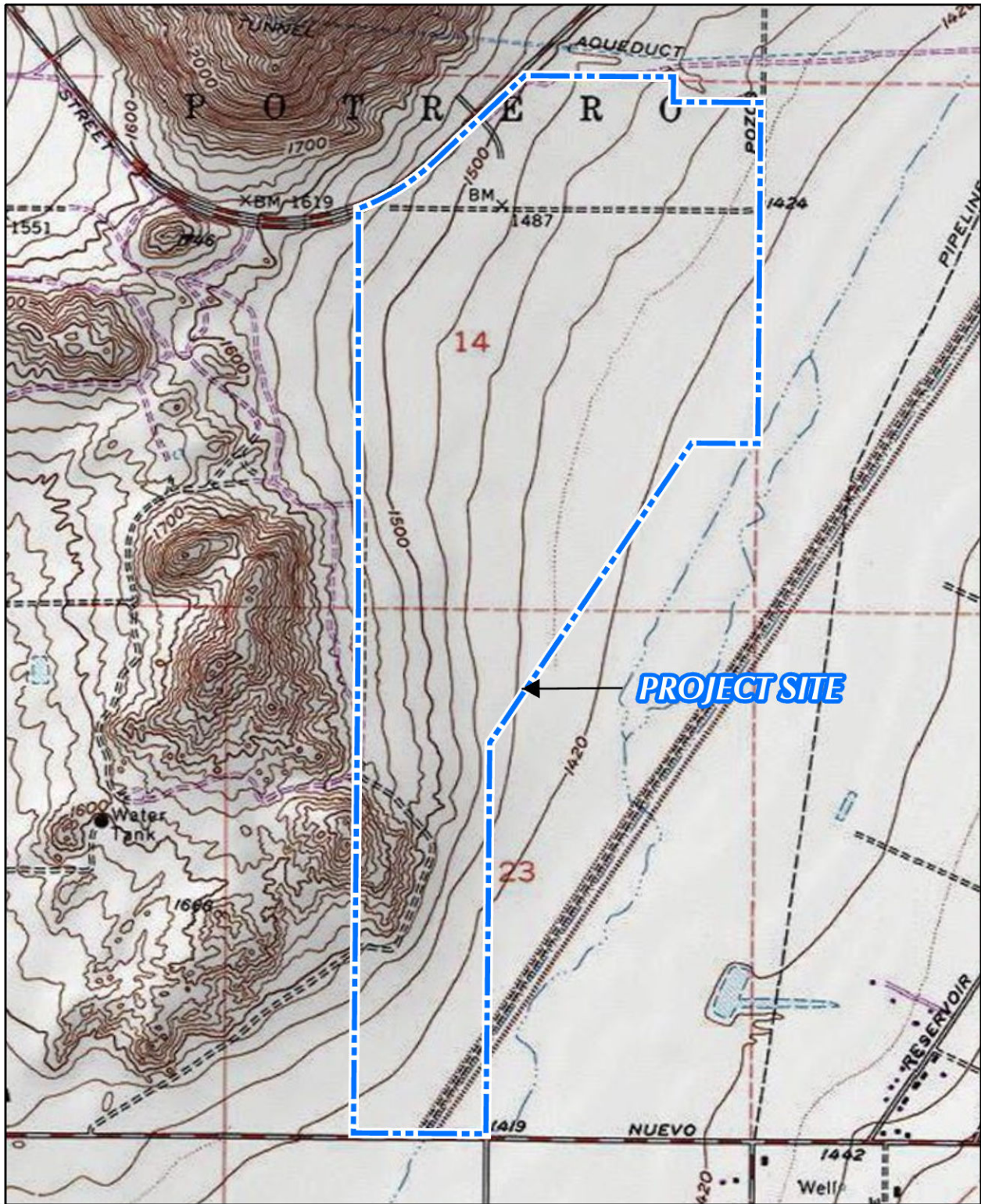
Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 2-7



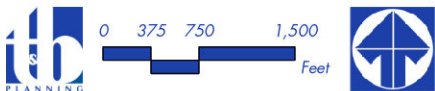
**Aerial Photograph**





Source(s): USGS (2013)

Figure 2-8



USGS Topographic Map



near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (Urban Crossroads, 2023a, pp. 16-17)

#### 2.5.4 AGRICULTURE AND FORESTRY RESOURCES

As more fully discussed in EIR Subsection 4.2, *Agriculture and Forestry Resources*, the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) identifies "Important Farmland" to include lands mapped as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and "Farmland of Local Importance." As mapped by the CDC's FMMP, the Project site is mapped as containing approximately 535.1 acres of "Farmland of Local Importance" and 47.6 acres of Grazing Land, neither of which comprise "Important Farmland" types, as that term is defined by the CDC and CEQA (*see* CEQA Guidelines Appendix G). The Project site is not zoned for agricultural use, is not currently used for agricultural production, and is not subject to any Williamson Act Contracts or County Agricultural Preserves. Additionally, no forestry resources occur on-site under existing conditions.

#### 2.5.5 BIOLOGICAL RESOURCES

The Project site and Offsite areas support the following vegetation/land cover types: agricultural; developed/disturbed; disturbed alkali playa, non-native grassland, ornamental, Riversidean sage scrub, ruderal, and southern riparian scrub. Table 2-2, *Summary of Vegetation/Land Use Types*, provides a summary of the vegetation/land cover types and their corresponding acreage within the Project Footprint, Conservation areas, and Offsite areas. Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of the vegetation communities that occur on site and within the Project's off-site improvement areas. (Noreas, 2023, Table 2)

The Project site occurs within Multiple Species Habitat Conservation Plan (MSHCP) Narrow Endemic Plant Species Survey Area (NEPSSA) designated Survey Area 3, as well as CAPSSA designated Survey Area 3; therefore, pursuant to the MSHCP, the following target species were evaluated: San Jacinto Valley crownscale, Parish's brittle scale, Davidson's salt scale, thread-leaved brodiaea, round-leaved filaree, smooth tarplant, Coulter's goldfields, little mousetail, mud nama, Munz's onion, San Diego ambrosia, many-stemmed dudleya, spreading navarretia, California orcutt grass, and Wright's trichocoronis along with other special-status plants that could cause a potential constraint to the Project under CEQA. In addition, the following special-status plants were detected at the Project site: Coulter's goldfields, San Jacinto Valley crownscale, smooth tarplant, and spreading navarretia. Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of sensitive plants that occur or have the potential to occur on site. (Noreas, 2023, pp. 7, 13)



**Table 2-2 Summary of Vegetation/Land Use Types**

<b>Vegetation Communities and Land Cover Types</b>	<b>Acreage</b>
<b>Vegetation Communities On Site (Project Footprint and Conservation Areas)</b>	
Agricultural	176.82
Developed/Disturbed	14.31
Disturbed Alkali Playa	21.45
Non-Native Grassland	1.39
Riversidean Sage Scrub	24.51
Ruderal	342.95
Southern Riparian Scrub	1.21
<b>Subtotal – On Site</b>	<b>582.64</b>
<b>Vegetation Communities Offsite (Offsite Areas)</b>	
Agricultural	21.47
Developed/Disturbed	85.01
Non-Native Grassland	0.01
Ornamental	0.97
Riversidean Sage Scrub	2.04
Ruderal	43.64
Southern Riparian Scrub	0.29
<b>Subtotal Off Site:</b>	<b>153.53</b>

(Noreas, 2023, Table 2)

The following special-status animals were detected at the Project site: ferruginous hawk (*Buteo regalis*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), northwestern San Diego pocket mouse (*Chaetodipus fallax*), San Diego desert woodrat (*Neotoma lepida intermedia*), Stephens’ kangaroo rat (*Dipodomys stephensi*), and San Diego black-tailed jackrabbit (*Lepus californicus*). Refer to EIR Subsection 4.4, *Biological Resources*, for a detailed description of sensitive animals that occur or have the potential to occur on site. (Noreas, 2023, pp. 1-2)

### 2.5.6 GEOLOGY

The Project site is regionally located in the Peninsular Ranges geomorphic province which extends from the Los Angeles Basin south to Baja California. The province is characterized by numerous southwest trending mountain ranges and valleys that are geologically controlled by a series of paralleling major active faults. More specifically, the 582.6-acre Project site is located in the northern portion of the Perris block, which is bordered to the northeast by the San Jacinto Fault Zone and to the southwest by the Chino/Elsinore Fault Zone. The Peninsular Ranges batholith is composed of Cretaceous-aged plutonic rocks mainly of tonalitic composition. Near the Project site, the plutonic rocks are associated with the Lakeview Mountain Pluton which primarily consists of biotite-hornblende tonalite characterized by ubiquitous schlieren and the lack of potassium feldspar. (LGC, 2019, p. 6)

The Project site is situated on the western margin of an alluvial flood plain associated with the San Jacinto River. Most of the alluvial areas west of the San Jacinto River consists of Pleistocene age fluvial deposits



similar to those observed at the subject site. These alluvial materials generally form the large area flanking the Perris Valley and the west side of the San Jacinto River Valley. (LGC, 2019, p. 6)

Based on the Geologic Map of the 7.5-foot Perris Quadrangle, the Project site is underlain by Very Old Fan Deposits of the late Pleistocene. In addition, Lakeview Mountain plutonic bedrock is present along and adjacent to the western boundary of the Project site. The presence of some minor amounts of artificial fill (not mapped) associated with existing “dirt” roadway construction and past agricultural uses likely occur on site. The approximate lateral limits of the geologic units are depicted on the Geotechnical Maps included in the Project’s Geotechnical Evaluation (refer to Sheets 1 through 3 of EIR *Technical Appendix F*). (LGC, 2019, p. 6)

### 2.5.7 SOILS

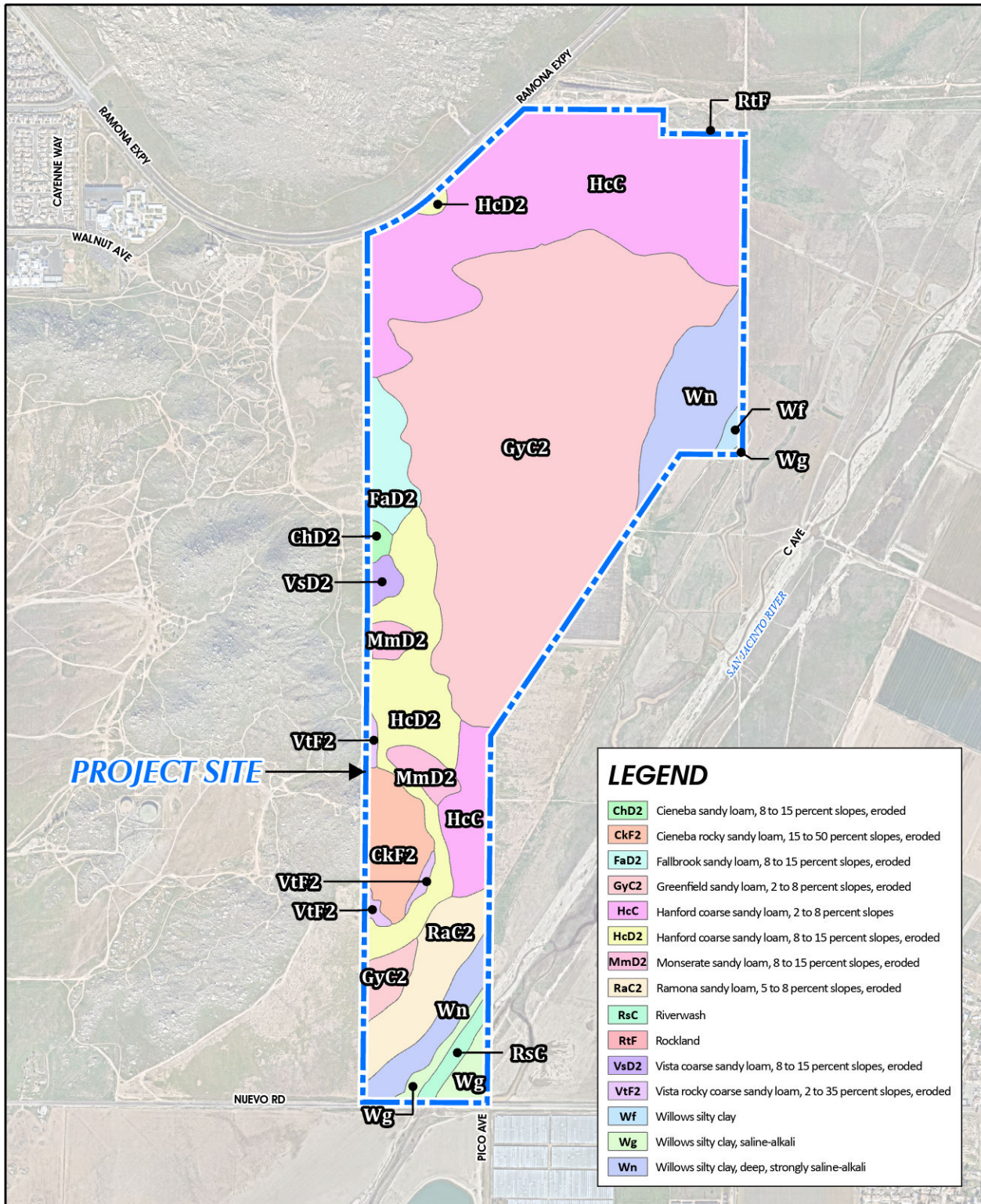
Figure 2-9, *On-Site Soils*, depicts the location and extent of soils within the Project site. Table 2-3, *Summary of On-Site Soil Characteristics*, provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 7.9% of the Project site has a “Very Slow” rate of runoff, with no erosion susceptibility identified. Approximately 1.8% of the Project site has a slow rate of runoff and a slight susceptibility to erosion. Approximately 68.1% of the Project site has a slow to medium rate of runoff and a slight to moderate susceptibility to erosion. Approximately 18.2% of the Project site has a medium rate of runoff and a moderate erosion susceptibility, while approximately 3.3% of the Project site has a rapid rate of runoff and a high susceptibility to erosion. Approximately 0.8% of the Project site is not rated by the United States Department of Agriculture (USDA) for rate of runoff or erosion susceptibility. (USDA, 1971, pp. 23-24, 32, 38-40, 47, 54-55, 65, and 67-68; USDA, 2020)

### 2.5.8 HYDROLOGY

Under existing conditions, a majority of the Project site is relatively flat, with a large hill form occurring along the western Project site boundary in the southern portion of the site. Runoff on the site and areas tributary to the site generally is conveyed in a west-to-east orientation towards the San Jacinto River, which is located immediately east of the Project site. The topography of the site is typical of the Perris Valley in that it exhibits gently rolling topography with elevations ranging from approximately 1,420 feet to 1,720 feet above mean sea level. (Hunsaker, 2021a) Refer to EIR Subsection 4.10, *Hydrology and Water Quality*, for additional information regarding the site’s existing drainage conditions.

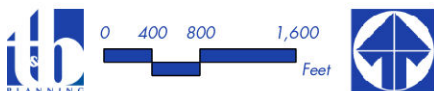
### 2.5.9 NOISE

The most common and significant source of noise in Riverside County is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and institutional) that generate stationary-source noise. The Project site is bound by Ramona Expressway to the north and Nuevo Road to the south. Both of these are major roadways within the County that serve a wide variety of residential, industrial, agricultural, and commercial land uses. As shown in EIR Table 4.13-3, the ambient recorded noise level on the Project site is 41.4 dBA. Refer to EIR Subsection 4.13, *Noise*, for additional information regarding the site’s existing noise conditions.



Source(s): ESRI, Nearmap Imagery (2023), RCLMA (2023), USDA (2019)

Figure 2-9



**On-Site Soils**



Table 2-3 Summary of On-Site Soil Characteristics

Map Symbol	Map Unit Name	Rate of Runoff	Erosion Susceptibility	Acres in AOI <sup>1</sup>	Percent of AOI <sup>1</sup>
ChD2	Cieneba sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	2.1	0.4%
CkF2	Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded	Rapid	High	19.3	3.3%
FaD2	Fallbrook sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	14.5	2.5%
GyC2	Greenfield sandy loam, 2 to 8 percent slopes, eroded	Slow to Medium	Slight to Moderate	251.1	43.1%
HcC	Hanford coarse sandy loam, 2 to 8 percent slopes	Slow to Medium	Slight to Moderate	145.7	25.0%
HcD2	Hanford coarse sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	47.6	8.2%
MmD2	Monserate sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	9.6	1.6%
RaC2	Ramona sandy loam, 5 to 8 percent slopes, eroded	Medium	Moderate	23.9	4.1%
RsC	Riverwash	--	--	4.5	0.8%
RtF	Rockland	--	--	0.1	0.0%
VsD2	Vista coarse sandy loam, 8 to 15 percent slopes, eroded	Medium	Moderate	3.4	0.6%
VtF2	Vista rocky coarse sandy loam, 2 to 35 percent slopes, eroded	Medium	Moderate	4.7	0.8%
Wf	Willows silty clay	Very Slow	--	2.2	0.4%
Wg	Willows silty clay, saline-alkali	Slow	Slight	10.3	1.8%
Wn	Willows silty clay, deep, strongly saline-alkali	Very Slow	--	43.5	7.5%
<b>Totals for Area of Interest:</b>		--	--	<b>582.6</b>	<b>100.0%</b>

1. Totals reflect rounding. AOI = Areas of Interest (USDA, 1971, pp. 23-24, 32, 38-40, 47, 54-55, 65, and 67-68; USDA, 2020)

### 2.5.10 TRANSPORTATION

Interstate 215 (I-215) is located approximately 2.6 miles southwest of the Project site, State Route 74/Ethanac Road occurs approximately 4.0 miles to the south, while State Route 79 (SR 79) occurs approximately 8.8 miles east of the Project site. Direct access to the Project site is currently available from the Ramona Expressway, located along the northern Project boundary, and Nuevo Road, located along the southern Project boundary. (Google Earth, 2021)

As shown on Figure 2-10, *LNAP Circulation Plan*, the Riverside County General Plan and LNAP classifies the Ramona Expressway as an “Expressway (128’ to 220’ ROW),” while Nuevo Road is classified as an “Urban Arterial (152’ ROW).” Additionally, the General Plan and LNAP indicates Orange Avenue is planned to traverse the Project site in an east-west orientation, and classifies Orange Avenue as an “Arterial (128’ ROW)” roadway. The General Plan and LNAP also show Antelope Road traversing the Project site in a north-south orientation between Orange Avenue and Nuevo Road, and classifies this road as a “Major (118’ ROW)” roadway. An unnamed roadway also is planned between Orange Avenue and the Ramona Expressway, and is classified as an “Arterial (128’ ROW)” roadway by the General Plan and LNAP. Additionally, the proposed Mid-County Parkway (MCP) is identified as an “Expressway (128’ to 220’ ROW),” and is identified as part of a Community Environmental Transportation Acceptability Process (CETAP) East-West Corridor. (Riverside County, 2019b, Figure 7)



Transit service is currently not available at the Project site, although existing Riverside Transit Agency (RTA) bus stops occur near the intersection of Sherman Road at Walnut Street, approximately 0.5 mile west of the Project site in the City of Perris.

Under existing conditions, no pedestrian or bicycle facilities have been constructed on the Project site, with exception of a number of informal trails within the hillsides in the western portion of the Project site. (Google Earth, 2021) As shown on Figure 2-11, *LNAP Trails and Bikeway System*, the General Plan and LNAP identify numerous planned trails on and adjacent to the Project site. A “Combination Trail (Regional Trail/Class I Bike Path)” is planned to traverse the southern and northeastern portions of the Project site. A “Community Trail” is planned to traverse the central portions of the Project site in a west-east orientation, with this trail continuing in a north-south alignment in the eastern portion of the site up to the northern site boundary, where it would connect to a proposed “Design Guidelines Trail.” The “Design Guidelines Trail” is planned along the southern alignment of the Ramona Expressway, and east along the northern Project boundary where it would connect to off-site portions of the Combination Trail (Regional Trail/Class I Bike Path). Several “Regional Trail: Open Space” trail segments are planned in the western portions of the site, primarily associated with the hill forms located in the western portions of the site and off site to the west. (Riverside County, 2019b, Figure 8)

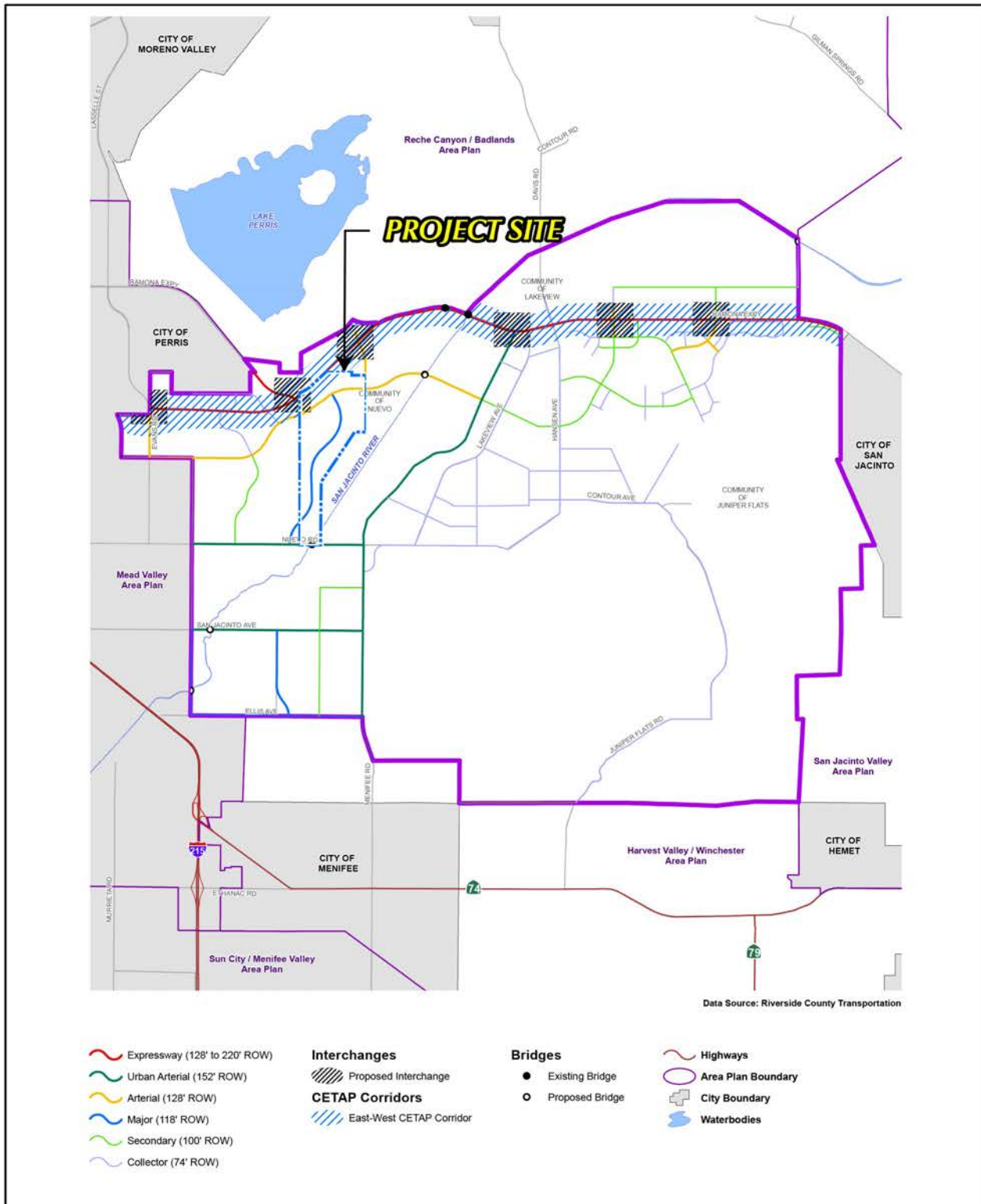
### 2.5.11 PUBLIC FACILITIES

Fire protection services in the Project area are primarily provided by the Riverside County Fire Department (RCFD). The primary fire station servicing the site would be RCFD Station 3 (Nuview), which is located approximately 3.2 roadway miles east of the Project site. Secondary fire protection services would be provided by RCFD Station 90 (North Perris City), located approximately 3.3 roadway miles west of the Project site. (Google Earth, 2021) Police protection services in the Project area are provided by the Riverside County Sheriff’s Department (RCSD). The nearest sheriff’s station to the Project site is the Perris Station, located at 137 North Perris Boulevard, Perris, or approximately 3.3 miles southwest of the Project site (Google Earth, 2021). In addition to community policing, other services provided by the Sheriff’s Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff’s Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program.

### 2.5.12 UTILITIES AND SERVICE SYSTEMS

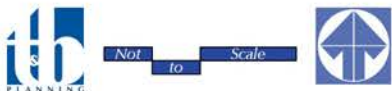
#### A. Water Service

The Project site is located in the service area of the Eastern Municipal Water District (EMWD). The EMWD provides water services to communities in Riverside County extending from Moreno Valley to Temecula, and west of Perris to the City of Hemet. Approximately half of the EMWD’s water demand is supplied from imported water from Metropolitan Water District (MWD) of Southern California through its Colorado River Aqueduct and its connections to the State Water Project. The remaining approximately half of water demand within EMWD is supplied through local supplies, including groundwater, desalinated groundwater, and recycled water. (EMWD, n.d.)



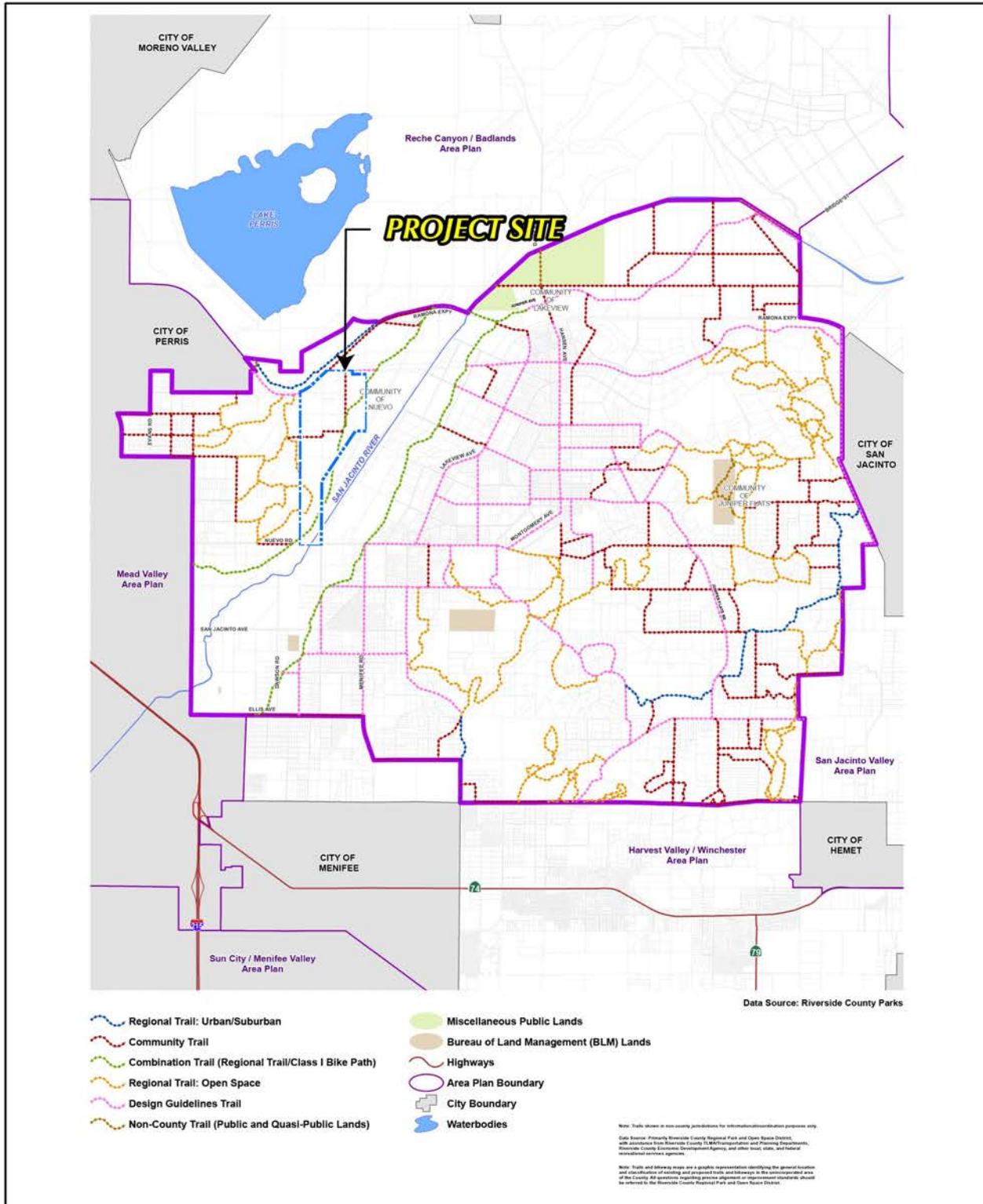
Source(s): Riverside County (04-16-2019)

Figure 2-10



**LNAP Circulation Plan**





Source(s): Riverside County (04-16-2019)

Figure 2-11



**LNAP Trails and Bikeway System**



Under existing conditions, there is no water infrastructure on the Project site. An existing 12-inch water line occurs within Ramona Expressway. There are no additional water lines in roadways abutting the Project site.

**B. Sewer Service**

The Project site is located in the service area of EMWD. The EMWD wastewater collection and treatment facilities treat approximately 49 million gallons per day (mgd) of wastewater at its four active regional water reclamation facilities through 1,813 miles of sewer pipelines. (EMWD, n.d.) Sewer flows from the Project area are treated by the Perris Valley Regional Water Reclamation Facility (PVRWRC), which has a current daily capacity of 22 mgd with typical daily flows of approximately 15.5 mgd. The PVRWRC has an ultimate capacity of 100 million gpd (EMWD, 2021, p. 1).

The only existing EMWD sewer facility in the Project area is an existing 27-inch gravity sewer main within Pico Avenue, south of the Project site.

**C. Solid Waste Services**

The Riverside County Department of Waste Resources (RCDWR) is responsible for the efficient and effective landfill disposal of non-hazardous county waste within the County, and operates six active landfills in addition to holding a contract agreement to dispose of waste at the private El Sobrante Landfill (Riverside County, 2015a, p. 4.17-36). Solid waste from the Project site would be taken to the Moreno Valley Transfer Station before being loaded into larger trucks and transferred to the El Sobrante Landfill for disposal. The El Sobrante Landfill is located at 10910 Dawson Canyon Road in Riverside County, east of the Interstate 15 and south of the City of Corona. Solid waste could also be taken to the Lamb Canyon Landfill or the Badlands Landfill which are both located within Riverside County (Riverside County, 2015a).

**D. Other Services**

The Project site also is located in the service territories of the Southern California Gas Company (natural gas) and Southern California Edison (electricity) (SCE, 2015; SoCalGas, 2016).

**2.5.13 RARE AND UNIQUE RESOURCES**

As required by State CEQA Guidelines § 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the project. The principal discretionary actions required of Riverside County to implement the Project are described in detail in Section 3.0, *Project Description*, and are listed in Table 3-11, *Matrix of Project Approvals/Permits*.

Based on the existing conditions of the Project site and surrounding area described above and discussed in more detail in Section 4.0, *Environmental Analysis*, the Project site contains one prominent hill form occurring in the southern portion of the Project site along the western Project boundary. Additionally, the San Jacinto River, which is a channelized drainage facility in the Project area, traverses the southeast corner of the Project site. There are no other rare or unique resources on the Project site under existing conditions.



## 3.0 PROJECT DESCRIPTION

This section will provide all of the information required for an RDEIR Project Description by State CEQA Guidelines § 15124, including a description of the Project’s precise location and boundaries; a statement of the Project’s objectives; a description of the Project’s technical, economic, and environmental characteristics; and a description of the intended use of this RDEIR, including a list of the government agencies that are expected to use this RDEIR in their decision-making process; a list of the permits and approvals that are required to implement the project; and a list of related environmental review and consultation requirements.

### 3.1 REGIONAL SETTING

The 582.6-acre Project site is located within the western portion of unincorporated Riverside County, California. Figure 2-1 (previously presented) depicts the Project site’s location within the regional vicinity. As shown, Riverside County abuts San Bernardino County to the north; Orange County to the west; and San Diego and Imperial Counties to the south. Riverside County is located in an urbanizing area of southern California commonly referred to as the Inland Empire. The Inland Empire is an approximate 28,000 square-mile region comprising western San Bernardino County, western Riverside County, and the eastern reaches of Los Angeles County.

### 3.2 PROJECT LOCATION AND SETTING

The 582.6-acre site that is subject of this RDEIR (“Project site”) is located within the Lakeview/Nuevo community of unincorporated Riverside County, south of Lake Perris and the Ramona Expressway, east of the City of Perris, and north of the City of Menifee. More specifically, and as previously depicted on Figure 2-2, the 582.6-acre Project site is located south of the Ramona Expressway, north of Nuevo Road, east of Foothill Drive, and west of the future extension of Menifee Road. Under existing conditions, the Project site is vacant and undeveloped, but has been disturbed in the past by agricultural activities and on-going discing for fire abatement purposes. The site vicinity and surrounding areas contain a mixture of undeveloped lands/open space, with agricultural uses occurring to the southeast of the Project site and residential and school uses occurring to the west and northwest of the site. Refer to RDEIR subsection 2.0 for a detailed description of the local setting and surrounding land uses.

### 3.3 PROPOSED PROJECT

The Riverside County Transportation Commission (RCTC) is currently planning the construction of a regional transportation facility, the “Mid-County Parkway (MCP),” a segment of which, along with an interchange, are planned to traverse the northwestern portions of the Project site. The MCP is a long-range transportation improvement by RCTC; however, the RCTC has not secured or identified funding for the segment of the MCP which traverses the Project area, and therefore the timing of this segment of the MCP and the associated interchange is unknown at this time. In addition, and due to environmental, economic, right of way, or other factors, it is possible that RCTC ultimately may not construct the MCP in this portion of Riverside County. Thus, in order to accommodate both the potential for the future construction of the MCP while also providing for development of the site in the event the MCP is not constructed as currently planned by RCTC, the Project



as evaluated herein includes two separate land use plans for the 582.6-acre Project site: the “Primary Land Use Plan” and the “Alternative Land Use Plan.” The two land use concepts are evaluated for the site throughout this RDEIR at an equal level of detail; however, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. The “Alternative Land Use Plan” only would be implemented in the event that the RCTC constructs the MCP through the northernmost portions of the Project site.

The “Primary Land Use Plan” anticipates that the MCP would not be constructed, in which case the Project site would be developed with up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail land uses, Open Space – Conservation on 18.1 acres, Open Space – Conservation Habitat on 81.6 acres, and major roadways on 37.3 acres. Pursuant to Amendment No. 1 to Specific Plan No. 239 (SP 239A1), Light Industrial land uses are restricted to a maximum of 7,350,000 square feet (s.f.) of building area (or a Floor Area Ratio [FAR] of approximately 0.43), Business Park land uses may be developed at an FAR up to 0.50, while Commercial Retail land uses can be developed at a FAR up to 0.35. Thus, under the Primary Land Use Plan, the Project site would be developed with up to 7,350,000 s.f. of Light Industrial building area, up to 1,069,398 s.f. of Business Park building area, and up to 121,968 s.f. of Commercial Retail building area.

The “Alternative Land Use Plan” anticipates that the MCP would be constructed through the northwest portions of the site, in which case the Project site would be developed with 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses (of which 8.5 acres would be within the alignment of the MCP and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail land uses (of which 0.2 acre would occur within the alignment of the MCP and would not be developed with Commercial Retail land uses), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major roadways. As with the Primary Land Use Plan, the Alternative Land Use Plan would allow for development of up to 7,350,000 s.f. of Light Industrial building area, Business Park uses are allowed at a maximum FAR of 0.50, while Commercial Retail land uses could be developed at a maximum FAR of 0.35. Thus, under the Alternative Land Use Plan, the Project site would be developed with up to 7,350,000 s.f. of Light Industrial building area, up to 936,540 s.f. of Business Park building area, and up to 126,542 s.f. of Commercial Retail building area.

This Program RDEIR analyzes the physical effects associated with all components of the proposed Project, including planning, construction, and on-going operation. The governmental approvals requested by the Project Applicant from Riverside County to implement the Project consist of the following:

1. Adoption by resolution of a General Plan Amendment (GPA 190008);
2. Adoption of Amendment No. 1 to Specific Plan No. 239 (SP 239A1); and
3. Adoption by ordinance of a Change of Zone (CZ 1900024).

The Project’s applications, as submitted to the County of Riverside by the Project Applicant, are herein incorporated by reference pursuant to State CEQA Guidelines § 15150 and are available for review at the Riverside County Planning Department, 4080 Lemon Street, 12<sup>th</sup> Floor, Riverside, CA 92501. A copy of the Project’s application materials also are included as *Technical Appendix O* to this RDEIR, while a copy of proposed SP 239A1 is included as *Technical Appendix Q* to this RDEIR. All other discretionary and



administrative approvals that would be required of the County of Riverside or other government agencies to implement the Project are also within the scope of the Project analyzed in this RDEIR.

### **3.4 STATEMENT OF OBJECTIVES**

The fundamental purpose and goal of the Stoneridge Commerce Center Project is to accomplish the orderly development of light industrial, business park, and commercial retail land uses to increase employment opportunities in a housing rich portion of unincorporated Riverside County. This underlying purpose aligns with various aspects of the Southern California Association of Governments' (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) primarily related to accommodating goods movement industries and balancing job and housing opportunities in local areas to reduce long commutes from home to work. SCAG identifies the Inland Empire as a housing rich area and coastal communities as job rich areas and is striving in their policies to achieve more equal balances locally. The Project would achieve its underlying purpose and goal through the following objectives:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses in an area predominately composed of housing.
- B. To assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire.
- C. To attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.
- F. To anticipate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.
- G. To develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.



### **3.5 PROJECT'S COMPONENT PARTS AND DISCRETIONARY APPROVALS**

The proposed Project consists of applications for General Plan Amendment No. 190008 (GPA 190008), Amendment No. 1 to the Stoneridge Specific Plan 239 (SP 239A1), and Change of Zone No. 1900024 (CZ 1900024). Two land use concepts are proposed for the site. In the scenario in which the MCP is not constructed within the northern portions of the Project site (i.e., the “Primary Land Use Plan” scenario), approval of these applications would allow for the future development of up to 388.5 acres of Light Industrial uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail uses, 18.1 acres of Open Space-Conservation, 81.6 acres of Open Space-Conservation Habitat, and 37.3 acres of major roadways. In the scenario in which the MCP is constructed through the northwestern portions of the Project site (i.e., the “Alternative Land Use Plan” scenario), the Project would allow for a total of 388.5 acres of Light industrial, 51.5 acres of Business Park land uses (of which 8.5 acres would be within the alignment of the MCP and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail (of which 0.2 acre would occur within the alignment of the MCP and would not be developed with Commercial Retail land uses), 18.1 acres of open space-conservation, 81.6 acres of open space-conservation habitat, and 34.4 acres of major roadways. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 3-7, *Matrix of Project Approvals/Permits*, at the end of this Section.

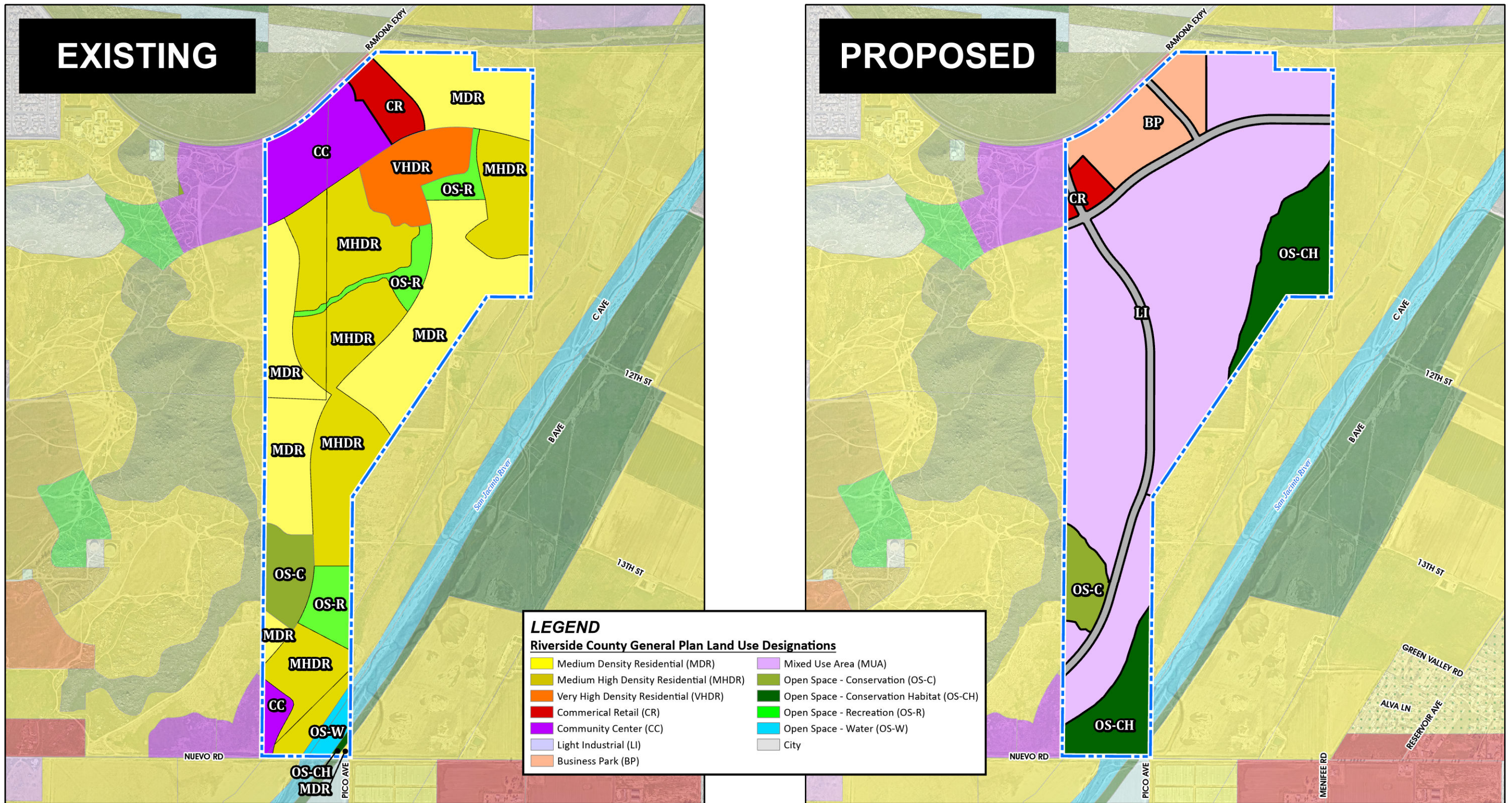
#### **3.5.1 GENERAL PLAN AMENDMENT NO. 190008 (GPA 190008)**

As shown on Figure 3-1, *General Plan Amendment No. 190008*, the Project Applicant is seeking a General Plan Amendment (GPA 190008) to modify the land use designations for the Project site in order to reflect changes proposed as part of proposed Amendment No. 1 to the Stoneridge Commerce Center Specific Plan No. 239 (SP 239A1), which is discussed below. The land use designations proposed as part of GPA 190008 are intended to reflect the land use designations proposed for both the Primary Land Use Plan and the Alternative Land Use Plan as part of SP 239A1, which is discussed below. The adopted General Plan and Lakeview/Nuevo Area Plan (LNAP) designate the Project site for “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Commercial Retail (CR),” “Community Center (CC),” “Open Space – Conservation (OS-C),” “Open Space – Recreation (OS-R),” and “Open Space – Water (OS-W).” Proposed GPA 190008 would amend the General Plan and LNAP land use designations to reflect those proposed as part of SP 239A1, which would include “Light Industrial (LI),” “Business Park (BP),” “Commercial Retail (CR),” “Open Space – Conservation (OS-C),” and “Open Space – Conservation Habitat” land uses.

#### **3.5.2 SPECIFIC PLAN NO. 239, AMENDMENT NO. 1 (SP 239A1)**

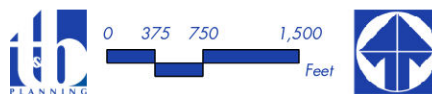
##### **A. Proposed Land Uses**

The Project entails the first amendment to the Stoneridge Specific Plan No. 239 (SP 239A1). As previously indicated, the Mid-County Parkway (MCP) is planned to traverse the northwestern portions of the Project site. As such, this RDEIR evaluates two land use alternatives for the Project. The “Primary Land Use Plan,” which



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 3-1





is depicted on Figure 3-2, *Primary Land Use Plan*, and summarized on Table 3-1, *SP 239A1 Proposed Land Uses – Primary Land Use Plan*, anticipates that the MCP would not be constructed through the property, in which case areas within the potential alignment of the MCP would be developed with Business Park and Commercial Retail land uses. As shown in Table 3-1, the Primary Land Use Plan would allow for development of up to 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail (CR), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 37.3 acres of major roadways. Proposed SP 239A1 would allow for up to 7,350,000 s.f. of Light Industrial building area, Business Park land uses would be restricted to a maximum FAR of 0.5, and Commercial Retail areas would be restricted to a FAR of up to 0.35. Accordingly, implementation of the Primary Land Use Plan would allow for up to 7,350,000 s.f. of light industrial building area, up to 1,069,398 s.f. of business park building area, and up to 121,968 s.f. of commercial retail building area. Although it is anticipated that the Project ultimately would be built out with less than the maximum allowable building area, the analysis throughout this RDEIR evaluates potential impacts associated with buildout of the maximum allowable building area in order to provide a conservative analysis of the impacts associated with the Primary Land Use Plan. For purposes of analysis throughout this RDEIR, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. Additionally, as part of its future review of implementing plot plans, Riverside County would ensure that no development that would interfere with implementation of the MCP is allowed within the MCP alignment unless or until RCTC makes a final decision it will not construct the MCP through the northern portions of the Projects site.

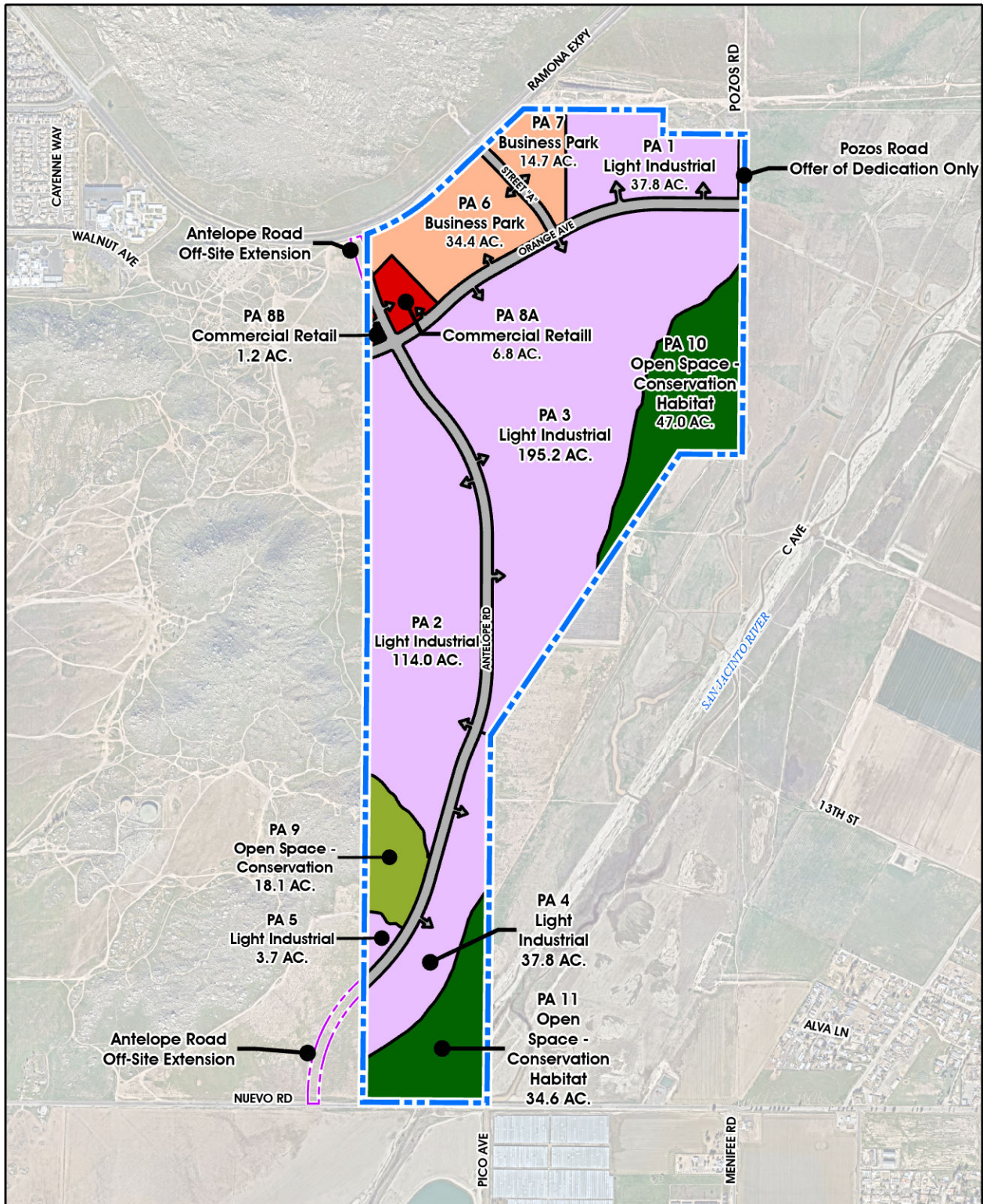
**Table 3-1 SP 239A1 Proposed Land Uses – Primary Land Use Plan**

PA	Land Use Designation	Acres	Maximum Building Square Footage
1	LI	37.8	715,135
2	LI	114.0	2,156,757
3	LI	195.2	3,692,973
4	LI	37.8	715,135
5	LI	3.7	70,000
6	BP	34.4	749,232
7	BP	14.7	320,166
8A	CR	6.8	103,673
8B	CR	1.2	18,295
9	OS-C	18.1	--
10	OS-CH	47.0	--
11	OS-CH	34.6	--
--	Circulation	37.3	--
<b>Total:</b>		<b>582.6</b>	<b>8,541,366</b>

Notes: PA = Planning Area; LI = Light Industrial; BP = Business Park; CR = Commercial Retail; OS-C = Open Space – Conservation; OS-CH = Open Space – Conservation Habitat.

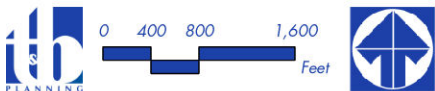
The “Alternative Land Use Plan,” which is depicted on Figure 3-3, *Alternative Land Use Plan*, and summarized on Table 3-2, *SP 239A1 Proposed Land Uses – Alternative Land Use Plan*, anticipates that the MCP would be



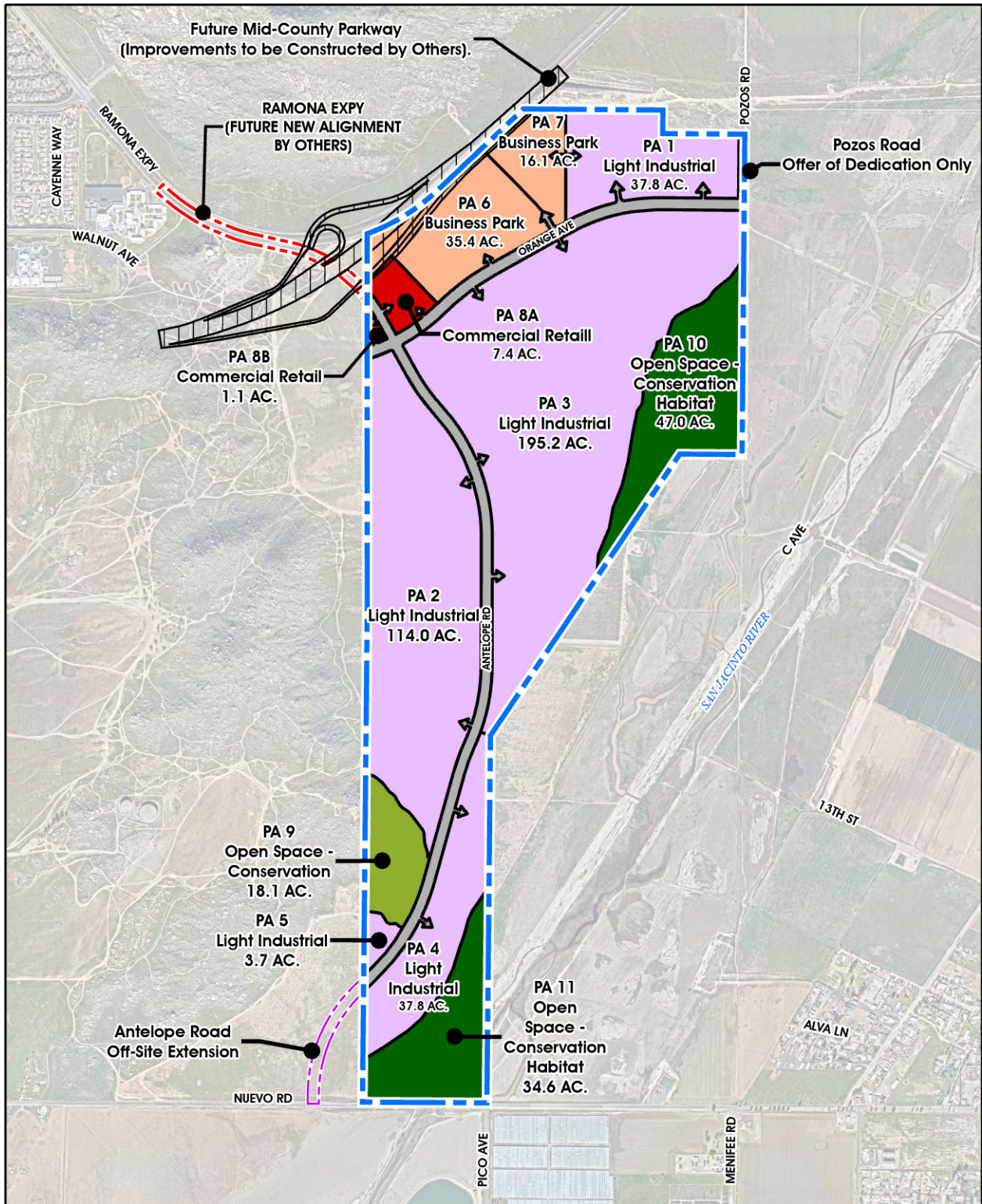


Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 3-2

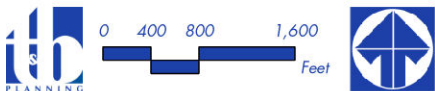


**Primary Land Use Plan**



Source(s): ESRI, Nearmap Imagery (2023), RCLMA (2023)

Figure 3-3



Alternative Land Use Plan



**Table 3-2 SP 239A1 Proposed Land Uses – Alternative Land Use Plan**

PA	Land Use Designation	Acres	Maximum Building Square Footage <sup>1</sup>
1	LI	37.8	715,135
2	LI	114.0	2,156,757
3	LI	195.2	3,692,973
4	LI	37.8	715,135
5	LI	3.7	70,000
6	BP	35.4	616,374
7	BP	16.1	320,166
8A	CR	7.4	109,771
8B	CR	1.1	16,771
9	OS-C	18.1	--
10	OS-CH	47.0	--
11	OS-CH	34.6	--
--	Circulation	34.4	--
<b>Totals:</b>		<b>582.6</b>	<b>8,413,082</b>

1. The Mid-County Parkway (MCP) would encompass approximately 7.1 acres within Planning Area 6, 1.4 acres within Planning Area 7, and 0.2 acre within Planning Area 8A. These areas would not be developed with Business Park or Commercial Retail land uses with construction of the MCP, and thus have been excluded from the calculation of allowable building square footage.

Notes: PA = Planning Area; LI = Light Industrial; BP = Business Park; CR = Commercial Retail; OS-C = Open Space – Conservation; OS-CH = Open Space – Conservation Habitat.

constructed through the property. As shown, for the Alternative Land Use Plan, proposed SP 239A1 would allow for development of 388.5 acres of Light Industrial land uses, 51.5 acres of Business Park land uses (of which 8.5 acres would occur within the MCP alignment and would not be developed with Business Park land uses), 8.5 acres of Commercial Retail (of which 0.2 acre would occur within the MCP alignment and would not be developed with Commercial Retail land uses), 18.1 acres of Open Space – Conservation, 81.6 acres of Open Space – Conservation Habitat, and 34.4 acres of major circulation facilities. As noted above, proposed SP 239A1 would allow for up to 7,350,000 s.f. of light industrial building area, Business Park land uses would be restricted to a maximum FAR of 0.5, and Commercial Retail areas would be restricted to a FAR of up to 0.35. Thus, excluding areas within the planned alignment of the MCP, the Alternative Land Use Plan would allow for up to 7,350,000 s.f. of Light Industrial building area, up to 936,540 s.f. of Business Park building area, and up to 126,542 s.f. of Commercial Retail land uses, for a total of 8,413,082 s.f. of building area. Although it is anticipated that the Project ultimately would be built out with less than the maximum allowable building area, the analysis throughout this RDEIR evaluates potential impacts associated with buildout of the maximum allowable building area in order to provide a conservative analysis of the impacts associated with the Alternative Land Use Plan. As previously indicated, for purposes of analysis throughout this RDEIR, the “Primary Land Use Plan” is the preferred and primary land use plan for the proposed Project. The “Alternative Land Use Plan” only would be implemented in the event that the RCTC constructs the MCP through the northernmost portions of the Project site.



Light Industrial uses are proposed in Planning Areas 1, 2, 3, 4, and 5 up to a maximum of 7,350,000 s.f. of building area under both the Primary Land Use Plan and Alternative Land Use Plan. These Planning Areas are anticipated to accommodate users such as industrial incubators, light manufacturing, parcel hub, warehouse/storage, fulfillment center, and e-commerce operations. For purposes of analysis within this RDEIR, Light Industrial building area is assumed to consist of approximately 40% high-cube cold storage uses, 40% high-cube fulfillment center uses, 10% high-cube warehouse uses, and 10% manufacturing uses.

Business Park land uses are proposed in Planning Areas 6 and 7, with a total maximum of approximately 1,069,398 s.f. of building area under the Primary Land Use Plan and 936,540 s.f. of building area for the Alternative Land Use Plan. Business Park land uses would include small-scale light industrial, incubator industrial, merchant wholesalers, professional services, hospitality, professional office, small-scale warehousing/ storage, and research and development uses. For purposes of analysis within this RDEIR, Business Park building area is assumed to consist of approximately 60% industrial park uses and 40% warehouse uses.

Commercial Retail land uses are proposed in Planning Areas 8A and 8B, with a total maximum of approximately 121,968 s.f. under the Primary Land Use Plan and 126,542 s.f. under the Alternative Land Use Plan. The Commercial Retail areas are designed to accommodate retail uses that provide convenient services to people who work or have business in the area, as well as to commuters on Ramona Expressway and/or the future MCP. Anticipated businesses include restaurants, financial institutions, commercial retailers, and personal service shops, as well as small retail businesses and offices. For purposes of analysis within this RDEIR, it is conservatively assumed that Commercial Retail uses under both the Primary and Alternative Land Use Plans would include 100,000 s.f. of free-standing discount superstore building area, with the remaining allowable building area (21,968 s.f. under the Primary Land Use Plan and 26,542 s.f. under the Alternative Land Use Plan) consisting of general commercial retail land uses.

Open Space – Conservation land uses are proposed in Planning Area 9 on 18.1 acres under both the Primary Land Use Plan and Alternative Land Use Plan. These areas are intended to preserve the on-site natural open space and hillsides in the western portion of the Project site.

Open Space – Conservation Habitat land uses are proposed in Planning Areas 10 and 11 on approximately 81.6 acres under both the Primary Land Use Plan and Alternative Land Use Plan. These areas are intended to preserve the on-site portions of the San Jacinto River habitat and floodplain in the eastern portion of the Specific Plan for inclusion into the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) reserve system.

Proposed SP 239A1 also includes land use and development standards to facilitate implementation of intended development. These development standards would limit the development of Light Industrial land uses to a maximum of 7,350,000 s.f. of building area, Business Park uses would be limited to a maximum FAR of 0.5, and Commercial Retail uses would be limited to a maximum FAR of 0.35. The proposed land use and development standards also would allow for a 15% variation in Planning Area acreage without the need for a Specific Plan Amendment, provided that the total amount of allowable building area does not increase; notes

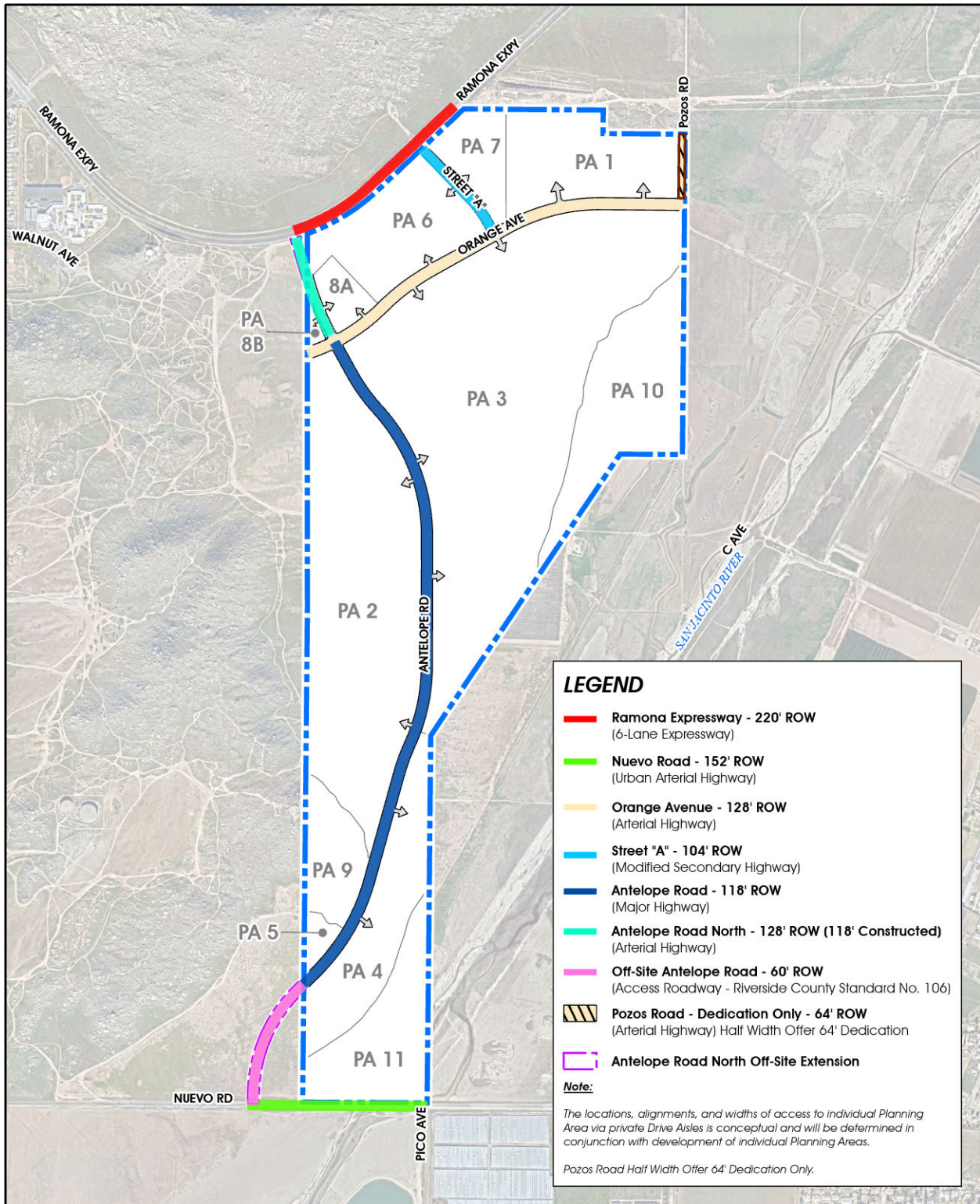


that additional CEQA compliance shall be conducted for future implementing development on site in order to evaluate site-specific components of implementing development applications and to verify or refine the mitigation requirements specified by this RDEIR; requires design plans for common areas, specifying location and extent of landscaping, irrigation system, structures, and circulation; requires measures for security and safety; requires a Master Sign Program as part of future implementing developments; includes standards for ownership and maintenance; and identifies applicable State law, County ordinances, and other agency requirements for future implementing developments.

## ***B. Circulation Plan***

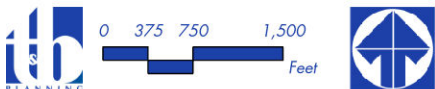
SP 239A1 includes a circulation plan, which is depicted on Figure 3-4, *Proposed Circulation Plan*. Proposed cross-sections are depicted on Figure 3-5, *Roadway Cross-Sections*. Traffic is to be conveyed by a hierarchical circulation system with roadway rights-of-way (ROW) ranging from 26 to 220 feet in width (inclusive of Private Drive Aisles, which are not depicted on Figure 3-4 and Figure 3-5). For the Primary Land Use Plan, access from the east and west would be accommodated by Orange Avenue, while access from the north and south would occur via Antelope Road, which would connect to the Ramona Expressway in the north and Nuevo Road to the south. For the Alternative Land Use Plan, east-west access would be provided via the Mid-County Parkway and Orange Avenue, while north-south access would be accommodated via Antelope Road, which would connect to Ramona Expressway in the north and Nuevo Road to the south. A summary of the roadway cross sections proposed as part of SP 239A1 is provided below. It should be noted that under the Alternative Land Use Plan scenario, the Mid-County Parkway (MCP) would be constructed through the northwestern portions of the Project site. However, the MCP is a planned regional improvement, and the Project Applicant would not be required to construct this facility as it is planned for improvement by the RCTC. Impacts associated with the construction of the MCP were evaluated as part of a separate Environmental Impact Report/Environmental Impact Statement and Section 4(F) Evaluation (SCH No. 2004111103), which is herein incorporated by reference and is available for public review at the RCTC, 4080 Lemon Street, 3<sup>rd</sup> Floor, Riverside, CA 92501. As such, the MCP is not discussed below, but this facility ultimately may provide regional access to the Project site. As part of the Project, the Project Applicant would implement the following improvements:

- ***Ramona Expressway (220' ROW)***. Ramona Expressway is designated as a 6-Lane Expressway by the Riverside County General Plan Circulation Element and proposed SP 239A1, with an ultimate planned 220-foot wide right-of-way and six (6) vehicular travel lanes. Under existing conditions, this roadway is partially improved with a total ROW of 80 feet and 41 feet of pavement. The Project Applicant would dedicate an additional 110 feet of right-of-way, providing for a total of 190 feet of ROW along the Project site's frontage with this roadway. Ultimately, with future ROW dedications by others anticipated along the northern side of the Ramona Expressway, this roadway would have a total of 220 feet of ROW. Improvements proposed as part of the Project would include an additional 56 feet of paved drive aisles, curb, and gutter, 8-foot bike lanes located outside of the vehicular travel lanes, and a five-foot meandering sidewalk along the site's frontage with Ramona Expressway.

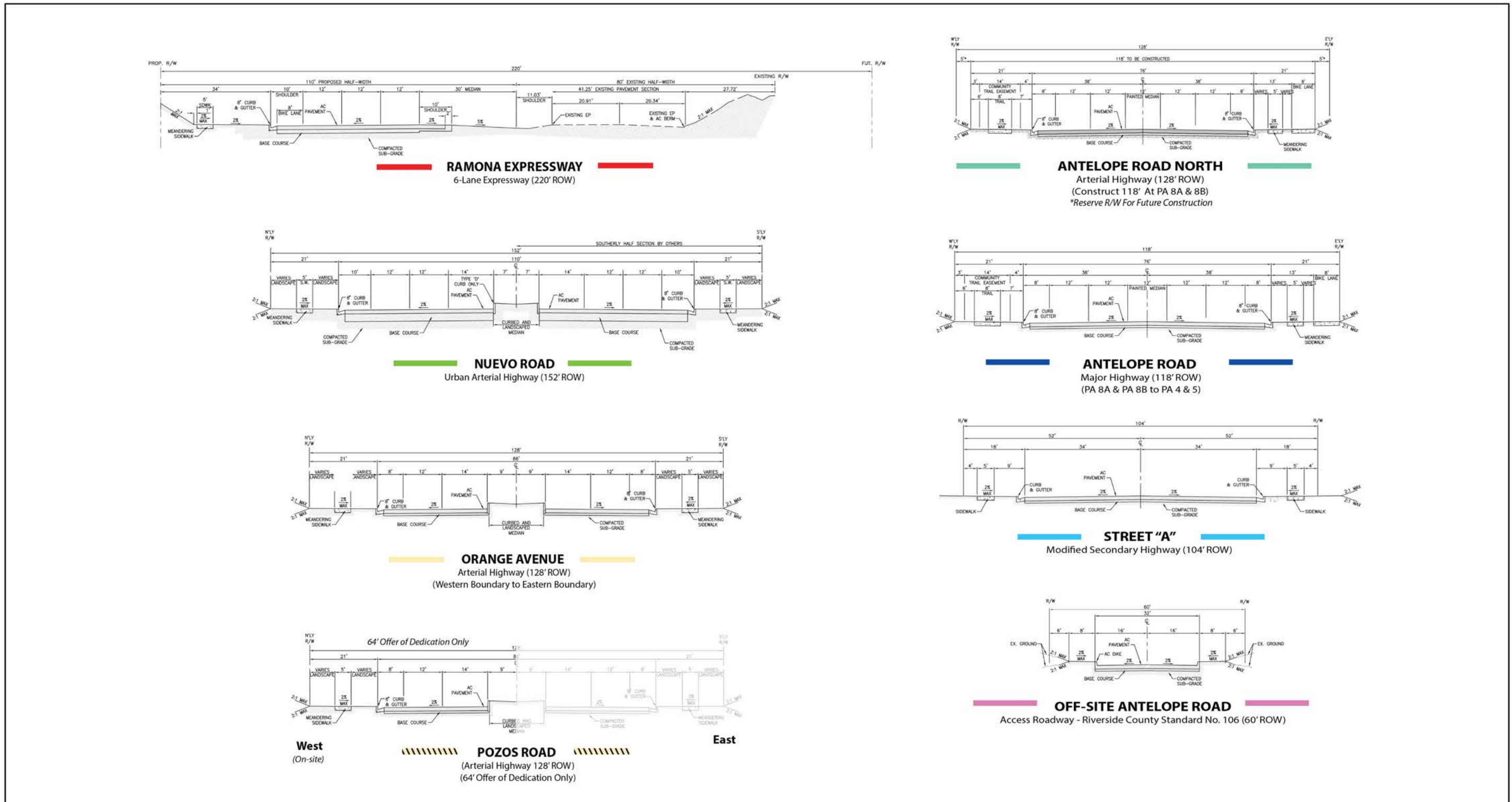


Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 3-4

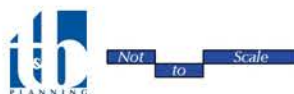


**Proposed Circulation Plan**



Source(s): Albert A. Webb Associates (02-20-2020) & Hunsaker Engineering (07-20-2020)

Figure 3-5





- ***Nuevo Road (152' ROW)***. Nuevo Road is designated as an Urban Arterial Highway by the General Plan Circulation Element and proposed SP 239A1, with an ultimate 152-foot ROW and six (6) vehicular travel lanes. Under existing conditions, Nuevo Road adjacent to the southern Project boundary consists of a two-lane roadway (one lane in each direction). As part of the Project, the Project Applicant would improve this facility to its ultimate half-width standard. The Project Applicant would dedicate approximately 76 feet of ROW along the site's frontage with this roadway, and would improve Nuevo Road between Antelope Road and Pico Avenue to provide 48 feet of paving, 7 feet of the ultimate 14-foot wide landscaped median, and a 5-foot wide meandering sidewalk within a 21-foot wide landscaped parkway. The remaining half of this roadway would be constructed by others in the future. It should be noted that this segment of Nuevo Road would require the construction of a bridge over the San Jacinto River, although bridge is identified for improvement as part of the County's Transportation Uniform Mitigation Fee (TUMF) program. Impacts associated with improvements to Nuevo Road are evaluated throughout this RDEIR, including impacts associated with the bridge, although it is anticipated that some or all of the required improvements to Nuevo Road would be implemented as part of the TUMF program.
- ***Orange Avenue (128' ROW)***. Orange Avenue is designated as an Arterial Highway by the Riverside County General Plan and proposed SP 239A1, with an ultimate 128-foot-wide right-of-way and four (4) vehicular travel lanes. Under existing conditions, Orange Avenue does not exist on or adjacent to the Project site. As part of the Project, the Project Applicant would construct full-width improvements to the on-site segments of Orange Avenue between the western and eastern boundary of the Specific Plan. The Project Applicant would dedicate a total of 128 feet of ROW on site, and would improve the roadway to include 68 feet of paved drive aisles, an 18-foot wide landscaped median, and 5-foot wide meandering sidewalks within 21-foot landscaped parkways on each side of the roadway.
- ***Antelope Road – On Site (118' ROW)***. The segment of Antelope Road planned on site between Ramona Expressway and Orange Avenue is designated as a Major Highway (118' ROW) by the General Plan Circulation Element and proposed SP 239A1. Under existing conditions, this road segment does not exist. As part of the Project, the Project Applicant would implement full-width improvements for the on-site segments of Antelope Road. The Project Applicant would dedicate a total of 118 feet of ROW, and would improve the roadway to include 64 feet of drive aisles; a 12-foot wide painted median; a five-foot wide meandering sidewalk and 8-foot bike lane within a 21-foot wide landscaped parkway along the eastern edge of the roadway; and an 8-foot wide community trail within a 21-foot wide landscaped parkway along the western side of the roadway.
- ***Antelope Road – Northern Off-Site Extension (118' ROW)***. The off-site segment of Antelope Road proposed between the northwest Specific Plan boundaries and the Ramona Expressway is designated as Major Highway by the General Plan Circulation Element and proposed SP 239A1. Under existing conditions, this segment of Antelope Road does not exist. As part of the Project, the Project Applicant would make full-width improvements to Antelope Road along this off-site segment. The Project Applicant would dedicate a total of 118 feet of ROW, and would improve this segment to provide for 64 feet of drive aisles; a 12-foot-wide painted median; a five-foot wide curb-separated sidewalk and





an 8-footwide bike lane within a 21-foot wide landscaped parkway along the eastern side of the road; and an 8-foot wide community trail within a 21-foot wide landscaped parkway along the western edge of the road.

- ***Antelope Road – Southern Off-Site Extension (60’ ROW).*** The segment of proposed Antelope Road located between the southwest boundary of SP 239A1 and Nuevo Road is identified for interim improvements by proposed SP 239A1 (i.e., the construction of travel lanes only), as needed to provide vehicular access to and from the Project site to Nuevo Road. Under existing conditions, this segment of Antelope Road does not exist. Interim condition improvements proposed for this segment of Antelope Road include 32 feet of drive isles in accordance with Riverside County Standard No. 106. This portion of Antelope Road ultimately would be improved by others as a Major Highway with 118 feet of ROW, with similar improvements as described above for the on-site portions of this roadway.
- ***Street “A” – Modified Secondary Highway (104’ ROW).*** Street “A,” which is proposed between Ramona Expressway and proposed Orange Avenue in the northern portion of the site (east of proposed Antelope Road), is designated as a Modified Secondary Highway by proposed SP 239A1. It should be noted that this roadway only would be constructed under the Primary Land Use Plan, and would not be constructed under the Alternative Land Use Plan. Under existing conditions, this road segment does not exist. As part of the Project, and assuming the MCP is not developed through the Project site, the Project Applicant would construct full-width improvements to Street “A.” Planned improvements include the dedication of 104 feet of ROW, 68 feet of drive aisles, and 5-foot wide curb-separated sidewalks within 18-foot wide landscaped parkways on each side of the roadway.
- ***Private Drive Aisles.*** Private Drive Aisles would connect individual planning areas to Antelope Road, Orange Avenue, and Street “A.” Within each planning area, Private Drive Aisles would provide vehicular access for automobiles and trucks to parking lots, truck courts, loading dock areas, etc. Private Drive Aisles would include pavement widths that range between 26 and 60 feet. Private Drive Aisles are not depicted in Figure 3-4 and Figure 3-5 because their locations, alignments, and widths would be determined in the future in conjunction with the development of individual planning areas.

In addition, as part of the Project, the Project Applicant would dedicate 64 feet of ROW for Pozos Road along the northeastern boundary of the Project site (refer to Figure 3-4), although no improvements to Pozos Road are proposed as part of the Project.

Furthermore, the Project would be required to construct improvements, make fair share contributions, or contribute payments towards the County’s Development Impact Fee (DIF) and Transportation Uniform Mitigation Fee (TUMF) programs; however, the list of required improvements varies depending on which Alternative Truck Route is implemented. Please refer to Tables 1-4, 1-5, and 1-9 of the Project’s Traffic Impact Analysis (“TIA”; EIR *Technical Appendix L3*) for a list of improvements required with implementation of Alternative Truck Routes 1, 2, and 6, respectively.



**C. Non-Vehicular Circulation and Mobility Plan**

Proposed SP 239A1 also includes a conceptual non-vehicular circulation and mobility plan, as depicted on Figure 3-6, *Conceptual Non-Vehicular Circulation and Mobility Plan*. As shown, the western side of Antelope Road would have an enhanced parkway that includes an 8-foot bike lane and 5-foot meandering sidewalk along the eastern edge of the roadway, with a community trail proposed along the western side of the roadway. On-site portions of Orange Avenue would include meandering sidewalks along both sides of the roadway. Street “A” would include non-curb adjacent sidewalks along both sides of the roadway. A Class I bike lane also is proposed along the Project site’s frontage with Ramona Expressway. A Regional Trail also is proposed at the boundary between Planning Area 9 and adjacent light industrial planning areas, while a trail easement would be accommodated along the northern boundary of proposed Planning Area 11.

**D. Drainage and Water Quality Improvements**

The Project site is located within the San Jacinto River Watershed, which is a sub-watershed of the Santa Ana River Watershed in the County of Riverside. According to mapping information from the Riverside County Flood Control and Water Conservation District (RCFCWCD), the Project site currently is located outside of but between the Lakeview/Nuevo Master Drainage Plan (MDP) to the east and the Perris Valley MDP to the west.

As shown in Figure 3-7, *Conceptual Drainage and Water Quality Plan*, on-site flows would be conveyed within the proposed streets to a series of catch basins and storm water lines which would direct storm flows to three “primary” retention basins on site. Two “primary” retention basins would be located within proposed Planning Area 3 and one “primary” retention basin is proposed within Planning Area 4. Additionally, catch basins and/or infiltration BMPs are proposed within Orange Avenue to capture surface runoff from developed areas within proposed Planning Areas 6, 8A, and 8B, and would direct the flows into storm drain lines within Orange Avenue and Antelope Road. Surface runoff originating in proposed Planning Areas 1 and 7 would flow easterly within Orange Avenue to a pair of catch basins at the eastern terminus of Orange Avenue, from which flows would be conveyed to the “primary” detention basin proposed in Planning Area 3.

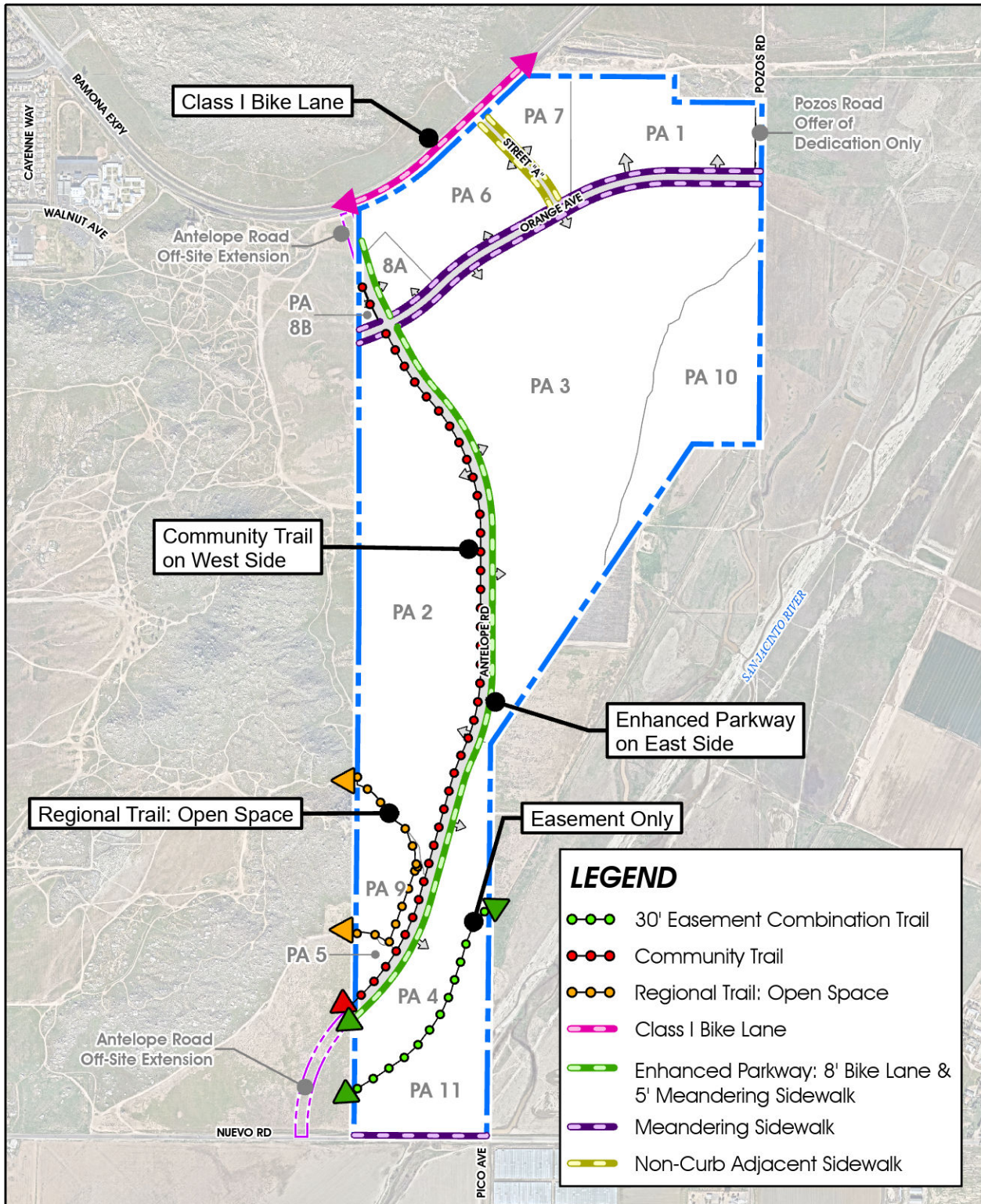
Off-site flows from the west would be captured along the western boundary of proposed Planning Area 2 and conveyed in proposed storm drain lines through proposed Planning Areas 2, 3, and 4 and would discharge directly into the San Jacinto River.

It should be noted that if the MCP is implemented through the Project site, there would be no substantial change in the Project’s proposed master drainage or water quality plans.

**E. Water and Sewer Plans**

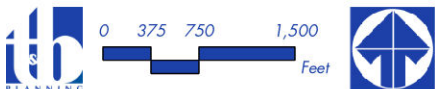
**1. Water Plan**

Potable water services to the proposed Project would be provided by the Eastern Municipal Water District (EMWD). Domestic water provided by EMWD consists of a blend of the California State Water Project and

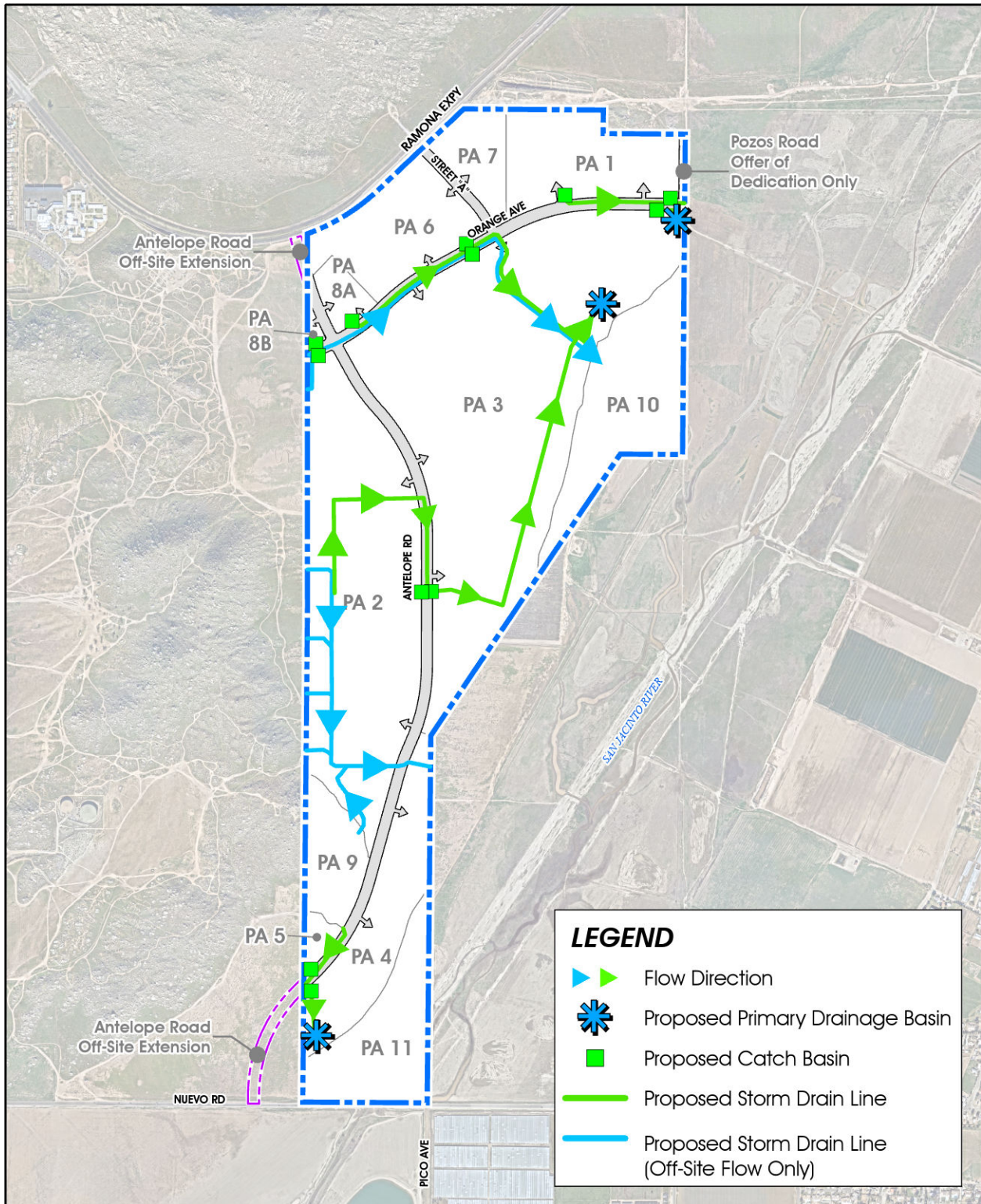


Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 3-6

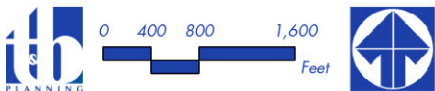


### Conceptual Non-Vehicular Circulation and Mobility Plan



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023), Hunsaker Engineering (2020)

Figure 3-7



**Conceptual Drainage and Water Quality Plan**



Colorado River waters, which are imported and supplied to EMWD by the Metropolitan Water District (MWD). EMWD has indicated that adequate water service can be provided for the proposed Project using existing facilities and extending master-planned facilities through and along the perimeter of the Project site (refer to the Project's Water Supply Assessment (WSA), included as *Technical Appendix M*). It should be noted that the Project's WSA assumed more building area than is currently proposed as part of the Project, and therefore provides a "worst case" analysis of the Project's potential impacts to water supply.

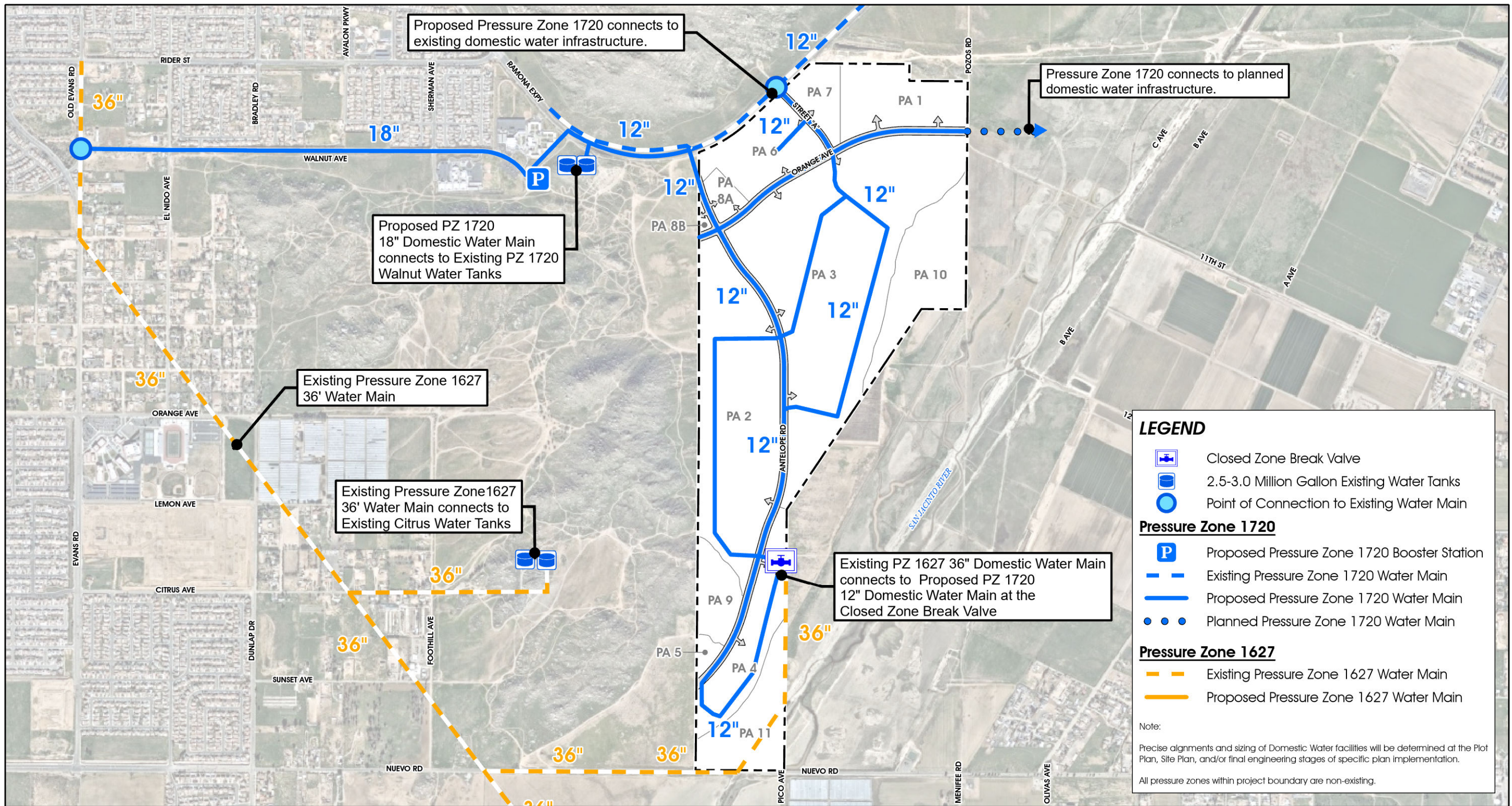
Figure 3-8, *Conceptual Domestic Water Plan*, depicts the existing and proposed water facilities in the area. It should be noted that the planned improvements depicted on Figure 3-8 generally would not change if the Mid-County Parkway (MCP) is constructed through the Project site. As shown, the Project site is served by EMWD in the 1720 Pressure Zone. The Project Applicant would construct the following facilities as necessary to serve the Project site with potable water: proposed on-site and off-site water mains within roadways, two (2) proposed 2.5-3.0 MG water tanks located off-site approximately 0.3 mile to the west of the Project site, a proposed booster station located approximately 500 feet west of the Project site.

Two (2) points of connection are proposed to existing EMWD water mains located off-site: (1) at the intersection of Old Evans Road and Walnut Ave; and (2) at the intersection of the Ramona Expressway and the proposed Street "A" (which would be constructed regardless as to whether Street "A" is constructed). The Project Applicant would be responsible for constructing the off-site water mains between the existing points of connection and the Project site.

As depicted on Figure 3-8, a proposed water line ranging in size from 12 to 18 inches would be constructed by the Project Applicant within Walnut Avenue and a portion of the Ramona Expressway between the existing point of connection at Old Evans Road and proposed Antelope Road. This water main would represent a transition between Pressure Zone 1627 to the west and Pressure Zone 1720 to the east, and a booster station for Pressure Zone 1720 is proposed at the easterly terminus of Walnut Street. An existing water tank located near the eastern terminus of Walnut Avenue and south of Ramona Expressway would be demolished as part of the Project, and replaced with two (2) 2.5-3.0 million-gallon water tanks.

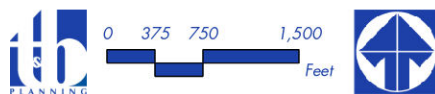
In addition, 12-inch water lines also would be constructed within Antelope Road (within EMWD Pressure Zone 1720), between Ramona Expressway and the southwestern Project boundary, which would connect in the north to the above-described proposed 12-inch water line within Ramona Expressway and in the south to an existing Closed Zone Break Valve within Planning Area 4.

A 12-inch water main also is proposed within Orange Avenue, and would connect to domestic water infrastructure planned to the east of the Project site (which would be constructed by others in the future) and to the proposed water mains within Antelope Road and Street "A." A 12-inch water line also is proposed within Street "A," which would be constructed regardless as to whether Street "A" is constructed as part of the Project, and would connect to an existing water main within Ramona Expressway and the proposed 12-inch water main within Orange Avenue.



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023), Hunsaker Engineering (2020)

Figure 3-8



Conceptual Domestic Water Plan



Water service to the remaining portions of the Project site would be accommodated by proposed 12-inch water lines that would be constructed throughout the Project site and would connect to the proposed facilities within Antelope Road, Orange Avenue, and Street “A.”

## 2. Sewer Plan

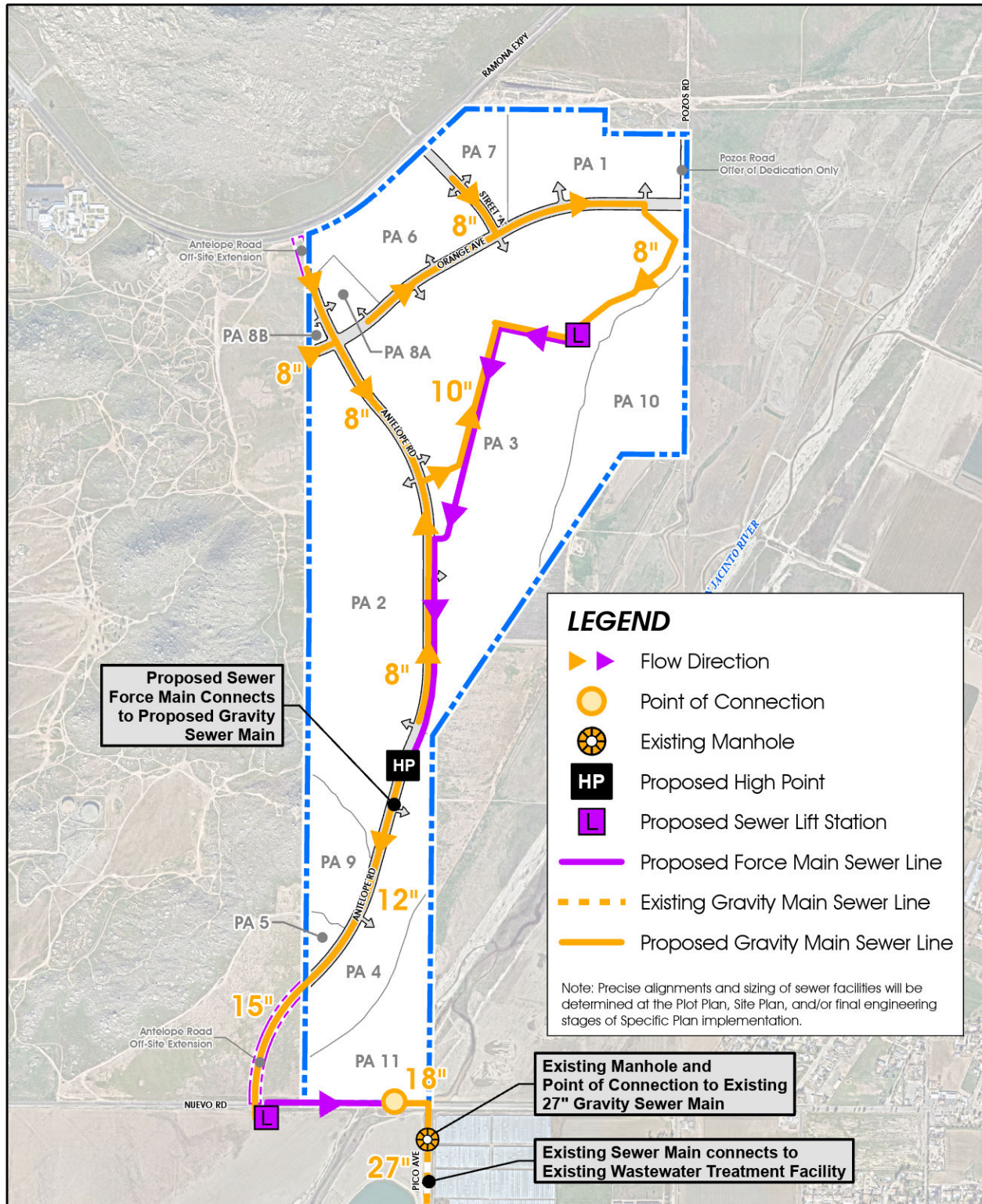
In addition to potable water services, the Eastern Municipal Water District (EMWD) would provide sewer services to the Project site. A series of proposed sewer lines, force mains, and sewer lift stations are proposed by the Project Applicant to convey sewer flows toward an existing 27-inch gravity main in Pico Avenue that flows to the existing Perris Valley Regional Water Reclamation Facility (PVRWRF) to the south.

As shown in Figure 3-9, *Conceptual Sewer Plan*, sewer flows within the northern portions of the Project site (i.e., north of the northern boundary of proposed Planning Area 4) would be conveyed via a series of proposed 8- to 10-inch sewer mains within Antelope Road, Orange Avenue, Street “A,” and internal roadways to a proposed sewer lift station within proposed Planning Area 3. Under the Alternative Land Use Plan, Street “A” would not be constructed but an 8-inch sewer line would be installed within the internal road providing access to Planning Areas 6 and 7. A proposed force main and sewer lift station<sup>1</sup> would be constructed within proposed Planning Area 3, which would convey sewer flows from the northern portions of the Project site to a proposed 12-inch gravity sewer main proposed within Antelope Road. The proposed 12-inch gravity sewer within Antelope Road would extend south to a proposed sewer lift station at the southeast corner of the future intersection of Antelope Road and Nuevo Road. The proposed sewer lift station would convey sewer flows easterly to a proposed point of connection within Nuevo Road near the southeastern corner of the Project site, where a proposed 18-inch gravity sewer main would convey flows east within Nuevo Road and south within Pico Avenue to an existing 27-inch sewer main located near the intersection of Nuevo Road and Pico Avenue.

## F. Grading Plan

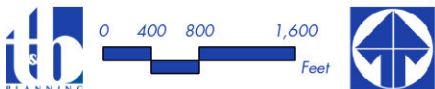
As shown on Figure 3-10, *Conceptual Grading Plan*, grading is proposed within the Project site to facilitate site development. Proposed elevations on the site would range from a low point at approximately 1,425 feet above mean sea level (amsl) in the east portion of the site to a high point approximately 1,630 feet amsl in the southwest portion of the site within proposed open space Planning Area 9. Grading proposed as part of the Project would result in an approximate 6,820,000 cubic yards (c.y.) of cut and 6,820,000 c.y. of fill. The conceptual grading is intended to provide for an overall balanced earthwork condition, requiring no import or export of earthwork materials. It should be noted that grading within the northwestern portions of the site may be different than shown on Figure 3-10 if the County implements the MCP through the northern portions of the site; however, if the MCP is constructed through the site, impacts due to grading would be associated with the MCP and would not be associated with the Project. Additionally, in the event the MCP is constructed through the Project site, earthwork on site would continue to be balanced, with no need for import or export of earth materials.

<sup>1</sup> It should be noted that impacts associated with the proposed off-site sewer lift station previously were evaluated as part of the Rio Vista Environmental Impact Report (SCH No. 2016051062), which is herein incorporated by reference pursuant to CEQA Guidelines § 15150 and is available for review by the public at the Riverside County Planning Department, 4080 Lemon Street, 12<sup>th</sup> Floor, Riverside, California 92501.



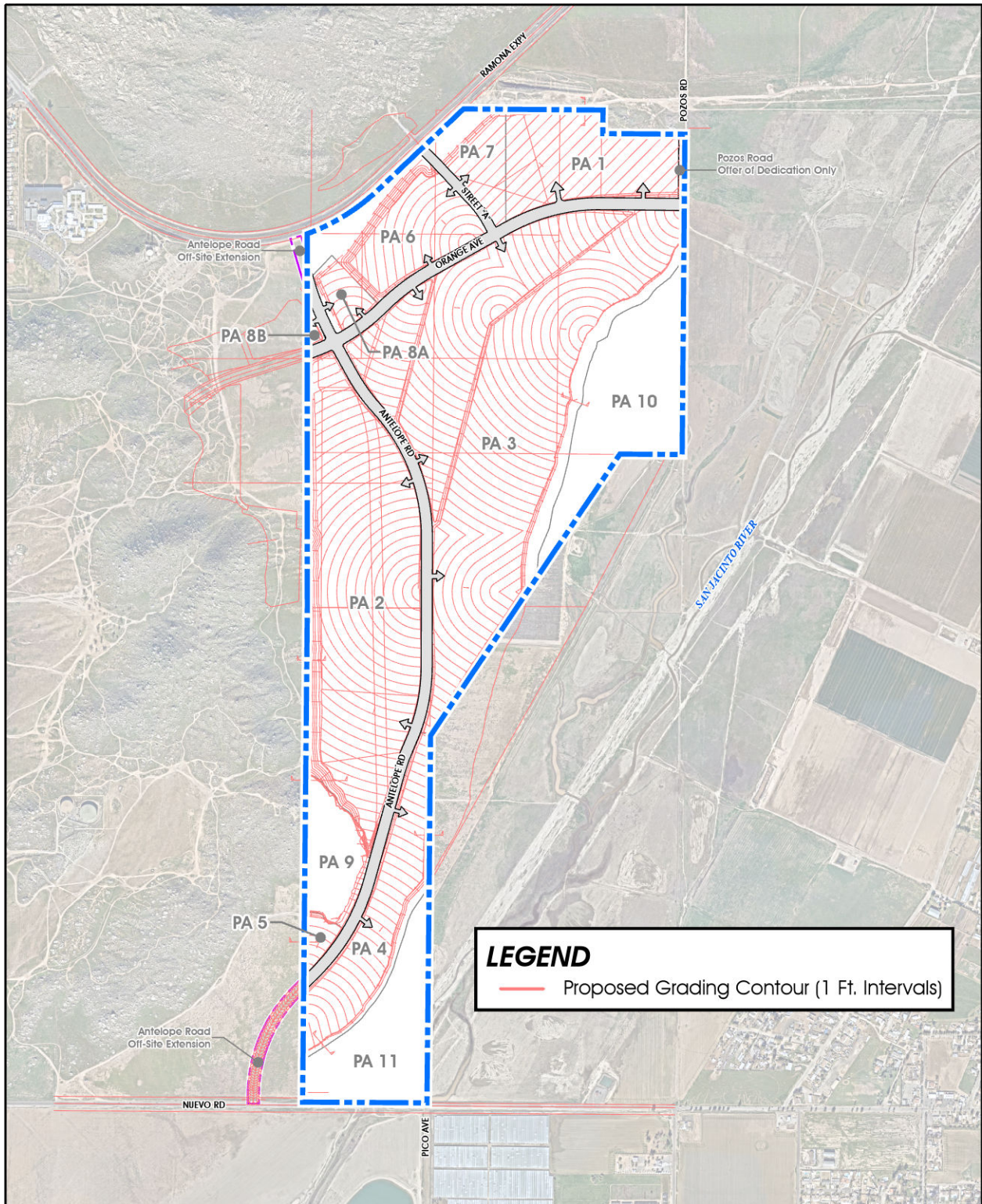
Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023), Hunsaker Engineering (2020)

Figure 3-9



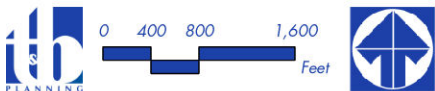
**Conceptual Sewer Plan**





Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023), Hunsaker & Associates (06-02-2021)

Figure 3-10



### Conceptual Grading Plan



In addition, as part of site grading activities, some blasting would be required off-site as part of the demolition of the existing water tank and replacement with two new 2.5-3.0 million-gallon water tanks. Total areas of blasting in this off-site area would involve approximately 68,877 c.y. over approximately 1.9 acres, with an over excavation depth of four feet below design grades. It is anticipated that approximately 68,877 c.y. of rock material would be exported from the water tank site.

**G. Stoneridge Commerce Center Design Guidelines**

Proposed SP 239A1 also includes Design Guidelines related to architecture, lighting, energy efficiency, signage, and landscape/hardscape design. The Design Guidelines are intended to allow for flexibility for future implementing developments while providing standards to help ensure the site is developed in a manner consistent with the development quality, character, and theme as described SP 239A1. Future implementing developments would be reviewed by the County for compliance with the Design Guidelines section of SP 239A1. Refer to Section 4 of proposed SP 239A1 for the specific design standards that would apply to future development.

**3.5.3 CHANGE OF ZONE NO. 1900024 (CZ 1900024)**

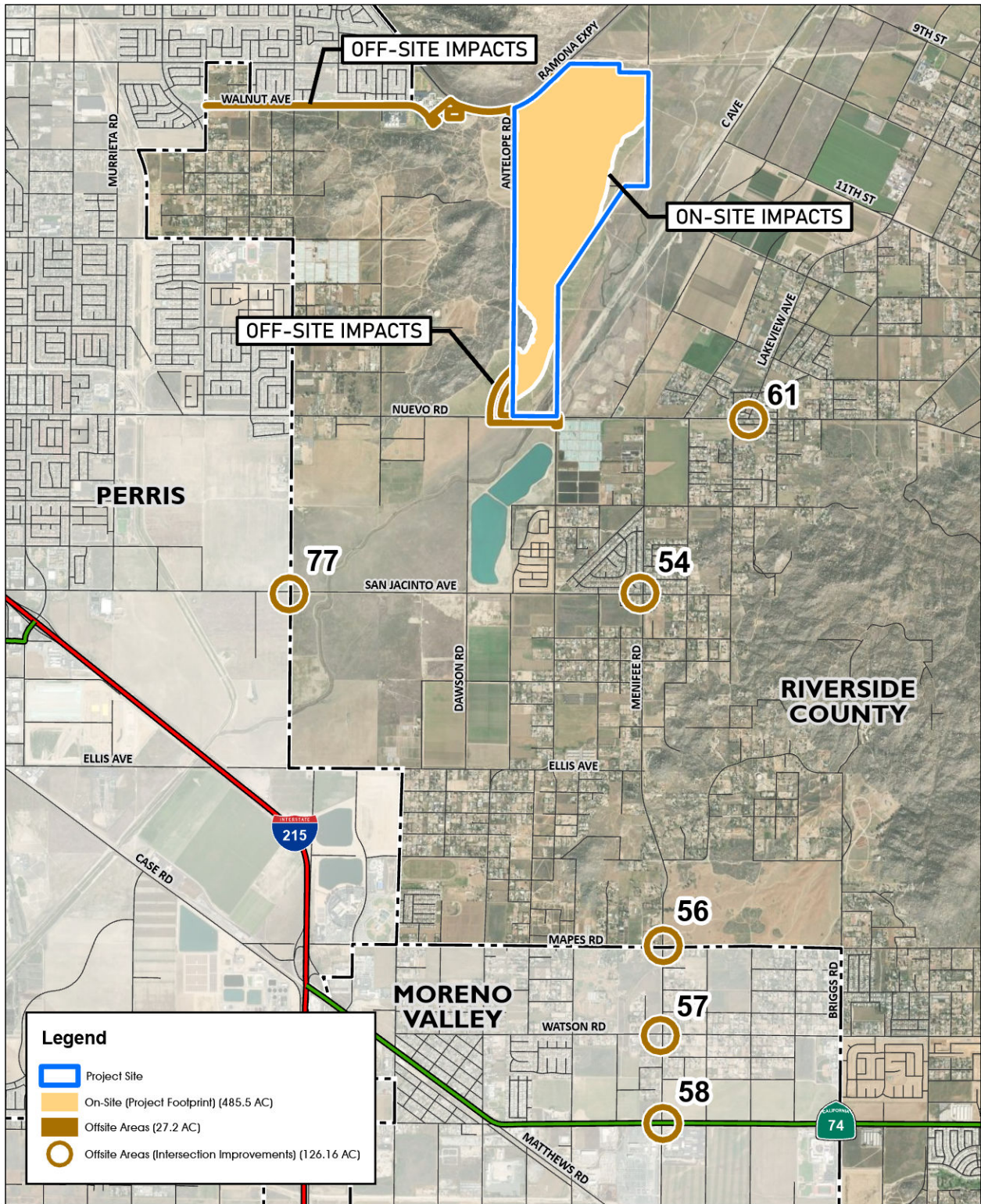
The Riverside County Zoning Ordinance, which is part of the County’s Municipal Code, assigns a zoning designation to all properties within unincorporated Riverside County. Development is required by law to comply with the provisions of the Zoning Ordinance. Under existing conditions, the 582.6-acre Project site is classified as “SP Zone,” indicating that zoning requirements for the Project site are governed by the adopted Stoneridge Specific Plan No. 239 (SP 239). Thus, the zoning requirements for the Project site currently are as established by the zoning ordinances adopted in conjunction with SP 239. Proposed Change of Zone No. 1900024 (CZ 1900024) would modify and establish the Planning Area boundaries, permitted uses, and development standards throughout the 582.6-acre site in order to reflect the land uses proposed as part of SP 239A1. Refer to subsection 3.5.2 for a description of the land uses proposed as part of SP 239A1.

**3.6 PROJECT CONSTRUCTION AND OPERATIONAL CHARACTERISTICS**

**3.6.1 CONSTRUCTION DETAILS**

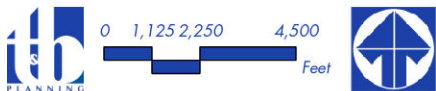
**A. Proposed Physical Disturbances**

For purposes of analysis throughout this RDEIR, it is assumed that implementation of the Project would result in physical disturbance to all portions of the Project site that are planned for development with “Light Industrial (LI),” “Business Park (BP),” and “Commercial Retail (CR)” land uses by proposed SP 239A1, as well as areas planned for major circulation facilities (i.e., Antelope Road, Orange Avenue, and Street “A”). In addition, the Project Applicant would construct half-width improvements to Nuevo Road along the Project site’s frontage, portions of which would be constructed on site. As shown in Figure 3-11, *Proposed Limits of Physical Disturbance*, on-site disturbances are anticipated to encompass approximately 484.9 acres of the Project site that are proposed for development as part of the Project. Off-site disturbances that would be required regardless as to which land use plan (Primary Land Use Plan or Alternative Land Use Plan) is implemented, and



Source(s): ESRI, RCLMA (2023), Werland Permitting (02-25-2022)

Figure 3-11



### Proposed Limits of Physical Disturbance



regardless as to which Alternative Truck Route ultimately is implemented, would include water, sewer, and roadway facilities, and would encompass approximately 27.9 acres offsite. Specifically, off-site improvements include the construction of water lines and a booster station within Walnut Avenue, between Old Evans Road and the Ramona Expressway, as well as a proposed water main within Ramona Expressway and the off-site portion of Antelope Road. An existing water tank located near the easterly terminus of Walnut Street, south of Ramona Expressway, would be demolished and replaced by two new water tanks. The Project Applicant also would improve off-site portions of Antelope Road (between the southwestern Project boundary and Nuevo Road, and between the northwestern Project boundary and Ramona Expressway) and Nuevo Road (between proposed Antelope Road and Pico Avenue). A sewer lift station also is planned at the southeast corner of the future intersection of Antelope Road at Nuevo Road. The Project also could result in additional impacts associated with roadway improvements required for the Primary and/or Alternative Land Use Plans; please refer to Tables 1-4, 1-5, and 1-9 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) for a list of improvements to be constructed by the Project with implementation of Alternative Truck Routes 1, 2, and 6, respectively, as well as the list of facilities that would be improved pursuant to the Project's fair share contributions and payment of DIF and TUMF fees. It should be noted that lands within the MCP alignment that would be impacted by construction of the MCP are considered a separate project unrelated to the proposed Project evaluated herein.

#### **B. Timing of Construction Activities**

At the time the Project's Notice of Preparation (NOP) was distributed for public review in April 2020, it was anticipated that Project construction activities would commence as early as summer 2021, and would be completed by 2030. Due to delays caused by the COVID-19 pandemic as well as due to the need to recirculate the Project's EIR for public review, it is now likely that Project construction activities would not commence until at least 2023. Table 3-3, *Anticipated Construction Duration*, shows the Project's anticipated construction schedule, which indicates construction activities would commence in July 2023 and would conclude in November 2031. Although it is possible construction activities may not commence until a later date, the assumed construction schedule provides a "worst case" assessment of potential construction-related impacts since air quality emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.<sup>2</sup> Additionally, although it is anticipated that the Project would be phased, no phasing plan is currently proposed. Buildout of the Project would occur based on market conditions at the time of implementation.

#### **C. Construction Equipment**

Table 3-4, *Anticipated Construction Equipment*, depicts the list of construction equipment anticipated with Project construction activities. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-4 would operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to County Ordinance No. 847. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution uses

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<sup>2</sup> As shown in the CalEEMod User's Guide Version 2016.3.2, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.



(Policy F-3), it is anticipated that equipment would meet at least CARB Tier 4 emissions standards. In cases where Tier 4 equipment is not available, Tier 3 equipment may be substituted. (Urban Crossroads, 2023a, p. 47)

**Table 3-3 Anticipated Construction Duration**

Construction Activity	Start Date	End Date	Days
Site Preparation	7/1/2023	3/9/2024	180
Grading/Blasting	3/10/2024	12/20/2025	465
Building Construction	3/22/2026	11/13/2031	1,474
Paving	3/22/2026	11/13/2031	1,474
Architectural Coating	3/22/2026	11/13/2031	1,474

(Urban Crossroads, 2023a)

**Table 3-4 Anticipated Construction Equipment**

Construction Activity	Equipment <sup>1</sup>	Quantity	Hours Per Day
Site Preparation	Rubber Tired Dozers	6	8
	Crawler Tractors	8	8
Grading	Graders	2	8
	Excavators	4	8
	Scrapers	4	8
	Rubber Tired Dozers	2	8
	Crawler Tractors	4	8
Building Construction	Cranes	2	8
	Forklifts	6	8
	Generator Sets	2	8
	Tractors/Loaders/Backhoes	6	8
	Welders	2	8
Paving	Pavers	4	8
	Paving Equipment	4	8
	Rollers	4	8
Architectural Coating	Air Compressors	2	8

1. In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes. (Urban Crossroads, 2023a, Table 3-4)

**3.6.2 OPERATIONAL CHARACTERISTICS**

At the time this RDEIR was prepared, the future users of the Stoneridge Commerce center buildings were unknown. For purposes of evaluation in this RDEIR, the Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be



subject to compliance with County of Riverside Ordinance Nos. 655 and 915. Ordinance No. 655 would require the use of low-pressure sodium lamps and the shielding of all nonexempt outdoor lighting fixtures. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the Project boundaries or onto the public right-of-way.

### **A. Employment**

Because the users of the Project’s buildings are not yet known, the number of jobs that the Project would generate cannot be precisely determined. Appendix E-1 to the Riverside County General Plan provides an estimate of the number of employees typically associated with various proposed land use types. However, it should be noted that the employment factors specified in Appendix E-1 do not account for the increasing automation of the industrial sector. As noted by the Southern California Association of Governments (SCAG) in the draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“Connect SoCal”), “[w]arehouses are increasingly integrating automation to improve operational efficiencies in responding to the dramatic surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety.” SCAG further notes that “as automation is adopted more holistically throughout supply chains, the region faces serious challenges for those whose jobs may be changed or eliminated as a result.” (SCAG, 2019a, Goods Movement Appendix, p. 2) Notwithstanding, Table 3-5, *Estimated Employment*, provides a conservative estimate of the number of employees anticipated with the Primary Land Use Plan and the Alternative Land Use Plan, based on the rates identified in Appendix E-1 to the County’s General Plan. As shown, buildout of the Primary Land Use Plan is estimated to result in up to 9,162 employees, while up to 8,950 employees are estimated for buildout of the Alternative Land Use Plan. While it is acknowledged that the number of jobs that would be created by the Project may be less than shown in Table 3-5 due to automation within the industry, the Project nonetheless would result in the creation of a substantial number of jobs that would serve to assist Riverside County in improving its jobs-housing balance. (Riverside County, 2015a, Appendix E-1, Table E-5)

### **B. Traffic**

#### **1. Trip Generation**

The trip generation summary illustrating daily and peak hour trip generation estimates for the proposed Project in actual vehicles and Passenger Car Equivalents (PCE)<sup>3</sup> without construction of the MCP (i.e., the Primary Land Use Plan) are shown in Tables 4-2 and 4-3 of the Project’s Traffic Analysis (“TA”; EIR *Technical Appendix L3*), respectively, while the daily and peak hour trip generation estimates with construction of the MCP (i.e., the Alternative Land Use Plan) in actual vehicles and PCE are shown in Tables 4-4 and 4-5 of the Project’s TA, respectively. A summary of Project-generated trips is provided below in terms of actual vehicles, as the analysis of the Project’s potential impacts due to health risks, localized air quality, and traffic-related noise relies on actual vehicles (and not PCEs). (Urban Crossroads, 2023h, Tables 4-2 through 4-5)

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<sup>3</sup> PCE factors were applied to the trip generation rates for heavy trucks (large 2-axles, 3-axles, 4+-axles). PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.



**Table 3-5 Estimated Employment**

Land Use Designation	Building Area	Building Area Per Employee	Estimated Employees
<b>Primary Land Use Plan</b>			
Light Industrial	7,350,000 s.f.	1,030 s.f.	7,136
Business Park	1,069,398 s.f.	600 s.f.	1,782
Commercial Retail	121,968 s.f.	500 s.f.	244
<b>Totals:</b>	<b>8,541,366 s.f.</b>	<b>--</b>	<b>9,162</b>
<b>Alternative Land Use Plan</b>			
Light Industrial	7,350,000 s.f.	1,030 s.f.	7,136
Business Park	936,540 s.f.	600 s.f.	1,561
Commercial Retail	126,542 s.f.	500 s.f.	253
<b>Totals:</b>	<b>8,413,082 s.f.</b>	<b>--</b>	<b>8,950</b>

(Riverside County, 2015a, Appendix E-1, Table E-5)

- Without MCP (Primary Land Use Plan): 23,680 vehicle trip-ends per day with 1,641 AM peak hour trips and 2,098 PM peak hour trips (of which 4,444 trip-ends per day are associated with trucks with 214 AM peak hour truck trips and 219 PM peak hour truck trips) (see Table 4-2 of the Project’s TA).
- With MCP (Alternative Land Use Plan): 23,474 vehicle trip-ends per day with 1,619 AM peak hour trips and 2,080 PM peak hour trips (of which 4,366 trip-ends per day are associated with trucks with 212 AM peak hour truck trips and 214 PM peak hour truck trips) (see Table 4-4 of the Project’s TA).

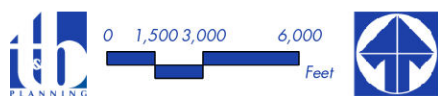
**2. Truck Routes**

Based on comments received during the public review period for the DEIR, a total of six (6) different alternative truck routes have been considered, as shown on Figure 3-12, *Alternative Truck Routes*. The anticipated trip distribution patterns for Project-related trucks are shown on Exhibits 4-4 through 4-9 of the Project’s TA for Alternative Truck Routes 1 through 6, respectively. The alternative truck routes have been identified in order to evaluate alternatives to the use of Ramona Expressway for westbound truck traffic in order to determine if any of the alternative truck routes would reduce the Project’s potential impacts to sensitive receptors along the identified truck routes. Only three of the Alternative Truck Routes were determined to be feasible: Alternative Truck Routes 1, 2, and 6, as described below. Project-related truck traffic would be required to utilize one of the three feasible Alternative Truck Routes described below, which would be enforced as part of Mitigation Measure 4.18-4, presented in RDEIR Subsection 4.18, *Transportation*.



Source(s): ESRI, Nearmap (2023), RCTLMA (2023), Urban Crossroads (01 2023)

Figure 3-12







- Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 2: Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 6: Alternative Truck Route 6 reflects the truck route previously evaluated in the DEIR for the Alternative Land Use Plan. Under near-term conditions and prior to full buildout of the Mid-County Parkway (MCP), truck traffic would utilize one of the alternative truck routes described above (i.e., Alternative Truck Routes 1 or 2). Once the MCP is constructed and operational, all westbound trucks would be routed west along the MCP to the west to access the I-215. Under this alternative, and following completion of the MCP, all eastbound truck traffic would be routed along the MCP to the east.

Three additional Alternative Truck Routes were considered for evaluation in this RDEIR, and are described below. However, for the reasons noted below, Alternative Truck Routes 3, 4, and 5 were determined to be infeasible. Thus, this RDEIR does not include a detailed evaluation of Alternative Truck Routes 3, 4, or 5.

- Alternative Truck Route 3 (Infeasible): Alternative Truck Route 3 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, and west on State Route 74 (SR-74) to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 3 was determined to be infeasible because the segment of Menifee Road between Mapes Road and SR-74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 3 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.
- Alternative Truck Route 4 (Infeasible): Alternative Truck Route 4 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, northwest on Matthews Road/State Route 74 (SR 74), and west on Ethanac Road to access the I-215 freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 4 was determined to be infeasible because the segment of Menifee Road between Mapes Road and Matthews Road/SR 74 within the City of Menifee is not identified as a designated truck route pursuant to Exhibit C-7 of the City of Menifee General Plan. As such, Alternative Truck Route 4 is not evaluated in detail as part of this RDEIR as it would be infeasible to route Project-related trucks along roadways within the City of Menifee that are not officially designated as truck routes by the City of Menifee General Plan.



- Alternative Truck Route 5 (Infeasible): Alternative Truck Route 5 would route all westbound trucks along Antelope Road to the south, east along Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on future Evans Avenue to access the I-215 freeway. It should be noted that Evans Road south of San Jacinto Avenue and the I-215 Freeway/Evans Avenue interchange do not currently exist and would need to be improved as part of the Project or as part of regional funding programs. Eastbound trucks would continue to be routed along Ramona Expressway to the east. Alternative Truck Route 5 was determined to be infeasible because implementation of this truck route would require use of the future I-215 Freeway/Evans Avenue. There are no publicly-accessible plans or construction schedules available from Caltrans related to the construction of this interchange, and it would not be financially feasible for the Project Applicant to construct the required interchange. As such, Alternative Truck Route 5 has been determined to be infeasible and therefore is not evaluated in detail as part of this RDEIR.

### **C. Water Demand**

Based on a Project-specific Water Supply Assessment (WSA) prepared by the Eastern Municipal Water District (EMWD), which is included as RDEIR *Technical Appendix M*, the Project is estimated to generate a demand for approximately 1,101 acre-feet per year (AF/yr), or approximately 982,080 gallons per day (gpd). (EMWD, 2020a, p. 20)

### **D. Wastewater Generation**

Based on Table 5.5-AF, *Cumulative Effect on Theoretical Wastewater Treatment Demand*, of the RDEIR prepared for Riverside County General Plan Amendment No. 960 (herein, RDEIR No. 521), Table 3-6, *Estimated Wastewater Generation* provides an estimate of the amount of wastewater that would be generated by the Project. As shown, the Project is anticipated to generate approximately 666,000 gpd of wastewater under the Primary Land Use Plan, and approximately 657,210 gpd under the Alternative Use Plan. (Riverside County, 2015a, Table 5.5-AF)

## **3.7 SUMMARY OF REQUESTED ACTIONS**

The County of Riverside has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this RDEIR pursuant to State CEQA Guidelines § 15050. The role of the Lead Agency was previously described in detail in Section 1.0 of this RDEIR. As part of the approval process for the proposed Project, the County's Planning Commission will hold a public hearing to consider the Program RDEIR, the Project's General Plan Amendment (GPA 190008), Amendment No. 1 to Specific Plan No. 293 (SP 239A1), and Change of Zone (CZ 1900024). The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny GPA 190008, SP 239A1, and CZ 1900024, and whether to certify this Program RDEIR. A public hearing would then be held before the Board of Supervisors, which will consider the information contained in the Project's RDEIR and the RDEIR's Administrative Record in its decision-making processes and will approve, approve with changes, or deny proposed GPA 190008, SP 239A1, and CZ 1900024.



**Table 3-6 Estimated Wastewater Generation**

Land Use	Commercial Acreage	Wastewater Generation Factors	Total Wastewater Generation
<b>Primary Land Use Plan</b>			
Light Industrial	388.5 acres	1,500 gpd/acre	582,750 gpd
Business Park	49.1 acres	1,500 gpd/acre	73,650 gpd
Commercial Retail	8.0 acres	1,200 gpd/acre	9,600 gpd
<b>Totals:</b>	<b>446.3 acres</b>	<b>--</b>	<b>666,000 gpd</b>
<b>Alternative Land Use Plan</b>			
Light Industrial	388.5 acres	1,500 gpd/acre	582,750 gpd
Business Park <sup>1</sup>	43.0 acres <sup>1</sup>	1,500 gpd/acre	64,500 gpd
Commercial Retail	8.3 acres <sup>1</sup>	1,200 gpd/acre	9,960 gpd
<b>Totals</b>	<b>440.5 acres</b>	<b>--</b>	<b>657,210 gpd</b>

- For the Alternative Land Use Plan, acreage shown for Business Park excludes 7.1 acres within Planning Area 6 and 1.4 acres within Planning Area 7, and acreage shown for Commercial Retail excludes 0.2 acres within Planning Area 8A. These areas would be located within the alignment of the MCP, and thus would not be developed with Business Park or Commercial Retail uses.

(Riverside County, 2015a, Table 5.5-AF)

### **3.8 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS**

Subsequent to approval of GPA 190008, SP 239A1, and CZ 1900024, additional discretionary applications would be required to implement the Project. Specifically, Tentative Tract Maps (TTMs) would be required to subdivide the 582.6-acre Project site in a manner that corresponds to the planning area boundaries proposed as part of SP 239A1 and/or to subdivide individual planning areas for ownership purposes. Additionally, Plot Plans would be required for development within the Light Industrial, Business Park, and Commercial Retail portions of the Project, while Conditional Use Permits (CUPs) also may be required for certain types of uses. Riverside County would review future applications for TTMs, Plot Plans, and CUPs for consistency with the General Plan, LMAP, SP 239A1, and the adopted zoning ordinance for the site. Additionally, the County would be required to conduct additional CEQA review for the future implementing TTMs, plot plans, and/or CUPs, and would evaluate whether the implementing discretionary action(s) meet the conditions of State CEQA Guidelines §§ 15162 and 15163 requiring preparation of a Subsequent or Supplemental EIR. If the implementing discretionary action(s) do not meet the conditions of State CEQA Guidelines §§ 15162 or 15163, then an Addendum to this Program RDEIR shall be prepared in accordance with State CEQA Guidelines § 15164.

Following approval of implementing discretionary actions, ministerial actions also would be necessary to implement the proposed Project. These include, but are not limited to, grading permits, building permits, encroachment permits/road improvements, drainage infrastructure improvements, water and sewer infrastructure improvements, stormwater permit(s) (NPDES), and State and federal resource agency permits. Table 3-7, *Matrix of Project Approvals/Permits* provides a summary of the agencies responsible for subsequent discretionary approvals associated with the Project. This RDEIR covers all federal, State and local government



approvals which may be needed to construct or implement the Project, whether explicitly noted in Table 3-7, or not [State CEQA Guidelines §15124(d)].

**Table 3-7 Matrix of Project Approvals/Permits**

<b>Public Agency</b>	<b>Approvals and Decisions</b>
<b>County of Riverside</b>	
<b>Proposed Project – Riverside County Discretionary Approvals</b>	
Riverside County Planning Commission	<ul style="list-style-type: none"> <li>• Provide recommendations to the Riverside County Board of Supervisors whether to approve Amendment No. 1 to the Stoneridge Commerce Center Specific Plan No. 239, General Plan Amendment No. 190008, and Change of Zone No. 1900024.</li> <li>• Provide recommendations to the Riverside County Board of Supervisors regarding certification of this Program RDEIR.</li> </ul>
Riverside County Board of Supervisors	<ul style="list-style-type: none"> <li>• Approve, conditionally approve, or deny Amendment No. 1 to the Stoneridge Commerce Center Specific Plan No. 239.</li> <li>• Approve or deny General Plan Amendment No. 190008.</li> <li>• Approve or deny Change of Zone No. 1900024.</li> <li>• Reject or certify this Program RDEIR along with appropriate CEQA Findings.</li> </ul>
<b>Subsequent Riverside County Discretionary and Ministerial Approvals</b>	
Riverside County Subsequent Implementing Approvals: Planning Department and/or Building & Safety	<ul style="list-style-type: none"> <li>• Approve implementing Tentative Tract Maps.</li> <li>• Approve implementing Plot Plans.</li> <li>• Approve implementing Conditional Use Permits.</li> <li>• Record Final Maps.</li> <li>• Issue Grading Permits.</li> <li>• Issue Building Permits.</li> <li>• Approve Road Improvement Plans.</li> <li>• Issue Encroachment Permits.</li> <li>• Issue Conditional Use Permits, if required.</li> </ul>
<b>Other Agencies – Subsequent Approvals and Permits</b>	
Regional Water Quality Control Board	<ul style="list-style-type: none"> <li>• Compliance with National Pollutant Discharge Elimination System (NPDES) Permit. Waste Discharge Requirements</li> <li>• Issuance of a Construction Activity General Construction Permit</li> <li>• Waste Discharge Requirements</li> <li>• Issuance of a Clean Water Act Section 401 Water Quality Certification pursuant to the CWA</li> </ul>
State Water Resources Control Board, Division of Drinking Water	<ul style="list-style-type: none"> <li>• Approval of a new or amended water supply permit pursuant to the Safe Drinking Water Act.</li> </ul>
California Department of Fish and Wildlife	<ul style="list-style-type: none"> <li>• Issuance of a Section 1602 Streambed Alteration Agreement (SAA)</li> </ul>
U.S. Army Corps of Engineers	<ul style="list-style-type: none"> <li>• Issuance of a Section 404 Permit</li> </ul>
Riverside County Flood Control and Water Conservation District (RCFCWCD)	<ul style="list-style-type: none"> <li>• Approval of proposed drainage infrastructure</li> </ul>
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"> <li>• Permits and approvals associated with operation of stationary equipment, if proposed.</li> </ul>
Eastern Municipal Water District (EMWD)	<ul style="list-style-type: none"> <li>• Approval of proposed water and sewer connections.</li> </ul>
City of Perris	<ul style="list-style-type: none"> <li>• Approval of transportation improvements within the City of Perris, as described in Tables 1-4 , 1-5, and 1-9 of the Project’s Traffic Analysis (RDEIR <i>Technical Appendix L3</i>).</li> <li>• Approval of water line improvements within City roadways.</li> </ul>



## 4.0 ENVIRONMENTAL ANALYSIS

### 4.0.1 SUMMARY OF RDEIR SCOPE

In accordance with CEQA Guidelines §§ 15126-15126.4, this RDEIR Section 4.0, *Environmental Analysis*, provides analyses of potential direct, indirect, and cumulatively-considerable impacts that could occur from planning, constructing, and operating the proposed Project. Since the release of the initial Draft EIR (DEIR) and in response to comments received, the development proposed by the Project has been significantly reduced – by over 1 million square feet – as further detailed in RDEIR Section 3.0, Project Description. In addition, the Project has modified the proposed truck routes, also in response to comments received.

In compliance with the procedural requirements of CEQA, a Notice of Preparation (NOP) was prepared and distributed for public review, in accordance with State CEQA Guidelines § 15082. An Initial Study was not prepared for the Project, and as such the NOP indicated that the required EIR will evaluate all of the topics listed in Appendix G to the State CEQA Guidelines, as implemented by Riverside County and the County’s standard Environmental Assessment (EA) Form. Public comment on the scope consisted of written comments received by the Riverside County in response to the NOP issued for this Program EIR. A publicly-noticed Scoping Session also was held as part of a Riverside County Planning Director’s Hearing on May 11, 2020 at the County of Riverside Administrative Building (4080 Lemon Street, Riverside, CA 92501), although no comments on the scope of the EIR were provided as part of the Scoping Session. Additional comments on the Project also were provided during the 45-day public review period for the Project’s initial DEIR, which are specifically addressed in Section R.0, *Recirculated Draft Environmental Impact Report*, as well as generally in the recirculated DEIR Subsections described below. Pursuant to Appendix G to the State CEQA Guidelines and the County’s standard EA form, this Program RDEIR evaluates 21 primary environmental subject areas, as listed below. All of the DEIR Subsections have been recirculated as a result of the changes made to the Project, in response to the comments received on the initial DEIR, to substantially reduce its impacts on the environment. Each Subsection evaluates several specific subject matters related to the general topic of the Subsection. The title of each Subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

- |  |                                    |
|--|------------------------------------|
| 4.1 Aesthetics                         | 4.12 Mineral Resources             |
| 4.2 Agriculture and Forestry Resources | 4.13 Noise                         |
| 4.3 Air Quality                        | 4.14 Paleontological Resources     |
| 4.4 Biological Resources               | 4.15 Population and Housing        |
| 4.5 Cultural Resources                 | 4.16 Public Services               |
| 4.6 Energy                             | 4.17 Recreation                    |
| 4.7 Geology and Soils                  | 4.18 Transportation                |
| 4.8 Greenhouse Gas Emissions           | 4.19 Tribal Cultural Resources     |
| 4.9 Hazards and Hazardous Materials    | 4.20 Utilities and Service Systems |
| 4.10 Hydrology and Water Quality       | 4.21 Wildfire                      |
| 4.11 Land Use and Planning             |                                    |



#### 4.0.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in State CEQA Guidelines § 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts” (State CEQA Guidelines §15130(a)(1)). As defined in State CEQA Guidelines § 15355:

*‘Cumulative Impacts’ refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*

*(a) The individual effects may be changes resulting from a single project or a number of separate projects.*

*(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

State CEQA Guidelines § 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: 1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency [‘the list of projects approach’], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact (‘the summary of projections approach’).”

As a Program EIR, the analysis herein primarily relies upon the summary of projections approach because implementation of the proposed Project would require subsequent discretionary approvals from Riverside County (e.g., tentative tract maps, plot plans, etc.), and it is not possible to identify a list of cumulative developments that may be proposed in the future when implementing discretionary applications are filed with Riverside County. As such, the analysis herein considers impacts that would result from Project buildout on the existing (2020) environment, as well as long-term cumulatively-considerable impacts that may result from buildout of the Riverside County General Plan and the local general plans of cities within the Project vicinity.

Notwithstanding, and in order to provide a comprehensive analysis of potential near-term cumulatively-considerable impacts, the analyses of cumulatively-considerable traffic-related air quality and noise impacts are based on existing traffic conditions plus ambient growth and the manual addition of traffic from past, present, and reasonably foreseeable projects and includes approved and pending development projects in proximity to the Project site that would contribute traffic to the same transportation facilities as the Project, as well as large, traffic-intensive projects farther from the Project site that have the potential to affect regional transportation facilities. This methodology recognizes development projects that have the potential to contribute measurable traffic to the same intersections, roadway segments, and/or State highway system



facilities as the proposed Project and have the potential to be made fully operational in the foreseeable future. As shown on Table 4.0-1, *Cumulative Development Land Use Summary*, and as depicted on Figure 4.0-1, *Cumulative Development Projects Location Map*, the near-term cumulative impact analysis of traffic impacts, as well as the near-term cumulative impact analysis of traffic-related air quality and noise includes 84 other past, present, and reasonably foreseeable projects within this study area in addition to ambient growth. The analysis of long-term cumulatively-considerable traffic impacts considers full buildout of the City of Perris, City of Moreno Valley, and nearby portions of unincorporated Riverside County, based on the General Plan land use plans for these jurisdictions, except as otherwise noted in the cumulative impact analyses provided in RDEIR Subsections 4.1 through 4.21.

The cumulative study area for evaluation is identified and defined in each Subsection of Chapter 4.0. For example, the issue of aesthetics considers the Project's viewshed, which is defined as the geographical area that is visible from a given location and represents the area within which the Project has the potential to result in adverse impacts to scenic resources. Within the Project's viewshed, which primarily includes portions of Riverside County as well as very limited portions of the City of Perris, the cumulative analysis of aesthetics assumes buildout in accordance with the County and City General Plans. For the issue of biology, the cumulative study area corresponds to the boundaries of the Western Riverside County Multiple Habitat Species Conservation Plan (MSHCP), as the MSHCP provides for the conservation of a wide variety of special status plant and animal species and encompasses a broad region that generally represents biological conditions associated with the Project area; thus, the cumulative study area for biological resources includes all future land uses within western Riverside County as called for by the General Plans of the County and the various cities that are included in the MSHCP region. Refer to the cumulative impact analysis provided in each Subsection in Chapter 4.0 for an issue-specific discussion of the cumulative study area.

For the issue of air quality, the cumulative study area comprises the South Coast Air Basin (SCAB), while the cumulative impact analysis relies on guidance from the South Coast Air Quality Management District (SCAQMD). The SCAQMD published a report giving direction on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD, 2003). In this report the AQMD states on page D-3:

*"...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.*



**Table 4.0-1 Cumulative Development Land Use Summary**

No.	Project Name / Case Number	Land Use <sup>1</sup>	Quantity	Units <sup>2</sup>	Location
<b>Riverside County</b>					
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. & MESSENLIA LN.
RC9	Majestic Freeway Business Center - Building 6	Warehousing	72.000	TSF	NORTH OF MESSENLIA 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 MESSENLIA 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.
RC26	Barker Logistics	High-Cube Warehouse	699.630	TSF	SWC OF PATTERSON AVE. & PLACENTIA ST.
RC27	Harvill / Rider Warehouse	High-Cube Warehouse	284.746	TSF	NORTH OF RIDER ST., WEST OF HARVILL AV.
		General Light Industrial	50.249	TSF	
RC28	Placentia Logistics	High-Cube Warehouse	274.190	TSF	NWC OF HARVILL AV. & PLACENTIA AV.
RC29	Dedeaux Harvill	Truck Terminal	55.700	TSF	NORTH OF RIDER ST., WEST OF HARVILL AV.
RC30	The Villages of Lakeview	Multifamily Residential	8,725	DU	SOUTH OF RAMONA EXWY., EAST OF LAKEVIEW AV.
		Office	825.000	TSF	
		Retail	555.000	TSF	
		School	114.2	AC	
		Public Facilities	49.7	AC	
		Open Space	82.0	AC	
RC31	TR29315	SFDR	318	DU	SEC OF POZOS RD. & MARTIN ST.
RC32	SP00183	SFDR	450	DU	SOUTH OF RAMONA EXWY., EAST OF MARTIN ST.
		Retail	10.0	AC	
RC33	TR33372	SFDR	98	DU	NWC OF NORTH DR. & THIRTEENTH ST.
RC34	TR26205	SFDR	148	DU	NORTH OF NUEVO RD. AND WEST OF HANSEN AV.
RC35	TR32165	SFDR	76	DU	NORTH OF NUEVO RD. AND WEST OF HANSEN AV.
RC36	TR32065	SFDR	99	DU	NORTH OF NUEVO RD. AND WEST OF HANSEN AV.
RC37	TR36030	SFDR	314	DU	SWC OF PASSAGE RD. & NUEVO RD.
RC38	TR36665	SFDR	587.000	DU	SWC OF DAWSON RD. & NUEVO RD.
RC39	TR26976	SFDR	389	DU	NEC OF FOOTHILL BL. & NUEVO RD.
		Retail	12.0	TSF	
RC40	TR33427	SFDR	291	DU	NORTH OF NUEVO RD. AND WEST OF PICO AV.
RC41	TR33976	Multifamily Residential	207	DU	SOUTH OF WATER AV. AND WEST OF PICO AV.
RC42	TR33978	SFDR	139	DU	NORTH OF WATER AV. AND WEST OF PICO AV.
RC43	TR36030	SFDR	314	DU	SWC OF PASSAGE RD. & NUEVO RD.
RC44	TR32372	SFDR	803	DU	SOUTH OF RAMONA EXWY. AND WEST OF PICO AV.
RC45	SP00366	Mixed Use	636.9	AC	NORTH OF MARVIN RD. AND EAST OF 5TH ST.





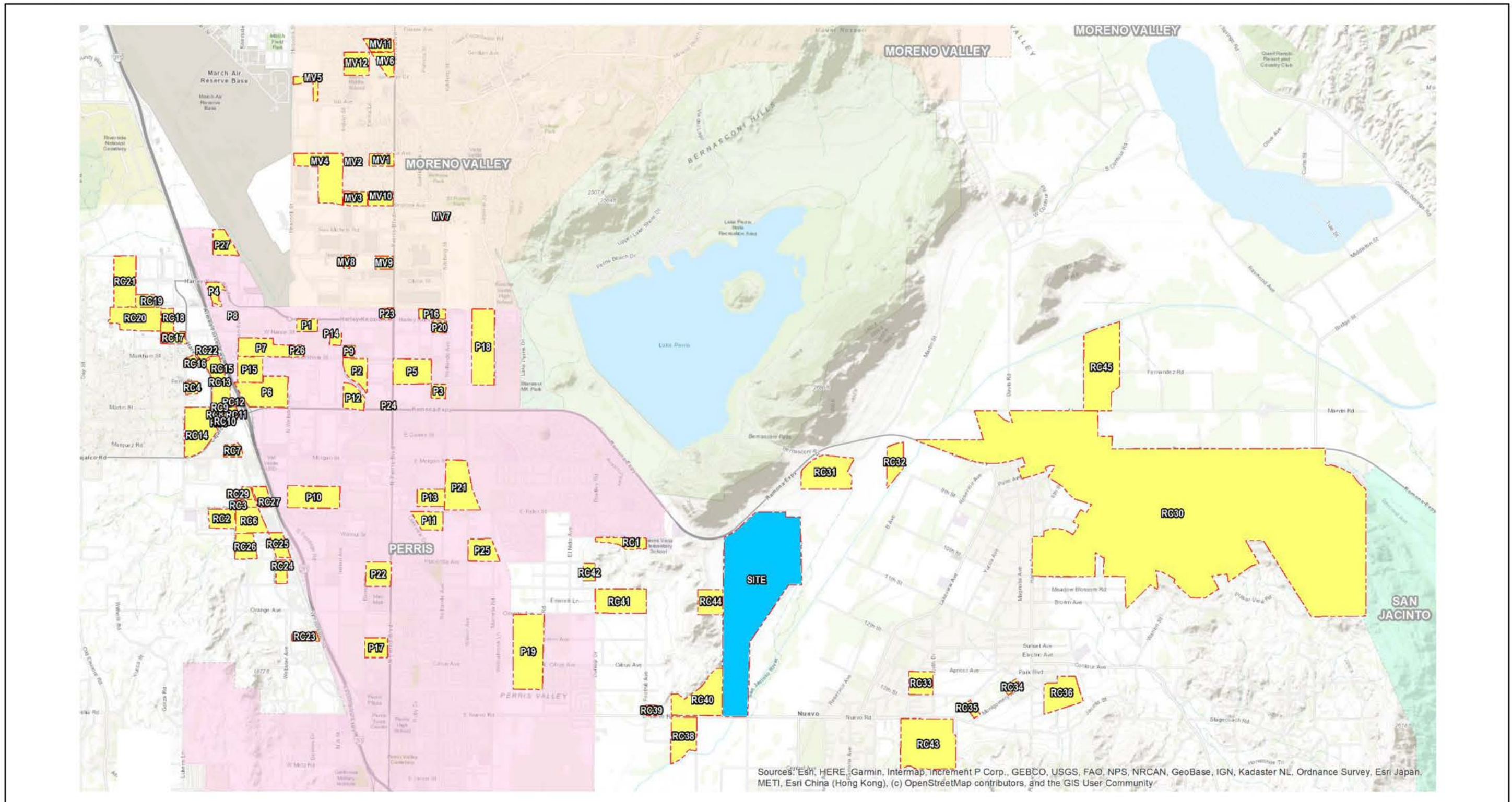
**Table 4.0-1 Cumulative Development Land Use Summary (Cont'd)**

City of Perris					
P1	Bargemann / DPR 07-09-0018	Warehousing	173.000	TSF	NEC OF WEBSTER & NANCE
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.
P21	Rider 2 and 4	High-Cube Warehouse	1,376.721	TSF	NWC OF REDLANDS AVE. AND RIDER ST.
P22	Weinerschnitzel / CUP 17-05083	Fast-Food Restaurant	2.000	TSF	WEST OF PERRIS BL., SOUTH OF PLACENTIA AVE.
P23	March Plaza / CUP16-05165	Commercial Retail	47.253	TSF	NWC OF PERRIS BL. AND HARLEY KNOX BL.
P24	Cali Express Carwash / CUP 16-05258	Carwash	5.600	TSF	NWC OF PERRIS BL. AND RAMONA EXWY.
P25	Wilson Industrial / DPR 19-00007	High-Cube Warehouse	303.000	TSF	SEC OF WILSON AVE. AND RIDER ST.
P26	Integra Expansion / MMOD 17-05075	High-Cube Warehouse	273.000	TSF	NCE OF MARKHAM ST. AND WEBSTER AVE.
P27	Western Industrial / DPR 19-00003	High-Cube Warehouse	250.000	TSF	NEC or WESTERN WY. AND NANDINA 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.
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.

<sup>1</sup> SFDR = Single Family Detached Residential

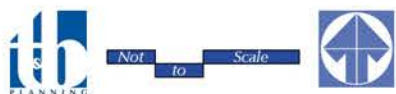
<sup>2</sup> DU = Dwelling Units; TSF = Thousand Square Feet; AC = Acres

(Urban Crossroads, 2023h, Table 4-6)



Source(s): Urban Crossroads (01-06-2023)

Figure 4.0-1



Cumulative Development Projects Location Map



*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.”*

The cumulative analysis provided in RDEIR Subsection 4.3 assumes that individual projects that do not generate 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 SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable.

Compliance with the SCAQMD guidelines for evaluating direct and cumulatively-considerable impacts due to air quality emissions has been shown to result in a demonstrable reduction in air quality pollutants within the South Coast Air Basin. As more thoroughly discussed in RDEIR Subsection 4.3, regulations promulgated by the SCAQMD have led to a dramatic reduction in the level of air quality pollutants within the SCAB, including levels of ozone, particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), carbon monoxide (CO), and oxides of nitrogen (NO<sub>x</sub>). As noted in the SCAQMD 2016 Air Quality Management Plan (AQMP), “the remarkable historical improvement in air quality since the 1970’s is the direct result of Southern California’s comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs” (SCAQMD, 2017). Improvements also have been seen in ozone levels. Part of the control processes of the SCAQMD’s duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD’s CEQA Handbook. The single threshold of significance used to assess Project direct and cumulative impacts has in fact been successful, as evidenced by the track record of the air quality in the Basin dramatically improving over the course of the past decades (refer to RDEIR Subsection 4.3 for an additional discussion on the improvements of air quality within the SCAB).

#### **4.0.3 IDENTIFICATION OF IMPACTS**

Subsections 4.1 through 4.21 of this RDEIR evaluate the twenty-one (21) environmental subjects warranting detailed analysis. The format of discussion is standardized as much as possible in each Subsection for ease of review. The environmental setting is discussed first, followed by a discussion of the Project’s potential environmental impacts based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant.

The thresholds of significance used in this Program RDEIR are based on the thresholds presented in State CEQA Guidelines Appendix G and as applied by Riverside County to create the Project’s standard Environmental Assessment (EA) Form. The thresholds are intended to assist the reader of this RDEIR in understanding how and why this RDEIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

Serving as the CEQA Lead Agency for this Program RDEIR, Riverside County is responsible for determining whether an adverse environmental effect identified in this RDEIR should be classified as significant or less



than significant. While Riverside County has generally elected to use the thresholds presented in State CEQA Guidelines Appendix G, it should be noted that CEQA affords the County discretion to formulate standards of significance, and recognizes that the significance of a particular impact may vary with the setting. (14 Cal. Code Regs., § 15064(b).) The standards of significance used in this RDEIR are based on the independent judgment of the Riverside County, taking into consideration the updated State CEQA Guidelines Appendix G, Riverside County’s Municipal Code, and adopted County policies and ordinances; the judgment of the technical experts that prepared this RDEIR’s Technical Appendices; performance standards adopted, implemented, and monitored by regulatory agencies; significance standards recommended by regulatory agencies; and the standards in CEQA that trigger the preparation of an EIR. As required by State CEQA Guidelines § 15126.2(a), impacts are identified in this RDEIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts of the proposed Project. A summarized “impact statement” is provided in each subsection following the analysis.

The following terms are used to describe the level of significance related to the physical conditions within the area affected by the proposed Project:

- No Impact: An adverse change in the physical environment would not occur.
- Less-than-Significant Impact: An adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance presented in this Program RDEIR.
- Significant Impact: A substantial or potentially substantial adverse change in the physical environment would occur and would exceed the threshold(s) of significance presented in this Program RDEIR, requiring the consideration of mitigation measures.

Each Subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations, etc.) that the Project is required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. The following terms are used to describe the level of significance following the application of recommended mitigation measures:

- Less-than-Significant Impact with Mitigation: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this Program RDEIR; however, the impact can be avoided or reduced to a less-than-significant level through the application of feasible mitigation measure(s).
- Significant and Unavoidable Impact: A substantial or potentially substantial adverse change in the physical environment would occur that would exceed the threshold(s) of significance presented in this Program RDEIR. Feasible and enforceable mitigation measure(s) that have a proportional nexus to the Project’s impact are either not available or would not be fully effective in avoiding or reducing the impact to below a level of significance.



For any impact identified as significant and unavoidable, Riverside County would be required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines § 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project's administrative record, that outweigh the unavoidable impacts.



## 4.1 AESTHETICS

This Subsection describes the aesthetic qualities and visual resources present on the Project site and in the site's vicinity and evaluates the potential effects that the Project may have on these resources. Descriptions of existing visual characteristics, both on-site and in the vicinity of the Project site, and the analysis of potential impacts to aesthetic resources are based, in part, on field observations and site photographs collected by T&B Planning, Inc. in December 2019, analysis of aerial photography (Google Earth, 2021), and Project application materials submitted to Riverside County and described in Section 3.0, *Project Description*, of this EIR. This Subsection also is based in part on information and policies contained in the Riverside County General Plan Update No. 960 (Riverside County, 2021a), Riverside County GIS database (RCIT, n.d.), Riverside County Ordinance No. 348 (Riverside County, 2023), and Riverside County Ordinance No. 655 (Riverside County, 1988).

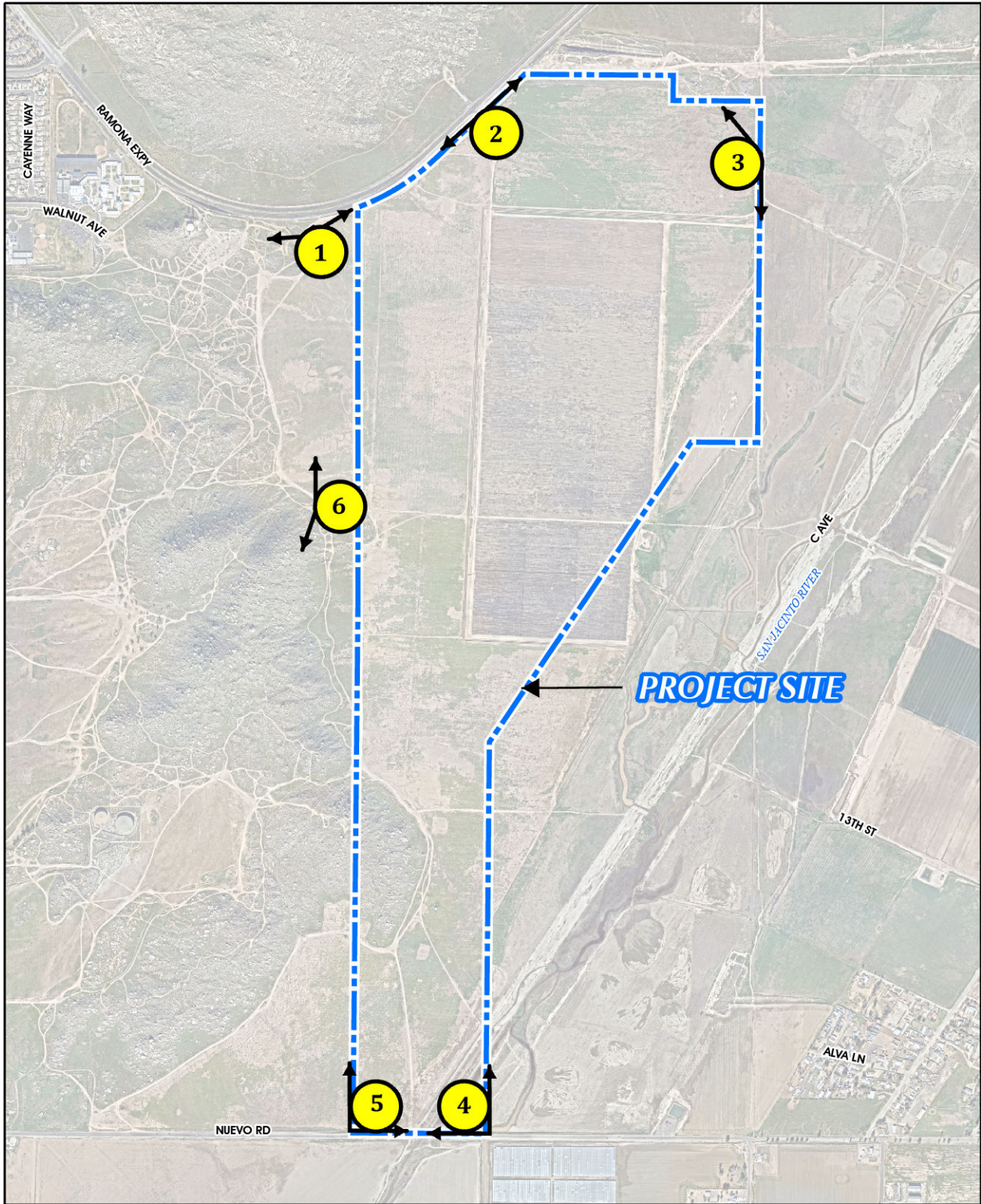
### 4.1.1 EXISTING CONDITIONS

#### A. Existing Aesthetic Conditions

The Project site comprises 582.6 acres of undeveloped land located south of and abutting the Ramona Expressway, north of and abutting Nuevo Road, west of the San Jacinto River, and east of the City of Perris. Under existing conditions, a majority of the Project site consists of relatively flat lands that were previously used for agricultural purposes and that are routinely disced for fire abatement purposes. Along the western boundary in the southern portion of the Project site is an existing undisturbed hillside that includes informal pedestrian trails at the base. With exception of Ramona Expressway, Nuevo Road, and the San Jacinto River, no improvements occur on site under existing conditions.

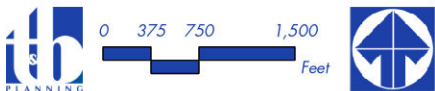
To illustrate the existing visual conditions of the Project site in more detail, a photographic inventory was prepared. Figure 4.1-1, *Site Photograph Key Map*, depicts the locations of the six vantage photographs, each of which are described below. These photographs, shown on Figure 4.1-2 through Figure 4.1-4, were taken in December 2019 and provide a representative visual inventory of the site's visual characteristics as seen from surrounding public viewing areas as of the approximate date of the issuance of the Project's Notice of Preparation (April 27, 2020). The visual conditions of the Project site and its immediate surroundings have not substantially changed since the site photographs were collected in December 2019.

- Site Photograph 1 (Figure 4.1-2): Site Photograph 1 was taken near the northwestern corner of the Project site near the Ramona Expressway, looking northeast to west. In the foreground and in the left and right portions of this photo is an existing dirt road and unvegetated disturbed lands. The Ramona Expressway and associated power lines are visible on the left portion of the photo. In the middle ground are vegetated areas on site that are highly disturbed and subject to routine discing for fire abatement purposes. The existing hill forms that occur on and off site near the western Project boundary are visible in the right portion of the photo in the distance. The Lakeview Mountains are visible along the horizon.



Source(s): ESRI, Nearmap Imagery (2023), RCLMA (2023), Riverside County General Plan (2019)

Figure 4.1-1



**Site Photograph Key Map**



Figure 4.1-2





Site Photograph 3: Northeast portion of project boundary looking South to Northwest



Site Photograph 4: Southeast corner of project boundary, along Pico Ave, looking West to North

Figure 4.1-3



Site Photograph 5: Southwest corner of project boundary, along Nuevo Rd, looking North to East



Site Photograph 6: Western portion of project boundary looking North to Southwest

Figure 4.1-4



- Site Photograph 2 (Figure 4.1-2): Site Photograph 2 was taken along the northern Project boundary near the Ramona Expressway, looking northeast to southwest. In the foreground are dirt and gravel roads that occur on site, with trash and furniture that have been illegally dumped on the Project site visible in the foreground. The Ramona Expressway and associated power poles are visible in the left and right portions of the photo. In the middle ground of the photo, ruderal vegetation that is routinely disced for fire abatement purposes is visible and dominates views of a majority of the site. The hill forms that straddle the western boundary of the Project site are visible in the right portion of the photo in the distance. The Lakeview Mountains are visible along the horizon.
- Site Photograph 3 (Figure 4.1-3): Site Photograph 3 was taken along an existing dirt road near the northeastern corner of the Project site, looking northwest to south. In the foreground of this photograph is natural vegetation that appears disturbed, portions of which are routinely disced for fire abatement purposes. The existing north-south oriented dirt road along the Project site's eastern boundary is visible in the left and right portions of the photo. Visible in the distance is the Ramona Expressway, beyond which are the Bernasconi Hills that surround the Lake Perris State Recreation Area. The large hill form that straddles the western Project boundary, along with several off-site hill forms, are visible along the horizon in the left-central portion of the photo.
- Site Photograph 4 (Figure 4.1-3): Site Photograph 4 was taken from the southeastern Project boundary, along Nuevo Road, looking west to north. As shown in the foreground, this portion of the Project site contains ruderal vegetation that is routinely disced for fire abatement purposes. Nuevo Road and associated power poles are visible in the left and right portions of the photo. In the distance, the hillside that occurs on and off site near the Project site's western boundary is visible. The San Bernardino Mountains are visible along the distant horizon in the right-central portion of the photo.
- Site Photograph 5 (Figure 4.1-4): Site Photograph 5 was taken at the southwest Project boundary along Nuevo Road, looking north to east. In the foreground of this photo is the existing disturbed shoulder of Nuevo Road, while Nuevo Road and associated power lines are visible in the left and right portions of the photo. On the Project site in the central portions of the photo, ruderal vegetation that is routinely disced for fire abatement purposes is visible. The existing hill forms that occur on and off site near the Project site's western boundary are visible along the horizon in the left-central portion of the photo. The San Bernardino Mountains are visible along the distant horizon in the right-central portion of the photo.
- Site Photograph 6 (Figure 4.1-4): Site Photograph 6 was taken in the west-central portion of the Project site along an existing dirt road, looking north to southwest. In the foreground is natural vegetation and several boulders, beyond which are the flatter portions of the Project site that are routinely disced for fire abatement purposes. Several existing dirt roadways are visible in the left and right portions of the photo, with additional dirt roads visible in the distance. In the right portion of the photo, the on-site portions of the hill form that straddle the Project's western boundary are visible. In the left portion of the photo in the distance are the Bernasconi Hills that surround the Lake Perris State Recreation Area.



The Lakeview Mountains and San Bernardino Mountains are visible in the far distance along the horizon.

**B. Scenic Highways**

According to Figure C-8 (Scenic Highways) of the County’s General Plan, and as shown on Figure 4.1-5, *General Plan Scenic Highways Map*, there are no State-Designated scenic highways in the Project vicinity. The nearest State-Designated scenic highway is the portion of SR-74 within the Idyllwild National Forest, which occurs approximately 20.8 miles southeast of the Project site. The nearest State-Eligible scenic highway is a portion of I-215/SR-74 located approximately 2.7 miles southwest of the Project site. While there are no County-Designated scenic highways in the Project’s vicinity, the Ramona Expressway, which occurs along the Project’s northern boundary, is designated as a County-Eligible scenic highway. (Google Earth, 2021; Riverside County, 2021a, Figure C-8)

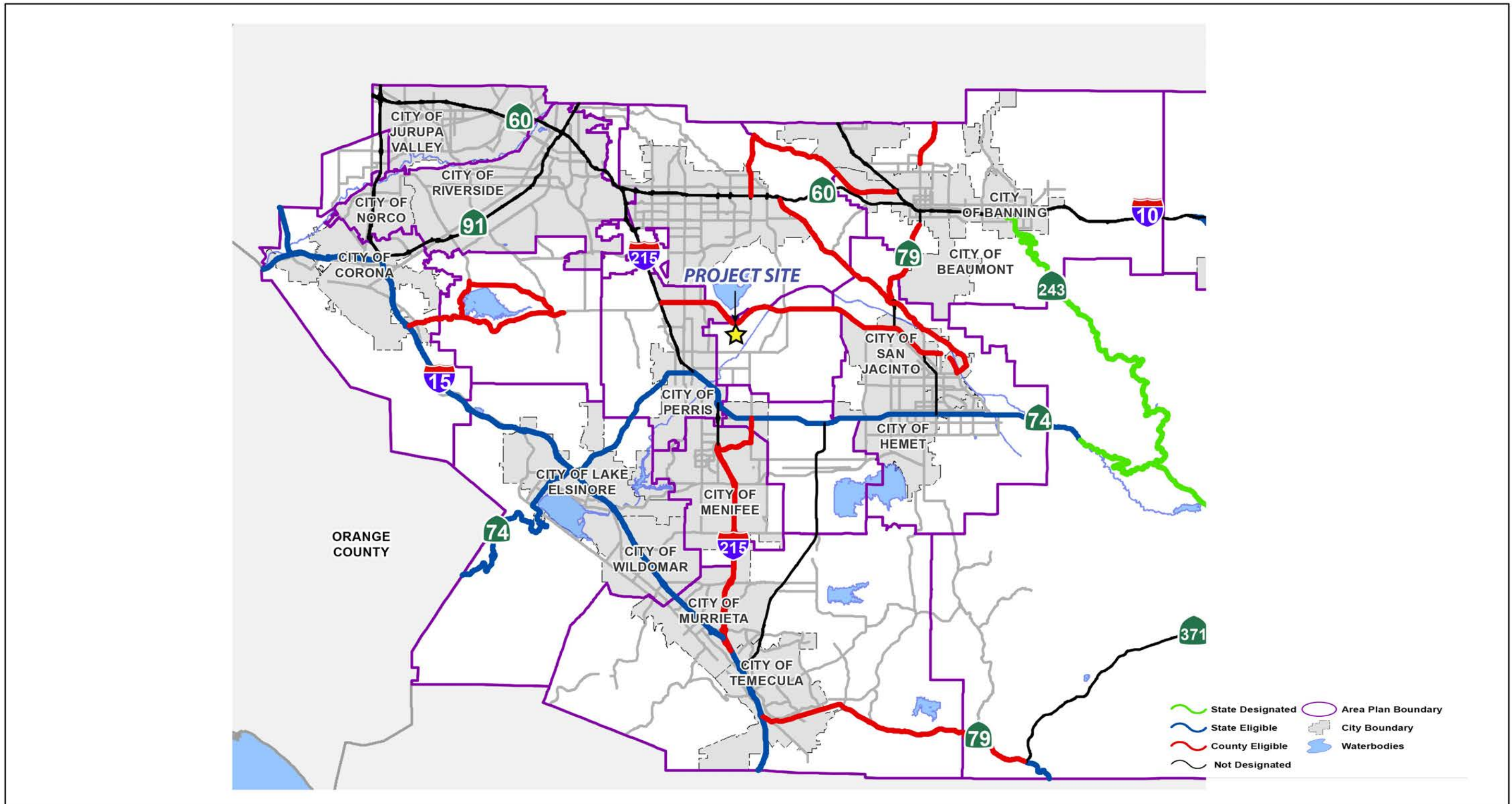
**4.1.2 APPLICABLE REGULATORY REQUIREMENTS**

**A. Riverside County General Plan**

The Riverside County General Plan does not have any specific sections related to aesthetics and visual resources. However, the Land Use Element of the Riverside County General Plan includes policies related to Land Use Compatibility, Community Design, and Scenic Corridors, which have applicability to the topic of aesthetics. The Land Use Element provides direction related to how future development is intended to build out, such as the intensity/density and character of new development. The Land Use Element also addresses the relationship between development, community enhancement, and natural resource management.

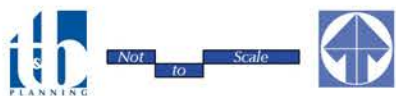
The Multipurpose Open Space Element of the Riverside General Plan also addresses open space and scenic resources in Riverside County. According to the Multipurpose Open Space Element, scenic resources include: “...areas that are visible to the general public and considered visually attractive,” and “...natural landmarks and prominent or unusual features of the landscape.” Hillsides and ridges that rise above urban or rural areas or highways can also be considered scenic backdrops. Additionally, the Multipurpose Open Space Element defines scenic vistas as “...points, accessible to the general public, that provide a view of the countryside.” Riverside County General Plan Policy OS 21.1 intends to “[i]dentify and conserve the skylines, view corridors, and outstanding scenic vistas within Riverside County.” (Riverside County, 2021a, pp. OS-52 to OS-53)

The Circulation Element, Land Use Element, and Multipurpose Open Space Element of the Riverside County General Plan also identify scenic corridors, which are roadways (including State and County eligible and designated scenic highways) that traverse scenic resources, and identify policies that are intended to protect and maintain the scenic resources within these corridors (Riverside County, 2021a, p. OS-52). Scenic highways in the Project vicinity are depicted on Figure 4.1-5. As noted in the LNAP, Policy LNAP 11.1 seeks to “Protect the scenic highways in the Lakeview/Nuevo planning area from change that would diminish the aesthetic value of views of the Bernasconi Hills, the San Jacinto River, the Mystic Lake Corridor, and the San Jacinto Wildlife Area in accordance with the Scenic Highways section of the General Plan Land Use, Multipurpose Open Space, and Circulation Elements” (Riverside County, 2021b, p. 51).



Source(s): Riverside County General Plan

Figure 4.1-5





**B. Riverside County Ordinance No. 348, Land Use Ordinance**

Riverside County’s Land Use Ordinance No. 348 establishes allowable uses of land and sets standards for what and how land may be developed. The ordinance protects the people and property of Riverside County from development of unsuitable land uses and aims to ensure that built areas are developed safely and with minimal conflict with surrounding lands. Ordinance No. 348 also identifies requirements for landscaping associated with development proposals. The landscaping of development projects enhances the visual character and aesthetic quality of a site and its surroundings. (Riverside County, 2023)

**C. Riverside County Ordinance No. 655, Regulating Light Pollution**

The County of Riverside has adopted an ordinance regulating light pollution (Ordinance No. 655). Ordinance No. 655 is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce “skyglow” or light pollution that affects day or nighttime views from the Mt. Palomar Observatory, which is located approximately 35.2 miles southeast of the Project site. As shown on LNAP Figure 6 (Lakeview/Nuevo Area Plan Mt Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of “Zone B” of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). As such, the Project site is subject to the outdoor lighting policies and requirements applicable to Zone B that are stated in Riverside County Ordinance No. 655. This Ordinance includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. The use of low-pressure sodium lamps is encouraged where possible by Ordinance No. 655, and the Ordinance also requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display. (Riverside County, 1988)

**D. Riverside County Ordinance No. 915, Regulating Outdoor Lighting**

The County of Riverside has adopted an ordinance regulating outdoor lighting (Ordinance No. 915). Ordinance No. 915 is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life. (Riverside County, 2012)

**4.1.3 BASIS FOR DETERMINING SIGNIFICANCE**

According to Section I of Appendix G to the State CEQA Guidelines, the proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would (OPR, 2018a):

- Have a substantial adverse effect on a scenic vista;



- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Additionally, the following thresholds are derived from Riverside County's Environmental Assessment Checklist, as revised to reflect the December 2018 updates to the State CEQA Guidelines. As such, the following thresholds are used to evaluate the significance of the proposed Project's impacts on aesthetics. The proposed Project would result in a significant impact to aesthetics if the Project or any Project-related component would:

- Have a substantial effect upon a scenic highway corridor within which it is located;*
- 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;*
- 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;*
- Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655;*
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area; or*
- Expose residential property to unacceptable light levels.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist, which are based on Appendix G to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project's impacts on aesthetics.



#### 4.1.4 IMPACT ANALYSIS

***Threshold a.: Would the Project have a substantial effect upon a scenic highway corridor within which it is located?***

As previously indicated and depicted on Figure 4.1-5, the nearest State-Designated scenic highway is the portion of SR-74 within the Idyllwild National Forest, which occurs approximately 20.8 miles southeast of the Project site. Due to distance, intervening topography, and other features of the viewshed for this facility, the Project site is not visible from this portion of SR-74 and the Project would therefore have no impact on State-Designated scenic highways. The nearest State-Eligible scenic highway is a portion of I-215/SR-74 located approximately 2.7 miles southwest of the Project site. Based on an analysis of the Project's viewshed conducted in Google Earth, the hillside that straddles the Project site's western boundary is distantly visible along portions of I-215/SR-74; however, the portions of the Project site that are proposed for development are not visible from any portion of I-215/SR-74. As such, the Project would have less-than-significant impacts to State-Eligible scenic highways. (Google Earth, 2021; Riverside County, 2021a, Figure C-8)

As previously noted, there are no County-Designated scenic highways in the Project's vicinity; however, the Ramona Expressway, which occurs along the Project's northern boundary, is designated as a County-Eligible scenic highway (Google Earth, 2021; Riverside County, 2021a, Figure C-8). The Project would be prominently visible along nearby portions of the Ramona Expressway. Specifically, the Project would result in the conversion of the site from an undeveloped, disturbed condition to a master-planned light industrial, business park, and commercial retail development. Although this represents a substantial change to views along this County-eligible facility, development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 239A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Design guidelines included as part of SP 239A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County's future review of implementing applications (e.g., plot plans, building permits, etc.). The following is a summary of the SP 239A1 Design Guidelines that are related to the issue of aesthetics (refer to EIR *Technical Appendix P* for a complete listing of the design guideline requirements of proposed SP 239A1):

- Section 4.2, *Design Theme*, of proposed SP 239A1 requires a contemporary aesthetic, which provides architectural styling with attractive detailing, steel accents, a light-toned color palette, and timeless features. Design elements are required to be included to reduce the visibility and intensity of the light industrial activities, including walls, landscaping, and building design. Signs are required to be modern, with lighting focused and directed, landscaping is required to be colorful and drought-tolerant, and design features are applied that lower energy use demands of building operations.
- Section 4.4, *Architectural Design Guidelines*, of proposed SP 239A1 emphasizes a contemporary interpretation of the traditional context with a focus on reducing the appearance of building massing with the use of structural articulation. Buildings are planned to be characterized by simple and distinct cubic masses with interlocking volumes of wall planes, colors, and materials to create visual appeal,





aesthetically pleasing proportions, and strong shadow patterns. Colors, materials, and textures are encouraged to be mixed to create interest. Specific elements of the Architectural Design Guidelines include the following:

- Subsection 4.4.1, *Building Form*, specifies standards for building facades that are visible along view corridors, such as Orange Avenue, Ramona Expressway, Antelope Road, and the future Mid-County Parkway. The design guidelines presented in this subsection are intended to ensure that structural development is visually consistent, appealing, and inviting to pedestrians and motorists.
- Subsection 4.4.2, *Building Materials, Colors, and Textures*, specifies standards requiring that the selected exterior materials, colors, and textures should complement one another throughout, with slight variations are encouraged to provide visual interest.
- Subsection 4.4.3, *Windows and Doors*, specifies standards encouraging the patterns of window and door openings to correspond with the overall rhythm of the building and to be consistent in form, pattern, and color within each Planning Area.
- Subsection 4.4.4, *Walls and Fences*, specifies standards for walls and fencing to ensure that these features complement the overall design theme and are attractive from public viewing areas, scaled appropriately, durable, and integrated consistently within the Specific Plan area.
- Subsection 4.4.5, *Truck Courts and Loading Docks*, specifies standards related to the orientation and screening from public view of loading doors, service docks, and equipment areas.
- Subsection 4.4.6, *Ground or Wall-Mounted Equipment*, specifies standards related to the screening of ground and wall-mounted equipment from public viewing areas including public roadways, and encourages these features to be integrated into the architectural elements of the building when visible from streets or public areas.
- Subsection 4.4.7, *Rooftop Equipment*, establishes design guidelines requiring rooftop equipment, such as mechanical equipment, electrical equipment, storage tanks, etc., must be screened by rooftop screens or parapet walls so as not to be visible from public locations, and requires such screening to be integrated into the architecture of the main building.
- Subsection 4.4.8, *Trash Enclosures*, establishes design guidelines requiring screening of refuse containers from public view, with the design of such enclosures is required to reflect the architectural style of adjacent building. Outdoor trash enclosures also are required to be constructed with solid roofs, and trash enclosures are encouraged to be located behind or to the side of buildings.



- Subsection 4.4.10, *Outdoor Lighting*, establishes design guidelines to minimize glare and “spill over” lighting onto public streets and adjacent properties, and requires that lighting fixtures be complementary with respect to design, materials, fixture color, and light color. The design guidelines prohibit the use of neon and other similar types of lighting, and requires electrical meter pedestals to be screened from public view. The design guidelines also prohibit the use of High-Pressure Sodium (HPS) light fixtures on site.
- Subsection 4.4.11, *Signage Guidelines*, and requires the establishment of a Master Sign Program subject to review and approval of the Riverside County Planning Director, which would establish cohesive guidelines for signage within the proposed development. The design guidelines require building signage to be in scale with the proposed building facades, prohibits signage that would be oriented in a way that may cause obstructions, and requires signage to be visually compatible with the architectural design of the future buildings.
- Section 4.5, *Supplemental Guidelines for Light Industrial & Business Park Uses*, sets forth additional guidelines that address considerations unique to the proposed light industrial and business park land uses. The guidelines encourage office spaces to be located at the corners of the building and facing public roadways where possible; requires screen elements to be oriented away from public viewing areas; recommends textured forms, reveals, or scoring on concrete tilt-up panels to provide visual relief; encourages variations in rooflines; recommends the avoidance of arched gable, hip and shed roof forms as a primary roof form, but allows such elements to be used as a secondary/accent roof form; and requires all rooftop mounted equipment to be screened from public view.
- Section 4.6, *Supplemental Guidelines for Commercial Retail Uses*, sets forth guidelines that address considerations unique to commercial retail uses within the proposed development. Among other guidelines, this Section encourages the use of simple building forms and to maximize the play of light on mass and voids to provide strong contrast; positioning of lower building masses and other design elements near pedestrian entrances, especially where visible from major public roadways; the use of towers and well-proportioned building elements to define entries and create pedestrian scale; buildings to be designed with a modern contemporary aesthetic; and the use of architectural projections to break up flat rooflines.
- Section 4.7, *Landscape Design Guidelines*, establishes landscape principles and standards that apply to all future development within SP 239A1. The intent is to ensure that plant materials, entries and monuments, streetscapes and other amenities are compatible with the overall design theme and that all implementing development projects are united under a common design vocabulary. The Landscape Design Guidelines include a plant palette to establish and differentiate area within the Project, including identification of plant species at Project entries, along streetscapes, within proposed buffer zones, and other areas of the proposed development. Also included are guidelines related to entry monumentation, streetscape treatments, walls and fencing, and landscape interfaces.



Furthermore, no development is proposed along the prominent hill form along the western boundary, as this area would be preserved as natural open space within Planning Area 9 of proposed SP 239A1. Buildings proposed as part of the Project would not exceed a height of 60 feet (as required by proposed SP 239A1), and would not obstruct views of the prominent hill forms that occur on and off site near the Project’s western boundary. Additionally, the Project would have no impact on views of the Bernasconi Hills visible from the Ramona Expressway, which occur north of Ramona Expressway and the Project site. Furthermore, the Ramona Expressway is not officially designated as a County-Designated scenic highway.

Based on the foregoing analysis, and assuming mandatory compliance with the design guidelines and development standards of proposed SP 239A1, Project impacts to scenic highways would be less than significant.

***Threshold b.:*** *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?*

***Threshold c.:*** *In non-urbanized areas, would the Project 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?*

Under existing conditions, the majority of the Project site consists of level terrain containing ruderal vegetation that is routinely disced for fire abatement purposes, with several large hill forms prominently visible on and off site near the western Project boundary that contain rock outcroppings. The only trees that occur on site under existing conditions are associated with the San Jacinto River, which traverses the southeastern corner of the Project site. (Google Earth, 2021)

With implementation of the proposed Project, most of the flatter portions of the Project site would be developed with light industrial, business park, and commercial retail land uses. The on-site portions of the existing hill form, as well as areas within the floodplain of the San Jacinto River, would be preserved as natural open space within Planning Areas 9, 10, and 11 of proposed SP 239A1. Thus, the Project would not significantly affect the existing hill forms, rock outcroppings, or trees along the San Jacinto River. There are no other scenic resources on site under existing conditions. Thus, the Project would result in less-than-significant impacts to scenic resources.

Scenic vistas in the Project area include the on- and off-site hill forms near the western Project boundary, the San Jacinto River, and the Bernasconi Hills that surround the Lake Perris State Recreation Area to the north. The on-site portion of the hill form that straddles the western Project boundary in the southern portion of the Project site would be preserved in open space as part of the Project and would continue to be visible from off-site locations. The Project also would not affect public viewing locations of the Bernasconi Hills or the Lake



Perris State Recreation Area, as these features occur north of Ramona Expressway and the Project site. Accordingly, the Project would not obstruct any prominent scenic vista or view open to the public, and impacts would be less than significant.

Development on site would be required to comply with the development standards and design guidelines included as part of proposed SP 239A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Refer to the analysis of Threshold a. for a description of applicable design guidelines. Design guidelines included as part of SP 239A1 include guidance related to site design, architecture, and landscaping, compliance with which would be assured by the County's future review of implementing applications (e.g., plot plans, building permits, etc.). Mandatory compliance with the design guidelines and development standards of proposed SP 239A1 would ensure the Project site is developed in a manner that is not aesthetically offensive. Additionally, compliance with the design guidelines and development standards of proposed SP 239A1 would ensure that the Project does not result in the creation of an aesthetically offensive site open to public view. Additionally, all future development on site would be required to comply with the SP 239A1 zoning ordinance and all other applicable requirements of the Riverside County Municipal Code.

Although the proposed Project would be developed in a manner that is not aesthetically offensive; that would not adversely affect scenic resources on site, such as hill forms, rock outcroppings, and trees; and that would not obstruct any prominent scenic vistas or views open to the public, under existing conditions the Project site consists of undeveloped lands while lands in the immediate Project vicinity exhibit a rural and agricultural character. Development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Although the Project site is planned for a mixture of residential, commercial, and recreational land uses as part of the County's adopted General Plan, the proposed light industrial, business park, and commercial retail uses proposed as part of the Project would be substantially more intense than the land uses currently allowed on site by the General Plan, and would therefore have a much greater effect on the existing visual quality and character of the Project site and its surroundings. Due to the level of development intensity proposed as part of the Project as well as the rural and agricultural character of lands within the immediate Project vicinity, the Project's impacts due to a change to the existing visual character and quality of public views of the site and its surroundings would represent a significant impact of the proposed Project.

***Threshold d.: Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?***

As shown on LNAP Figure 6 (Lakeview/Nuevo Area Plan Mt Palomar Nighttime Lighting Policy Area), the Project site is located within the limits of "Zone B" of the Mt. Palomar Observatory Lighting Policy Area (Riverside County, 2021b, Figure 6). All development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory. Ordinance No. 655 states that low-pressure sodium lamps are the preferred illuminating source, and that outdoor lighting fixtures are required to be



shielded. Pursuant to Section 7 of Ordinance No. 655, future building permits would be required to include specific information with regards to lighting, as follows: 1) the location of the site where outdoor light fixtures would be installed; 2) plans indicating the location and type of fixtures of the premises; and 3) a description of the outdoor light fixtures, including, but not limited to, manufacturer’s catalog cuts and drawings. The required plans and descriptions would enable the County to determine whether compliance with the requirements of the ordinance is met. No building permits would be issued by the County unless the building permit applications demonstrate consistency with the applicable provisions of Ordinance No. 655. As such, the Project has no potential to interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655, and impacts would be less than significant. (Riverside County, 1988)

***Threshold e.: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

***Threshold f.: Would the Project expose residential property to unacceptable light levels?***

In addition to Riverside County Ordinance No. 655, which is addressed above under the analysis of Threshold d., future development on the Project site would be subject to Riverside County Ordinance No. 915 as well as the development standards and design guidelines of SP 239A1. Ordinance No. 915 requires that all outdoor luminaires shall be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way. Compliance with Ordinance No. 915 would be assured through future review of plot plan, conditional use permit, and/or building permit applications by Riverside County, and would ensure that the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.

Additionally, SP 239A1 includes the following design guidelines for exterior lighting, which would serve to prevent the creation of substantial light that could adversely affect day or nighttime views in the area and the exposure of residential properties to unacceptable light levels (T&B Planning, 2023a, Section 4.4.10):

- Minimize glare and “spill over” light onto public streets and adjacent properties by using downward-directed lights and/or cutoff devices on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading, and similar areas.
- Select all lighting fixtures used in the Specific Plan area from the same – or complementary – family of fixtures with respect to design, materials, fixture color, and light color. Use of LED lighting is encouraged.
- Neon and similar types of lighting are prohibited in all areas of the Project site.
- Locate all electrical meter pedestals and light switch/control equipment in areas with minimum public visibility or screen them with appropriate plant materials.
- High Pressure Sodium (HPS) light fixtures are prohibited for site lighting.

Riverside County would review future implementing plot plan, conditional use permit, and/or building permit applications for compliance with the Specific Plan design guidelines related to lighting.



Furthermore, none of the Project's proposed building materials would consist of reflective materials, except for the proposed windows, which would not be mirrored and would have similar low-potential glare characteristics as do other glass windows on buildings in the Project vicinity. The proposed Project does not include any components that would generate substantial amounts of reflective surfaces to the Project vicinity; therefore, impacts associated with glare would be less than significant. Mandatory compliance with the development standards and design guidelines of SP 239A1 and Riverside County Ordinance Nos. 655 and 915 would ensure that all lighting and building design elements proposed by the Project are designed to prevent the creation of substantial light or glare that could affect day or nighttime views in the area. Accordingly, implementation of the Project would result in a less-than-significant impact related to new sources of light or glare.

Based on the foregoing analysis, and because the Project would be required to comply with the lighting standards in SP 239A1 as well as lighting provisions of Riverside County Ordinance Nos. 655 and 915, impacts due to Project lighting and glare, and due to the exposure of residential property to unacceptable light levels, would be less than significant.

#### **4.1.5 CUMULATIVE IMPACT ANALYSIS**

For purposes of analysis, the Project's cumulative study area includes all areas within the Project's viewshed, as the Project does not have the potential to result in cumulatively-considerable impacts to visual quality outside of areas in which the Project site is visible.

As indicated under the analysis of Threshold a., the Project would result in less-than-significant direct impacts to the Ramona Expressway (a County-Eligible scenic highway) with mandatory compliance with the development standards and design guidelines of proposed SP 239A1. Residential developments are proposed to the west as part of the McCanna Hills Specific Plan (SP 246) and would be required to comply with the development standards and design guidelines of SP 246, while lands to the east and south are designated by the Riverside County General Plan for development with low and medium density housing developments. Very little development is planned to the north side of the Ramona Expressway in this portion of Riverside County. Thus, while the Project and other cumulative development would contribute to a change in southern views along the Ramona Expressway from that of a rural/undeveloped area to a mixed-use community, neither the Project nor surrounding cumulative development would obstruct views of the existing hill forms that occur on and off site near the Project's western boundary, the Bernasconi Hills that surround the Lake Perris State Recreation Area, or any other scenic resources visible from the Ramona Expressway. As such, Project impacts to scenic highways would be less-than-cumulatively considerable.

The Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features, and impacts would therefore be less-than-cumulatively considerable. Although the Project site and surrounding areas would be developed in the long-term with a mixture of urban and rural land uses, future development is not anticipated to obstruct views of any scenic vistas or views open to public review, as future development in the area would not adversely affect views of the existing hill forms that occur



on and off site near the Project's western boundary, the Bernasconi Hills that surround the Lake Perris State Recreation Area, or any other scenic resources; thus, impacts would be less-than-cumulatively considerable. Additionally, because the Project would be developed in compliance with the design guidelines and development standards of proposed SP 239A1, the Project would not contribute to the creation of an aesthetically offensive site open to public view. Furthermore, the Project would comply with the SP 239A1 development standards, design guidelines, and zoning ordinance, and the Project also would be required to comply with all applicable Riverside County ordinances governing scenic quality. Notwithstanding, lands immediately surrounding the Project site exhibit a rural and agricultural character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Development of the surrounding areas in conformance with the Riverside County General Plan would contribute to the changes to the existing visual character and quality of public views available in the local area. Accordingly, the Project's potential impacts to the existing visual character and quality of public views of the site and its surroundings would be cumulatively considerable.

The Project and other cumulative developments within the Project's viewshed would be required to comply with Riverside County Ordinance No. 655 requirements pertaining to Zone B. Compliance with Ordinance No. 655 would be assured through future County review of plot plan, conditional use permit, and/or building permit applications. As such, cumulatively-considerable impacts due to a conflict with Ordinance No. 655 would not occur.

The proposed Project as well as other cumulative developments within the Project's viewshed would be subject to compliance with Riverside County Ordinance Nos. 655 and 915. Additionally, future development on site would be subject to the SP 239A1 lighting design guidelines (cited above under the analysis of Thresholds e. and f.), while development to the west within the McCanna Hills SP 246 would be subject to the lighting requirements of SP 246. There are no components of the proposed Project that would contribute to cumulatively-considerable impacts due to the creation of substantial light or glare. Additionally, most of the development in areas surrounding the Project site would consist of residential communities that would not have the potential to contribute to substantial light or glare impacts, as development of these areas also would be subject to compliance with Riverside County Ordinance Nos. 655 and 915 and residential uses are not associated with the generation of substantial amounts of glare. Although the Project and cumulative developments may incorporate building materials with the potential to create glare, such as glass elements, such impacts would be minor as the use of glass or other materials with the potential to result in glare would not be prominently visible from off-site locations and therefore would not adversely affect day or nighttime views in the area. Impacts due to light and glare would be less-than-cumulatively considerable.

#### 4.1.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. While the Project would be visible from Ramona Expressway, which is designated as a County-Eligible scenic highway, development on site would be required to comply with the development standards and design guidelines included as part of



proposed SP 239A1, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. As such, Project impacts to scenic highways would be less than significant.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. The Project would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; or conflict with applicable zoning and other regulations governing scenic quality. However, lands in the immediate vicinity of the Project site exhibit a rural and agricultural character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Impacts would therefore be significant.

Threshold d.: Less-than-Significant Impact. Project compliance with the provisions of County Ordinance No. 655 would be assured through future County review of plot plan, conditional use permit, and/or building permit applications. Impacts due to a conflict with Ordinance No. 655 would be less than significant.

Thresholds e. and f.: Less-than-Significant Impact. Mandatory compliance with the SP 239A1 design guidelines related to lighting, along with compliance with Riverside County Ordinance Nos. 655 and 915, would ensure that Project-related lighting and glare would not adversely affect day or nighttime views in the area, and also would ensure the Project does not expose residential property to unacceptable light levels. Impacts would be less than significant.

#### **4.1.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp source and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from the Mount Palomar Observatory (located approximately 35.2 miles south of the Project site in northern San Diego County). Pursuant to the requirements of Ordinance No. 655, all lighting shall consist of low-pressure sodium lighting, or other lamp types that emit 4050 lumens or less. If light fixtures are proposed above 4050 lumens, then the lighting shall be fully shielded in conformance with the requirements of Ordinance No. 655.
- The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all





development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

- The Project is required to comply with the Development Standards and Design Guidelines of SP 239A1, including standards related to lighting. Compliance with these Design Guidelines would be assured by the County's future review of implementing building permit applications for compliance with the Specific Plan's design features that would serve to reduce and/or avoid impacts relating to aesthetics.

### ***Mitigation***

Although the Project would be required to comply with the design guidelines and development standards of proposed SP 239A1, the SP 239A1 zoning ordinance, and all other applicable requirements of the Riverside County Municipal Code, mitigation measures are not available to address the Project's significant impacts due to substantial changes to the existing visual character and quality of public views of the site and its surroundings, which would occur from virtually any development of these areas.

#### **4.1.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION**

Thresholds b. and c.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project vicinity exhibits a rural and agricultural character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Although the Project would be required to comply with the design guidelines and development standards of proposed SP 239A1, the SP 239A1 zoning ordinance, and all other applicable requirements of the Riverside County Municipal Code, which would serve to ensure that the Project site is developed in a manner that is not visually offensive, mitigation measures are not available to address the Project's significant impacts due to substantial changes to the existing visual character and quality of public views of the site and its surroundings. Impacts would be significant and unavoidable.



## 4.2 AGRICULTURE AND FORESTRY RESOURCES

The information and analysis in this Subsection is based in part on a Project-specific technical study prepared by T&B Planning, entitled, “Land Evaluation and Site Assessment Model for the Stoneridge Commerce Center Project” (herein, “LESA Analysis”), dated May 17, 2023, and included as EIR *Technical Appendix S* (T&B Planning, 2023b). The analysis in this Subsection also is based on information obtained from the California Department of Conservation (CDC) Farmland Mapping & Monitoring Program (FMMP) (CDC, n.d.), Riverside County GIS (RCIT, n.d.), and the Riverside County General Plan Amendment 960 Final EIR (Riverside County, 2015a). Refer to Section 7.0, *References*, for a complete list of these and other reference sources.

### 4.2.1 EXISTING CONDITIONS

#### A. Forest Resources

The Project site is located in the Lakeview/Nuevo portion of unincorporated Riverside County, a rapidly urbanizing region that generally contains dry, sparsely-vegetated terrain in the natural condition. As shown in Figure 4.5.2 of the Riverside County General Plan Update Draft EIR No. 521, there are no forestry resources in the Project’s vicinity under existing conditions (Riverside County, 2015a, Figure 4.5.2).

#### B. Agricultural Resources

##### 1. Regional Agricultural Setting

According to the Riverside County Agricultural Commissioner’s Office, in a document entitled, “Riverside County Agricultural Production Report 2021,” the top three categories of agricultural resources cultivated in Riverside County (by value) are nursery stock, milk, and table grapes. In 2021 (the most recent year for which data is available), the total gross value of agricultural production in Riverside County was approximately \$1.41 billion, which represents a slight decrease (0.9%) from 2020 when total values were \$1.42 billion. (Agricultural Commissioner's Office, 2021)

The CDC reports that agricultural lands face continuing pressure from urbanization and rising production costs. The CDC’s “2014-2016 California Farmland Conversion Report” summarizes land use conversion between 2014 and 2016 (the most recent years for which information has been reported by the CDC), and states that Riverside County as a whole experienced a net loss of 3,635 acres of “Important Farmland” between 2014 and 2016, representing a decline of 0.9% (CDC, n.d., p. 53, Table A-25). “Important Farmlands,” as defined in the CDC report, include Prime Farmland, Farmland of Statewide Importance, and Unique Farmland.

##### 2. Historic and Existing Site Conditions

According to the Project’s Phase I Environmental Site Assessment (ESA, *Technical Appendix G*), the Project site was historically used for agricultural production as early as 1938 until at least 1985. However, agricultural activities on site ceased in the late 1980s. (Hillman, 2019, p. 15) Under existing conditions, the flatter portions of the Project site consist of disturbed lands that are routinely disced for fire abatement purposes. The hill



form that straddles the site's western boundary was not previously used for agricultural production, and consists of natural vegetation.

### 3. Zoning

As described in EIR Section 2.0, *Environmental Setting*, the 582.6-acre Project site is zoned for "Specific Plan Zone (SP Zone)," indicating that the Project site is located within the boundaries of the Stoneridge Specific Plan No. 239 (SP 239). Zoning requirements are as established by the zoning ordinance adopted in conjunction with SP 239. SP 239 designates the Project site with a mixture of mixed-use, commercial retail, residential, recreational, and open space land uses, with no agricultural designations applied to the Project site. As such, the Project site is not zoned for agricultural production under existing conditions.

### 4. Agricultural Land Designations

The goal of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP's objective is to provide maps and statistical data to the public, academia, and local, State, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. California Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local governments and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, 2004, p. 3)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, 2004, p. 6). Provided below is a description of the various map categories established by the FMMP:

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- **Farmland of Statewide Importance (S):** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)

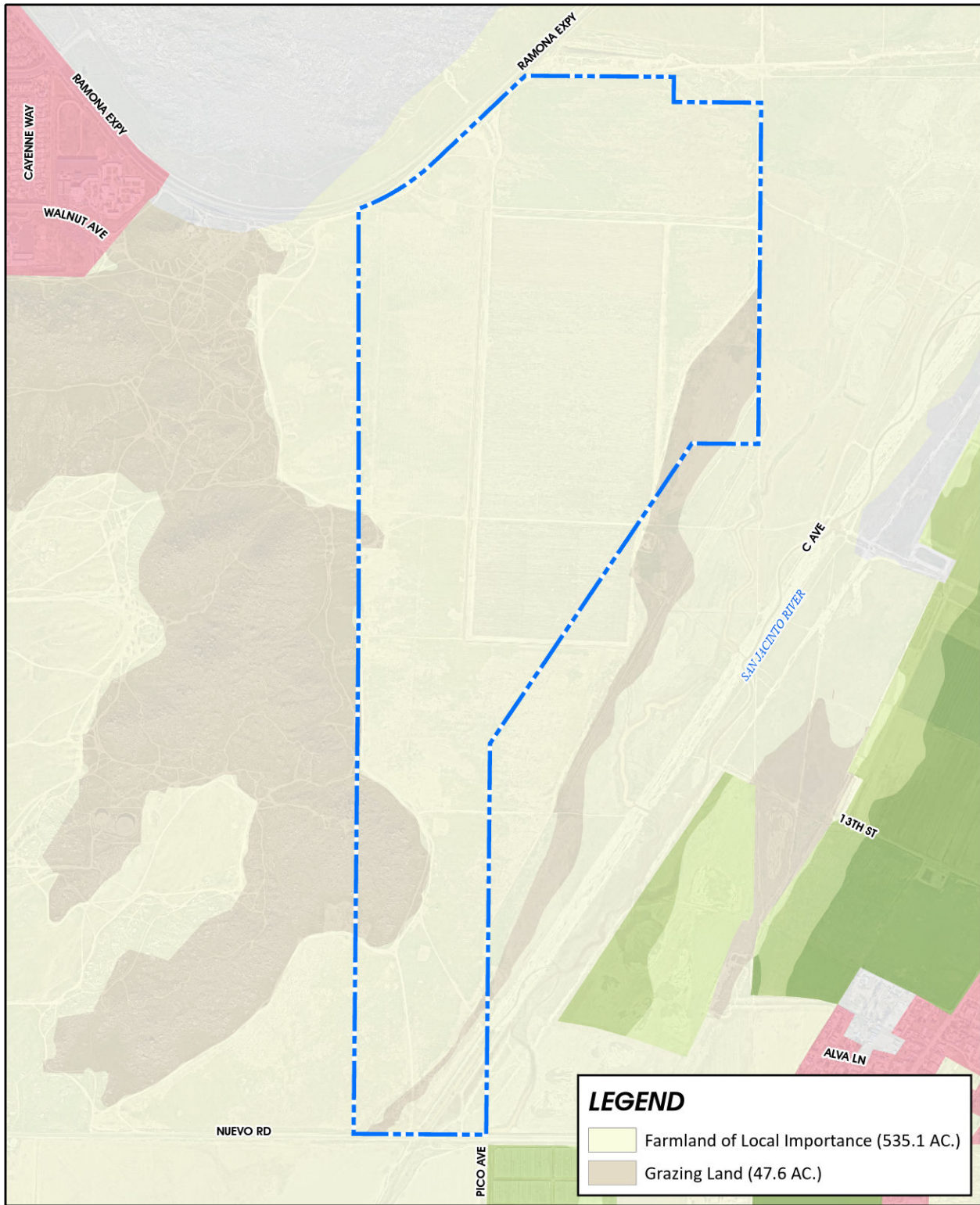


- **Unique Farmland (U):** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. (CDC, 2004, p. 6)
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. (CDC, 2004, p. 6)
- **Grazing Land (G):** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. (CDC, 2004, p. 6)
- **Urban and Built-Up Land (D):** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. (CDC, 2004, p. 6)
- **Other Land (X):** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. (CDC, 2004, p. 6)

As shown on Figure 4.2-1, *FMMP Farmland Map*, approximately 535.1 acres of the Project site are mapped as containing "Farmland of Local Importance" and approximately 47.6 acres of the Project site are mapped as "Grazing Land." "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines to mean "Prime Farmland," "Farmland of Statewide Importance," and "Unique Farmland." Thus, the Project site does not contain any "Farmland" as mapped by the FMMP. (CDC, n.d.)

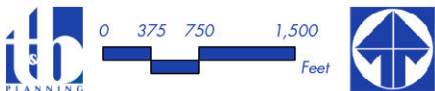
## 5. Williamson Act Land Preserves and Agricultural Preserves

Agricultural preserves are the result of Riverside County's participation in the California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, CA Gov. Code § 51200, et seq. This program allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. The main purpose of the Act is to encourage property owners to continue to farm their land, and to prevent the premature conversion of farmland to urban uses. According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. The nearest agricultural preserve land occurs approximately 0.6 mile southwest of



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023), CA Department of Conservation (2018)

Figure 4.2-1



**FMMP Farmland Map**



the Project site, south of Nuevo Road, while the nearest Williamson Act contracted land occurs approximately 4.3 miles west of the Project site (Perris Valley 3). (CDC, n.d.; RCIT, n.d.)

#### 4.2.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the state and local environmental laws and related regulations governing the protection of agricultural and forest resources.

##### A. State Regulations

##### 1. **California Land Conservation Act (CLCA)**

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (CA Gov. Code § 51200, et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value. Pursuant to California Government Code § 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts pursuant to the CLCA are only allowed for areas within established Agricultural Preserves. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. Once established, land uses within an Agricultural Preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. For lands within Agricultural Preserves, individual land owners may enter into a Contract with a county or city, which would provide for the exclusion of uses other than agricultural, and other than those compatible with agricultural uses, for the duration of the Contract, even if the land is sold to a new owner. In return for entering into a Contract, the landowner is granted preferential taxes that are based upon agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the process of term nonrenewal. Under this process, the remaining contract term (nine years in the case of an original term of ten years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual tax assessment continually increases each year until it is equivalent to current tax rates at the end of the nonrenewal period. Under a set of specifically defined circumstances, a Contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process, and the payment of a fee by the landowner equal to 12.5 percent of the full market value of the property in question. (CDC, 2019; CA Legislative Info, n.d.)

##### 2. **Farmland Mapping and Monitoring Program (FMMP)**

The goal of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP's objective is to provide



maps and statistical data to the public, academia, and local, state, and federal governments to assist them in making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. Government Code § 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local government and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process. (CDC, 2004, p. 3)

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted (CDC, 2004, p. 6). A description of the seven map categories identified as part of the FMMP is included above in subsection 4.2.1.B.

### **3. California Forest Practice Act**

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on privately-owned lands in California. The Forest Practice Act was enacted in 1973 to ensure that logging is done in a manner that will preserve and protect fish, wildlife, forests and streams. The State Board of Forestry and Fire Protection enacts and enforces additional rules to protect these resources. (CAL FIRE, n.d.)

CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Although there are specific exemptions in some cases, compliance with the Forest Practice Act and Board rules apply to all commercial harvesting operations for landowners of small parcels, to ranchers owning hundreds of acres, and large timber companies with thousands of acres. (CAL FIRE, n.d.)

The Timber Harvesting Plan (THP) is the environmental review documents submitted by landowners to CAL FIRE outlining what timber he or she wants to harvest, how it will be harvested, and the steps that will be taken to prevent damage to the environment. THPs are prepared by Registered Professional Foresters (RPFs) who are licensed to prepare these comprehensive, detailed plans. THPs can range from about 100 pages to more than 500 pages. (CAL FIRE, n.d.)

CAL FIRE does not have the authority to deny a THP that is in compliance with state and federal rules and laws, simply because the logging plan is unpopular with the public. The Department reviews and approves between 500 to 1,400 THPs each year. A THP that does not comply with all forestry and environmental regulations is returned to the RPF. It is only approved after the RPF and landowner agree to make the changes necessary to ensure compliance with all laws. CAL FIRE follows-up on approved THPs with site inspections and can shut down operations, cite or fine RPFs, Licensed Timber Operators (LTOs), and landowners if illegal operations are found. (CAL FIRE, n.d.)



### **B. Local Regulations**

The following ordinances address farmland and agricultural preserves within unincorporated Riverside County.

- Riverside County Ordinance No. 509: This ordinance establishes uniform rules which apply to Agricultural Preserves. This ordinance determines which uses are agricultural or compatible uses within an Agricultural Preserve and prohibits all other uses within an Agricultural Preserve.
- Riverside County Ordinance No. 625: This “Right-to-Farm” Ordinance requires that development of residential uses adjacent to properties zoned primarily for agricultural purposes be regulated. Specifically, Ordinance No. 625 states that if any agricultural operation that has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses shall cause said operation to become a nuisance. A note is to be added to the Environmental Constraints Sheet for any tentative land division that states:

*“...that no agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three (3) years if it was not a nuisance at the time it began.”*

If any parcel within 300 feet of the site is zoned primarily for agricultural uses at the time of occupancy permit issuance, the Project shall comply with the “Right-to-Farm” Ordinance. County Ordinance No. 625 defines land zoned for “primarily agricultural purposes” as any land lying within any one of the following zone classifications established by the Riverside County Land Use Ordinance No. 348: A-1 (Light Agriculture); A-P (Light Agriculture with Poultry); A-2 (Heavy Agriculture); A-D (Agriculture-Dairy); or C/V (Citrus/Vineyard).

#### **4.2.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section II of Appendix G to the State CEQA Guidelines addresses typical adverse effects to forest and agricultural resources, and includes the following threshold questions to evaluate the Project’s impacts on forest and agricultural resources (OPR, 2018a):

- *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*





- *Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*
- *Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on forest or agricultural resources if construction and/or operation of the Project would:

- 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, to non-agricultural use;*
- e. *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));*
- f. *Result in the loss of forest land or conversion of forest land to non-forest use; or*
- g. *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 significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts on forest and agricultural resources.



#### 4.2.4 METHODOLOGY

##### A. ***Land Evaluation and Site Assessment Model (LESA Model)***

The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources and assist in the determination of the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993) and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process (CDC, 1997, p. 4). The California LESA Model is the methodology used by the County of Riverside to determine whether important agricultural resources are present on a property, and was utilized to evaluate the Project site's feasibility for agricultural resources.

The California LESA Model is made up of two components, known as "Land Evaluation" (LE) and "Site Assessment" (SA), that are scored and weighted separately to yield a total LE subscore and SA subscore. The Final LESA Score is the sum of the LE and SA subscores and has a maximum possible score of 100 points. Based on the Final LESA Score, numerical thresholds are used to determine the significance of a project's impacts on agricultural resources (CDC, 1997, p. 31).

##### 1. ***Land Evaluation***

The LE subscore consists of two factors, including the Land Capability Classification (LCC) rating and the Storie Index rating, which were devised to measure the inherent soil-based qualities of land as they relate to agricultural production. The LCC Rating and Storie Index rating scores are based upon the soil map unit(s) identified on a property and the acreage of each soil mapping unit relative to the property's total acreage. Data for the soil map unit(s), LCC, and Storie Index are obtained from soil survey data provided by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) (CDC, 1997, pp. 7-9).

##### **Land Capability Classification (LCC) Rating**

There are eight (8) classes of LCC (I through VIII). Soils designated "I" have the fewest limitations for agricultural production and soils designated "VIII" are least suitable for farmland. The LCC is further divided into subclasses (designated by lowercase letters *e*, *w*, *s*, or *c*) to describe limitations, including a soil's susceptibility to erosion ("e"), limitations due to water in or on the soil ("w"), shallow or stony soils ("s"), or climate ("c") (USDA, 2023).

Once the LCC for each soil mapping unit is obtained from the USDA NRCS soil survey, the LCC classification is converted into a numeric score established by the California LESA Model. Table 4.2-1, *Numeric Conversion of Land Capability Classification Units*, summarizes the LCC numeric conversion scores used by the LESA model. The LCC Score accounts for 25 percent of the total California LESA Model Score (CDC, 1997, p. 7).



**Table 4.2-1 Numeric Conversion of Land Capability Classification Units**

<b>LCC</b>	I	Ile	IIs, w	IIIe	IIIs, w	IVe	IVs, w	V	VI	VII	VIII
<b>Rating</b>	100	90	80	70	60	50	40	30	20	10	0

(CDC, 1997)

For properties with multiple soil mapping units, the LCC Score used in the LESA Model is determined by multiplying the LCC Rating for each map unit by the corresponding map unit’s proportion of the property’s total acreage. The LCC Score for each map unit is summed together for a total, single LCC Score for the property (CDC, 1997, p. 7).

**Storie Index Rating**

The Storie Index is a quantitative method of rating the agricultural capability of soils. The Storie Index has been used in California for over 50 years, with the most recent version of the Storie Index being published in 1978. The Storie Index is based on four factors: 1) degree of soil profile development; 2) surface texture; 3) slope; 4) other soil and landscape conditions including drainage, alkalinity, nutrient level, acidity, erosion, and microrelief. Soils are graded on a 100-point scale that represents the relative value of a given soil when used for intensive agricultural purposes (University of California, 1978, p. 1). The Storie Index Score accounts for 25 percent of the total California LESA Model Score (CDC, 1997, p. 12).

For properties with multiple soil mapping units, the Storie Index Score is calculated by multiplying the Storie Index rating by the map unit’s proportion of the property’s total acreage. The Storie Index Score for each map unit is added together to provide a single Storie Index Score for the property (CDC, 1997, p. 12).

**2. Site Assessment (SA)**

The SA subscore consists of four factors that measure social, economic, and geographic features that contribute to the overall value of agricultural land. The SA factors include Project Size, Water Resource Availability, Surrounding Agricultural Land, and Protected Resource Land (CDC, 1997, p. 13).

**Project Size**

The Project Size rating evaluates the potential viability of potential agricultural productivity on a property. Generally, high quality soils (high rate of economic return per acre planted) only need to be present in relatively small quantities on a property to be considered important, whereas lower quality soils (low or moderate rate of economic return per acre planted) need to be present in larger quantities to be considered important.

The Project Size rating corresponds with the acreage of each LCC Class identified on a property. Table 4.2-2, *Project Size Scoring*, summarizes the different Project Size scoring combinations. For properties with multiple map units within the subject property, the mapping unit that generates the highest Project Size score is used as the final Project Size score for the Project site. The Project Size score accounts for 15 percent of the total California LESA Model Score (CDC, 1997, pp. 13-15).



**Table 4.2-2 Project Size Scoring**

LCC Class I or II soils		LCC Class III soils		LCC Class IV or lower	
Acreage	Points	Acreage	Points	Acreage	Points
80 or above	100	160 or above	100	320 or above	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
Fewer than 10	0	20-39	30	Fewer than 40	0
		10-19	10		
		Fewer than 10	0		

(CDC, 1997)

**Water Resource Availability Scoring**

The Water Resources Availability rating measures the reliability of a property’s water resources that could be used for agricultural production during non-drought and drought years (water availability score) and the proportion of the property served by each water source (weighted availability score). The water availability score established by the California LESA Model is summarized in Table 4.2-3, *Water Resources Availability Scoring*. The total Water Resources score is the sum of the weighted availability score(s). The Water Resources Availability score accounts for 15 percent of the total California LESA Score (CDC, 1997, pp. 16, 29).

**Surrounding Agricultural Land**

The Surrounding Agricultural Land rating accounts for the potential effect of development on properties containing important agricultural resources that surround a project site. The Surrounding Agricultural Land rating is dependent on the amount of agricultural land or related open space within a project’s “Zone of Influence” (ZOI). The ZOI is determined by drawing the smallest rectangle that will completely contain the Project site on a map (Rectangle A) and creating a second rectangle that extends 0.25-mile beyond Rectangle A on all sides (Rectangle B). All parcels that are within or intersected by Rectangle B are included within the project’s ZOI (CDC, 1997, pp. 23-25). The ZOI for the Project site is illustrated on Figure 4.2-2, *Zone of Influence*.

The Surrounding Agricultural Land rating is determined by the proportion of land within a project’s ZOI that is currently used for agricultural production. The Surrounding Agricultural Land score established by the California LESA Model is summarized in Table 4.2-4, *Surrounding Agricultural Land Score*. Data for surrounding agricultural land can be obtained from the Department of Conservation’s Important Farmland Map Series, the Department of Water Resources’ Land Use Map Series, locally derived maps, and/or inspection of the site. The surrounding agricultural land score accounts for 15 percent of the total California LESA Model Score (CDC, 1997, pp. 26, 29).



**Table 4.2-3 Water Resources Availability Scoring**

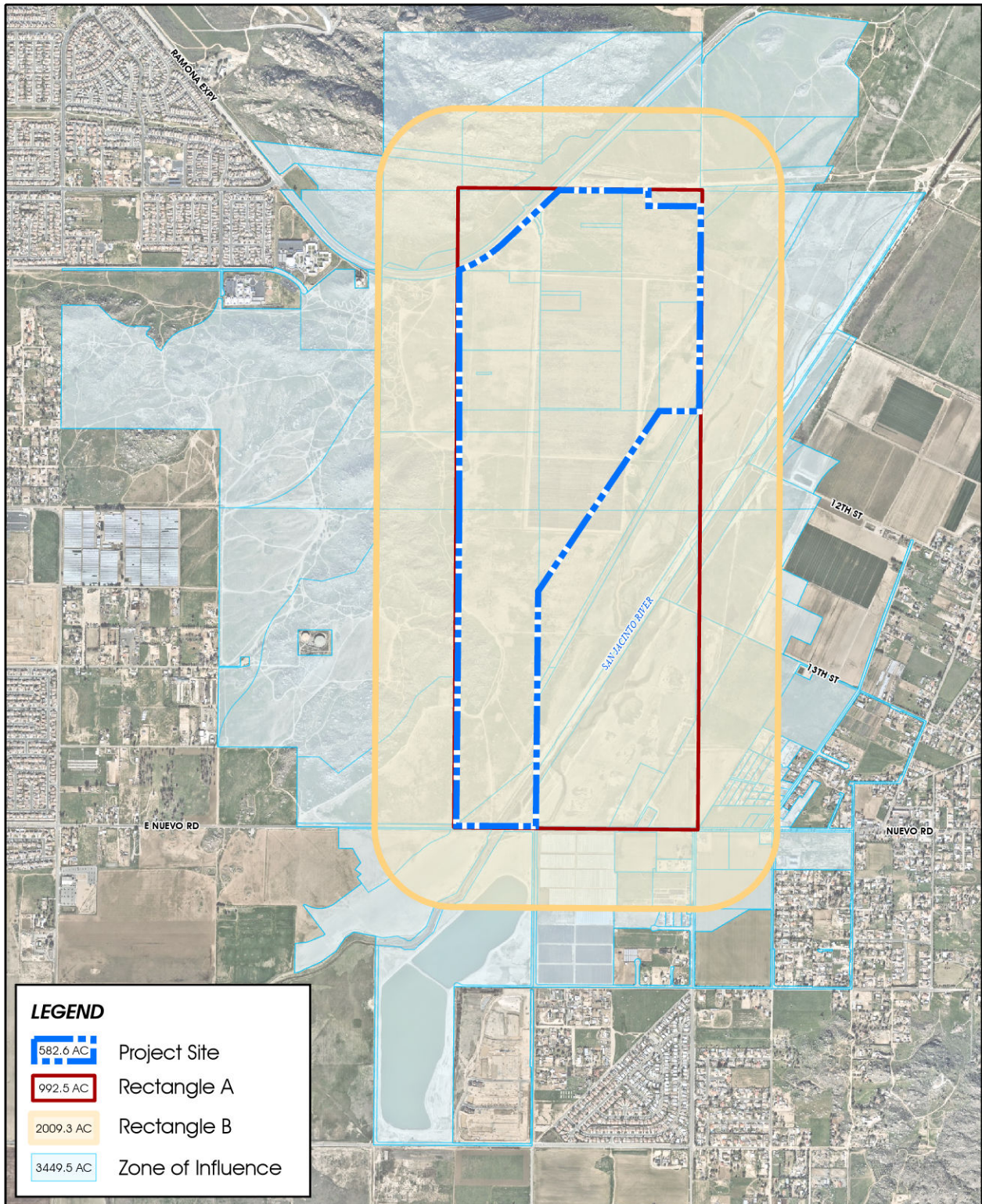
Non-Drought Years			Drought Years			SCORE
Restrictions			Restrictions			
Irrigation Feasible	Physical Restrictions	Economic Restrictions	Irrigation Feasible	Physical Restrictions	Economic Restrictions	
YES	NO	NO	YES	NO	NO	100
YES	NO	NO	YES	NO	YES	95
YES	NO	YES	YES	NO	YES	90
YES	NO	NO	YES	YES	NO	85
YES	NO	NO	YES	YES	YES	80
YES	YES	NO	YES	YES	NO	75
YES	YES	YES	YES	YES	YES	65
YES	NO	NO	NO	-- --	-- --	50
YES	NO	YES	NO	-- --	-- --	45
YES	YES	NO	NO	-- --	-- --	35
YES	YES	YES	NO	-- --	-- --	30
Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
Neither irrigated nor dry land production feasible						0

(CDC, 1997)

**Table 4.2-4 Surrounding Agricultural Land Score**

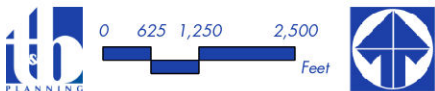
Percent of Project's ZOI in Agricultural Use	Surrounding Agricultural Land Score
90 – 100 percent	100 Points
80 – 89	90
75 – 79	80
70 – 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
<40	0

Source: (CDC, 1997)



Source(s): ESRI, NearMap (2023), RCTLMA (2023)

Figure 4.2-2



**Zone of Influence**



**Surrounding Protected Resource Land**

Similar to the Surrounding Agricultural Land rating, the California LESA Model considers the potential effect of development on protected resource lands surrounding a project site. Protected resource lands include Williamson Act contracted lands, publicly owned lands maintained as park, forest, or watershed resources, and lands with natural resource easements (e.g., agricultural, wildlife habitat, open space).

The Surrounding Protected Resource Land rating is determined by the proportion of protected resource lands within a project’s ZOI. The Surrounding Protected Resource Land scoring system established by the California LESA Model is summarized in Table 4.2-5, *Surrounding Protected Resource Land Score*. The Surrounding Protected Resource Land score accounts for 5 percent of the total California LESA Score (CDC, 1997, pp. 28-29).

**Table 4.2-5 Surrounding Protected Resource Land Score**

Percent of Project’s ZOI Defined as Protected	Surrounding Protected Resource Land Score (Points)
90 – 100	100
80 – 89	90
75 – 79	80
70 – 74	70
65 - 69	60
60 - 64	50
55 - 59	40
50 - 54	30
45 - 49	20
40 - 44	10
<40	0

Source: (CDC, 1997)

**4.2.5 IMPACT ANALYSIS**

**Threshold a.:** *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

**A. FMMP Classifications**

As mapped by the CDC’s FMMP, the Project site is mapped as containing approximately 535.1 acres of “Farmland of Local Importance” and 47.6 acres of Grazing Land. As previously noted, “Grazing Land” and “Farmland of Local Importance” are not considered “Farmland,” as that term is defined by Appendix G to the State CEQA Guidelines, the County or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other “Farmland” as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-



agricultural use. Implementation of the proposed Project would result in direct and indirect impacts to up to 482.9 acres of the Project site, the majority of which is mapped as containing Farmland of Local Importance. Thus, based on FMMP mapping, the Project would not result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance (Farmland) to a non-agricultural use.

## **B. LESA Model**

As previously noted, a site-specific LESA Analysis was prepared for the Project, and is included as EIR *Technical Appendix S*. The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources and assist in the determination of the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993) and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process (CDC, 1997, p. 4). The California LESA Model is the methodology used by the County of Riverside to determine whether important agricultural resources are present on a property. Provided below is a summary of the results of the Project's LESA Analysis.

### **1. Land Evaluation (LE)**

The LE subscore measures the agricultural suitability of soils identified on a property by using the LCC Rating and Storie Index for each present soil map unit. The Project study area consists of fifteen (15) soil map units including: Cieneba sandy loam, 8 to 15 percent slopes, eroded (ChD2), Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded (CkF2), Fallbrook sandy loam, 8 to 15 percent slopes, eroded (FaD2), Greenfield sandy loam, 2 to 8 percent, eroded (GyC2), Hanford coarse sandy loam, 2 to 8 percent slopes (HcC), Hanford coarse sandy loam 8 to 15 percent slopes, eroded (HcD2), Monserate sandy loam, 8 to 15 percent slopes, eroded (MmD2), Ramona sandy loam, 5 to 8 percent slopes, eroded (RaC2), Riverwash (RsC), Rockland (RtF), Vista coarse sandy loam, 8 to 15 percent slopes, eroded (VsD2), Vista rocky coarse sandy loam, 2 to 35 percent slopes, eroded (VtF2), Willows silty clay (Wf), Willows silty clay, saline-alkali (Wg), and Willows silty clay, deep, strongly saline-alkali (Wn).

#### **Land Capability Classification**

Refer to Table 4.2-6, *Land Capability Classification Score*, below, for the LCC Scores of the Project site. The Project site's overall LCC Score is 56.7.

#### **Storie Index**

Refer to Table 4.2-7, *Storie Index Score*, below, for the total Storie Index scores for the Project site. The Project site's overall Storie Index score is 71.5.





**Table 4.2-6 Land Capability Classification Score**

Soil Map Unit	Acres	Proportion of Project Site (percent)	LCC	LCC Rating	LCC Score
ChD2	2.1	0.4	VIe	20	0.08
CkF2	19.3	3.3	VIIe	10	0.33
FaD2	14.5	2.5	IVe	50	1.3
GyC2	251.1	43.1	IIIe	70	30.2
HcC	145.7	25.0	IIIe	70	17.5
HcD2	47.6	8.2	IVe	20	1.6
MmD2	9.6	1.6	IVe	50	0.8
RaC2	23.9	4.1	IIIe	70	3.3
RsC	4.5	0.8	VIII	0	0.0
RtF	0.1	0.0	VIII	0	0.0
VsD2	3.4	0.6	IVe	50	0.3
VtF2	4.7	0.8	VIe	20	0.18
Wf	2.2	0.4	IVw	40	0.16
Wg	10.3	1.8	IVw	40	0.96
Wn	43.5	7.5	VIIw	10	0.76
<b>Totals</b>	<b>582.6</b>	<b>100<sup>1</sup></b>			<b>56.7</b>

<sup>1</sup>Rounded to the nearest 10<sup>th</sup>.

The non-irrigated LCC was utilized because under existing conditions, the Project site does not have an irrigation system. (USDA, 2023)

**Table 4.2-7 Storie Index Score**

Soil Map Unit	Acres	Proportion of Project Site (percent)	Storie Index	Storie Index Score
ChD2	2.1	0.4	24	0.96
CkF2	19.3	3.3	18	0.59
FaD2	14.5	2.5	42	1.0
GyC2	251.1	43.1	87	37.5
HcC	145.7	25.0	82	20.5
HcD2	47.6	8.2	75	6.2
MmD2	9.6	1.6	28	0.45
RaC2	23.9	4.1	86	3.5
RsC	4.5	0.8	0	0.0
RtF	0.1	0.0	0	0.0
VsD2	3.4	0.6	40	0.24
VtF2	4.7	0.8	37	0.30
Wf	2.2	0.4	11	0.04
Wg	10.3	1.8	11	0.20
Wn	43.5	7.5	11	0.83
<b>Totals</b>	<b>582.6</b>	<b>100<sup>1</sup></b>		<b>71.5</b>

<sup>1</sup>Rounded to the nearest 10<sup>th</sup>.

(USDA, 2023)



**2. Site Assessment (SA)**

As previously noted, the SA subscore is based on a combination of a property’s size, the availability of water resources, the presence/absence of surrounding agricultural lands, and the presence/absence of surrounding protected resource lands.

**Project Size**

Refer to Table 4.2-8, *Project Size Score*, below, for the total Project Size scores for the Project site. The Project’s overall Project Size score is 100.

**Table 4.2-8 Project Size Score**

	Soil Class		
	LCC Class I-II	LCC Class III	LCC Class IV-VIII
Acres of Project site	0.0	420.7	161.9
<b>Project Size Scores</b>	<b>0</b>	<b>100</b>	<b>60</b>

*Refer to Table 4.2-2 for Project Size Scoring, which is based on LCC Class and acreage.*  
(USDA, 2023)

**Water Resource Availability**

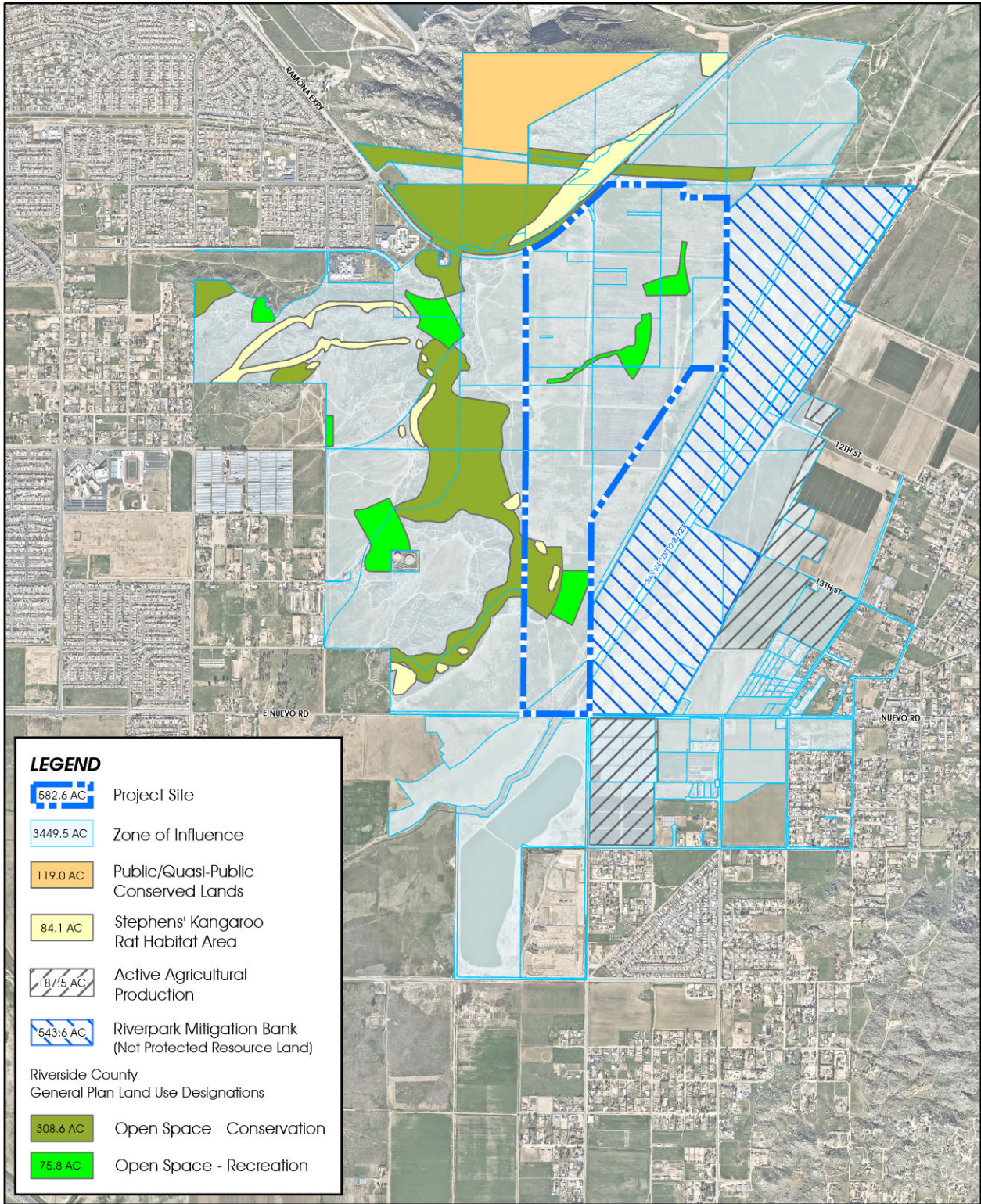
The Project site does not have existing irrigation systems; therefore, the California LESA model considers irrigated production to be infeasible on the Project site (CDC, 1997, p. 18). Notwithstanding, the LESA Model analyzes the potential for dryland production. The County is characterized as having an arid climate and receives little rainfall throughout the year. The average annual precipitation in the general Project site vicinity is approximately 11 inches (Best Places, 2023). Dryland farming can be productive with as little as 10-12 inches of rain per year (CAWSI, 2022). Accordingly, at the Project site, dryland farming is considered feasible during normal years but not feasible during drought years, which corresponds to Water Resources Availability scores of 20 (refer to Table 4.2-3).

**Surrounding Agricultural Land**

The Surrounding Agricultural Land score is dependent on the presence or absence of active agricultural production land within a project’s ZOI. Figure 4.2-3, *Surrounding Agricultural and Protected Resources Land*, illustrates the active agricultural production lands in the ZOIs for the Project site. Table 4.2-9, *Surrounding Agricultural Land Score*, summarizes the Surrounding Agricultural Land score for the Project site; the Project site’s Surrounding Agricultural Land score is 0.

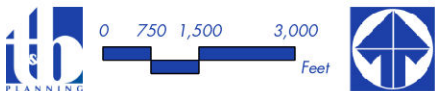
**3. Total LESA Score**

The total LESA Score is calculated by summing the Project site’s LE and SA subscores. The Project site’s LESA subscores are summarized in Table 4.2-10, *Total LESA Score Sheet – Project Site*. The Project site’s final LESA score is 50.1. As shown in Table 4.2-11, *California LESA Model Scoring Thresholds*, impacts to land that receives a LESA score between 40 and 59 are considered significant under CEQA if the LE and SA subscores are each greater than or equal to 20 points. As shown in Table 4.2-10, the Project’s LE score is 32.1



Source(s): ESRI, NearMap (2023), RCTLMA (2023), CA Department of Conservation (2018)

Figure 4.2-3



**Surrounding Agricultural & Protected Resources Land**



**Table 4.2-9 Surrounding Agricultural Land Score**

Zone of Influence			Surrounding Agricultural Land Score
Total Acres	Acres of Surrounding Agricultural Land	Percent Surrounding Agricultural Land	
3,449.5	187.5	5.4	0

**Table 4.2-10 Total LESA Score Sheet – Project Site**

	Factor Scores	Factor Weight	Weighted Factor Scores
<b>LE Factors</b>			
LCC	56.7	0.25	14.2
Storie Index	71.5	0.25	17.9
<i>LE Subtotal</i>			<i>32.1</i>
<b>SA Factors</b>			
Project Size	100.0	0.15	15.0
Water Resource Availability	20.0	0.15	3.0
Surrounding Agricultural Land	0.0	0.15	0.0
Protected Resource Land	0.0	0.05	1.5
<i>SA Subtotal</i>			<i>18.0</i>
<b>Final LESA Score</b>			<b>50.1</b>

(T&B Planning, 2023b, Table 4-6)

**Table 4.2-11 California LESA Model Scoring Thresholds**

Total LESA Score	Scoring Decision
0 to 39	Not Considered Significant
<b>40 to 59</b>	<b>Considered Significant <u>only</u> if LE <u>and</u> SA subscores are <u>each</u> greater than or equal to 20 points</b>
60 to 79	Considered Significant <u>unless</u> either LE <u>or</u> SA subscore is <u>less</u> than 20 points
80 to 100	Considered Significant

(CDC, 1997, Table 9)

**C. Conclusion**

As indicated in the preceding analysis, the Project only would result in impacts to approximately 482.9 acres Farmland of Local Importance and Grazing Land, neither of which comprise “Farmland,” as that term is defined by Appendix G to the State CEQA Guidelines, the County or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other “Farmland” as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Even if “Farmland” included Farmland of Local Importance and Grazing Land, based on the Project’s LESA Analysis (*Technical Appendix S*), all of the Project’s impacts on Farmland still would be less than significant. The Project site’s final LESA score is 50.1, with an LE score of



32.1 and an SA score of 18.0. Thus, because the SA score is not greater than or equal to 20, the Project site is determined to have a relatively low value for agricultural production, indicating that the Project site does not contain any areas of important farmland types, and therefore, conversion of the Project site's Farmland of Local Importance and Grazing Land to non-agricultural use would be less than significant. Accordingly, 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, and impacts would be less than significant.

***Threshold b.: Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?***

Under existing conditions, the 582.6-acre Project site is located within an adopted specific plan (SP 239), and zoning requirements are as established by the zoning ordinance adopted in conjunction with SP 239. Specifically, the Project site is located within the Stoneridge Commerce Center Specific Plan No. 239 (SP 239), which designates the Project site with a mixture of mixed-use, commercial retail, residential, recreational, and open space land uses, with no agricultural designations applied to the Project site. Moreover, according to Riverside County GIS the nearest agriculturally-zoned property, which is zoned for "Light Agriculture, 20-acre minimum lot size (A-1-20)" occurs approximately 0.3-mile (1,505 feet) west of the Project site, and this property is not used for agricultural production under existing conditions. Due to distance to the nearest agriculturally-zoned property, there are no components of the Project that have the potential to adversely affect agricultural uses on the nearest agriculturally-zoned property. Therefore, the Project would not conflict with existing agricultural zoning, and impacts would be less than significant. (RCIT, n.d.; Google Earth, 2021)

Although the Project site has been used for agricultural production in the past, the site has not been used for agricultural production since the 1980s. Thus, the Project would not directly conflict with existing agricultural uses. Existing agricultural uses occur to the west, south, and east of the Project site, with the nearest agricultural use occurring immediately to the southeast of the southeastern corner of the Project site. However, the portion of the Project site nearest to this existing off-site agricultural use are planned as open space as part of the Project. Areas proposed for light industrial uses on site would occur approximately 0.2-mile (1,220 feet) northwest of the nearest existing agricultural use. Furthermore, the light industrial land uses proposed in the southern portions of the Project site generally are considered to be a compatible use with agricultural activities. There are no components of the proposed Project that could result in indirect impacts to off-site agricultural uses such that agricultural use of off-site properties would be adversely affected. Accordingly, Project impacts to existing agricultural uses would be less than significant.

According to Riverside County GIS, the Project site is not included in any agricultural preserves, and is not subject to a Williamson Act Contract. Thus, the Project would not result in any direct impacts to agricultural preserves or Williamson Act-contracted lands. The nearest Williamson Act contracted land occurs approximately 4.3 miles west of the Project site, while the nearest agricultural preserve land occurs approximately 0.6 mile southwest of the Project site, south of Nuevo Road. There are no components of the



proposed Project that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant.

***Threshold c.: Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 “Right-to-Farm”)?***

Pursuant to Riverside County Ordinance No. 625, “agriculturally-zoned property” includes lands that are zoned for “Light Agriculture (A-1 Zone),” “Light Agriculture with Poultry (A-P Zone),” “Heavy Agriculture (A-2 Zone),” “Agriculture-Dairy (A-D Zone),” and “Citrus/Vineyard (C/V Zone).” According to Riverside County GIS, there are no lands within 300 feet of the Project site that are zoned for A-1, A-P, A-2, A-D, or C/V. The nearest agriculturally-zoned property occurs approximately 0.3-mile (1,505 feet) west of the Project site. Therefore, the Project would not cause development of non-agricultural uses within 300 feet of agriculturally-zoned property, and no impact would occur.

***Threshold d.: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?***

Aside from the Project’s less-than-significant impacts to “Farmland” as discussed under the analysis of Threshold a., there are no components of the Project that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. Although agricultural uses occur in the Project vicinity (refer to the discussion of Threshold a.), there are no components of the proposed Project that could indirectly affect these existing agricultural uses. Additionally, the light industrial, business park, and commercial retail land uses proposed as part of the Project generally are considered to be compatible with agricultural uses. Thus, the Project would not result in any other changes to the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, and impacts would be less than significant.

***Threshold e.: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Govt. Code section 51104(g))?***

***Threshold f.: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

***Threshold g.: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?***

The Project site and surrounding areas are not zoned for 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)) (RCIT, n.d.). As such, the Project has no potential to conflict with such zoning, and no impact would occur.



According to Figure 4.5.2 (Forestry Resources Western Riverside County) of Riverside County EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update, the Project site and surrounding areas do not contain any forest resources (Riverside County, 2015a, Figure 4.5.2). Based on a review of aerial imagery, there are no forest-related uses within the vicinity of the Project site (Google Earth, 2021). As such, the Project has no potential to result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

Furthermore, the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use. No impact would occur.

#### 4.2.6 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the evaluation of potential impacts to agriculture and forestry resources includes all of western Riverside County. Lands within western Riverside County generally exhibit similar climate, geologic, and soil characteristics, and agricultural production is evaluated by Riverside County and the State of California at the County level. Additionally, agricultural lands throughout western Riverside County are subject to future development that would preclude agricultural uses, based on the various land use designations applied to lands throughout western Riverside County by the County's General Plan.

As discussed under Threshold a., implementation of the proposed Project would result in direct and indirect impacts to up to 482.9 acres of the Project site, the majority of which is mapped as containing Farmland of Local Importance with the remaining areas being mapped Grazing Land. Additionally, based on the Project's LESA Analysis, the Project site is determined to have a relatively low value for agricultural production, further demonstrating that the Project site does not contain any areas of important farmland types. Although it is possible that cumulative developments could result in significant impacts to important farmland types, the Project would not impact any important farmland types and therefore Project impacts would be less than significant on a cumulatively-considerable basis.

As there are no lands zoned primarily for agricultural use abutting the Project site, the Project would not result in a conflict with existing agricultural zoning, and impacts would therefore be less-than-cumulatively considerable. The Project site also does not contain any agricultural uses under existing conditions, the Project site is not located within a Riverside County Agricultural Preserve, and the site is not subject to a Williamson Act contract. There are no components of the proposed Project that could indirectly affect nearby Agricultural Preserves or Williamson Act-contracted lands. Therefore, Project impacts due to a conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve would be less-than-cumulatively considerable.

There are no lands within 300 feet of the Project site that are zoned for A-1, A-P, A-2, A-D, or C/V. The nearest agriculturally-zoned property occurs approximately 0.3-mile (1,505 feet) west of the Project site. Therefore, impacts due to development of non-agricultural uses within 300 feet of agriculturally-zoned property would be less-than-cumulatively considerable.



There are no components of the proposed Project that could indirectly result in the conversion of nearby Farmland to non-agricultural uses, beyond the direct and indirect impacts to on-site Farmlands. As such, Project impacts due to such conversion would be less-than-cumulatively considerable.

There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. Cumulatively-considerable impacts would not occur.

#### 4.2.7 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project would result in impacts to approximately 482.9 acres Farmland of Local Importance and Grazing Land, neither of which comprise “Farmland,” as that term is defined by CEQA, the County or the CDC, meaning that the Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other “Farmland” as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Even if “Farmland” included Farmland of Local Importance and Grazing Land, based on the Project’s LESA Analysis (*Technical Appendix S*), all of the Project’s impacts on Farmland still would be less than significant. The Project site’s final LESA score is 50.1, with an LE score of 32.1 and an SA score of 18.0. Thus, because the SA score is not greater than or equal to 20, the Project site is determined to have a relatively low value for agricultural production, indicating that the Project site does not contain any areas of important farmland types, and therefore, conversion of the Project site’s Farmland of Local Importance and Grazing Land to non-agricultural use would be less than significant. Accordingly, 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, and impacts would be less than significant.

Threshold b.: Less-than-Significant Impact. Due to distance to the nearest agriculturally-zoned property, there are no components of the Project that have the potential to adversely affect agricultural uses on the nearest agriculturally-zoned property. Therefore, the Project would not conflict with existing agricultural zoning, and impacts would be less than significant. There are no components of the proposed Project that could result in indirect impacts to off-site agricultural uses such that agricultural use of off-site properties would be adversely affected. Accordingly, Project impacts to existing agricultural uses would be less than significant. Additionally, the Project site is not subject to a Williamson Act contract and is not located within any County Agricultural Preserves, and there are no components of the proposed Project that have the potential to adversely affect agricultural operations at the nearest agricultural preserve/Williamson Act-contracted lands. As such, Project impacts to agricultural preserves and Williamson Act-contracted lands would be less than significant.

Threshold c.: No Impact. There are no lands within 300 feet of the Project site that are zoned primarily for agricultural use, as defined by Ordinance No. 625. As such, the Project would not cause development of non-agricultural uses within 300 feet of agriculturally-zoned property, and no impact would occur.





Threshold d.: Less-than-Significant Impact. The Project would not result in any other changes to the existing environment that could result in the conversion of off-site Farmland to non-agricultural use, and impacts would be less than significant.

Thresholds e., f., and g.: No Impact. There are no forest lands in the Project vicinity, and no lands in the Project vicinity are zoned for timberland, timberland production, or forest uses. The Project would not result in the conversion of forest land to non-forest use. No impact would occur.

#### **4.2.8 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- In the event that zoning changes are approved in the Project vicinity to establish new agriculturally-zoned lands as defined by Riverside County Ordinance No. 625, the provisions of Ordinance No. 625 would apply. Ordinance No. 625 requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are on-going in the area, and mandate that such agricultural uses shall not be the subject of nuisance complaints.

##### ***Mitigation***

Impacts to Agriculture and Forestry Resources would be less than significant; therefore, no mitigation measures are required.



## 4.3 AIR QUALITY

This Subsection is based on two technical reports prepared by Urban Crossroads, Inc. (Urban Crossroads). The first report addresses the Project’s regional and localized impacts to air quality, is entitled, “Stoneridge Commerce Center Specific Plan Air Quality Impact Analysis” (herein, “AQIA”), is dated July 28, 2023, and is included as *Technical Appendix B1* to this EIR (Urban Crossroads, 2023a). The second report addresses the Project’s potential to result health risk impacts to nearby sensitive receptors, is entitled, “Stoneridge Commerce Center Specific Plan Mobile Source Health Risk Assessment” (herein, “HRA”), is dated July 28, 2023, and is included as *Technical Appendix B2* to this EIR (Urban Crossroads, 2023b). Refer to Section 7.0, *References*, for a complete list of reference sources. As set forth in more detail in Section S.0, *Executive Summary*, Section 1.0, *Introduction*, and Section 3.0, *Project Description*, this Section 4.3, *Air Quality*, has been revised and recirculated, along with the above-referenced revised and update technical reports, to address third party comments received during previous public review of the EIR, and analyze the revised Project, which results in less development and significantly reduces impacts on the environment, including impacts due to air quality emissions.

### 4.3.1 EXISTING CONDITIONS

#### A. South Coast Air Basin (SCAB)

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of SCAQMD. 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. The Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. 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, and the San Diego Air Basin to the south. (Urban Crossroads, 2023a, p. 14)

#### B. Regional Climate

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality. The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F. (Urban Crossroads, 2023a, p. 14)

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO<sub>2</sub>) to sulfates (SO<sub>4</sub>) 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. The annual average relative



humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. (Urban Crossroads, 2023a, p. 14)

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast. (Urban Crossroads, 2023a, p. 14)

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year, there are approximately 10 hours of possible sunshine, and on the longest day of the year, there are approximately 14½ hours of possible sunshine. (Urban Crossroads, 2023a, p. 15)

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections. (Urban Crossroads, 2023a, p. 15)

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. (Urban Crossroads, 2023a, p. 15)

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 the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean



sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline. (Urban Crossroads, 2023a, p. 15)

### **C. Wind Patterns**

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season. (Urban Crossroads, 2023a, pp. 15-16)

### **D. Criteria Pollutants**

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

#### **1. Carbon Monoxide (CO)**

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO emissions come from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating. CO concentrations tend to be highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone (O<sub>3</sub>), motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. (Urban Crossroads, 2023a, Table 2-1)

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O<sub>2</sub>) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with O<sub>2</sub> transport and competing with O<sub>2</sub> to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for O<sub>2</sub> 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 (O<sub>2</sub> deficiency) as seen at high altitudes. (Urban Crossroads, 2023a, Table 2-1)

#### **2. Sulfur Oxides (SO<sub>x</sub>)**

Sulfur dioxide (SO<sub>2</sub>) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO<sub>2</sub> oxidizes in the atmosphere, it forms SO<sub>4</sub>. Collectively, these



pollutants are referred to as sulfur oxides (SO<sub>x</sub>). Sources of SO<sub>x</sub> include coal or oil burning power plants and industries, refineries, and diesel engines. (Urban Crossroads, 2023a, Table 2-1)

A few minutes of exposure to low levels of SO<sub>2</sub> 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 SO<sub>2</sub>. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO<sub>2</sub>. Animal studies suggest that despite SO<sub>2</sub> being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO<sub>2</sub> levels. In these studies, efforts to separate the effects of SO<sub>2</sub> 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. (Urban Crossroads, 2023a, Table 2-1)

### 3. Nitrogen Oxides (NO<sub>x</sub>)

Nitrogen Oxides (NO<sub>x</sub>) consist of nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>), and nitrous oxide (N<sub>2</sub>O) and are formed when nitrogen (N<sub>2</sub>) combines with O<sub>2</sub>. Their lifespan in the atmosphere ranges from one to seven days for NO and NO<sub>2</sub>, to 170 years for N<sub>2</sub>O. NO<sub>x</sub> are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO<sub>x</sub> result from any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating. NO<sub>2</sub> is a criteria air pollutant and may result in numerous adverse health effects. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of NO<sub>x</sub> compounds, NO<sub>2</sub> is the most abundant in the atmosphere. As ambient concentrations of NO<sub>2</sub> are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO<sub>2</sub> than those indicated by a regional monitoring station. (Urban Crossroads, 2023a, Table 2-1)

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO<sub>2</sub> 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 NO<sub>2</sub> 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. In animals, exposure to levels of NO<sub>2</sub> considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of Ozone (O<sub>3</sub>) exposure increases when animals are exposed to a combination of O<sub>3</sub> and NO<sub>2</sub>. (Urban Crossroads, 2023a, Table 2-1)

### 4. Ozone (O<sub>3</sub>)

O<sub>3</sub> is a highly reactive and unstable gas that is formed when reactive organic gases (ROG) and NO<sub>x</sub>, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of



sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing, and storage and pesticides. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant. (Urban Crossroads, 2023a, Table 2-1)

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for O<sub>3</sub> effects. Short-term exposure (lasting for a few hours) to O<sub>3</sub> 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 O<sub>3</sub> levels are associated with increased school absences. In recent years, a correlation between elevated ambient O<sub>3</sub> levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and live in communities with high O<sub>3</sub> levels. O<sub>3</sub> exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O<sub>3</sub> may be more toxic than exposure to O<sub>3</sub> 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. (Urban Crossroads, 2023a, Table 2-1)

## 5. *Particulate Matter (PM)*

Particulate matter (PM) includes inhalable particles with diameters that are generally 10 micrometers and smaller, which are referred to as PM<sub>10</sub>, and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller, which are referred to as PM<sub>2.5</sub>. (Urban Crossroads, 2023a, Table 2-1)

PM<sub>10</sub> is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Sources of PM<sub>10</sub> include road dust, windblown dust, and construction. PM<sub>10</sub> also is formed from other pollutants (acid rain, NO<sub>x</sub>, SO<sub>x</sub>, and organics), and from the incomplete combustion of any fuel. Particulate matter pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction of air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, PM<sub>10</sub> is a criteria air pollutant. (Urban Crossroads, 2023a, Table 2-1)

PM<sub>2.5</sub> is a similar air pollutant to PM<sub>10</sub> consisting of tiny solid or liquid particles that are 2.5 microns or smaller (often referred to as fine particles). PM<sub>2.5</sub> comes from fuel combustion in motor vehicles, equipment, and industrial sources, and residential and agricultural burning. PM<sub>2.5</sub> also is formed from reaction of other pollutants (acid rain, NO<sub>x</sub>, SO<sub>x</sub>, and organics). These particles are formed in the atmosphere from primary gaseous emissions that include SO<sub>4</sub> formed from SO<sub>2</sub> release from power plants and industrial facilities and nitrates that are formed from NO<sub>x</sub> release 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. PM<sub>2.5</sub> is a criteria air pollutant. (Urban Crossroads, 2023a, Table 2-1)



A consistent correlation between elevated ambient fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) 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 lifespan, and an increased mortality from lung cancer. Daily fluctuations in PM<sub>2.5</sub> concentration levels have also 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, people with preexisting respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM<sub>10</sub> and PM<sub>2.5</sub>. (Urban Crossroads, 2023a, Table 2-1)

## 6. *Volatile Organic Compounds (VOCs)*

Volatile Organic Compounds (VOCs) are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O<sub>3</sub> to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide (CO<sub>2</sub>), carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O<sub>3</sub>, which is a criteria pollutant. The terms VOC and ROG (as discussed below) are used interchangeably. (Urban Crossroads, 2023a, Table 2-1)

Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing, and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while in use, and, to some degree, when they are stored. (Urban Crossroads, 2023a, Table 2-1)

Breathing VOCs can irritate the eyes, nose, and throat; can cause difficulty breathing and nausea; and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several. (Urban Crossroads, 2023a, Table 2-1)

## 7. *Reactive Organic Gases (ROGs)*

Similar to VOCs, Reactive Organic Gases (ROGs) are also precursors in forming O<sub>3</sub> and consist of compounds containing methane (CH<sub>4</sub>), ethane (C<sub>2</sub>H<sub>6</sub>), propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO<sub>x</sub> react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O<sub>3</sub>, which is a criteria pollutant. The terms ROG and VOC (see above discussion) are used interchangeably. Sources of ROGs and health effects of ROGs are similar to VOCs, and are described above. (Urban Crossroads, 2023a, Table 2-1)



## 8. *Lead (Pb)*

Lead (Pb) is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions include ore and metals processing, particularly Pb smelters; resource recovery; the deterioration of Pb-based paints; and leaded gasoline use and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. (Urban Crossroads, 2023a, Table 2-1)

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotients. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb 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 Pb because of previous environmental Pb exposure of their mothers. (Urban Crossroads, 2023a, Table 2-1)

## 9. *Odor*

Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves. Odors can come from many sources including animals, human activities, industry, nature, and vehicles. (Urban Crossroads, 2023a, Table 2-1)

Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress. (Urban Crossroads, 2023a, Table 2-1)

### ***E. 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. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 4.3-1, *Ambient Air Quality Standards*. (Urban Crossroads, 2023a, p. 23)

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards. The most recent State and federal standards were updated by CARB on May 4, 2016 and are presented in Table 4.3-1. The air quality in a region





is considered to be in attainment by the state if the measured ambient air pollutant levels for O<sub>3</sub>, CO (except 8-hour Lake Tahoe), SO<sub>2</sub> (1 and 24 hour), NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are not to be exceeded. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) is drafted by CARB. The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area. (Urban Crossroads, 2023a, p. 23)

### **1. Regional Air Quality**

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O<sub>3</sub>, particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), NO<sub>2</sub>, and SO<sub>2</sub> which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On January 5, 2021, CARB posted the 2020 amendments to the State and national area designations. See Table 4.3-2, *Attainment Status of Criteria Pollutants in the SCAB*, for attainment designations for the SCAB. Appendix 2.1 to the Project's AQIA (*EIR Technical Appendix B1*) provides geographic representation of the State and federal attainment status for applicable criteria pollutants within the SCAB. (Urban Crossroads, 2023a, p. 26)

### **F. Local Air Quality**

SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district in order to provide Southern California residents about the air quality conditions. The Project site is located within the Perris Valley area (SRA 24). The Perris Valley monitoring station is located approximately 3.8 miles southwest of the Project site and reports air quality statistics for O<sub>3</sub> and PM<sub>10</sub>. The Metropolitan Riverside County monitoring station, which is located 18.7 miles northwest of the Project site in SRA 23, records air quality data for CO, NO<sub>2</sub>, and PM<sub>2.5</sub>. It should be noted that data from Metropolitan Riverside County monitoring station was utilized in lieu of the Perris Valley monitoring station only in instances where data was not available. The most recent three (3) years of data available is shown on Table 4.3-3, *Project Area Air Quality Monitoring Summary (2019-2021)*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Development Site. Data for O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for 2019 through 2021 was obtained from the SCAQMD Air Quality Data Tables. Additionally, data for SO<sub>2</sub> has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO<sub>2</sub> concentrations. (Urban Crossroads, 2023a, pp. 26-27)



Table 4.3-1 Ambient Air Quality Standards

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> ) <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	—	—	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>11</sup>	—	
Lead <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	<b>No National Standards</b>		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

See footnotes on next page ...

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**Table 4.3-1 Ambient Air Quality Standards (Cont'd)**

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from  $15 \mu\text{g}/\text{m}^3$  to  $12.0 \mu\text{g}/\text{m}^3$ . The existing national 24-hour PM2.5 standards (primary and secondary) were retained at  $35 \mu\text{g}/\text{m}^3$ , as was the annual secondary standard of  $15 \mu\text{g}/\text{m}^3$ . The existing 24-hour PM10 standards (primary and secondary) of  $150 \mu\text{g}/\text{m}^3$  also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.  
  
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990  
(Urban Crossroads, 2023a, Table 2-2)

California Air Resources Board (5/4/16)



**Table 4.3-2 Attainment Status of Criteria Pollutants in the SCAB**

Criteria Pollutant	State Designation	Federal Designation
O <sub>3</sub> – 1-hour standard	Nonattainment	--
O <sub>3</sub> – 8-hour standard	Nonattainment	Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO <sub>2</sub>	Attainment	Unclassifiable/Attainment
SO <sub>2</sub>	Attainment	Unclassifiable/Attainment
Pb <sup>1</sup>	Attainment	Unclassifiable/Attainment

1. The federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB. Note: See Appendix 2.1 to the Building 13 AQIA (*Technical Appendix B1*) for a detailed map of State/National Area Designations within the SCAB.

--“ = The national 1-hour O<sub>3</sub> standard was revoked effective June 15, 2005.

(Urban Crossroads, 2023a, Table 2-3)

**G. Regional Air Quality Improvement**

The Project is within the jurisdiction of the SCAQMD. In 1976, California adopted the Lewis Air Quality Management Act which created SCAQMD from a voluntary association of air pollution control districts in Los Angeles, Orange, Riverside, and San Bernardino counties. The geographic area of which SCAQMD consists of is known as the SCAB. SCAQMD develops comprehensive plans and regulatory programs for the region to attain federal standards by dates specified in federal law. The agency is also responsible for meeting state standards by the earliest date achievable, using reasonably available control measures. (Urban Crossroads, 2023a, pp. 32-33)

SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SCAB air quality. 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 SCAB, such as is occurring here. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. (Urban Crossroads, 2023a, p. 33)

As discussed above, the SCAQMD is the lead agency charged with regulating air quality emission reductions for the entire SCAB. SCAQMD created AQMPs which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SCAB. The 2012 AQMP states, “the remarkable historical improvement in air quality since the 1970’s is the direct result of Southern California’s comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs.” (Urban Crossroads, 2023a, p. 33)



**Table 4.3-3 Project Area Air Quality Monitoring Summary (2019-2021)**

Pollutant	Standard	Year		
		2019	2020	2021
<b>O<sub>3</sub></b>				
Maximum Federal 1-Hour Concentration (ppm)		0.118	0.125	0.117
Maximum Federal 8-Hour Concentration (ppm)		0.095	0.106	0.094
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	26	34	25
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	64	74	60
<b>CO</b>				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.5	1.9	2.1
Maximum Federal 8-Hour Concentration	> 20 ppm	1.2	1.4	1.8
<b>NO<sub>2</sub></b>				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.066	0.052
Annual Federal Standard Design Value		0.014	0.014	0.014
<b>PM<sub>10</sub><sup>A</sup></b>				
Maximum Federal 24-Hour Concentration (µg/m <sup>3</sup> )	> 150 µg/m <sup>3</sup>	97	77	76
Annual Federal Arithmetic Mean (µg/m <sup>3</sup> )		25.3	35.9	34.2
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m <sup>3</sup>	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m <sup>3</sup>	4	6	16
<b>PM<sub>2.5</sub></b>				
Maximum Federal 24-Hour Concentration (µg/m <sup>3</sup> )	> 35 µg/m <sup>3</sup>	46.70	41.00	82.1
Annual Federal Arithmetic Mean (µg/m <sup>3</sup> )	> 12 µg/m <sup>3</sup>	11.13	12.63	12.58
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m <sup>3</sup>	4	4	10

<sup>A</sup>For 2021, data for PM<sub>10</sub> was not available for the Perris monitoring station. As a result, data from the Metropolitan Riverside County monitoring station was substituted.

ppm = Parts Per Million

µg/m<sup>3</sup> = Microgram per Cubic Meter

Source: Data for O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> was obtained from SCAQMD Air Quality Data Tables.

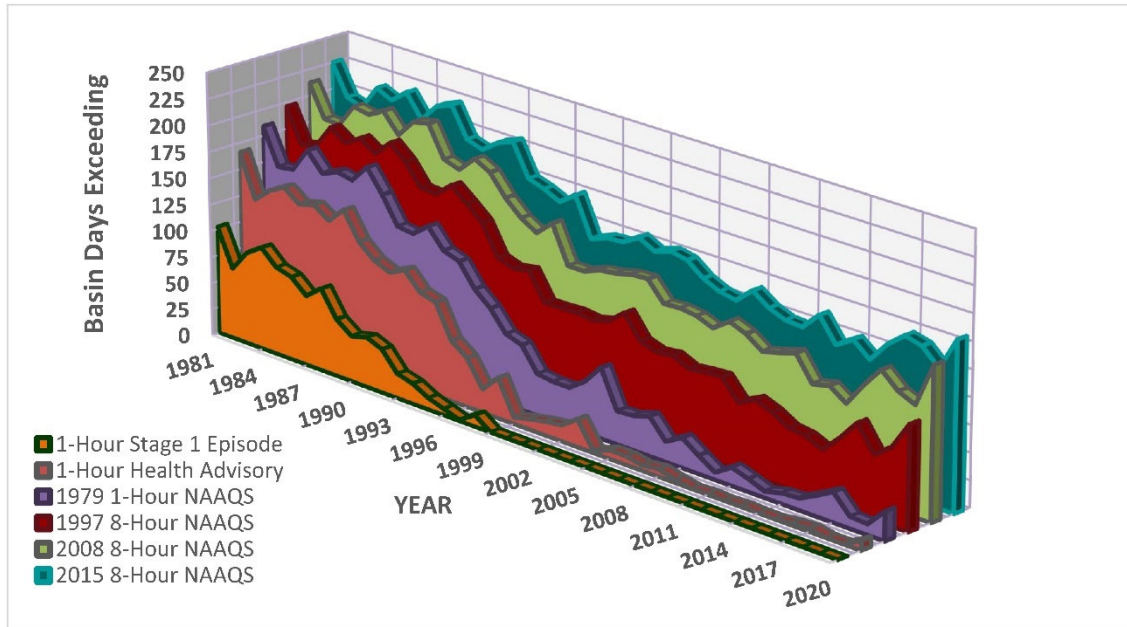
(Urban Crossroads, 2023a, Table 2-4)

Emissions of O<sub>3</sub>, NO<sub>x</sub>, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease through 2020. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO<sub>x</sub> and VOC levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO<sub>x</sub> emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. O<sub>3</sub> contour maps show that the number of days exceeding the 8-hour NAAQS has generally decreased between 1980 and 2020. For 2020, there was an overall decrease in exceedance days compared with the 1980 period. However, as shown on Figure 4.3-1, *SCAB O<sub>3</sub> Trend*, O<sub>3</sub> levels have increased in the past three years due to higher temperatures and stagnant weather conditions. Notwithstanding, O<sub>3</sub> levels in the SCAB have decreased substantially over the last 30 years with



the current maximum measured concentrations being approximately one-third of concentrations within the late 70's. (Urban Crossroads, 2023a, p. 33)

Figure 4.3-1 SCAB O<sub>3</sub> Trend



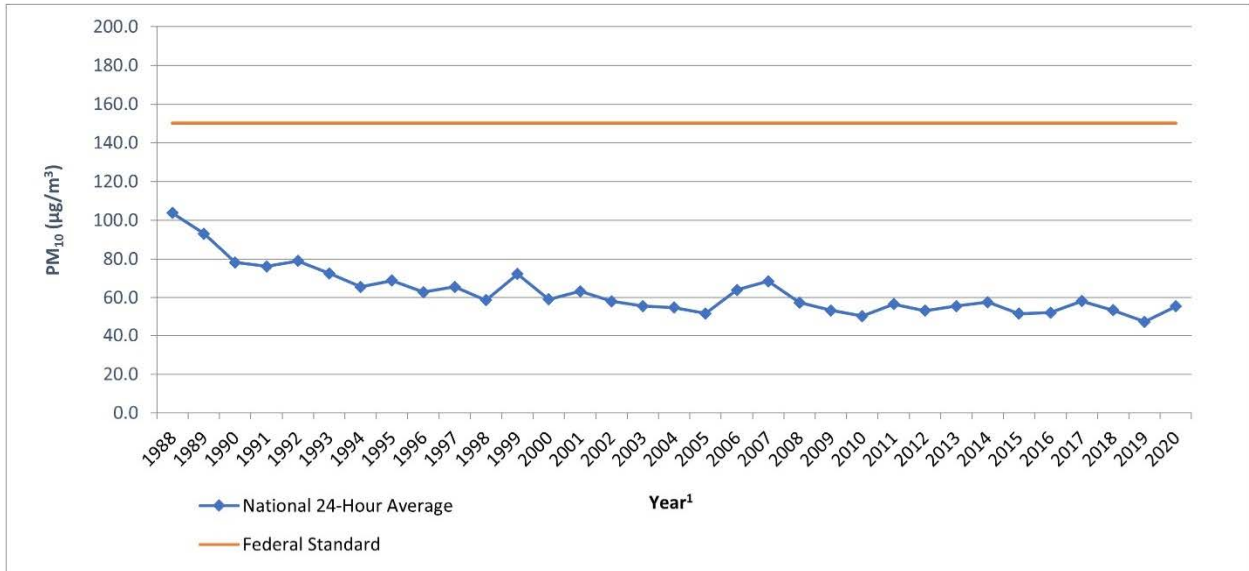
(Urban Crossroads, 2023a, Table 2-5)

The overall trends of PM<sub>10</sub> and PM<sub>2.5</sub> levels in the air (not emissions) show an overall improvement since 1975. Direct emissions of PM<sub>10</sub> have remained somewhat constant in the SCAB and direct emissions of PM<sub>2.5</sub> have decreased slightly since 1975. Area wide sources (fugitive dust from roads, dust from construction, and other sources) contribute the greatest amount of direct particulate matter emissions. (Urban Crossroads, 2023a, p. 34)

As with other pollutants, the most recent PM<sub>10</sub> statistics show an overall improvement as illustrated in Figure 4.3-2, *SCAB Average 24-Hour Concentration PM<sub>10</sub> Trend (Based on Federal Standard)*, and Figure 4.3-3, *SCAB Annual Average Concentration PM<sub>10</sub> Trend (Based on State Standard)*. During the period for which data are available, the 24-hour national annual average concentration for PM<sub>10</sub> decreased by approximately 46%, from 103.7 microgram per cubic meter (µg/m<sup>3</sup>) in 1988 to 55.5 µg/m<sup>3</sup> in 2020. Although the values are below the federal standard, it should be noted that there are days within the year where the concentrations would exceed the threshold. The 24-hour state annual average for emissions for PM<sub>10</sub> have decreased by approximately 64%, from 93.9 µg/m<sup>3</sup> in 1989 to 33.9 µg/m<sup>3</sup> in 2020. Although data in the late 1990's show some variability, this is probably due to the advances in meteorological science rather than a change in emissions. Similar to the ambient concentrations, the calculated number of days above the 24-hour PM<sub>10</sub> standards has also shown an overall drop. (Urban Crossroads, 2023a, p. 34)



Figure 4.3-2 SCAB Average 24-Hour Concentration PM<sub>10</sub> Trend (Based on Federal Standard)

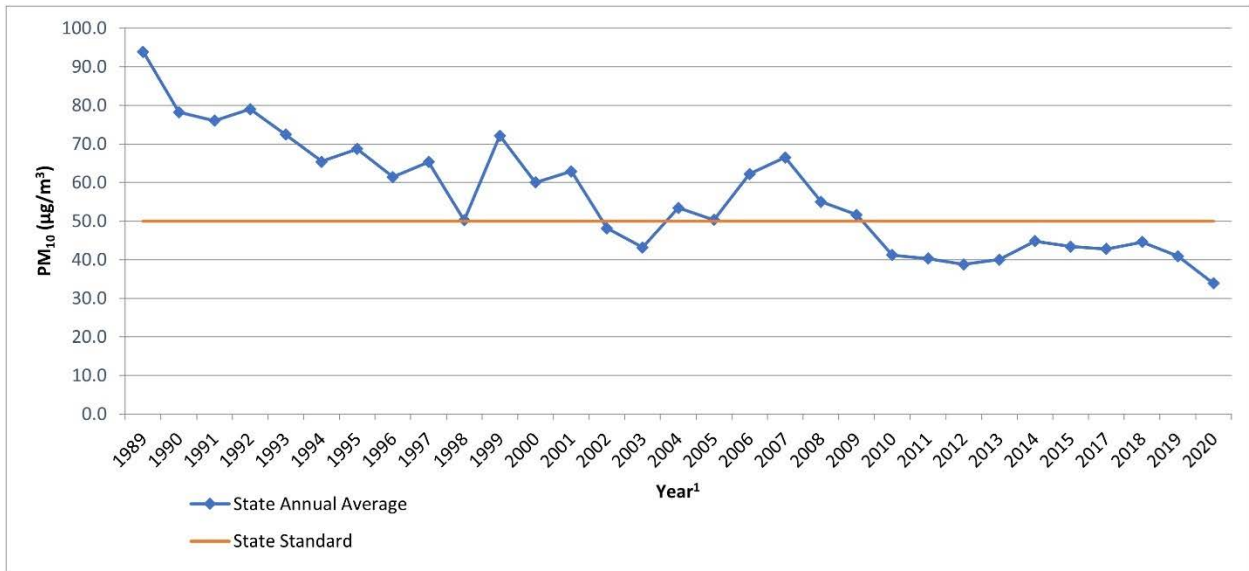


Source: 2020 CARB, iADAM: Top Four Summary: PM<sub>10</sub> 24-Hour Averages (1988-2020)

<sup>1</sup> Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-6)

Figure 4.3-3 SCAB Annual Average Concentration PM<sub>10</sub> Trend (Based on State Standard)



Source: 2020 CARB, iADAM: Top Four Summary: PM<sub>10</sub> 24-Hour Averages (1988-2020)

<sup>1</sup> Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

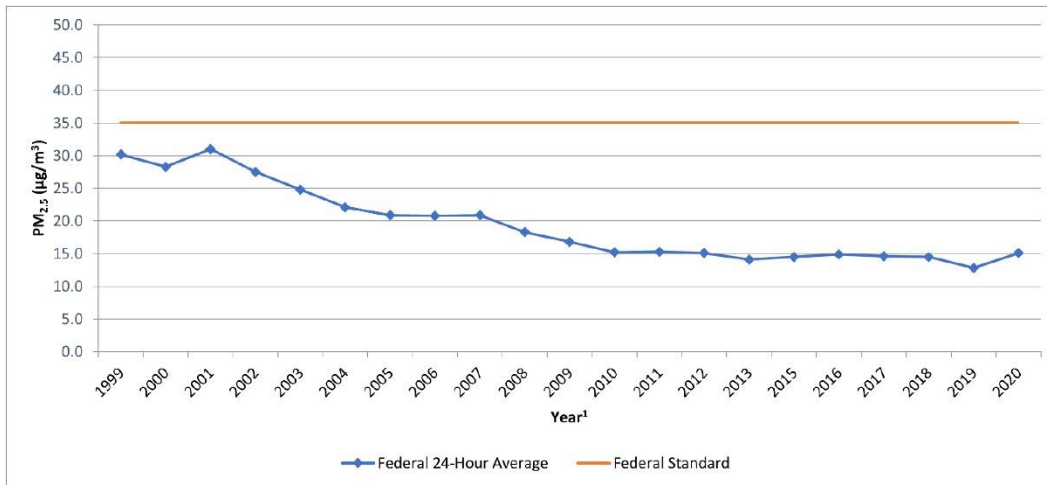
(Urban Crossroads, 2023a, Table 2-7)

Figure 4.3-4, SCAB 24-Hour Average Concentration PM<sub>2.5</sub> Trend (Based on Federal Standard), and Figure 4.3-5, SCAB 24-Hour Average Concentration PM<sub>2.5</sub> Trend (Based on State Standard), show the most recent



24-hour average PM<sub>2.5</sub> concentrations in the SCAB from 1999 through 2020. Overall, the national and State annual average concentrations have decreased by almost 50% and 31% respectively. It should be noted that the SCAB is currently designated as nonattainment for the State and federal PM<sub>2.5</sub> standards. (Urban Crossroads, 2023a, p. 35)

**Figure 4.3-4 SCAB 24-Hour Average Concentration PM<sub>2.5</sub> Trend (Based on Federal Standard)**

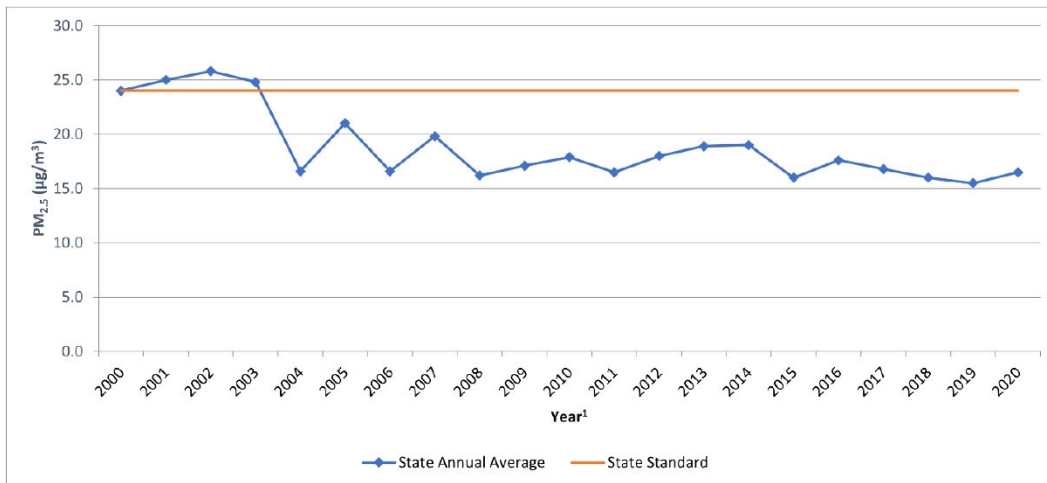


Source: 2020 CARB, iADAM: Top Four Summary: PM<sub>2.5</sub> 24-Hour Averages (1999-2020)

<sup>1</sup> Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-8)

**Figure 4.3-5 SCAB 24-Hour Average Concentration PM<sub>2.5</sub> Trend (Based on State Standard)**



Source: 2020 CARB, iADAM: Top Four Summary: PM<sub>2.5</sub> 24-Hour Averages (1999-2020)

<sup>1</sup> Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.

(Urban Crossroads, 2023a, Table 2-9)

While the 2012 AQMP PM<sub>10</sub> attainment demonstration and the 2015 associated supplemental SIP submission indicated that attainment of the 24-hour standard was predicted to occur by the end of 2015, it could not





anticipate the effect of the ongoing drought on the measured PM<sub>2.5</sub>. The 2006 to 2010 base period used for the 2012 attainment demonstration had near-normal rainfall. While the trend of PM<sub>2.5</sub>-equivalent emission reductions continued through 2015, the severe drought conditions contributed to the PM<sub>2.5</sub> increases observed after 2012. As a result of the disrupted progress toward attainment of the federal 24-hour PM<sub>2.5</sub> standard, SCAQMD submitted a request and the EPA approved, in January 2016, a “bump up” to the nonattainment classification from “moderate” to “serious,” with a new attainment deadline as soon as practicable, but not beyond December 31, 2019. As of March 14, 2019, the EPA approved portions of a SIP revision submitted by California to address CAA requirements for the 2006 24-hour PM<sub>2.5</sub> NAAQS in the Los Angeles-SCAB Serious PM<sub>2.5</sub> nonattainment area. The EPA also approved 2017 and 2019 motor vehicle emissions budgets for transportation conformity purposes and inter-pollutant trading ratios for use in transportation conformity analyses. (Urban Crossroads, 2023a, pp. 36-37)

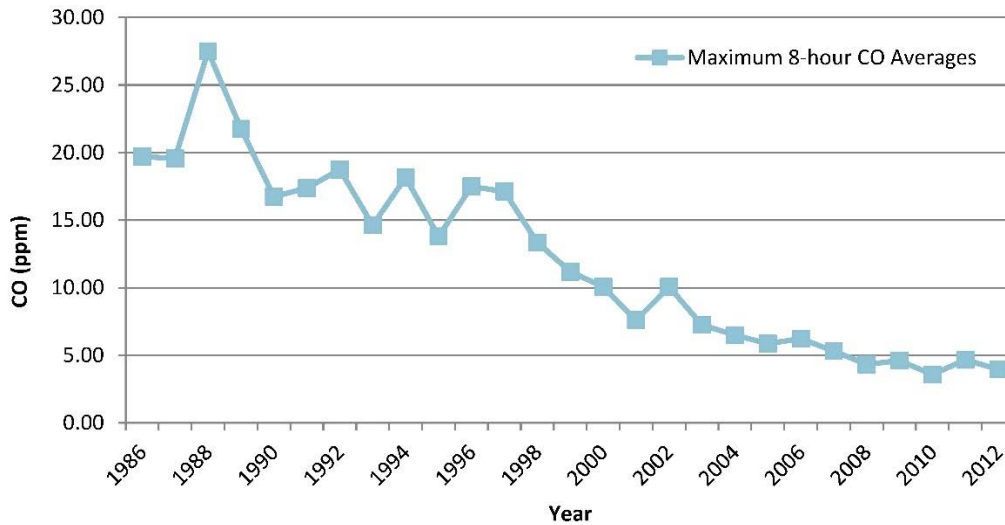
In December 2022, the SCAQMD released the Final 2022 AQMP. The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and updated emission inventory methodologies for various source categories. (Urban Crossroads, 2023a, p. 37)

The most recent CO concentrations in the SCAB are shown in Figure 4.3-6, *SCAB 8-Hour Average Concentration CO Trend*. CO concentrations in the SCAB have decreased markedly – a total decrease of more about 80% in the peak 8-hour concentration from 1986 to 2012. It should be noted 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB. The number of exceedance days has also declined. The entire SCAB is now designated as attainment for both the state and national CO standards. Ongoing reductions from motor vehicle control programs should continue the downward trend in ambient CO concentrations. (Urban Crossroads, 2023a, p. 37)

Part of the control process of the SCAQMD’s duty to greatly improve the air quality in the SCAB is the uniform CEQA review procedures required by SCAQMD’s 1993 CEQA Air Quality Handbook (1993 CEQA Handbook). The single threshold of significance used to assess project direct and cumulative impacts has in fact “worked” as evidenced by the track record of the air quality in the SCAB dramatically improving over the course of the past decades. As stated by the SCAQMD, the District’s thresholds of significance are based on factual and scientific data and are therefore appropriate thresholds of significance to evaluate a project’s potential air quality impacts. (Urban Crossroads, 2023a, p. 38)



Figure 4.3-6 SCAB 8-Hour Average Concentration CO Trend



Source: 2020 CARB, iADAM: Top Four Summary: CO 8-Hour Averages (1986-2012)  
<sup>1</sup> The most recent year where 8-hour concentration data is available is 2012.  
 (Urban Crossroads, 2023a, Table 2-10)

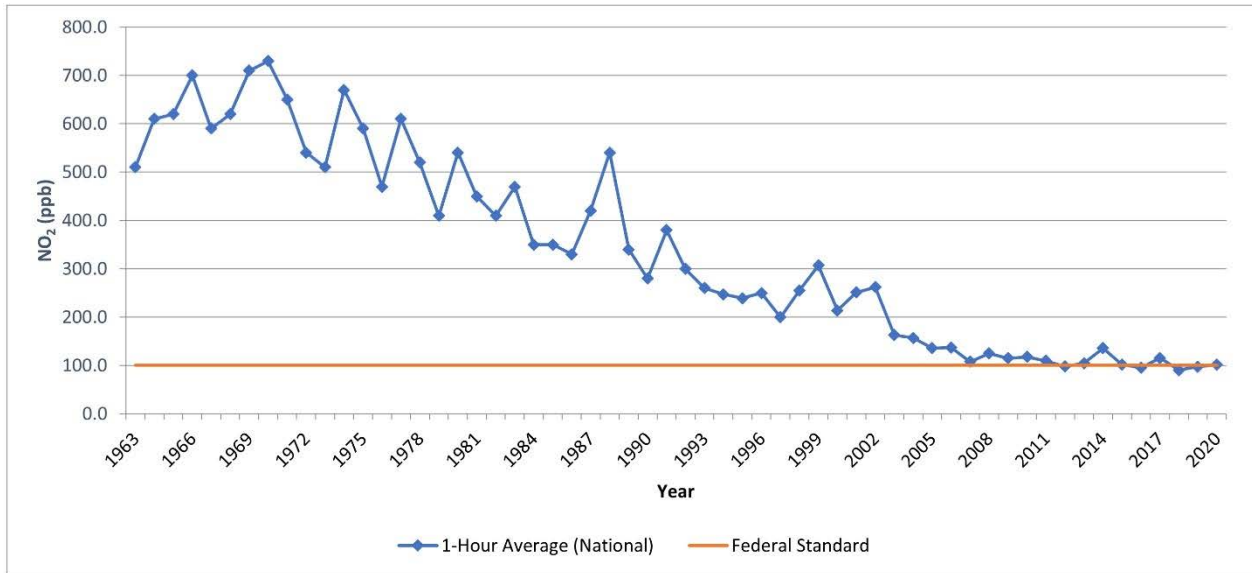
The most recent NO<sub>2</sub> data for the SCAB is shown in Figure 4.3-7, *SCAB 1-Hour Average NO<sub>2</sub> Concentration Trend (Based on Federal Standard)*, and Figure 4.3-8, *SCAB 1-Hour Average NO<sub>2</sub> Concentration Trend (Based on State Standard)*. Over the last 50 years, NO<sub>2</sub> values have decreased significantly; the peak 1-hour national and State averages for 2020 is approximately 80% lower than what it was during 1963. The SCAB attained the State 1-hour NO<sub>2</sub> standard in 1994, bringing the entire State into attainment. A new State annual average standard of 0.030 ppm was adopted by CARB in February 2007. The new standard is just barely exceeded in the SCAQMD. NO<sub>2</sub> is formed from NO<sub>x</sub> emissions, which also contribute to O<sub>3</sub>. As a result, the majority of the future emission control measures would be implemented as part of the overall O<sub>3</sub> control strategy. Many of these control measures would target mobile sources, which account for more than three-quarters of California’s NO<sub>x</sub> emissions. These measures are expected to bring the SCAQMD into attainment of the state annual average standard. (Urban Crossroads, 2023a, p. 38)

**H. Toxic Air Contaminants (TAC) Trends**

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary sources, and consumer products. According to the *Ambient and Emission Trends of Toxic Air Contaminants in California* journal article, which was prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly. The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene (C<sub>6</sub>H<sub>6</sub>), and 1,3-butadiene (C<sub>4</sub>H<sub>6</sub>); those that are derived from stationary sources: perchloroethylene (C<sub>2</sub>Cl<sub>4</sub>) and hexavalent chromium (Cr(VI));

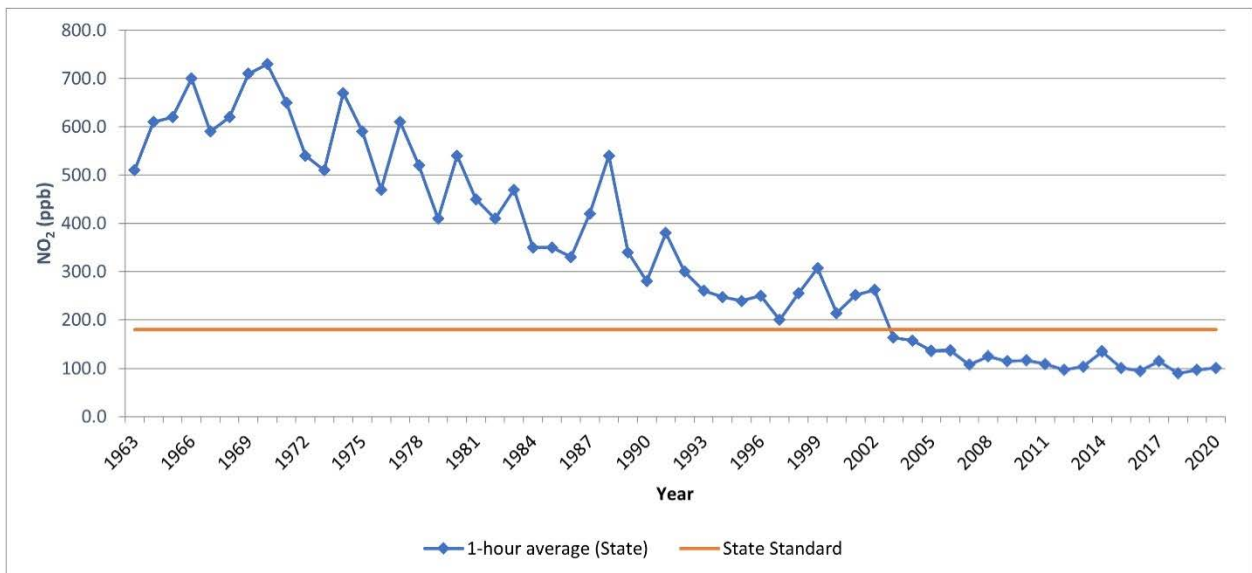


Figure 4.3-7 SCAB 1-Hour Average NO<sub>2</sub> Concentration Trend (Based on Federal Standard)



(Urban Crossroads, 2023a, Table 2-11)

Figure 4.3-8 SCAB 1-Hour Average NO<sub>2</sub> Concentration Trend (Based on State Standard)



(Urban Crossroads, 2023a, Table 2-12)

and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH<sub>2</sub>O) and acetaldehyde (C<sub>2</sub>H<sub>4</sub>O). The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk. (Urban Crossroads, 2023a, pp. 39-40)



### 1. *Mobile-Source TACs*

CARB introduced two programs that aimed at reducing mobile emissions for light and medium duty vehicles through vehicle emissions controls and cleaner fuel. In California, light-duty vehicles sold after 1996 are equipped with California’s second-generation On-Board Diagnostic (OBD-II) system. The OBD-II system monitors virtually every component that can affect the emission performance of the vehicle to ensure that the vehicle remains as clean as possible over its entire life and assists repair technicians in diagnosing and fixing problems with the computerized engine controls. If a problem is detected, the OBD-II system illuminates a warning lamp on the vehicle instrument panel to alert the driver. This warning lamp typically contains the phrase “Check Engine” or “Service Engine Soon.” The system also would store important information about the detected malfunction so that a repair technician can accurately find and fix the problem. CARB has recently developed similar OBD requirements for heavy-duty vehicles over 14,000 pounds (lbs). CARB’s phase II Reformulated Gasoline Regulation (RFG-2), adopted in 1996, also led to a reduction of mobile source emissions. Through such regulations, benzene levels declined 88% from 1990-2012. 1,3-Butadiene concentrations also declined 85% from 1990-2012 as a result of the use of reformulated gasoline and motor vehicle regulations. (Urban Crossroads, 2023a, p. 40)

In 2000, CARB’s Diesel Risk Reduction Plan (DRRP) recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (<15 ppm) diesel fuel. As a result of these measures, DPM concentrations have declined 68% since 2000, even though the State’s population increased 31% and the amount of diesel vehicles miles traveled increased 81%, as shown on Figure 4.3-9, *DPM and Diesel Vehicle Miles Trend*. With the implementation of these diesel-related control regulations, CARB expects a DPM decline of 71% for 2000-2020. (Urban Crossroads, 2023a, p. 40)

### 2. *Diesel Regulations*

CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, CARB Drayage Truck Regulation, CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of “clean trucks” into the statewide truck fleet. In other words, older more polluting trucks would be replaced with newer, cleaner trucks as a function of these regulatory requirements. (Urban Crossroads, 2023a, p. 41)

Moreover, the average Statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, would dramatically be reduced due to the aforementioned regulatory requirements. Diesel emissions identified in this analysis would therefore overstate future DPM emissions since not all the regulatory requirements are reflected in the modeling. (Urban Crossroads, 2023a, p. 41)

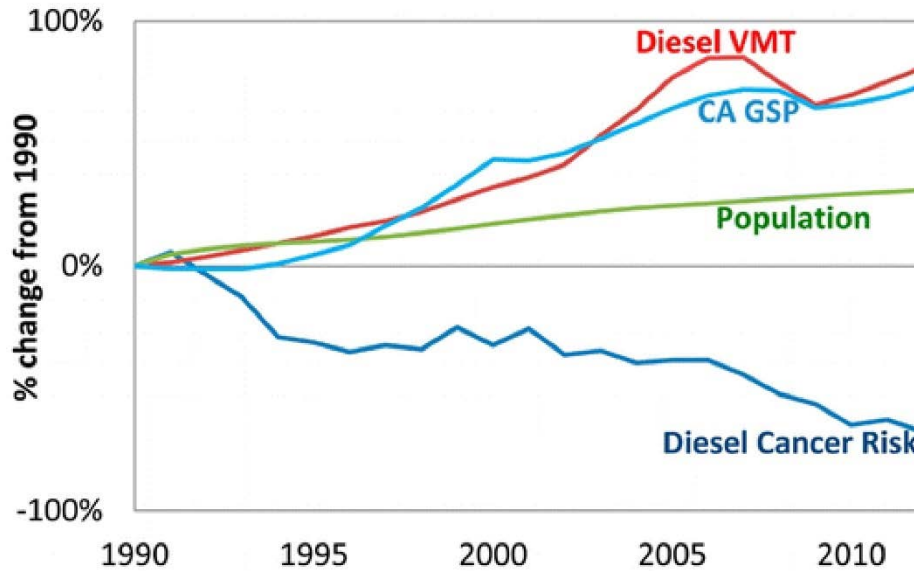
### 3. *Cancer Risk Trends*

Based on information available from CARB, overall cancer risk throughout the SCAB has had a declining trend since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified



Figure 4.3-9 DPM and Diesel Vehicle Miles Trend

California Population, Gross State Product (GSP),  
Diesel Cancer Risk, Diesel Vehicle-Miles-Traveled (VMT)



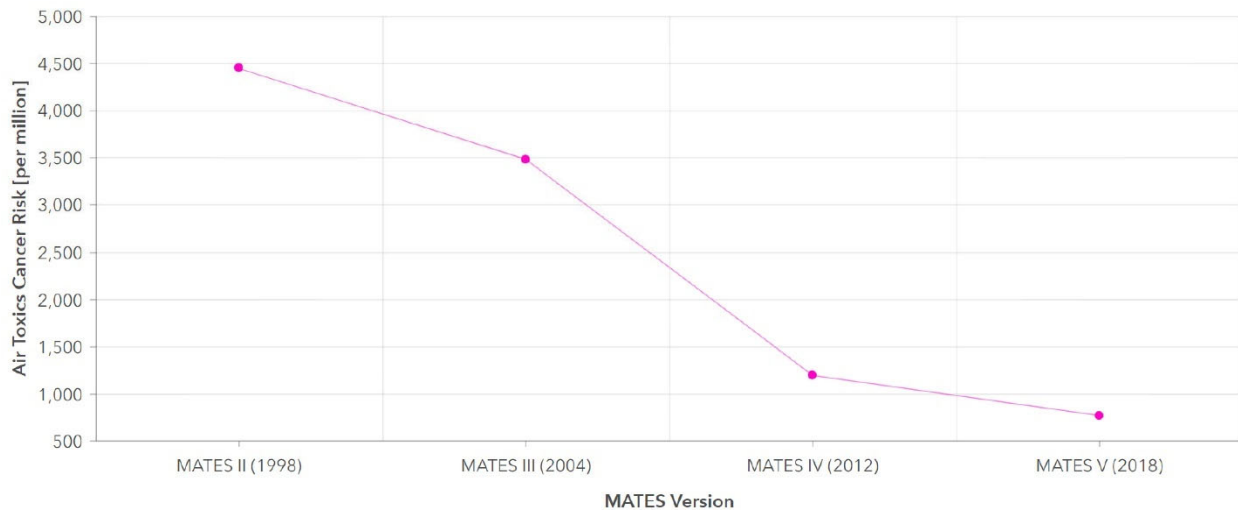
(Urban Crossroads, 2023a, Exhibit 2-A)

particulate matter from diesel-fueled engines as a toxic air contaminant. The SCAQMD initiated a comprehensive urban toxic air pollution study called the MATES. DPM accounts for more than 70% of the cancer risk. (Urban Crossroads, 2023a, p. 41)

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, SCAQMD began conducting the MATES V Program. MATES V field measurements were conducted at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V also included measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV. The draft report for the MATES V study was published in late May 2021 and the comment submission deadline was on June 7, 2021. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in South Coast AQMD’s programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic non-cancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic non-cancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. Figure 4.3-10, *MATES V Risk Map*, illustrates the MATES V Risk trends for the nearest available monitoring site to the Project, located in Rubidoux. (Urban Crossroads, 2023a, p. 42)



Figure 4.3-10 MATES V Risk Map



(Urban Crossroads, 2023a, Exhibit 2-B)

The reductions in cancer and non-cancer risks and heavy truck-related air quality emissions within the SCAB also has been documented in a technical memorandum prepared by Ramboll US Consulting, Inc. (Ramboll). This technical memorandum, which is herein incorporated by reference pursuant to CEQA Guidelines § 15150, is entitled, “Technical Comments in Response to the December 2022 Report Titled *A Region In Crisis: The Rationale For A Public Health State Of Emergency In The Inland Empire*” (herein, “Ramboll Report”), is dated February 13, 2023, and a copy of this report is included in *Technical Appendix U* to this RDEIR. As demonstrated by the Ramboll Report, emissions of DPM and NO<sub>x</sub> and vehicle miles traveled (VMT) from heavy truck trips have consistently declined within the Inland Empire (IE) and are expected to continue to decline through at least 2040. The Ramboll Report also notes that “[e]xisting regulatory requirements have reduced PM and NO<sub>x</sub> emissions from trucks in the IE by 94% and 82% respectively from 2000 to 2023,” and further notes that “[a]dditional reductions of PM (7%) and NO<sub>x</sub> (27%) emissions are expected to occur from 2023 to 2040 as a result of the recently adopted Low NO<sub>x</sub> Heavy-Duty Omnibus and ACT regulations that are already transitioning the diesel vehicles to cleaner technologies including Zero Emission (ZE) trucks.” The Ramboll Report also demonstrates that the DPM emissions from trucks operating in the IE were reduced by 77% from 2016 to 2023, and shows that the DPM emissions from Transport Refrigeration Units (TRUs) operating in the IE also have been reduced by 39% since 2016. This reduction in DPM emission rates has resulted in a corresponding significant reduction in risk as well, despite increasingly conservative regulatory guidance in the preparation of HRAs, particularly OEHHA’s adoption of age sensitivity factors in their revised HRA guidance released in 2015 (Urban Crossroads, 2023b, p. 49). Moreover, the results of Ramboll’s study showed an estimated basin-wide air toxics cancer risk of 336 in a million in 2023, representing a 20% reduction as compared to 2018 when the basin average air toxics cancer risk was estimated at 424 in a million, as reported by MATES V. The Ramboll Report concludes that “substantial air quality improvements have occurred and will continue to occur based on existing regulatory requirements and the transition to ZE trucks as they become more commercially available will only further improve an already dramatically improved air quality environment.” (Ramboll, 2023, pp. 14, 24, and 26)



### ***I. Sensitive Receptors***

The SCAQMD’s Localized Significance Thresholds (LSTs) represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from a project’s activities. (Urban Crossroads, 2023a, p. 59)

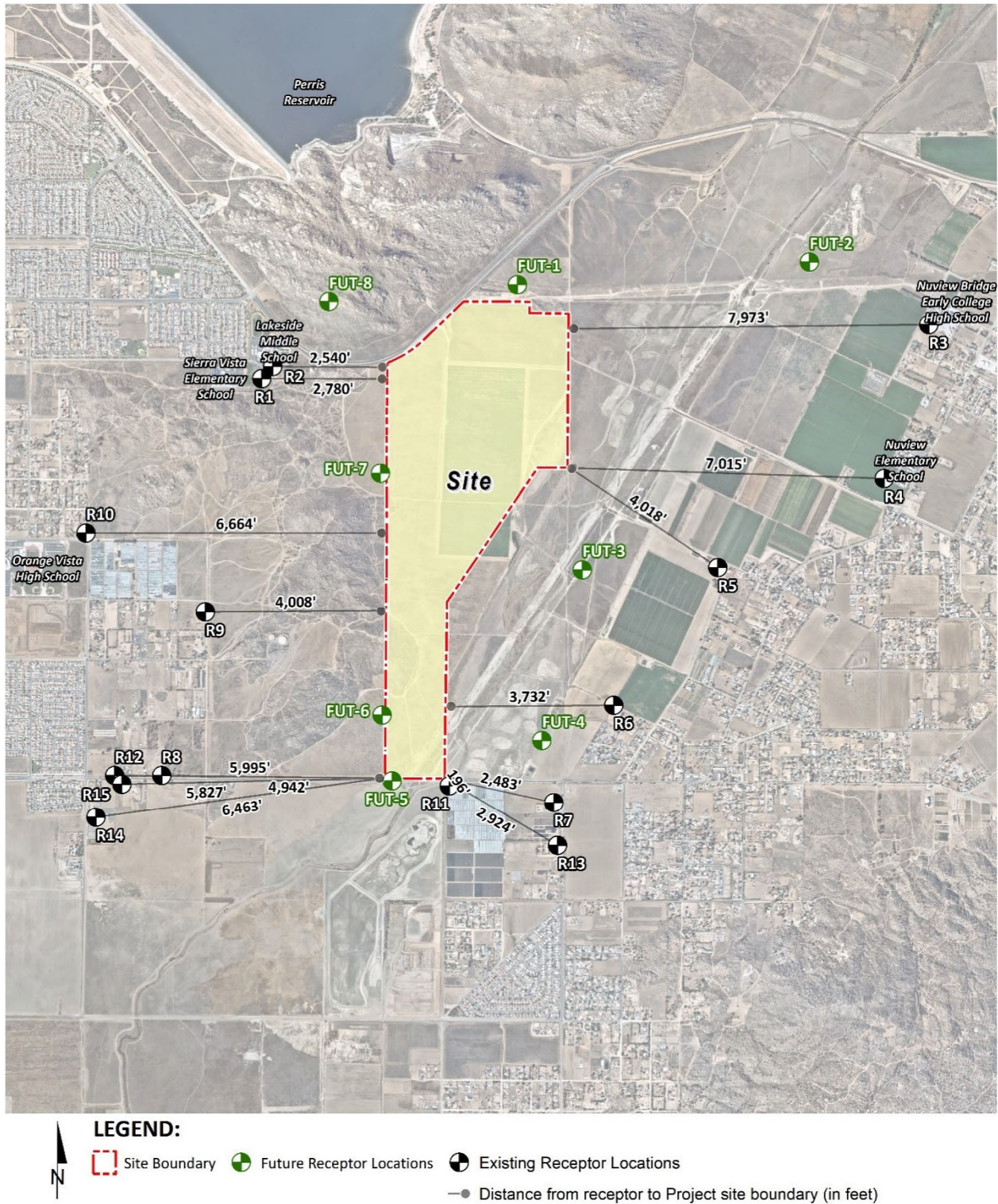
Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as “sensitive receptors.” These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. (Urban Crossroads, 2023a, p. 59)

Receptors in the Project study area are described below and shown on Figure 4.3-11, *Sensitive Receptor Locations*. Localized air quality impacts and health risk assessments were evaluated at sensitive receptor land uses nearest the Project site. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Project site. (Urban Crossroads, 2023a, pp. 60-61)

- R1: Location R1 represents Sierra Vista Elementary School, approximately 2,780 feet west of the Project site.
- R2: Location R2 represents Lakeside Middle School, approximately 2,540 feet west of the Project site.
- R3: Location R3 represents Nuview Bridge Early College High School, approximately 7,973 feet east of the Project site.
- R4: Location R4 represents Nuview Elementary School, approximately 7,015 feet east of the Project site.
- R5: Location R5 represents the existing residence at 28900 Reservoir Avenue, approximately 4,018 feet east of the Project site. Receptor R5 is placed in the private outdoor living areas (backyard) facing the Project site.
- R6: Location R6 represents the existing residence at 28240 Green Valley Road, approximately 3,732 feet east of the Project site. Receptor R6 is placed in the private outdoor living areas (backyard) facing the Project site.
- R7: Location R7 represents the existing residence at 22125 Menifee Road, approximately 2,483 feet southeast of the Project site. Receptor R7 is placed in the private outdoor living areas (backyard) facing the Project site.
- R8: Location R8 represents the existing residence at 27304 Nuevo Road, approximately 4,942 feet west of the Project site. Receptor R8 is placed in the private outdoor living areas (backyard) facing the Project site.



Figure 4.3-11 Sensitive Receptor Locations



(Urban Crossroads, 2023a, Exhibit 3-A)





- R9: Location R9 represents the existing residence at 21361 Foothill Avenue, approximately 4,008 feet west of the Project site. Since there are no private outdoor living areas facing the Project site, R9 is placed at the building façade facing the Project site.
- R10: Location R10 represents Orange Vista High School, approximately 6,664 feet west of the Project site.
- R11: Location R11 represents New Life Growers, approximately 196 feet southeast of the Project site.
- FUT-1: Location FUT-1 represents the potential future medium density residential land use located north of the Project site.
- FUT-2: Location FUT-2 represents the potential future medium-high density residential land use located northeast of the Project site.
- FUT-3: Location FUT-3 represents the potential future medium density residential land use located east of the Project site.
- FUT-4: Location FUT-4 represents the potential future medium density residential land use located east of the Project site.
- FUT-5: Location FUT-5 represents the potential future medium density residential land use located south of the Project site.
- FUT-6: Location FUT-6 represents the potential future medium density residential land use located west of the Project site within the McCanna Hills Specific Plan.
- FUT-7: Location FUT-7 represents the potential future medium density residential land use located west of the Project site within the McCanna Hills Specific Plan.
- FUT-8: Location FUT-8 represents the potential future medium density residential land use located northwest of the Project site.

#### **4.3.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations governing air quality emissions.

##### ***A. Federal Regulations***

##### ***1. Federal Clean Air Act***

The Clean Air Act (CAA; 42 U.S.C. § 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM<sub>10</sub>), PM<sub>2.5</sub>, and lead (Pb). (EPA, 2020a)



One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans (SIPs), applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977 and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines. (EPA, 2020a)

The sections of the federal CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of O<sub>3</sub> (smog), CO, and PM<sub>10</sub>. Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet Federal air quality standards designed to protect public health. (EPA, 2020b) Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO<sub>x</sub> on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. (EPA, 2020c)

Section 112 of the Clean Air Act addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 Clean Air Act Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source. (EPA, 2020a)

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk. (EPA, 2020a)

## **2. National Emissions Standards for Hazardous Air Pollutants (NESHAPs) Program**

National Emission Standards for Hazardous Air Pollutants (NESHAP) are stationary source standards for hazardous air pollutants. Hazardous air pollutants (HAPs) are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. The EPA develops national enforcement initiatives that focus on significant environmental risks and noncompliance patterns. For Fiscal Years 2014 to 2016, the Cutting Hazardous Air Pollutants National Initiatives Strategy focuses on categories of sources that emit HAPs. (EPA, 2020d)



Sources subject to NESHAPs are required to perform an initial performance test to demonstrate compliance. To demonstrate continuous compliance, sources are generally required to monitor control device operating parameters which are established during the initial performance test. Sources may also be required to install and operate continuous emission monitors to demonstrate compliance. Consistent with EPA's Clean Air Act Stationary Source Compliance Monitoring Strategy, NESHAP sources that meet the Clean Air Act definition of "major source" generally receive a full compliance evaluation by the state or regional office at least once every two years. (EPA, 2020d)

## ***B. State Regulations***

### ***1. California Clean Air Act (CCAA)***

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain state ambient air quality standards for criteria air contaminants. The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the California Ambient Air Quality Standards (CAAQS), by the earliest practical date. The California Air Resources Board (CARB) established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources. (SCAQMD, n.d.)

### ***2. Air Toxic "Hot Spots" Information and Assessment Act***

The Air Toxic "Hot Spots" Information and Assessment Act of 1987, commonly known as AB 2588, (Health & Safety Code §§ 44300, et seq.) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds. If the district determines the health impact to be significant, neighbors must be notified. In addition, state law requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the state and enforced by districts. (SCAQMD, n.d.)

### ***3. Air Quality Management Planning***

The California Air Resources Board (CARB) and local air districts throughout the State are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient



air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies. (CARB, 2012)

#### **4. Title 24 Energy Efficiency Standards and California Green Building Standards**

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2022 version of Title 24 was adopted by the CEC and will become effective on January 1, 2023. The 2022 Building Energy Efficiency Standards focuses on four key areas in newly constructed homes and businesses: (1) encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units; (2) establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies; (3) expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the State's progress toward a 100 percent clean electricity grid; and strengthening ventilation standards to improve indoor air quality. The 2019 Building Energy Efficiency Standards already were seven (7) percent more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. The 2016 Building Energy Efficiency Standards also already were 28 percent more efficient for residential construction and five (5) percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced. (CEC, n.d.)

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

As previously stated, the Title 24 Building Energy Efficient Standards and CALGreen Code are updated on a regular basis, with the most recent approved updates consisting of the 2022 Building Energy Efficiency Standards and 2022 CALGreen Code, which will become effective on January 1, 2023. Non-residential mandatory measures included in the 2022 CALGreen Code include:

- 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).
- EV charging stations. New construction shall facilitate the future installation of EV 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). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- 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 reuse 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 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 potable water uses 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 Landscape Ordinance (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 (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses 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).

## 5. California Air Resources Board Rules

The CARB enforces rules related to air pollutant emissions in the State of California. Rules with applicability to the Project include, but are not limited to, those listed below.

- CARB Rule 2480 (13 CCR 2480): Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools, which limits nonessential idling for commercial trucks and school buses within 100 feet of a school.
- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.



- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

## 6. *South Coast Air Quality Management District Rules*

The South Coast Air Quality Management District (SCAQMD) enforces rules related to air pollutant emissions in the SCAB. Rules with applicability to the Project include, but are not limited to, those listed below.

- SCAQMD Rule 201: Permit to Construct
- SCAQMD Rule 402: Nuisance Odors
- SCAQMD Rule 403: Fugitive Dust
- SCAQMD Rule 431.2: Low Sulfur Fuel
- SCAQMD Rule 1113: Table of Standards
- SCAQMD Rule 1186: PM<sub>10</sub> Emissions from Paved and Unpaved Roads, and Livestock Operations

## 7. *Truck & Bus Regulation*

Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines. Older, more polluting trucks are required to be replaced first, while trucks that already have relatively clean engines are not required to be replaced until later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were removed from service on California roads by 2015. Between 2015 and 2020, pre-2000 heavy trucks were equipped with PM filters and upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements occurred on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads must have engines that meet 2010 emissions standards. Lighter trucks (those with a gross vehicle weight rating of 14,001 to 26,000 pounds) adhered to a similar schedule, and were all replaced by 2020. (CARB, n.d.)

## 8. *Advanced Clean Truck Regulation*

In June, 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California will be required to be zero-emission. Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales. CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks and buses operate less than 100 miles per day. Commercial availability of electric-powered long-haul trucks is very limited. However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market ready zero-emission trucks in the future. (CARB, Advanced Clean Trucks Fact Sheet, 2020)



### **9. Senate Bill 535 – Disadvantaged Communities**

Senate Bill 535 (“SB 535”; De León, Chapter 830, 2012) recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality. Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. These investments are aimed at improving public health, quality of life, and economic opportunity in California’s most burdened communities while at the same time reducing pollution that causes climate change. Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the State’s cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases. SB 535 requires that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). (OEHHA, 2017)

### **10. Senate Bill 1000 – Environmental Justice in Local Land Use Planning**

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed Senate Bill 1000 (SB 1000) in 2016, requiring local governments to identify environmental justice communities (called “disadvantaged communities”) in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments’ planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community’s exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities. (OAG, n.d.)

### **11. Assembly Bill 617**

Assembly Bill 617 (AB 617) was enacted into law in 2017, and relates to criteria air pollutants and toxic air contaminants from sources other than vehicles. In response to AB 617, the California Air Resources Board (CARB) established the Community Air Protection Program (CAPP or Program). The Program’s focus is to reduce exposure in communities most impacted by air pollution. Communities around the State are working together to develop and implement new strategies to measure air pollution and reduce health impacts. This first-of-its-kind statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air





pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air. (CARB, n.d.)

## **12. Senate Bill 1137 (SB 1137)**

SB 1137 is intended to protect the public health of California’s communities by creating a minimum health and safety distance of 3,200-feet between sensitive receptors, such as a residence, school, childcare facility, playground, hospital, or nursing home and an oil and gas production well. Specifically, the bill prohibits the California Geological Energy Management Division (CalGEM) from approving the drilling, re-drilling, or significant alteration of any oil and gas well within this “health protection zone.” SB 1137 also requires oil and gas facility operators in these protection zones to implement strict pollution controls, and to develop response plans to protect the health of Californians currently living within 3,200 feet of an existing oil well. SB 1137 also requires operators of wells/facilities to provide an individual indemnity bond sufficient to pay the full cost of properly plugging and abandoning the well and decommissioning the facility in order to prevent operators from failing to properly decommission. (CA Legislative Info, n.d.)

### **C. Local Regulations**

#### **1. Riverside County General Plan Air Quality Element**

The County General Plan Air Quality Element identifies goals, policies and programs that are meant to balance the County’s actions regarding land use, circulation, and other issues with their potential effects on air quality. The Air Quality Element addresses ambient air quality standards set forth by the USEPA and CARB. The Air Quality Element contains policies designed to establish a regional basis for improving air quality. The following relevant and applicable policies from the County’s Air Quality Element have been identified for the Project:

**AQ 1.1:** Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.

**AQ 1.4:** Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

**AQ 2.1:** The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

**AQ 2.2:** Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.

**AQ 2.3:** Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.



**AQ 3.1:** Allow the market place, as much as possible, to determine the most economical approach to relieve congestion and cut emissions.

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

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

**AQ 4.2:** Require 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.

**AQ 4.6:** Require stationary air pollution sources to comply with applicable air district rules and control measures.

**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.

**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.

## **2. *Riverside County Board of Supervisors Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses***

The County of Riverside Board of Supervisors *Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses* (“Good Neighbor Policy”) provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County’s Land Use Ordinance, which provides development requirements for said projects. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. It should be noted that the currently-proposed Project consists of applications for a General Plan Amendment, Specific Plan Amendment, and Change of Zone, and no site-specific development applications (e.g., plot plans, etc.) are proposed at this time. As the Good Neighbor Policy requirements relate to site-specific development and construction activities, the requirements of the Good Neighbor Policy would be enforced as part of the County’s review of future site-specific development applications, such as implementing plot plans. (Riverside County, 2019f)

### **4.3.3 BASIS FOR DETERMINING SIGNIFICANCE**

#### **A. *Thresholds of Significance***

Section III of Appendix G to the State CEQA Guidelines addresses typical adverse effects to air quality, and includes the following threshold questions to evaluate the Project’s impacts due to air quality emissions (OPR, 2018a):



- Would the Project conflict with or obstruct implementation of the applicable air quality plan?
- Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- Would the Project expose sensitive receptors to substantial pollutant concentrations?
- Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section II of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact due to air quality emissions if construction and/or operation of the Project would:

- 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; or*
- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

The significance thresholds set forth in Riverside County's Environmental Assessment Checklist were used to evaluate the significance of the proposed Project's impacts due to air quality emissions. Riverside County also has chosen to apply SCAQMD significance thresholds, as presented in SCAQMD's CEQA Air Quality Significance Thresholds (April 2019), to evaluate the Project's air quality impacts against the above thresholds.

Accordingly, Threshold a., which addresses Section III.a of Appendix G to the State CEQA Guidelines, evaluates whether the proposed Project would conflict with SCAQMD's 2022 AQMP, which addresses State and federal requirements under the CAA. A conflict with the AQMP standards and requirements would inhibit the SCAQMD's ability to achieve State and federal standards for air quality.

Threshold b. addresses Section III.b of Appendix G to the CEQA Guidelines, and emissions generated by a development project would be significant under Threshold b. if emissions are projected to exceed the Regional Thresholds established by the SCAQMD for criteria pollutants.

Threshold c. addresses Section III.c of Appendix G to the State CEQA Guidelines. Under this threshold, impacts would be potentially significant if emissions are projected to exceed the LSTs established by the State



of California and the SCAQMD for criteria pollutants, if the Project would cause or contribute to CO “Hot Spots,” or if the Project were to result in cancer or health hazard impacts that exceed the SCAQMD thresholds of significance.

Threshold d. evaluates Section III.d of Appendix G of the State CEQA Guidelines. SCAQMD Rule 402 (“Nuisance”) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. The potential to violate Rule 402 or § 41700 is used herein as a basis to consider a project’s odors or other emissions to be significant and require feasible mitigation measures.

**B. SCAQMD Regional Thresholds**

The SCAQMD has also developed regional significance thresholds for other regulated pollutants, as summarized in Table 4.3-4, *Maximum Daily Regional Emissions Thresholds*. The SCAQMD’s *CEQA Air Quality Significance Thresholds* (April 2019) indicate that 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. (Urban Crossroads, 2023a, p. 44)

**Table 4.3-4 Maximum Daily Regional Emissions Thresholds**

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NO <sub>x</sub>	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM <sub>10</sub>	150 lbs/day	150 lbs/day
PM <sub>2.5</sub>	55 lbs/day	55 lbs/day
SO <sub>x</sub>	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = Pounds Per Day  
(Urban Crossroads, 2023a, Table 3-1)

**C. SCAQMD Localized Significance Thresholds**

In order to estimate localized pollutant concentrations resulting from Project construction and long-term operational activities, the SCAQMD-approved American Meteorological Society/EPA Regulatory Model (AERMOD) dispersion model was utilized, as discussed in further detail in Subsection 3.6 of the Project’s AQIA (*Technical Appendix B1*). The purpose of performing a localized significance is to assess the potential for the Project to create site-adjacent health impacts. The results of the dispersion modeling were then compared to the SCAQMD’s LSTs, which are presented below in Table 4.3-5, *SCAQMD Localized Significance Thresholds*. (Urban Crossroads, 2023a, pp. 56-61)



**Table 4.3-5 SCAQMD Localized Significance Thresholds**

Pollutant	Localized Significance Thresholds	
	Site Preparation/Grading	Long-Term Operation
CO (1 Hour)	20 ppm	20 ppm
CO (8 Hour)	9 ppm	9 ppm
NO <sub>2</sub> (1 Hour)	0.18 ppm	0.18 ppm
PM <sub>10</sub> (24 Hours)	10.4 µg/m <sup>3</sup>	2.5 µg/m <sup>3</sup>
PM <sub>2.5</sub> (24 Hours)	10.4 µg/m <sup>3</sup>	2.5 µg/m <sup>3</sup>

(Urban Crossroads, 2023a, Tables 3-11 through 3-13)

**2. Localized Thresholds for CO Emissions**

Based on the SCAQMD’s CEQA Air Quality Handbook (1993), a project’s localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations (Urban Crossroads, 2023a, pp. 65-66):

- 1-hour CO standard of 20.0 ppm
- 8-hour CO standard of 9.0 ppm

**D. Toxic Air Contaminant Thresholds**

The SCAQMD regulates levels of air toxics through a permitting process that covers both construction and operation. The SCAQMD has adopted Rule 1401 for both new and modified sources that use materials classified as air toxics. The SCAQMD CEQA Guidelines for permit processing consider the following types of projects significant:

- Any project involving the emission of a carcinogenic or toxic air contaminant identified in SCAQMD Rule 1401 that exceeds the maximum individual cancer risk of 10 in one million if the project is constructed with best available control strategy for toxics (T-BACT) using the procedures in SCAQMD Rule 1401.
- Any project that could accidentally release an acutely hazardous material or routinely release a toxic air contaminant posing an acute health hazard above an acute or chronic hazard index of 1.0.

**E. Methodology**

**1. California Emissions Estimator Model (CalEEMod)**

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In May 2022 the CAPCOA in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>) and greenhouse gas (GHG) emissions from direct and indirect sources, and to quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used to determine the



Project's construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendices 3.1 through 3.3 to the Project's AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 45)

## 2. Emissions Factors Model (EMFAC)

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10 $\mu$ m in diameter (PM<sub>10</sub>) generated with the 2021 version of the Emission FACtor model (EMFAC) developed by the CARB. EMFAC 2021 is a mathematical model that CARB developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. (Urban Crossroads, 2023b, p. 21)

## 3. Construction Emissions

Construction activities associated with the Project would result in emissions of VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction related emissions are expected from the following construction activities: site preparation, grading/blasting, building construction, paving, and architectural coating (Urban Crossroads, 2023a, p. 45).

### Construction Activities

#### Grading Activities

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Based on information provided by the Project Applicant, the Project would require approximately 6,820,000 cubic yards (c.y.) of cut and 6,820,000 c.y. of fill. The conceptual grading is intended to provide for an overall balanced earthwork condition, requiring no import or export of earthwork materials. (Urban Crossroads, 2023a, p. 45)

#### Blasting Activities

The estimated emissions of NO<sub>x</sub>, CO, and SO<sub>x</sub> from explosives used for blasting were determined using emission factors in Section 13.3 (Explosives Detonation) of AP-42, *Compilation of Air Pollutant Emissions Factors*, published in 1980 by the federal Environmental Protection Agency ("EPA" 1980), and PM<sub>10</sub> and PM<sub>2.5</sub> emissions were determined using Section 11.9 of AP-42 (EPA, 1980). According to AP-42, "Unburned hydrocarbons also result from explosions, but in most instances, methane is the only species that has been reported"; methane is not a VOC, and a methane emission factor has not been determined for ammonium nitrate/fuel oil (ANFO). Additional details on the emissions calculation associated with blasting are provided in Appendix 5.2 to the Project's AQIA (*Technical Appendix B1*). Based on information provided by the Project Applicant, it is anticipated that blasting would occur over an area of approximately 1.85 acres, and the Project



would require the export of approximately 68,877 cubic yards of rock. Blasting activities are expected to occur over a period of ten days, with no more than 3.44 tons of explosives detonated per day. (Urban Crossroads, 2023a, pp. 45-46)

**Off-Site Utility and Infrastructure Improvements**

In addition, there may be paving for off-site improvements associated with roadway construction and utility installation for the Project. It is expected that the off-site construction activities would not take place at one location for the entire duration of construction. Impacts associated with these activities are not expected to exceed the emissions identified for Project-related construction activities since the off-site construction areas would have physical constraints on the amount of daily activity that could occur. The physical constraints would limit the amount of construction equipment that could be used, and any offsite and utility infrastructure construction would not use equipment totals that would exceed the equipment totals previously depicted in EIR Table 3-4, *Anticipated Construction Equipment*. As such, no air quality impacts beyond what already is identified herein for on-site construction activities are expected to occur. (Urban Crossroads, 2023a, p. 46)

**On-Road Trips**

Construction generates on-road vehicle emissions from vehicle usage for workers, vendor trucks and haul trucks traveling to and from the site. The number of worker, vendor, and haul trips are presented in Table 4.3-6, *Construction Trip Assumptions*. Worker trips are based on CalEEMod defaults. It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. (Urban Crossroads, 2023a, p. 46)

**Table 4.3-6 Construction Trip Assumptions**

<b>Construction Activity</b>	<b>Worker Trips Per Day</b>	<b>Vendor Trips Per Day</b>	<b>Hauling Trips Per Day</b>
Site Preparation	35	119	14
Grading/Blasting	40	307	14
Building Construction	3,575	974	0
Paving	30	0	0
Architectural Coating	715	0	0

(Urban Crossroads, 2023a, Table 3-2)

**Construction Duration**

Refer to RDEIR subsection 3.6.1.B and RDEIR Table 3-3 for a description of the duration of anticipated construction activities.

**Construction Equipment**

Refer to RDEIR subsection 3.6.1.C and RDEIR Table 3-4 for a description of the duration of anticipated construction equipment.



#### 4. *Operational Emissions*

Operational activities associated with the Project would result in emissions of VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Operational emissions are expected from the following primary sources: Area Source Emissions, Energy Source Emissions, Mobile Source Emissions, On-Site Cargo Handling Equipment Emissions, and TRU Emissions. (Urban Crossroads, 2023a, p. 49)

##### **Area Source Emissions**

###### **Architectural Coatings**

Over a period of time the buildings that are part of this Project would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 49)

###### **Consumer Products**

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod. (Urban Crossroads, 2023a, p. 49)

###### **Landscape Maintenance Equipment**

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023a, pp. 49-50)

##### **Energy Source Emissions**

###### **Combustion Emissions Associated with Electricity**

Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are excluded from the evaluation of significance. (Urban Crossroads, 2023a, p. 50)

##### **Mobile Source Emissions**

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip





characteristics available from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) were used in the analysis. (Urban Crossroads, 2023a, p. 50)

### **Approach for Analysis of the Project**

In order to determine emissions from passenger car vehicles from industrial uses and all vehicles from the shopping center use, a trip length of 11.37 miles was used for all trips based on the Project's Vehicle Miles Traveled (VMT) Analysis (RDEIR *Technical Appendix L2*). For the Project's proposed industrial uses, it is important to note that although the Project's TA (EIR *Technical Appendix L3*) does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1<sup>1</sup> & LDT2<sup>2</sup>), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the fleet mix shown in Table 4.3-7, *Passenger Car Fleet Mix*, was utilized for the industrial uses. The CalEEMod default fleet mix was used for the commercial uses. (Urban Crossroads, 2023a, p. 50)

To determine emissions from trucks for the proposed industrial uses, the analysis incorporates the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2), 14.2 miles for 3-axle (MHDT) trucks, and 39.9 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages. The trip length function for the industrial uses have been revised to 30.51 miles for both the Primary Land Use Plan and Alternative Land Use Plan scenarios, and an assumption of 100% primary trips. Trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided by the SCAQMD recommended truck mix, by axle type. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1<sup>3</sup> & LHDT2<sup>4</sup>)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. To account for emissions generated by trucks, the fleet mix in Table 4.3-8, *Truck Fleet Mix*, was utilized. (Urban Crossroads, 2023a, p. 51)

### **Fugitive Dust Related to Vehicular Travel**

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod. (Urban Crossroads, 2023a, p. 52)

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<sup>1</sup> Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

<sup>2</sup> Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

<sup>3</sup> Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

<sup>4</sup> Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.



**Table 4.3-7 Passenger Car Fleet Mix**

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Cold Storage	53.21%	3.61%	24.28%	16.58%	2.32%
High-Cube Fulfillment					
High-Cube Warehouse					
Manufacturing					
Warehouse					
Industrial Park					

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types. (Urban Crossroads, 2023a, Table 3-6)

**Table 4.3-8 Truck Fleet Mix**

Phase	Land Use	% Vehicle Type			
		LHDT1	LHDT2	MHDT	HHDT
Primary Land Use Plan	High-Cube Cold Storage	18.80%	5.37%	13.39%	62.44%
	High-Cube Fulfillment				
	High-Cube Warehouse				
	Manufacturing				
	Warehouse				
	Industrial Park				
Alternative Land Use Plan	High-Cube Cold Storage	18.88%	5.40%	13.26%	62.46%
	High-Cube Fulfillment				
	High-Cube Warehouse				
	Manufacturing				
	Warehouse				
	Industrial Park				

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips. (Urban Crossroads, 2023a, Table 3-7)

**On-Site Cargo Handling Equipment Source Emissions**

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building’s truck court areas. In accordance with the County of Riverside Good Neighbor Policy for Logistics



and Warehouse/Distribution Uses (Policy F-3), it was assumed that all on-site operational equipment would be electric-powered<sup>5</sup>. (Urban Crossroads, 2023a, p. 52)

**TRU Emissions**

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. For modeling purposes, 2,208 two-way truck trips have been estimated to include TRUs (e.g., all truck trips that would be associated with up to 2,940,000 s.f. of high-cube cold storage use identified under both the Primary Land Use Plan and Alternative Land Use Plan (i.e., up to 40% of the total 7,350,000 s.f. of light industrial building area). TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on Emissions FACTor Model version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of Project level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with Project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations. (Urban Crossroads, 2023a, p. 52)

**5. Modeling Inputs for Mobile Source Health Risk Assessment**

The Project's HRA (*Technical Appendix B2*) was prepared based on SCAQMD guidelines to produce conservative estimates of risk posed by Project-related DPM emissions.

**Construction Health Risk Assessment**

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity as discussed above for the Project's AQIA and as described in further detail RDEIR Section 3.0 (refer specifically to RDEIR subsection 3.6.1) (Urban Crossroads, 2023b, pp. 18-19).

**Operational Emissions**

**On- and Off-Site Truck Activity**

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10 $\mu$ m in diameter (PM<sub>10</sub>) generated with the 2021 version of EMFAC by the CARB. The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the

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<sup>5</sup> The requirement that all on-site equipment shall be required to be powered by electricity also has been imposed herein as Mitigation Measure MM 4.3-5.



distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. (Urban Crossroads, 2023b, p. 21)

Several distinct emission processes are included in EMFAC 2021. Emission factors calculated using EMFAC 2021 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The emission processes and corresponding emission factor units associated with diesel particulate exhaust for this Project are presented below. (Urban Crossroads, 2023b, p. 21)

For the proposed Project, annual average PM<sub>10</sub> emission factors were generated by running EMFAC 2021 in EMFAC Mode for vehicles in the Riverside County jurisdiction. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. The vehicle travel speeds for each segment modeled are summarized below. (Urban Crossroads, 2023b, p. 21)

- Idling – on-site loading/unloading and truck gate
- 5 miles per hour – on-site vehicle movement including driving and maneuvering
- 25 miles per hour – off-site vehicle movement including driving and maneuvering.

It is expected that minimal idling would occur at nearby intersections during truck travel on study area roadways (e.g., at an intersection during a red light, or yielding to make a turn). Notwithstanding, the analysis conservatively utilizes a reduced off-site average speed of 25 miles per hour (below the posted speed limit) for travel on study area roadways, use of a lower average speed for off-site travel results in a higher emission factor and therefore accounts for any negligible idling that would occur during truck travel along within the study area. (Urban Crossroads, 2023b, p. 21)

Calculated emission factors are shown at Table 4.3-9, *2032-2062 Weighted Average DPM Emissions Factors*. A 2032-2062 EMFAC 2021 run covering a 30 year span (2032-2062) was conducted and averaged in order to account for the entire duration of the analysis provided in the Project’s HRA. Additionally, based on EMFAC 2021, Light-Heavy-Duty Trucks are comprised of 59.7% diesel, Medium-Heavy-Duty Trucks are comprised of 92.9% diesel, and Heavy-Heavy-Duty Trucks are comprised of 94.5% diesel. Trucks fueled by diesel are accounted for by these percentages accordingly in the emissions factor generation. Appendix 2.2 to the Project’s HRA (*Technical Appendix B2*) includes additional details on the emissions estimates from EMFAC. (Urban Crossroads, 2023b, p. 21)

**Table 4.3-9 2032-2062 Weighted Average DPM Emissions Factors**

Speed	Weighted Average
0 (idling)	0.00910 (g/idle-hr)
5	0.00832 (g/s)
25	0.00362 (g/s)

(Urban Crossroads, 2023b, Table 2-3)



The vehicle DPM exhaust emissions were calculated for running exhaust emissions. The running exhaust emissions were calculated by applying the running exhaust PM<sub>10</sub> emission factor (g/VMT) from EMFAC over the total distance traveled. The following equation was used to estimate off-site emissions for each of the different vehicle classes comprising the mobile sources: (Urban Crossroads, 2023b, pp. 21-22)

$$\text{Emissions}_{\text{SpeedA}} \text{ (g/s)} = \text{EF}_{\text{RunExhaust}} \text{ (g/VMT)} * \text{Distance (VMT/trip)} * \text{Number of Trips (trips/day)} \div \text{seconds per day}$$

Where:

- Emission<sub>SpeedA</sub> (g/s): Vehicle emissions at a given speed A;
- EF<sub>RunExhaust</sub> (g/VMT): EMFAC running exhaust PM<sub>10</sub> emission factor at speed A;
- Distance (VMT/trip): Total distance traveled per trip.

Similar to off-site traffic, on-site vehicle running emissions were calculated by applying the running exhaust PM<sub>10</sub> emission factor (g/VMT) from EMFAC and the total vehicle trip number over the length of the driving path using the same formula presented above for on-site emissions. In addition, on-site vehicle idling exhaust emissions were calculated by applying the idle exhaust PM<sub>10</sub> emission factor (g/idle-hr) from EMFAC and the total truck trip over the total assumed idle time (15 minutes). The following equation was used to estimate the on-site vehicle idling emissions for each of the different vehicle classes: (Urban Crossroads, 2023b, p. 22)

$$\text{Emissions}_{\text{Idle}} \text{ (g/s)} = \text{EF}_{\text{Idle}} \text{ (g/hr)} * \text{Number of Trips (trips/day)} * \text{Idling Time (min/trip)} * 60 \text{ minutes per hour} / \text{seconds per day}$$

Where:

- Emission<sub>Idle</sub> (g/s): Vehicle emissions during idling;
- EF<sub>Idle</sub> (g/s): EMFAC idle exhaust PM<sub>10</sub> emission factor.

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Due to the large number of volume sources modeled for the analysis, the corresponding coordinates of each volume source are included in Appendix 2.3 to the Project’s HRA (*Technical Appendix B2*). The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment and dividing the result by the number of volume sources along that roadway, as illustrated on Table 4.3-10 through Table 4.3-15 for Alternatives 1, 2, and 6, respectively. The modeled on-site emission sources are illustrated on Figure 4.3-12, *Modeled On-Site Emission Sources – All Alternative Truck Routes*, and the off-site emission sources are depicted on Figure 4.3-13, *Modeled Off-Site Emission Sources – Alternative Truck Route 1*, Figure 4.3-14, *Modeled Off-Site Emission Sources – Alternative Truck Route 2*, and Figure 4.3-15, *Modeled Off-Site Emission Sources – Alternative Truck Route 6* for Alternative 1, 2, and 6, respectively. The modeling domain is limited to the Project’s primary truck route and includes off-site sources in the study area for more than ¾-mile. This modeling domain is more inclusive and conservative than using only a ¼-mile modeling domain which is the



**Table 4.3-10 Alternative Truck Route 1 – DPM Emissions from Project Trucks (Without Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/Idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	39			0.0091	3.17	3.670E-05
On-Site Idling - Building 2	28			0.0091	2.30	2.659E-05
On-Site Idling - Building 3	25			0.0091	2.04	2.367E-05
On-Site Idling - Building 4	26			0.0091	2.14	2.473E-05
On-Site Idling - Building 5	29			0.0091	2.34	2.712E-05
On-Site Idling - Building 6	42			0.0091	3.45	3.989E-05
On-Site Idling - Building 7	23			0.0091	1.88	2.180E-05
On-Site Idling - Building 8	53			0.0091	4.34	5.026E-05
On-Site Idling - Building 9	160			0.0091	12.98	1.502E-04
On-Site Idling - Building 10	49			0.0091	4.02	4.653E-05
On-Site Idling - Building 11	206			0.0091	16.77	1.941E-04
On-Site Idling - Building 12 East	222			0.0091	18.09	2.094E-04
On-Site Idling - Building 12 West	222			0.0091	18.09	2.094E-04
On-Site Idling - Building 13	55			0.0091	4.48	5.185E-05
On-Site Idling - Building 14	12			0.0091	0.94	1.090E-05
On-Site Idling - Building 15	71			0.0091	5.74	6.648E-05
On-Site Idling - Building 16	88			0.0091	7.17	8.297E-05
On-Site Idling - Building 17	16			0.0091	1.26	1.463E-05
On-Site Idling - Building 18 East	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 18 West	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 19 East	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 19 West	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 20	79			0.0091	6.44	7.459E-05
On-Site Travel - Building 1	78	8.54	0.0083		0.14	1.580E-06
On-Site Travel - Building 2	56	5.32	0.0083		0.09	9.845E-07
On-Site Travel - Building 3	50	12.47	0.0083		0.20	2.307E-06
On-Site Travel - Building 4	53	8.48	0.0083		0.14	1.569E-06
On-Site Travel - Building 5	58	14.92	0.0083		0.24	2.761E-06
On-Site Travel - Building 6	85	14.70	0.0083		0.24	2.721E-06
On-Site Travel - Building 7	46	10.71	0.0083		0.17	1.981E-06
On-Site Travel - Building 8	107	39.79	0.0083		0.64	7.363E-06
On-Site Travel - Building 9	319	206.44	0.0083		3.30	3.820E-05
On-Site Travel - Building 10	99	17.64	0.0083		0.28	3.265E-06
On-Site Travel - Building 11	412	170.74	0.0083		2.73	3.159E-05
On-Site Travel - Building 12 East	445	352.38	0.0083		5.63	6.521E-05
On-Site Travel - Building 12 West	445	231.23	0.0083		3.70	4.279E-05
On-Site Travel - Building 13	110	32.26	0.0083		0.52	5.969E-06
On-Site Travel - Building 14	23	2.15	0.0083		0.03	3.978E-07
On-Site Travel - Building 15	141	54.81	0.0083		0.88	1.014E-05
On-Site Travel - Building 16	176	70.00	0.0083		1.12	1.295E-05
On-Site Travel - Building 17	31	3.16	0.0083		0.05	5.850E-07
On-Site Travel - Building 18	565	496.04	0.0083		7.93	9.179E-05
On-Site Travel - Building 19	565	550.33	0.0083		8.80	1.018E-04
On-Site Travel - Building 20	158	37.14	0.0083		0.59	6.872E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	4022	8663.32	0.0036		44.62	5.164E-04
Off-Site Travel - Antelope Rd. 1% Inbound/Outbound	40	9.15	0.0036		0.05	5.457E-07
Off-Site Travel - Nuevo Rd. 98% Inbound/Outbound	3942	15789.81	0.0036		81.32	9.412E-04
Off-Site Travel - Street A 1% Inbound/Outbound	40	8.74	0.0036		0.05	5.210E-07
Off-Site Travel - Ramona Expwy 1% Inbound/Outbound	40	12.82	0.0036		0.07	7.642E-07
Off-Site Travel - Ramona Expwy 2% Inbound/Outbound	80	825.03	0.0036		4.25	4.918E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.

<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 2.1 hours.

(Urban Crossroads, 2023b, Table 2-4)



**Table 4.3-11 Alternative Truck Route 1 – DPM Emissions from Project Trucks (With Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	39			0.0091	0.46	5.350E-06
On-Site Idling - Building 2	28			0.0091	0.33	3.877E-06
On-Site Idling - Building 3	25			0.0091	0.30	3.450E-06
On-Site Idling - Building 4	26			0.0091	0.31	3.605E-06
On-Site Idling - Building 5	29			0.0091	0.34	3.954E-06
On-Site Idling - Building 6	42			0.0091	0.50	5.815E-06
On-Site Idling - Building 7	23			0.0091	0.27	3.179E-06
On-Site Idling - Building 8	53			0.0091	0.63	7.327E-06
On-Site Idling - Building 9	160			0.0091	1.89	2.190E-05
On-Site Idling - Building 10	49			0.0091	0.59	6.784E-06
On-Site Idling - Building 11	206			0.0091	2.45	2.830E-05
On-Site Idling - Building 12 East	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 12 West	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 13	55			0.0091	0.65	7.559E-06
On-Site Idling - Building 14	12			0.0091	0.14	1.589E-06
On-Site Idling - Building 15	71			0.0091	0.84	9.692E-06
On-Site Idling - Building 16	88			0.0091	1.05	1.210E-05
On-Site Idling - Building 17	16			0.0091	0.18	2.132E-06
On-Site Idling - Building 18 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 18 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 20	79			0.0091	0.94	1.087E-05
On-Site Travel - Building 1	78	8.54	0.0083		0.10	1.201E-06
On-Site Travel - Building 2	56	5.32	0.0083		0.06	7.483E-07
On-Site Travel - Building 3	50	12.47	0.0083		0.15	1.753E-06
On-Site Travel - Building 4	53	8.48	0.0083		0.10	1.193E-06
On-Site Travel - Building 5	58	14.92	0.0083		0.18	2.099E-06
On-Site Travel - Building 6	85	14.70	0.0083		0.18	2.068E-06
On-Site Travel - Building 7	46	10.71	0.0083		0.13	1.506E-06
On-Site Travel - Building 8	107	39.79	0.0083		0.48	5.597E-06
On-Site Travel - Building 9	319	206.44	0.0083		2.51	2.904E-05
On-Site Travel - Building 10	99	17.64	0.0083		0.21	2.482E-06
On-Site Travel - Building 11	412	170.74	0.0083		2.08	2.402E-05
On-Site Travel - Building 12 East	445	352.38	0.0083		4.28	4.957E-05
On-Site Travel - Building 12 West	445	231.23	0.0083		2.81	3.253E-05
On-Site Travel - Building 13	110	32.26	0.0083		0.39	4.538E-06
On-Site Travel - Building 14	23	2.15	0.0083		0.03	3.024E-07
On-Site Travel - Building 15	141	54.81	0.0083		0.67	7.709E-06
On-Site Travel - Building 16	176	70.00	0.0083		0.85	9.846E-06
On-Site Travel - Building 17	31	3.16	0.0083		0.04	4.447E-07
On-Site Travel - Building 18	565	496.04	0.0083		6.03	6.977E-05
On-Site Travel - Building 19	565	550.33	0.0083		6.69	7.741E-05
On-Site Travel - Building 20	158	37.14	0.0083		0.45	5.224E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	4022	8663.32	0.0036		37.98	4.395E-04
Off-Site Travel - Antelope Rd. 1% Inbound/Outbound	40	9.15	0.0036		0.04	4.644E-07
Off-Site Travel - Nuevo Rd. 98% Inbound/Outbound	3942	15789.81	0.0036		69.21	8.011E-04
Off-Site Travel - Street A 1% Inbound/Outbound	40	8.74	0.0036		0.04	4.434E-07
Off-Site Travel - Ramona Expwy 1% Inbound/Outbound	40	12.82	0.0036		0.06	6.504E-07
Off-Site Travel - Ramona Expwy 2% Inbound/Outbound	80	825.03	0.0036		3.62	4.186E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.

<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 30 minutes.

(Urban Crossroads, 2023b, Table 2-5)



**Table 4.3-12 Alternative Truck Route 2 – DPM Emissions from Project Trucks (Without Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/Idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	39			0.0091	3.17	3.670E-05
On-Site Idling - Building 2	28			0.0091	2.30	2.659E-05
On-Site Idling - Building 3	25			0.0091	2.04	2.367E-05
On-Site Idling - Building 4	26			0.0091	2.14	2.473E-05
On-Site Idling - Building 5	29			0.0091	2.34	2.712E-05
On-Site Idling - Building 6	42			0.0091	3.45	3.989E-05
On-Site Idling - Building 7	23			0.0091	1.88	2.180E-05
On-Site Idling - Building 8	53			0.0091	4.34	5.026E-05
On-Site Idling - Building 9	160			0.0091	12.98	1.502E-04
On-Site Idling - Building 10	49			0.0091	4.02	4.653E-05
On-Site Idling - Building 11	206			0.0091	16.77	1.941E-04
On-Site Idling - Building 12 East	222			0.0091	18.09	2.094E-04
On-Site Idling - Building 12 West	222			0.0091	18.09	2.094E-04
On-Site Idling - Building 13	55			0.0091	4.48	5.185E-05
On-Site Idling - Building 14	12			0.0091	0.94	1.090E-05
On-Site Idling - Building 15	71			0.0091	5.74	6.648E-05
On-Site Idling - Building 16	88			0.0091	7.17	8.297E-05
On-Site Idling - Building 17	16			0.0091	1.26	1.463E-05
On-Site Idling - Building 18 East	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 18 West	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 19 East	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 19 West	141			0.0091	11.49	1.330E-04
On-Site Idling - Building 20	79			0.0091	6.44	7.459E-05
On-Site Travel - Building 1	78	8.54	0.0083		0.14	1.580E-06
On-Site Travel - Building 2	56	5.32	0.0083		0.09	9.845E-07
On-Site Travel - Building 3	50	12.47	0.0083		0.20	2.307E-06
On-Site Travel - Building 4	53	8.48	0.0083		0.14	1.569E-06
On-Site Travel - Building 5	58	14.92	0.0083		0.24	2.761E-06
On-Site Travel - Building 6	85	14.70	0.0083		0.24	2.721E-06
On-Site Travel - Building 7	46	10.71	0.0083		0.17	1.981E-06
On-Site Travel - Building 8	107	39.79	0.0083		0.64	7.363E-06
On-Site Travel - Building 9	319	206.44	0.0083		3.30	3.820E-05
On-Site Travel - Building 10	99	17.64	0.0083		0.28	3.265E-06
On-Site Travel - Building 11	412	170.74	0.0083		2.73	3.159E-05
On-Site Travel - Building 12 East	445	352.38	0.0083		5.63	6.521E-05
On-Site Travel - Building 12 West	445	231.23	0.0083		3.70	4.279E-05
On-Site Travel - Building 13	110	32.26	0.0083		0.52	5.969E-06
On-Site Travel - Building 14	23	2.15	0.0083		0.03	3.978E-07
On-Site Travel - Building 15	141	54.81	0.0083		0.88	1.014E-05
On-Site Travel - Building 16	176	70.00	0.0083		1.12	1.295E-05
On-Site Travel - Building 17	31	3.16	0.0083		0.05	5.850E-07
On-Site Travel - Building 18	565	496.04	0.0083		7.93	9.179E-05
On-Site Travel - Building 19	565	550.33	0.0083		8.80	1.018E-04
On-Site Travel - Building 20	158	37.14	0.0083		0.59	6.872E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	4022	8663.32	0.0036		44.62	5.164E-04
Off-Site Travel - Antelope Rd. 1% Inbound/Outbound	40	9.15	0.0036		0.05	5.457E-07
Off-Site Travel - Nuevo Rd. 98% Inbound/Outbound	3942	23617.61	0.0036		121.64	1.408E-03
Off-Site Travel - Street A 1% Inbound/Outbound	40	8.74	0.0036		0.05	5.210E-07
Off-Site Travel - Ramona Expwy 1% Inbound/Outbound	40	12.82	0.0036		0.07	7.642E-07
Off-Site Travel - Ramona Expwy 2% Inbound/Outbound	80	825.03	0.0036		4.25	4.918E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.

<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 2.1 hours.

(Urban Crossroads, 2023b, Table 2-6)





**Table 4.3-13 Alternative Truck Route 2 – DPM Emissions from Project Trucks (With Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	39			0.0091	0.46	5.350E-06
On-Site Idling - Building 2	28			0.0091	0.33	3.877E-06
On-Site Idling - Building 3	25			0.0091	0.30	3.450E-06
On-Site Idling - Building 4	26			0.0091	0.31	3.605E-06
On-Site Idling - Building 5	29			0.0091	0.34	3.954E-06
On-Site Idling - Building 6	42			0.0091	0.50	5.815E-06
On-Site Idling - Building 7	23			0.0091	0.27	3.179E-06
On-Site Idling - Building 8	53			0.0091	0.63	7.327E-06
On-Site Idling - Building 9	160			0.0091	1.89	2.190E-05
On-Site Idling - Building 10	49			0.0091	0.59	6.784E-06
On-Site Idling - Building 11	206			0.0091	2.45	2.830E-05
On-Site Idling - Building 12 East	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 12 West	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 13	55			0.0091	0.65	7.559E-06
On-Site Idling - Building 14	12			0.0091	0.14	1.589E-06
On-Site Idling - Building 15	71			0.0091	0.84	9.692E-06
On-Site Idling - Building 16	88			0.0091	1.05	1.210E-05
On-Site Idling - Building 17	16			0.0091	0.18	2.132E-06
On-Site Idling - Building 18 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 18 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 20	79			0.0091	0.94	1.087E-05
On-Site Travel - Building 1	78	8.54	0.0083		0.10	1.201E-06
On-Site Travel - Building 2	56	5.32	0.0083		0.06	7.483E-07
On-Site Travel - Building 3	50	12.47	0.0083		0.15	1.753E-06
On-Site Travel - Building 4	53	8.48	0.0083		0.10	1.193E-06
On-Site Travel - Building 5	58	14.92	0.0083		0.18	2.099E-06
On-Site Travel - Building 6	85	14.70	0.0083		0.18	2.068E-06
On-Site Travel - Building 7	46	10.71	0.0083		0.13	1.506E-06
On-Site Travel - Building 8	107	39.79	0.0083		0.48	5.597E-06
On-Site Travel - Building 9	319	206.44	0.0083		2.51	2.904E-05
On-Site Travel - Building 10	99	17.64	0.0083		0.21	2.482E-06
On-Site Travel - Building 11	412	170.74	0.0083		2.08	2.402E-05
On-Site Travel - Building 12 East	445	352.38	0.0083		4.28	4.957E-05
On-Site Travel - Building 12 West	445	231.23	0.0083		2.81	3.253E-05
On-Site Travel - Building 13	110	32.26	0.0083		0.39	4.538E-06
On-Site Travel - Building 14	23	2.15	0.0083		0.03	3.024E-07
On-Site Travel - Building 15	141	54.81	0.0083		0.67	7.709E-06
On-Site Travel - Building 16	176	70.00	0.0083		0.85	9.846E-06
On-Site Travel - Building 17	31	3.16	0.0083		0.04	4.447E-07
On-Site Travel - Building 18	565	496.04	0.0083		6.03	6.977E-05
On-Site Travel - Building 19	565	550.33	0.0083		6.69	7.741E-05
On-Site Travel - Building 20	158	37.14	0.0083		0.45	5.224E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	4022	8663.32	0.0036		37.98	4.395E-04
Off-Site Travel - Antelope Rd. 1% Inbound/Outbound	40	9.15	0.0036		0.04	4.644E-07
Off-Site Travel - Nuevo Rd. 98% Inbound/Outbound	3942	23617.61	0.0036		103.53	1.198E-03
Off-Site Travel - Street A 1% Inbound/Outbound	40	8.74	0.0036		0.04	4.434E-07
Off-Site Travel - Ramona Expwy 1% Inbound/Outbound	40	12.82	0.0036		0.06	6.504E-07
Off-Site Travel - Ramona Expwy 2% Inbound/Outbound	80	825.03	0.0036		3.62	4.186E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.

<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 30 minutes.

(Urban Crossroads, 2023b, Table 2-7)



**Table 4.3-14 Alternative Truck Route 6 – DPM Emissions from Project Trucks (Without Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/Idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	38			0.0091	3.17	3.668E-05
On-Site Idling - Building 2	28			0.0091	2.30	2.658E-05
On-Site Idling - Building 3	25			0.0091	2.04	2.366E-05
On-Site Idling - Building 4	26			0.0091	2.14	2.472E-05
On-Site Idling - Building 5	28			0.0091	2.34	2.711E-05
On-Site Idling - Building 6	42			0.0091	3.44	3.987E-05
On-Site Idling - Building 7	23			0.0091	1.88	2.179E-05
On-Site Idling - Building 8	52			0.0091	4.34	5.023E-05
On-Site Idling - Building 9	157			0.0091	12.97	1.502E-04
On-Site Idling - Building 10	49			0.0091	4.02	4.651E-05
On-Site Idling - Building 11	203			0.0091	16.76	1.940E-04
On-Site Idling - Building 12 East	219			0.0091	18.08	2.093E-04
On-Site Idling - Building 12 West	219			0.0091	18.08	2.093E-04
On-Site Idling - Building 13	54			0.0091	4.48	5.183E-05
On-Site Idling - Building 14	11			0.0091	0.94	1.090E-05
On-Site Idling - Building 15	69			0.0091	5.74	6.645E-05
On-Site Idling - Building 16	87			0.0091	7.16	8.293E-05
On-Site Idling - Building 17	15			0.0091	1.26	1.462E-05
On-Site Idling - Building 18 East	139			0.0091	11.48	1.329E-04
On-Site Idling - Building 18 West	139			0.0091	11.48	1.329E-04
On-Site Idling - Building 19 East	139			0.0091	11.48	1.329E-04
On-Site Idling - Building 19 West	139			0.0091	11.48	1.329E-04
On-Site Idling - Building 20	78			0.0091	6.44	7.455E-05
On-Site Travel - Building 1	77	8.39	0.0083		0.14	1.566E-06
On-Site Travel - Building 2	56	5.23	0.0083		0.08	9.758E-07
On-Site Travel - Building 3	49	12.25	0.0083		0.20	2.286E-06
On-Site Travel - Building 4	52	8.34	0.0083		0.13	1.555E-06
On-Site Travel - Building 5	57	14.67	0.0083		0.24	2.736E-06
On-Site Travel - Building 6	83	14.45	0.0083		0.23	2.697E-06
On-Site Travel - Building 7	46	10.53	0.0083		0.17	1.964E-06
On-Site Travel - Building 8	105	39.12	0.0083		0.63	7.298E-06
On-Site Travel - Building 9	314	202.95	0.0083		3.27	3.787E-05
On-Site Travel - Building 10	97	17.35	0.0083		0.28	3.236E-06
On-Site Travel - Building 11	405	167.86	0.0083		2.71	3.132E-05
On-Site Travel - Building 12 East	437	346.43	0.0083		5.58	6.463E-05
On-Site Travel - Building 12 West	437	227.32	0.0083		3.66	4.241E-05
On-Site Travel - Building 13	108	31.71	0.0083		0.51	5.917E-06
On-Site Travel - Building 14	23	2.11	0.0083		0.03	3.943E-07
On-Site Travel - Building 15	139	53.88	0.0083		0.87	1.005E-05
On-Site Travel - Building 16	173	68.81	0.0083		1.11	1.284E-05
On-Site Travel - Building 17	31	3.11	0.0083		0.05	5.799E-07
On-Site Travel - Building 18	555	487.65	0.0083		7.86	9.098E-05
On-Site Travel - Building 19	555	541.03	0.0083		8.72	1.009E-04
On-Site Travel - Building 20	156	36.51	0.0083		0.59	6.812E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	3954	8516.85	0.0036		44.09	5.103E-04
Off-Site Travel - Antelope Rd. 100% Inbound/Outbound	3954	1220.59	0.0036		6.32	7.313E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.  
<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.  
<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 2.1 hours.

(Urban Crossroads, 2023b, Table 2-8)



**Table 4.3-15 Alternative Truck Route 6 – DPM Emissions from Project Trucks (With Mitigation)**

Truck Emission Rates						
Source	Trucks Per Day	VMT <sup>a</sup> (miles/day)	Truck Emission Rate <sup>b</sup> (grams/mile)	Truck Emission Rate <sup>b</sup> (grams/Idle-hour)	Daily Truck Emissions <sup>c</sup> (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Building 1	39			0.0091	0.46	5.350E-06
On-Site Idling - Building 2	28			0.0091	0.33	3.877E-06
On-Site Idling - Building 3	25			0.0091	0.30	3.450E-06
On-Site Idling - Building 4	26			0.0091	0.31	3.605E-06
On-Site Idling - Building 5	29			0.0091	0.34	3.954E-06
On-Site Idling - Building 6	42			0.0091	0.50	5.815E-06
On-Site Idling - Building 7	23			0.0091	0.27	3.179E-06
On-Site Idling - Building 8	53			0.0091	0.63	7.327E-06
On-Site Idling - Building 9	160			0.0091	1.89	2.190E-05
On-Site Idling - Building 10	49			0.0091	0.59	6.784E-06
On-Site Idling - Building 11	206			0.0091	2.45	2.830E-05
On-Site Idling - Building 12 East	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 12 West	222			0.0091	2.64	3.053E-05
On-Site Idling - Building 13	55			0.0091	0.65	7.559E-06
On-Site Idling - Building 14	12			0.0091	0.14	1.589E-06
On-Site Idling - Building 15	71			0.0091	0.84	9.692E-06
On-Site Idling - Building 16	88			0.0091	1.05	1.210E-05
On-Site Idling - Building 17	16			0.0091	0.18	2.132E-06
On-Site Idling - Building 18 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 18 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 East	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 19 West	141			0.0091	1.67	1.938E-05
On-Site Idling - Building 20	79			0.0091	0.94	1.087E-05
On-Site Travel - Building 1	78	8.54	0.0083		0.10	1.201E-06
On-Site Travel - Building 2	56	5.32	0.0083		0.06	7.483E-07
On-Site Travel - Building 3	50	12.47	0.0083		0.15	1.753E-06
On-Site Travel - Building 4	53	8.48	0.0083		0.10	1.193E-06
On-Site Travel - Building 5	58	14.92	0.0083		0.18	2.099E-06
On-Site Travel - Building 6	85	14.70	0.0083		0.18	2.068E-06
On-Site Travel - Building 7	46	10.71	0.0083		0.13	1.506E-06
On-Site Travel - Building 8	107	39.79	0.0083		0.48	5.597E-06
On-Site Travel - Building 9	319	206.44	0.0083		2.51	2.904E-05
On-Site Travel - Building 10	99	17.64	0.0083		0.21	2.482E-06
On-Site Travel - Building 11	412	170.74	0.0083		2.08	2.402E-05
On-Site Travel - Building 12 East	445	352.38	0.0083		4.28	4.957E-05
On-Site Travel - Building 12 West	445	231.23	0.0083		2.81	3.253E-05
On-Site Travel - Building 13	110	32.26	0.0083		0.39	4.538E-06
On-Site Travel - Building 14	23	2.15	0.0083		0.03	3.024E-07
On-Site Travel - Building 15	141	54.81	0.0083		0.67	7.709E-06
On-Site Travel - Building 16	176	70.00	0.0083		0.85	9.846E-06
On-Site Travel - Building 17	31	3.16	0.0083		0.04	4.447E-07
On-Site Travel - Building 18	565	496.04	0.0083		6.03	6.977E-05
On-Site Travel - Building 19	565	550.33	0.0083		6.69	7.741E-05
On-Site Travel - Building 20	158	37.14	0.0083		0.45	5.224E-06
Off-Site Travel - Orange Ave./Antelope Rd. 100% Inbound/Outbound	4022	8663.32	0.0036		37.98	4.395E-04
Off-Site Travel - Antelope Rd. 1% Inbound/Outbound	40	9.15	0.0036		0.04	4.644E-07
Off-Site Travel - Nuevo Rd. 98% Inbound/Outbound	3942	23617.61	0.0036		103.53	1.198E-03
Off-Site Travel - Street A 1% Inbound/Outbound	40	8.74	0.0036		0.04	4.434E-07
Off-Site Travel - Ramona Expwy 1% Inbound/Outbound	40	12.82	0.0036		0.06	6.504E-07
Off-Site Travel - Ramona Expwy 2% Inbound/Outbound	80	825.03	0.0036		3.62	4.186E-05

<sup>a</sup> Vehicle miles traveled are for modeled truck route only.

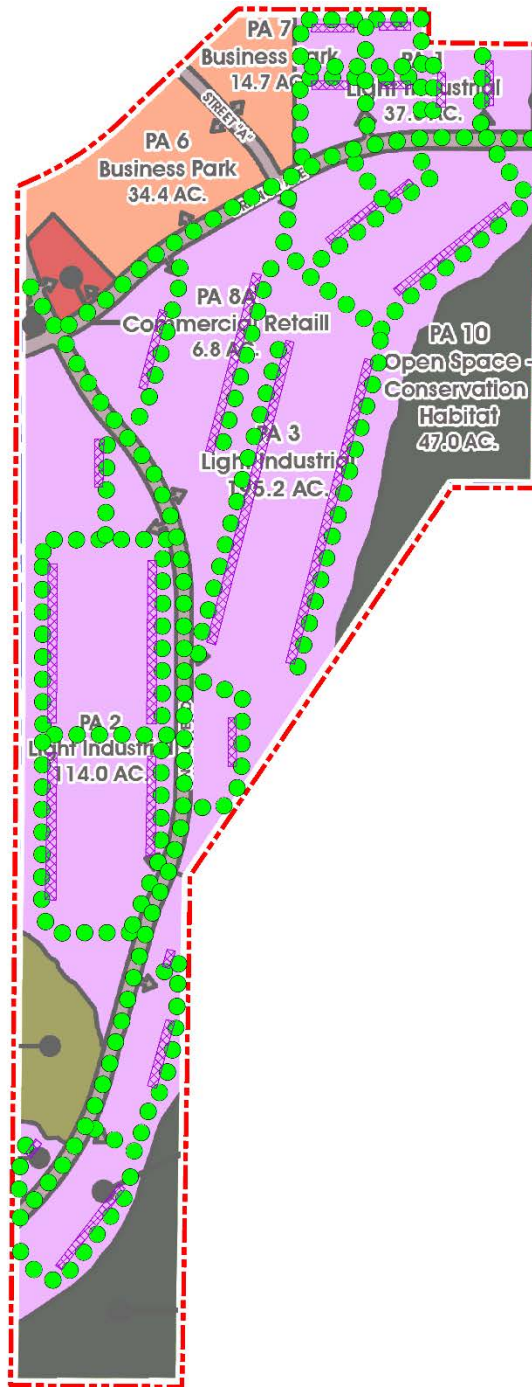
<sup>b</sup> Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

<sup>c</sup> This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes and each TRU operates for 30 minutes.

(Urban Crossroads, 2023b, Table 2-9)



Figure 4.3-12 Modeled On-Site Emission Sources – All Alternative Truck Routes



**LEGEND:**

- Site Boundary
- Truck Movements
- Loading Dock Activity



Figure 4.3-13 Modeled Off-Site Emission Sources – Alternative Truck Route 1

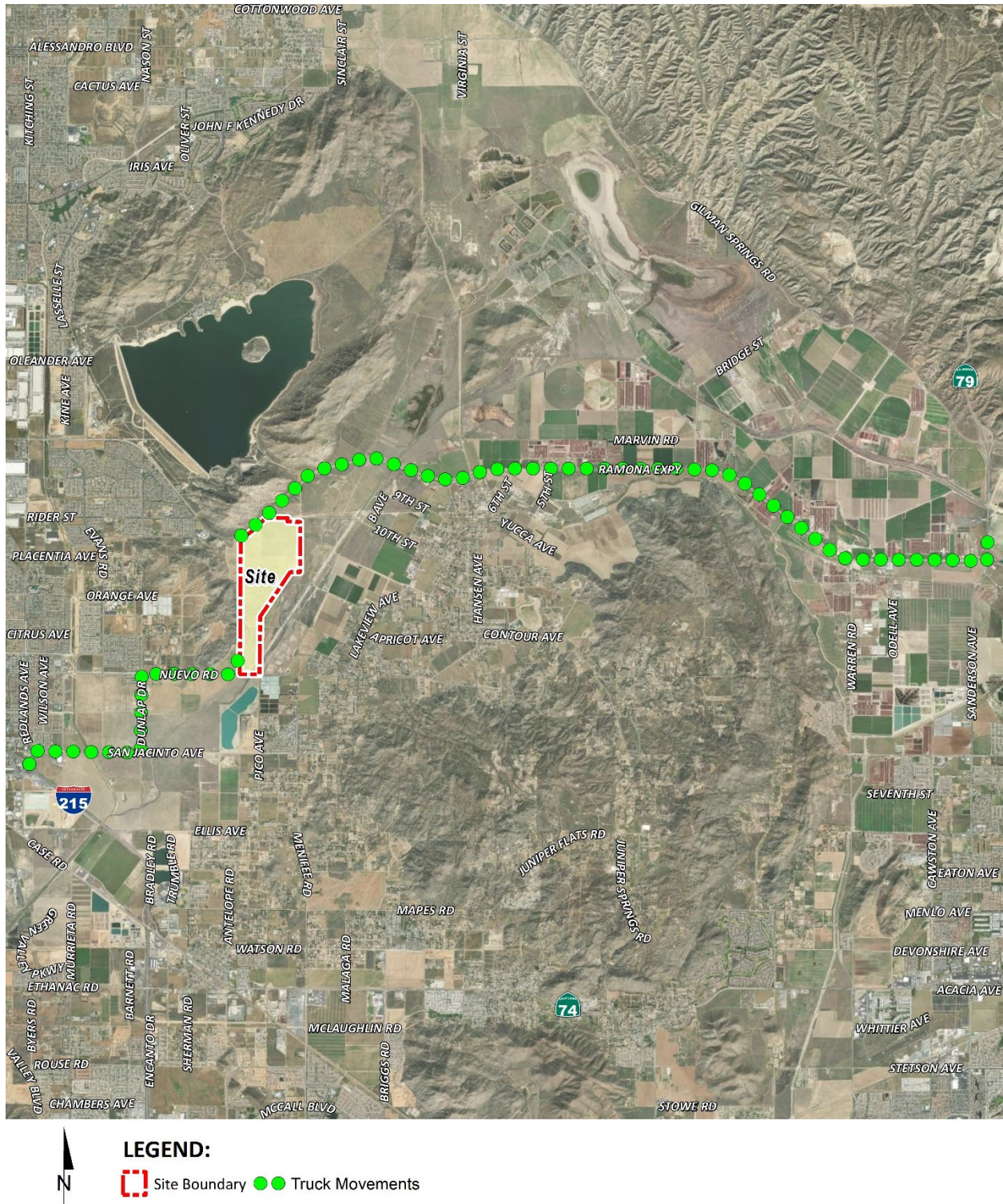




Figure 4.3-14 Modeled Off-Site Emission Sources – Alternative Truck Route 2

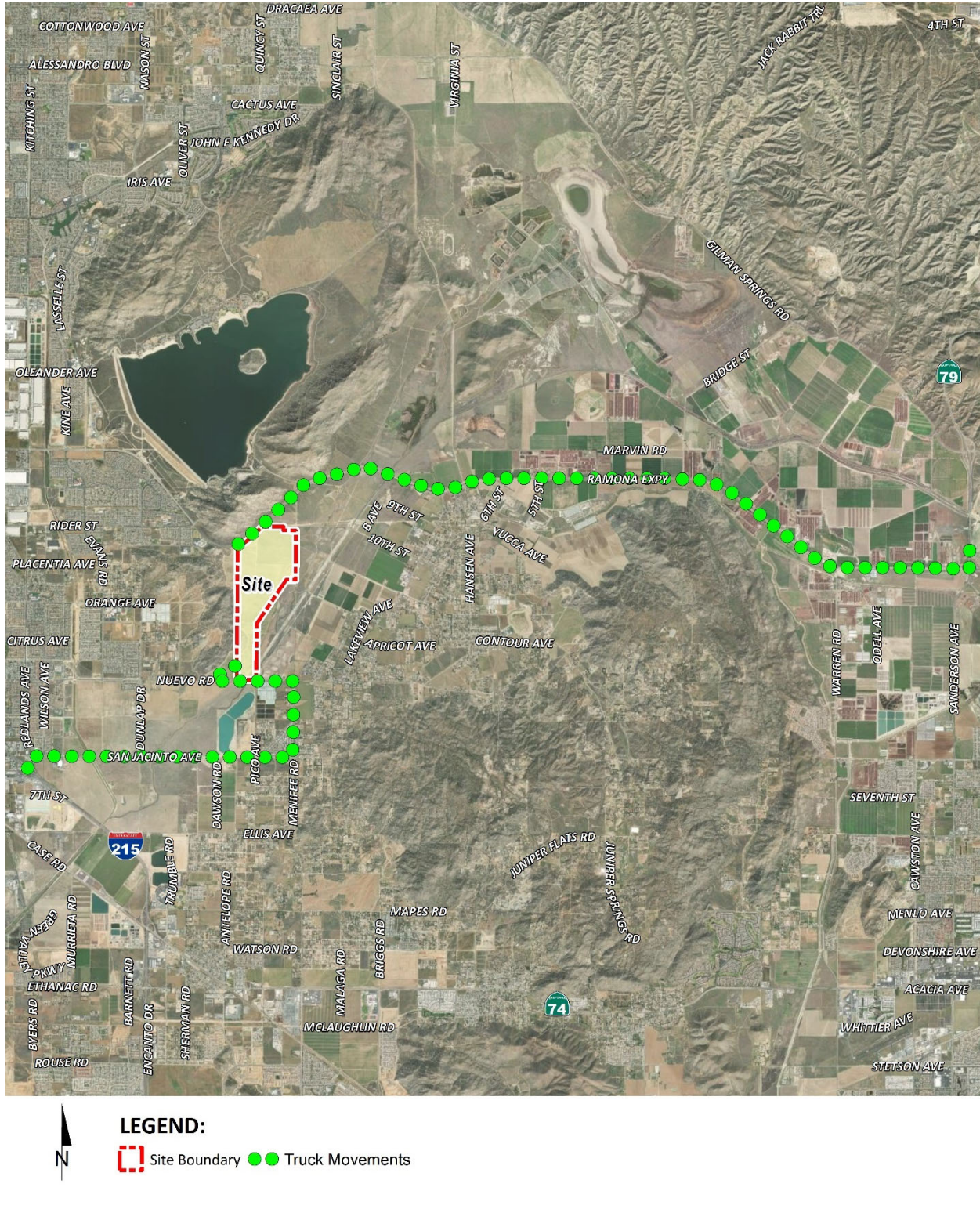
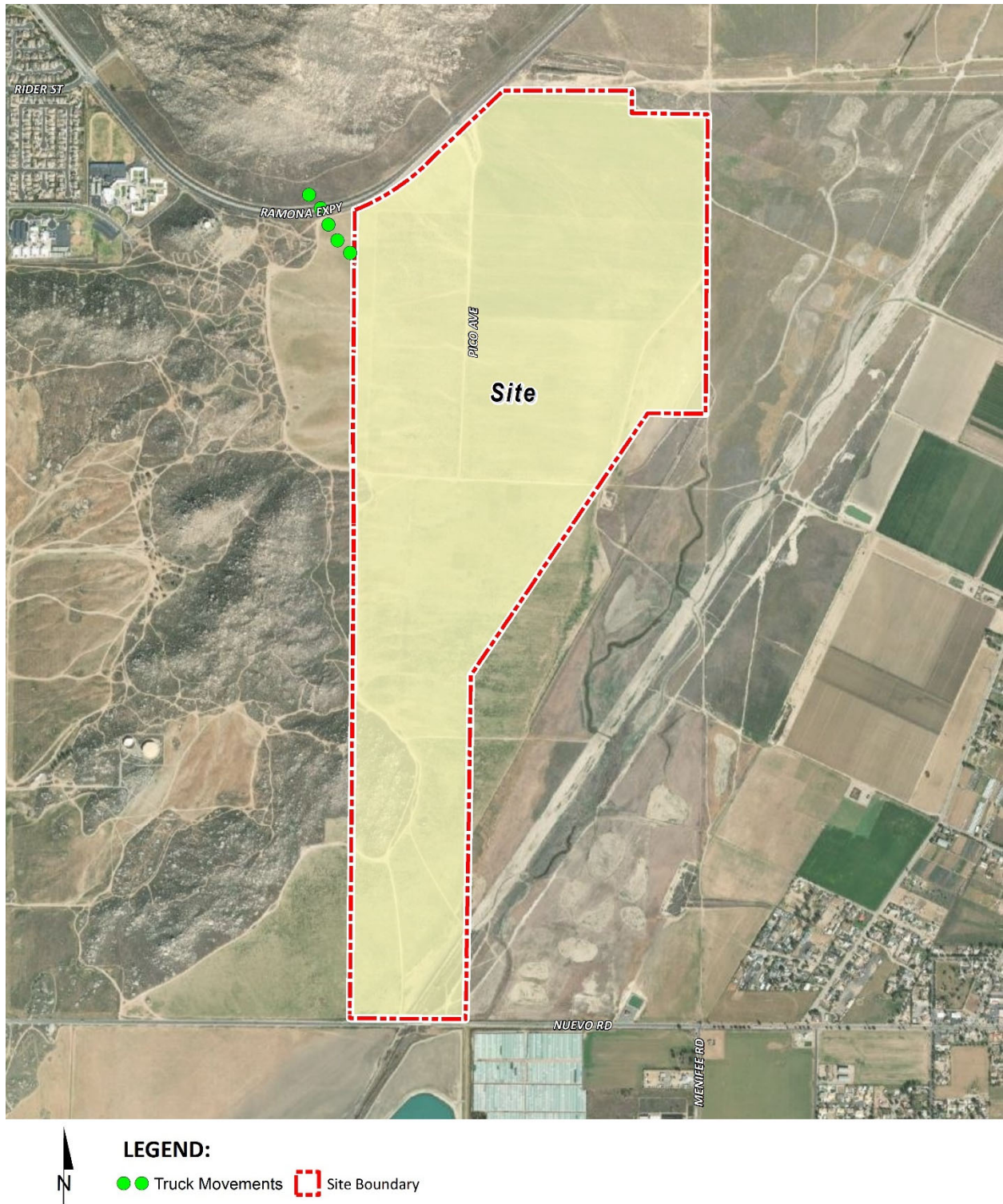




Figure 4.3-15 Modeled Off-Site Emission Sources – Alternative Truck Route 6





distance supported by several reputable studies which conclude that the greatest potential risks occur within a ¼-mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling and on-site travel). (Urban Crossroads, 2023b, pp. 22-23)

On-site truck idling was estimated to occur as trucks enter and travel through the Project site. Although the Project’s diesel-fueled truck and equipment operators will be required by State law to comply with CARB’s idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling (8), which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, this analysis calculates truck idling at 15 minutes, consistent with SCAQMD’s recommendation. (Urban Crossroads, 2023b, p. 23)

**4.3.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. (Urban Crossroads, 2023a, pp. 66-67)

Currently, these State and federal air quality standards are exceeded in most parts of the SCAB although, as discussed above in subsections 4.3.1.G and 4.3.1.H, overall air quality in the SCAB is vastly improving – even in the face of tremendous population growth over the past decades. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (Urban Crossroads, 2023a, p. 67)

The 2022 AQMP was adopted by SCAQMD’s Governing Board on December 2, 2022. In order to attain its goals of reducing smog-forming emissions by 70% beyond existing regulations by 2037, the 2022 AQMP would expand zero-emission regulations across all sectors, including water and space heating as well as for on-road vehicles, construction equipment, and industrial facilities. The 2022 AQMP will next need to be approved by CARB and will then be submitted to the United States Environmental Protection Agency for review and approval. (Urban Crossroads, 2023a, p. 67)

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below:





- **Consistency Criterion No. 1:** *Potential to 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 refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

#### **Construction Impacts – Consistency Criterion No. 1**

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized or regional significance thresholds were exceeded. As indicated under the analysis of Thresholds b. and c., the Project’s localized and regional construction-source emissions would not exceed applicable regional significance threshold or LST thresholds. Thus, the Project’s construction-related emissions would be consistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 67)

#### **Operational Impacts – Consistency Criterion No. 1**

As indicated under the discussion and analysis of Threshold c., the Project’s localized operational-source emissions would not exceed applicable LSTs. However, and as discussed under the analysis of Threshold b., Project operational-source emissions would exceed applicable regional thresholds for emissions of VOC, NO<sub>x</sub>, and CO. It should be noted that because the SCAB is in attainment for CO, the Project’s regional CO emissions would not conflict with the AQMP despite exceeding the SCAQMD regional significance threshold; notwithstanding, and in order to provide a conservative analysis of the Project’s potential impacts to air quality, the Project’s emissions of CO are evaluated as a significant impact of the Project. Accordingly, Project operational-source VOC, NO<sub>x</sub>, and CO emissions exceedances would therefore increase the frequency or severity of existing air quality violations and would cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

#### **Conclusion – Consistency Criterion No. 1**

On the basis of the preceding discussion, the Project is determined to be inconsistent with the first criterion.

- **Consistency Criterion No. 2:** *Potential to exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2022 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 adopted by cities in the district 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. (Urban Crossroads, 2023a, p. 68)

#### **Construction Impacts – Consistency Criterion No. 2**

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site’s land



use designation, development of the site to its maximum potential would likely occur, with disturbance of the majority of the Project site occurring during construction activities. As such, when considering that no construction-related emissions thresholds would be exceeded (as discussed under the analysis of Thresholds b. and c.), the Project's construction-related emissions would be consistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 68)

***Operational Impacts – Consistency Criterion No. 2***

The proposed Project is located in unincorporated Riverside County and is located within the Lakeview/Nuevo Area Plan. The County of Riverside General Plan and Lakeview/Nuevo Area Plan designate the Project site for Medium Density Residential (MDR), Medium-High Density Residential (MHDR), Very-High Density Residential (VHDR), Commercial Retail (CR), Community Center (CC), Open Space – Conservation (OS-C), Open-Space Recreation (OS-R), and Open Space – Water (OS-W) land uses. The Project Applicant proposes to amend the General Plan and Lakeview/Nuevo Area Plan to redesignate the Project site for Light Industrial (LI), Business Park (BP), Commercial Retail (CR), Open Space – Conservation (OS-C), and Open Space – Conservation Habitat land uses.

The 2022 AQMP does not reflect the proposed land use designation for the Project site as summarized above. For this reason, there is the potential for the Project to exceed air quality impact assumptions in the AQMP or increments based on the years of Project build-out phase. Consequently, the development of the Project site as proposed would generate operational-source emissions not reflected within the current 2022 AQMP regional emissions inventory for the SCAB. Thus, the Project would be inconsistent with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 68)

***Conclusion – Consistency Criterion No. 2***

On the basis of the preceding discussion, the Project is determined to be inconsistent with the second criterion.

**AQMP Consistency Conclusion**

The Project would be inconsistent with AQMP Criterion No's. 1 and 2 under long-term operational conditions, resulting in a determination that impacts in this regard would be potentially significant. The Project would implement air quality mitigation measures identified below in subsection 4.3.7, which would act to generally reduce the Project's operational-source air pollutant emissions. Additionally, incorporation of contemporary energy-efficient technologies and operational programs and compliance with SCAQMD emissions reductions and control requirements would serve to reduce Project air pollutant emissions generally. Notwithstanding, based on the analysis presented above, the Project is considered to be inconsistent with applicable AQMP Consistency Criteria. This is evaluated as a significant impact of the proposed Project. (Urban Crossroads, 2023a, pp. 68-69)



***Threshold b.: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

**Construction Emissions**

Construction activities associated with the Project would result in emissions of VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction-related emissions are expected from the following construction activities: site preparation, grading/blasting, building construction, paving, and architectural coating. Refer to Subsection 3.4 of the Project’s AQIA (*Technical Appendix B1*) for a description of the modeling inputs used to calculate the Project’s estimated construction-related air pollutant emissions. (Urban Crossroads, 2023a, pp. 45-48)

CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions without mitigation for both summer and winter periods are summarized on Table 4.3-16, *Overall Construction Emissions Summary – Without Mitigation*. Detailed unmitigated construction model outputs are presented in Appendix 3.1 to the Project’s AQIA (*Technical Appendix B1*). Under the assumed scenarios, emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD. Accordingly, impacts due to the Project’s regional air quality emissions during construction activities would be less than significant requiring no mitigation. (Urban Crossroads, 2023a, p. 48)

**Operational Emissions**

Operational activities associated with the Project would result in emissions of VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Operational emissions are expected from the following primary sources: area source emissions, energy source emissions, mobile source emissions, on-site cargo handling equipment emissions, and Transportation Refrigeration Unit (TRU) emissions. Refer to subsection 4.3.3.E (above) for a description of modeling inputs and assumptions used to calculate the Project’s operational emissions. (Urban Crossroads, 2023a, pp. 49-52)

As previously stated, CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized on Table 4.3-17, *Summary of Peak Operational Emissions – Primary Land Use Plan*, for the Primary Land Use Plan (without MCP) scenario, and Table 4.3-18, *Summary of Peak Operations – Alternative Land Use Plan*, for the Alternative Land Use Plan (with MCP) scenario. Detailed operation model outputs for the Project are presented in Appendix 3.3 to the Project’s AQIA (*Technical Appendix B1*). Under both the Primary Land Use Plan and Alternative Land Use Plan, the Project would exceed the numerical thresholds of significance established by the SCAQMD for emissions of VOCs, NO<sub>x</sub>, and CO. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O<sub>3</sub>, and VOCs and NO<sub>x</sub> are precursors to ozone formation. Thus, the Project’s emissions of VOCs and NO<sub>x</sub> would cumulatively contribute to a net increase of a criteria pollutant (O<sub>3</sub>) for which the SCAB is considered nonattainment. Although the SCAB is considered attainment for CO, because the Project would exceed the



Table 4.3-16 Overall Construction Emissions Summary – Without Mitigation

Year	Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer						
2023	1.35	69.55	295.44	7.02	15.93	6.26
2024	1.80	79.55	310.04	7.09	11.77	3.43
2025	1.70	79.05	309.64	7.09	11.77	3.43
2026	47.30	58.10	375.00	0.30	65.40	16.10
2027	46.30	55.00	352.00	0.30	65.40	16.10
2028	45.70	53.40	332.00	0.30	65.40	16.10
2029	45.00	50.40	314.00	0.30	65.40	16.10
2030	42.40	47.30	296.00	0.30	65.40	16.10
2031	41.70	46.20	282.00	0.30	65.40	15.90
Winter						
2023	1.33	69.85	294.74	7.02	15.93	6.26
2024	1.77	80.15	309.34	7.09	15.93	6.26
2025	1.67	79.55	308.94	7.09	11.77	3.43
2026	46.20	61.40	300.00	0.30	65.40	16.10
2027	45.30	58.30	282.00	0.30	65.40	16.10
2028	44.70	56.70	267.00	0.30	65.40	16.10
2029	42.30	53.50	252.00	0.30	65.40	16.10
2030	41.60	50.70	241.00	0.30	65.40	16.10
2031	40.90	47.50	228.00	0.30	65.40	15.90
<b>Maximum Daily Emissions</b>	<b>47.30</b>	<b>80.15</b>	<b>375.00</b>	<b>7.09</b>	<b>65.40</b>	<b>16.10</b>
SCAQMD Regional Threshold	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 to the Project’s AQIA (Technical Appendix B1).  
(Urban Crossroads, 2023a, Table 3-5)



Table 4.3-17 Summary of Peak Operational Emissions – Primary Land Use Plan

Source	Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer						
Mobile Source	66.50	327.00	685.00	4.46	128.00	30.50
Area Source	266.00	3.13	371.00	0.02	0.50	0.66
Energy Source	3.04	55.40	46.50	0.33	4.21	4.21
TRU Source	79.96	87.56	9.54	0.00	3.73	3.43
<b>Total Maximum Daily Emissions</b>	<b>415.50</b>	<b>473.09</b>	<b>1,112.04</b>	<b>4.81</b>	<b>136.44</b>	<b>38.80</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
Winter						
Mobile Source	63.60	344.00	586.00	4.36	128.00	30.50
Area Source	205.00	0.00	0.00	0.00	0.00	0.00
Energy Source	3.04	55.40	46.50	0.33	4.21	4.21
TRU Source	79.96	87.56	9.54	0.00	3.73	3.43
<b>Total Maximum Daily Emissions</b>	<b>351.60</b>	<b>486.96</b>	<b>642.04</b>	<b>4.69</b>	<b>135.94</b>	<b>38.14</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.3 to the Project's AQIA (Technical Appendix B1).

(Urban Crossroads, 2023a, Table 3-8)



**Table 4.3-18 Summary of Peak Operations – Alternative Land Use Plan**

Source	Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Summer						
Mobile Source	66.00	322.00	680.00	4.40	126.00	30.10
Area Source	262.00	3.08	366.00	0.02	0.49	0.65
Energy Source	3.00	54.50	45.80	0.33	4.14	4.14
TRU Source	79.96	87.56	9.54	0.00	3.73	3.43
<b>Total Maximum Daily Emissions</b>	<b>410.96</b>	<b>467.14</b>	<b>1,101.34</b>	<b>4.75</b>	<b>134.36</b>	<b>38.32</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
Winter						
Mobile Source	63.20	338.00	581.00	4.30	126.00	30.10
Area Source	202.00	0.00	0.00	0.00	0.00	0.00
Energy Source	3.00	54.50	45.80	0.33	4.14	4.14
TRU Source	79.96	87.56	9.54	0.00	3.73	3.43
<b>Total Maximum Daily Emissions</b>	<b>348.16</b>	<b>480.06</b>	<b>636.34</b>	<b>4.63</b>	<b>133.87</b>	<b>37.67</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.3 to the Project’s AQIA (Technical Appendix B1).

(Urban Crossroads, 2023a, Table 3-9)

SCAQMD regional threshold for this pollutant, impacts due to emissions of CO are conservatively evaluated as significant. Accordingly, the Project’s long-term operational emissions of VOCs, NO<sub>x</sub>, and CO would represent a significant impact for which mitigation would be required. (Urban Crossroads, 2023a, p. 52)

***Threshold c.: Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?***

During construction and operational activities, the Project has the potential to expose nearby sensitive receptors to substantial pollutant concentrations. The following provides an analysis based on the applicable LSTs established by the State of California and SCAQMD, an analysis of the Project’s potential to result in or contribute to CO “hot spots,” and an analysis of the Project’s potential to result in cancer risks and non-cancer health hazards.

**A. Localized Significance Thresholds (LSTs) Analysis**

In order to estimate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. The modeling approach utilized is discussed in detail in subsection 4.3.3.E (above). (Urban Crossroads, 2023a, p. 59)



Sensitive receptors considered as part of the analysis previously were depicted on Figure 4.3-11 and were described previously in subsection 4.3.1.I. Consistent with the *LST Methodology*, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM<sub>10</sub> and PM<sub>2.5</sub>, since PM<sub>10</sub> and PM<sub>2.5</sub> thresholds are based on a 24-hour averaging time. Per the *LST Methodology*, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, the *LST Methodology* explicitly states that “LSTs based on shorter averaging periods, such as the NO<sub>2</sub> and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours.” Therefore, any adjacent land use where an individual could remain for 1 or 8 hours, that is located at a closer distance to the Project site than the receptor used for PM<sub>10</sub> and PM<sub>2.5</sub> analysis, must be considered to determine construction and operational LST air impacts for emissions of NO<sub>2</sub> and CO since these pollutants have an averaging time of 1 and 8 hours. (Urban Crossroads, 2023a, pp. 59-60)

#### **Localized Significance Thresholds (LSTs) – Construction**

Based on SCAQMD’s *LST Methodology*, emissions of concern during construction activities are on-site NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. The *LST Methodology* clearly states that “off-site mobile emissions from the Project should not be included in the emissions compared to LSTs.” As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod “onsite” emissions outputs were considered. (Urban Crossroads, 2023a, p. 58)

The “acres disturbed” for analytical purposes are based on specific equipment type for each subcategory of construction activity and the estimated maximum area a given piece of equipment can pass over in an 8-hour workday (as shown on Table 3-10 of the Project’s AQIA, included as *Technical Appendix B1*). The equipment-specific grading rates are summarized in the SCAQMD’s *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User’s Guide *Appendix C: Emission Calculation Details for CalEEMod*. The disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. In other words, one Rubber Tired Dozer can make multiple passes over the same land area totaling 0.5 acres in a given 8-hour day. Based on Table 3-10 of the Project’s AQIA, the Project’s construction activities could actively disturb approximately 7.0 acres per day during site preparation activities and 8.0 acres per day during grading activities. (Urban Crossroads, 2023a, p. 58)

As shown on Table 4.3-19, *Localized Significance Summary – Peak Construction*, emissions during the peak construction activity would not exceed the SCAQMD’s localized significance thresholds at the maximally exposed receptor location. All other modeled locations in the Project’s study area would experience a lesser concentration and consequently a lesser impact. As such, the Project’s localized impacts during construction activity would be less than significant. Outputs from the model runs for construction LSTs are provided in Appendix 3.13 to the Project’s AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 63)



**Table 4.3-19 Localized Significance Summary – Peak Construction**

Peak Construction	CO		NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.03	0.01	4.46E-03	0.21	0.06
Background Concentration <sup>A</sup>	2.1	1.8	0.066		
<b>Total Concentration</b>	<b>2.13</b>	<b>1.81</b>	<b>0.07</b>	<b>0.21</b>	<b>0.06</b>
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>A</sup> Highest concentration from the last three years of available data.

Notes: PM<sub>10</sub> and PM<sub>2.5</sub> concentrations are expressed in µg/m<sup>3</sup>. All others are expressed in ppm.

(Urban Crossroads, 2023a, Table 3-11)

**Localized Significance Thresholds (LSTs) – Long-Term Operations**

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment, as discussed in Section 3.5 of Project’s AQIA, included as *Technical Appendix B1*). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, to establish a maximum potential impact scenario for analytic purposes, the modeled emissions include all on-site Project-related stationary (area) sources and on-site Project-related mobile emissions. In order to account for on-site mobile emissions, a trip length of 3.0 miles was utilized for both scenarios for both trucks and passenger cars. (Urban Crossroads, 2023a, p. 63)

As shown in Table 4.3-20, *Primary Land Use Plan Localized Significance Summary – Peak Operations*, and Table 4.3-21, *Alternative Land Use Plan Localized Significance Summary – Peak Operations*, emissions during peak operational activity would not exceed the SCAQMD’s localized significance thresholds at the maximally impacted receptor location for both the Primary Land Use Plan (without MCP) and Alternative Land Use Plan (with MCP). All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. As such, the Project’s localized impacts during operational activity would be less than significant. Outputs from the model runs for operational LSTs are provided in Appendix 3.13 to the Project’s AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, p. 63)

**B. Carbon Monoxide “Hot Spots”**

An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of





**Table 4.3-20 Primary Land Use Plan Localized Significance Summary – Peak Operations**

Peak Construction	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	7.30E-02	5.64E-02	9.02E-03	1.08	0.47
Background Concentration <sup>A</sup>	2.1	1.8	0.066		
<b>Total Concentration</b>	<b>2.17</b>	<b>1.86</b>	<b>0.08</b>	<b>1.08</b>	<b>0.47</b>
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>A</sup> Highest concentration from the last three years of available data.  
Notes: PM<sub>10</sub> and PM<sub>2.5</sub> concentrations are expressed in µg/m<sup>3</sup>. All others are expressed in ppm.  
(Urban Crossroads, 2023a, Table 3-12)

**Table 4.3-21 Alternative Land Use Plan Localized Significance Summary – Peak Operations**

Peak Construction	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	7.30E-02	5.64E-02	8.98E-03	1.08	0.47
Background Concentration <sup>A</sup>	2.1	1.8	0.066		
<b>Total Concentration</b>	<b>2.17</b>	<b>1.86</b>	<b>0.07</b>	<b>1.08</b>	<b>0.47</b>
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>A</sup> Highest concentration from the last three years of available data.  
Notes: PM<sub>10</sub> and PM<sub>2.5</sub> concentrations are expressed in µg/m<sup>3</sup>. All others are expressed in ppm.  
(Urban Crossroads, 2023a, Table 3-13)

cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment, as previously noted in Table 4.3-2. (Urban Crossroads, 2023a, p. 64)

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards, as shown on Table 3-14 of the Project’s AQIA (*Technical Appendix B1*). (Urban Crossroads, 2023a, pp. 64-65)

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As



evidence of this, for example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the “hot spot” analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a “hot spot”, would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. (Urban Crossroads, 2023a, p. 65)

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 2.1 ppm and 1.8 ppm, respectively (data from Metropolitan Riverside County monitoring station for 2021). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO “hot spot” at any study area intersections. (Urban Crossroads, 2023a, p. 65)

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph) – or 24,000 vph where vertical and/or horizontal air does not mix – in order to generate a significant CO impact. Traffic volumes generating the CO concentrations for the “hot spot” analysis are shown on Table 3-15 of the Project’s AQIA (*Technical Appendix B1*). The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) still would not likely exceed the most stringent 1-hour CO standard (20.0 ppm). (Urban Crossroads, 2023a, pp. 65-66)

When considering maximum traffic volumes in the Project study area, as summarized on Table 4.3-22, *Project Area Peak Hour Traffic Volumes*, the intersection of Perris Boulevard and Ramona Expressway would have the highest AM and PM traffic volumes of 6,632 vehicles per hour (vph) and 7,831 vph, respectively. The total traffic volumes at the intersections considered are less than the traffic volumes identified in the 2003 AQMP. As such, the Project when considered in conjunction with background and cumulative development would not produce the volume of traffic required to generate a CO “hot spot” either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO “hot spots” are not an environmental impact of concern for the Project. Localized air quality impacts due to CO “hot spots” would therefore be less than significant. (Urban Crossroads, 2023a, p. 66)

### **C. Project-Related DPM Source Cancer and Non-Cancer Risks**

A Project-specific Health Risk Assessment (HRA) was prepared for the Project and is included as EIR *Technical Appendix B2*. Refer to Section 2 of the Project’s HRA for a detailed discussion of the recommended methodology, emissions estimation, exposure quantification, carcinogenic chemical risk, and non-carcinogenic exposure used as inputs to the analysis. Nearby sensitive receptors evaluated as part of the HRA



are described above in subsection 4.3.1.I and are depicted on Figure 4.3-11. Provided below is a summary of the results of the HRA for the Maximally Exposed Individual Receptor (MEIR) and Maximally Exposed Individual Worker (MEIW), and Maximally Exposed Individual School Child (MEISC).

**Table 4.3-22 Project Area Peak Hour Traffic Volumes**

Intersection Location	Peak Traffic Volumes (vph)				
	Northbound (AM/PM)	Southbound (AM/PM)	Eastbound (AM/PM)	Westbound (AM/PM)	Total (AM/PM)
Perris Boulevard/Ramona Expressway	1,502/1,089	814/1,490	1,740/2,995	2,576/2,257	6,632/7,831
Evans Road/Ramona Expressway	866/623	809/1,352	1,534/3,406	2,711/2,131	5,920/7,512
I-215 NB Ramps/Ramona Expressway	1,114/1,034	0/0	1,976/3,122	2,416/2,717	5,507/6,873
Bernasconi Road/Orange Avenue	1,138/936	1,794/3,090	1,459/1,565	1,199/1,243	5,590/6,835

(Urban Crossroads, 2023a, Table 3-16; Urban Crossroads, 2023h)

**1. Construction-Related Health Risk Impacts**

The construction scenario evaluated in this analysis is expected to be identical under both the Primary Land Use Plan and Alternative Land Use Plan. The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R15 which is located approximately 5,827 feet west of the Project site at an existing residence located at 27231 Nuevo Road (refer to Figure 4.3-11). Since there are no private outdoor living areas (backyards) facing the Project site, R15 is placed at the building façade. Although Location R15 is not the nearest receptor to the Project site, due to its location in relation to haul routes and construction sources as well as meteorological conditions in the Project vicinity, R15 would experience the highest concentrations of DPM during Project construction. As shown in Table 4.3-23, *Summary of Construction Cancer and Non-Cancer Risks*, at the MEIR, the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.71 in one million, which is less than the SCAQMD’s significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable threshold of 1.0. Because all other modeled receptors would experience lower concentrations of DPM, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. Therefore, Project-related cancer and non-cancer health risks during construction would be less than significant. (Urban Crossroads, 2023b, pp. 37-38)

**2. Operational-Related Health Risk Impacts**

As previously indicated in EIR Subsection R.3, a total of three feasible Alternative Truck Routes have been identified for the Project, including Alternative Truck Routes 1, 2, and 6. Provided below is a description of each of these Alternative Truck Routes, followed by an analysis of potential health risk impacts associated with each.



**Table 4.3-23 Summary of Construction Cancer and Non-Cancer Risks**

Time Period	Receptor	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
8.38 Year Exposure	R15	Maximum Exposed Sensitive Receptor	1.71	10	NO
	R14	Maximum Exposed Worker Receptor	0.10	10	NO
	R2	Maximum Exposed Individual School Child	0.01	10	NO
Time Period	Receptor	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Annual Average	R15	Maximum Exposed Sensitive Receptor	≤0.01	1	NO
	R14	Maximum Exposed Worker Receptor	≤0.01	1	NO
	R2	Maximum Exposed Individual School Child	≤0.01	1	NO

(Urban Crossroads, 2023b, Table ES-1)

- Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 2: Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 6: Alternative Truck Route 6 reflects the truck route previously evaluated in the DEIR for the Alternative Land Use Plan. Under near-term conditions and prior to full buildout of the Mid-County Parkway (MCP), truck traffic would utilize one of the alternative truck routes described above (i.e., Alternative Truck Routes 1 or 2). Once the MCP is constructed and operational, all westbound trucks would be routed west along the MCP to the west to access the I-215. Under this alternative, and following completion of the MCP, all eastbound truck traffic would be routed along the MCP to the east.

***Residential Exposure Scenario – Alternative Truck Route 1***

The residential land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 1 is Location FUT-6 (refer to Figure 4.3-11), which represents the potential future medium density residential land use located west of the Project site within the McCanna Hills Specific Plan. As summarized in Table 4.3-24, *Summary of Operational Cancer and Non-Cancer Risks (Without Mitigation)*, the maximum incremental cancer risk attributable to Project operational-source DPM emissions



is estimated at 9.67 in one million, which is less than the SCAQMD’s significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEIR would be less than significant with implementation of Alternative Truck Route 1. (Urban Crossroads, 2023b, p. 38)

**Table 4.3-24 Summary of Operational Cancer and Non-Cancer Risks (Without Mitigation)**

Project Scenario	Receptor	Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
ATR 1	FUT-6	30 Year Exposure	Maximum Exposed Sensitive Receptor	9.67	10	NO
ATR 2	FUT-6			10.59	10	<b>YES</b>
ATR 6	FUT-7			9.20	10	NO
ATR 1	R14	25 Year Exposure	Maximum Exposed Worker Receptor	0.84	10	NO
ATR 2	R11			0.83	10	NO
ATR 6	R11			0.15	10	NO
ATR 1	R2	9 Year Exposure	Maximum Exposed Individual School Child	0.23	10	NO
ATR 2	R2			0.24	10	NO
ATR 6	R2			0.23	10	NO
Project Scenario	Receptor	Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
ATR 1	FUT-6	Annual Average	Maximum Exposed Sensitive Receptor	$\leq 0.01$	1	NO
ATR 2	FUT-6			$\leq 0.01$	1	NO
ATR 6	FUT-7			$\leq 0.01$	1	NO
ATR 1	R14	Annual Average	Maximum Exposed Worker Receptor	$\leq 0.01$	1	NO
ATR 2	R11			$\leq 0.01$	1	NO
ATR 6	R11			$\leq 0.01$	1	NO
ATR 1	R2	Annual Average	Maximum Exposed Individual School Child	$\leq 0.01$	1	NO
ATR 2	R2			$\leq 0.01$	1	NO
ATR 6	R2			$\leq 0.01$	1	NO

Note: ATR = Alternative Truck Route  
(Urban Crossroads, 2023b, Table ES-2)

**Residential Exposure Scenario – Alternative Truck Route 2**

The residential land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 2 is Location FUT-6 (refer to Figure 4.3-11), which represents the potential future medium density residential land use located west of the Project site within the McCanna Hills Specific Plan. As summarized above in Table 4.3-24, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 10.59 in one million, which would exceed the SCAQMD’s significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Accordingly, because the Project would exceed the SCAQMD threshold of significance of 10 in one million for cancer-related impacts, the Project’s



localized air quality impact due to DPM at the MEIR would represent a significant impact of the proposed Project prior to mitigation. (Urban Crossroads, 2023b, pp. 38-39)

#### ***Residential Exposure Scenario – Alternative Truck Route 6***

The residential land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 6 is Location FUT-7 (refer to Figure 4.3-11), which represents the potential future medium density residential land use located west of the Project site. As summarized above in Table 4.3-24, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 9.20 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEIR would be less than significant with implementation of Alternative Truck Route 6. (Urban Crossroads, 2023b, p. 40)

#### ***Worker Exposure Scenario – Alternative Truck Route 1***

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 1 is Location R11 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 196 feet southeast of the Project site. As summarized above in Table 4.3-24, at the MEIW the maximum incremental cancer risk impact is 0.83 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEIW would be less than significant with implementation of Alternative Truck Route 1. (Urban Crossroads, 2023b, p. 40)

#### ***Worker Exposure Scenario – Alternative Truck Route 2***

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 2 is Location R11 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 196 feet southeast of the Project site. As summarized above in Table 4.3-24, at the MEIW the maximum incremental cancer risk impact is 0.83 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEIW would be less than significant with implementation of Alternative Truck Route 2. (Urban Crossroads, 2023b, pp. 40-41)

#### ***Worker Exposure Scenario – Alternative Truck Route 6***

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions under Alternative Truck Route 6 is Location R11 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 196 feet southeast of the Project site. As summarized above in Table 4.3-24, at the MEIW the maximum incremental cancer risk impact is 0.15 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation,



Project-related operational cancer and non-cancer health risk impacts at the MEIW would be less than significant with implementation of Alternative Truck Route 6. (Urban Crossroads, 2023b, p. 41)

### ***School Child Exposure Scenario – Alternative Truck Route 1***

The nearest school to the Project site is Lakeside Middle School, located approximately 2,540 feet west of the Project site. The MEISC is the school receptor that would experience the highest modeled concentrations of DPM, and thus the highest risk. As summarized above in Table 4.3-24, at the MEISC the maximum incremental cancer risk impact attributable to the Project with implementation of Alternative Truck Route 1 is calculated to be 0.23 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEISC would be less than significant with implementation of Alternative Truck Route 1. (Urban Crossroads, 2023b, p. 41)

### ***School Child Exposure Scenario – Alternative Truck Route 2***

The nearest school to the Project site is Lakeside Middle School, located approximately 2,540 feet west of the Project site. As summarized above in Table 4.3-24, at the MEISC the maximum incremental cancer risk impact attributable to the Project with implementation of Alternative Truck Route 2 is calculated to be 0.24 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEISC would be less than significant with implementation of Alternative Truck Route 2. (Urban Crossroads, 2023b, pp. 41-42)

### ***School Child Exposure Scenario – Alternative Truck Route 6***

The nearest school to the Project site is Lakeside Middle School, located approximately 2,540 feet west of the Project site. As summarized above in Table 4.3-24, at the MEISC the maximum incremental cancer risk impact attributable to the Project with implementation of Alternative Truck Route 6 is calculated to be 0.23 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be  $\leq 0.01$ , which would not exceed the applicable significance threshold of 1.0. Thus, prior to mitigation, Project-related operational cancer and non-cancer health risk impacts at the MEISC would be less than significant with implementation of Alternative Truck Route 6. (Urban Crossroads, 2023b, p. 42)

## **3. Combined Construction and Operational Health Risk Impacts**

This analysis considers a conservative scenario in which a child at a nearby residence is exposed to Project construction-related DPM emissions from birth for the expected 8.38 years of Project construction, and is then exposed to Project operational emissions for the remaining 21.62 years of the 30-year residential exposure scenario. It should be noted that in many cases the combined construction and operational risk is less than the operational risk alone due to varying DPM concentrations at receptors for the construction and operational phases of the Project, as well as the assumed exposure durations and scenarios, which place a greater emphasis



on pollutant exposures that occur early in life. The results of the analysis are summarized in Table 4.3-25, *Summary of Construction and Operational Cancer and Non-Cancer Risks (Without Mitigation)*, and are discussed below. (Urban Crossroads, 2023b, p. 42)

**Table 4.3-25 Summary of Construction and Operational Cancer and Non-Cancer Risks (Without Mitigation)**

Project Scenario	Receptor	Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
Alternative 1	FUT-6	30 Year Exposure	Maximum Exposed Sensitive Receptor	5.21	10	NO
Alternative 2	FUT-5			3.77	10	NO
Alternative 6	FUT-7			9.20	10	NO
Alternative 1	R14	25 Year Exposure	Maximum Exposed Worker Receptor	0.66	10	NO
Alternative 2	R11			0.57	10	NO
Alternative 6	R14			0.13	10	NO
Alternative 1	R2	9 Year Exposure	Maximum Exposed Individual School Child	0.03	10	NO
Alternative 2	R2			0.03	10	NO
Alternative 6	R2			0.03	10	NO
Project Scenario	Receptor	Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Alternative 1	FUT-6	Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1	NO
Alternative 2	FUT-5			≤0.01	1	NO
Alternative 6	FUT-7			≤0.01	1	NO
Alternative 1	R14	Annual Average	Maximum Exposed Worker Receptor	≤0.01	1	NO
Alternative 2	R11			≤0.01	1	NO
Alternative 6	R14			≤0.01	1	NO
Alternative 1	R2	Annual Average	Maximum Exposed Individual School Child	≤0.01	1	NO
Alternative 2	R2			≤0.01	1	NO
Alternative 6	R2			≤0.01	1	NO

(Urban Crossroads, 2023b, Table ES-4)

***Alternative Truck Route 1 – Combined Construction & Operational Health Risks***

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions with implementation of Alternative Truck Route 1 is Location FUT-6 (refer to Figure 4.3-11). As summarized above in Table 4.3-25, at the MEIR the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 5.21 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable threshold of 1.0. Thus, prior to mitigation, Project-related combined construction and operational cancer and non-cancer health risk impacts at the MEIR would be less than significant with implementation of Alternative Truck Route 1. (Urban Crossroads, 2023b, p. 42)





### ***Alternative Truck Route 2 – Combined Construction & Operational Health Risks***

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions with implementation of Alternative Truck Route 2 is Location FUT-5 (refer to Figure 4.3-11). As summarized above in Table 4.3-25, at the MEIR the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 3.77 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable threshold of 1.0. Thus, prior to mitigation, Project-related combined construction and operational cancer and non-cancer health risk impacts at the MEIR would be less than significant with implementation of Alternative Truck Route 2. (Urban Crossroads, 2023b, p. 43)

### ***Alternative Truck Route 6 – Combined Construction & Operational Health Risks***

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions with implementation of Alternative Truck Route 6 is Location FUT-7 (refer to Figure 4.3-11). As summarized above in Table 4.3-25, at the MEIR the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 9.20 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be  $\leq 0.01$ , which would not exceed the applicable threshold of 1.0. Thus, prior to mitigation, Project-related combined construction and operational cancer and non-cancer health risk impacts at the MEIR would be less than significant with implementation of Alternative Truck Route 6. (Urban Crossroads, 2023b, p. 43)

## **D. Community Health**

Most local agencies, including the County of Riverside, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or “generic” data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project’s air emissions without undue speculation. Instead, readers are directed to the above analysis of the Project’s air quality impacts, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project’s construction and long-term operation. (Urban Crossroads, 2023a, p. 69)

Notwithstanding, the Project’s AQIA does evaluate the proposed Project’s localized impact to air quality for emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> by comparing the proposed Project’s on-site emissions to the SCAQMD’s applicable LST thresholds. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD’s LSTs during construction or long-term operation. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Project’s localized emissions would comply with federal, State, and local air quality standards. The proposed Project’s emissions are not sufficiently high



enough to use a regional modeling program to correlate health effects on a basin-wide level, and such an analysis would not provide a reliable indicator of health effects even if modeled. (Urban Crossroads, 2023a, pp. 69-70)

***Threshold d.: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. (Urban Crossroads, 2023a, p. 70)

Standard construction requirements would minimize odor impacts from construction. The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by SCAQMD Rule 113, *Table of Standards*; compliance with low sulfur fuel requirements pursuant to SCAQMD Rule 431.2, *Low Sulfur Fuel*; and compliance with SCAQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. (Urban Crossroads, 2023a, p. 70)

Potential sources of operational odors generated by the Project's long-term operations would include disposal of miscellaneous commercial refuse and the use of diesel equipment. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project operations would not adversely affect a substantial number of people, and Project impacts during long-term operations would be less than significant. (Urban Crossroads, 2023a, p. 70)

Accordingly, Project odor-causing emissions impacts during near-term construction and long-term operational activities would be less than significant.

#### **4.3.5 CUMULATIVE IMPACT ANALYSIS**

With exception of the issue of odors, the cumulative study area for air quality includes the County of Riverside and the SCAB. The SCAB is designated as a nonattainment area for State standards of O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The region is also designated as a nonattainment area for federal standards of O<sub>3</sub> and PM<sub>2.5</sub>. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis



consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

As previously shown in Table 4.3-2, the CAAQS designate the Project region as nonattainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, while the NAAQS designates the Project region as nonattainment for O<sub>3</sub> and PM<sub>2.5</sub>. The AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the AQMD clearly states (Page D-3): (Urban Crossroads, 2023a, pp. 70-71)

*“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for 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, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts also would not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. SCAQMD’s thresholds of significance for project-specific direct and cumulatively-considerable impacts have clearly been successful, as application of these thresholds has led to significant air quality improvements throughout the SCAB, as demonstrated by the detailed discussion presented in subsection 4.3.1.G (above). (Urban Crossroads, 2023a, p. 71)

#### **A. AQMP Consistency (Threshold a.)**

As discussed under the analysis of Threshold a., although construction activities associated with the proposed Project would not conflict with the SCAQMD AQMP, and although the Project’s operational air quality emissions would be below the SCAQMD LSTs, long-term operation of the proposed Project would exceed applicable regional thresholds for emissions of VOC, NO<sub>x</sub>, and CO. In addition, the Project’s proposed land uses are not consistent with the land use assumptions used in the AQMP. Thus, the Project would result in a



conflict with the SCAQMD AQMP prior to mitigation. As other cumulative developments also have the potential to result in conflicts with the SCAQMD AQMP, Project impacts due to a conflict with the SCAQMD AQMP would be cumulatively considerable.

***B. Regional Criteria Pollutant Emissions (Threshold b.)***

As indicated under the analysis of Threshold b., although the Project's construction-related regional emissions would not exceed the SCAQMD thresholds of significance, with implementation of the Primary Land Use Plan or Alternative Land Use Plan the Project's regional emissions would exceed the SCAQMD thresholds of significance for VOCs, NO<sub>x</sub>, and CO. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O<sub>3</sub>, and VOCs and NO<sub>x</sub> are precursors to ozone formation. Thus, the Project's emissions of VOCs and NO<sub>x</sub> would cumulatively contribute to a net increase of a criteria pollutant (O<sub>3</sub>) for which the SCAB is considered nonattainment. Although the SCAB is considered attainment for CO, because the Project would exceed the SCAQMD regional threshold for this pollutant, impacts due to emissions of CO are conservatively evaluated as significant. Accordingly, and pursuant to SCAQMD's thresholds of significance that indicate that direct impacts also should be considered to be cumulatively considerable, the Project's impacts due to operational emissions of VOCs, NO<sub>x</sub>, and CO would be cumulatively considerable.

***C. Localized Air Quality Impacts (Threshold c.)***

***1. LST Analysis***

As indicated under the analysis of Threshold c., and as shown in Table 4.3-19 and Table 4.3-20, construction and long-term operation of the proposed Project would not exceed any of the SCAQMD LSTs. Accordingly, and based on SCAQMD guidance, the Project's construction and long-term operational localized air quality impacts would be less than significant on a cumulatively-considerable basis.

***2. CO "Hot Spots"***

As indicated in the analysis of Threshold c., the Project and other cumulative developments would not generate the level of traffic volumes necessary to produce a CO "hot spot." As shown in Table 4.3-22, the intersection of Perris Boulevard and Ramona Expressway would have the highest AM and PM traffic volumes of 6,632 vph and 7,831 vph, respectively, which is far below the traffic volumes identified in the 2003 AQMP. Accordingly, the Project when considered in conjunction with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Localized air quality impacts due to CO "hot spots" would therefore be less than significant on a cumulatively-considerable basis.

***3. Cumulatively-Considerable DPM-Source TAC Impacts***

There are no State or federal ambient air quality standards applicable to TAC emissions. Preparing a cumulative assessment for TACs is complicated by the fact that site-specific impacts can be far different from average impacts over a larger geographic area. Impacts from TAC emissions are highest closest to sources of TACs, but the sources are often spread over a large area. For example, emissions from diesel engines, the

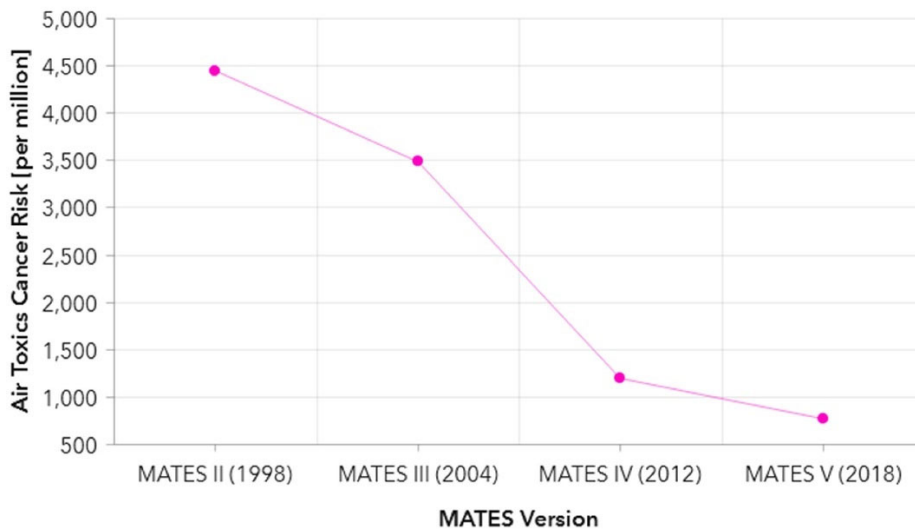


largest source of risk from TACs, are operated on roads, businesses, and construction sites throughout the SCAB. Locations where large numbers of TAC sources are concentrated such as freeways, rail yards, and ports may pose a higher level of risk to sensitive receptors near these facilities. Examination of the risk from TACs at national, State, regional, and local levels is useful for providing context, but site-specific evaluation is ultimately necessary to determine existing conditions for development projects. (Urban Crossroads, 2023b, p. 46)

**Ambient TAC Impacts Presumed to be Cumulatively Significant**

The SCAQMD has conducted an in-depth periodic analysis of toxic air contaminants and their resulting health risks within the air basin. This study, the *Multiple Air Toxics Exposure Study in the South Coast Air Quality Management District*, shows that cancer risk has decreased by approximately 80% between MATES II (1998) and MATES V (2018) at the nearest monitored location to the Project site (Rubidoux), as shown on Figure 4.3-16, *Air Toxics Cancer Risk Trends – Rubidoux*. (Urban Crossroads, 2023b, p. 46)

**Figure 4.3-16 Air Toxics Cancer Risk Trends – Rubidoux**



(Urban Crossroads, 2023b, Exhibit 3-A)

MATES-V is the most comprehensive dataset documenting the ambient air toxic levels and health risks associated with emissions within the SCAB. Therefore, the MATES-V study represents the baseline health risk for a cumulative analysis. The available scientific data from SCAQMD, which is the expert agency charged with governing air quality and preparing regional risk calculations, shows that although there has been tremendous growth basin-wide, risk levels have declined. The decline in emissions is likely due to existing regulatory requirements that have been implemented over the past 20 years. (Urban Crossroads, 2023b, p. 47)

As indicated above, the AQMD’s, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, clearly states (Page D-3):



*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.*

In many ways, California’s Proposition 65 (also called the Safe Drinking Water and Toxic Enforcement Act), which became law in 1986, can serve as a benchmark for cumulative risk assessment. Under Proposition 65, the law defines “no significant cancer risk” as a level of exposure that would cause no more than 1 extra case of cancer in 100,000 people, or 10 extra cases of cancer in 1,000,000 people over a 70-year lifetime (the same threshold used herein and recommended by SCAQMD). It should be noted that diesel exhaust (DE) or DPM is listed by the OEHHA as a known carcinogen with respect to Proposition 65. (Urban Crossroads, 2023b, p. 48)

MATES-V estimates that in the localized area encompassing the Project site, the risk is estimated at 308 incidents per million population. This existing cumulative TAC-source cancer risk level far exceeds the 10 in one million cancer risk at which project-level TAC-source cancer risks would be determined significant under SCAQMD’s thresholds of significance. (Urban Crossroads, 2023b, p. 48)

Comparing the ambient cumulative TAC-source cancer risk (308 per million locally) to the SCAQMD’s established threshold for project-level TAC-source cancer risks (10 in one million), the ambient cumulative TAC-source cancer risk (without the proposed Project) is approximately 30 times greater than the incremental risk at which project-level TAC-source cancer risks would be considered significant. However, as these data reflect existing conditions, the Project would not result in any impacts due to ambient cumulative TAC levels. (Urban Crossroads, 2023b, p. 48)

### **Justification of a Geographic Scope in Risk Assessment**

Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. (Urban Crossroads, 2023b, p. 48) In 2005, CARB published land use guidance<sup>6</sup> that recommended a minimum separation distance of 1,000 feet between new sensitive land uses and warehouses that accommodate more than 100 trucks per day or 300 hours per week of TRU operation. This siting distance guideline was chosen to reflect the distance at which cancer risk from DPM emissions would be less than 100 in a million. CARB’s analysis for the developing of this guidance reflected DPM emissions from TRUs operating in calendar year 2000, and as demonstrated in subsection 4.3.1.G (above), the data used to develop its buffer distance recommendation does not reflect the regional improvements in air quality that have occurred since 2000 due to State and federal regulations implemented since 2000. In order to evaluate how these changes affect CARB’s recommended siting distance of 1,000 feet, Ramboll conducted a HRA of two warehouse scenarios in calendar years 2000 and 2023. These

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<sup>6</sup> CARB. 2005. Air Quality and Land Use Handbook – A Community Health Perspective. Available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>. Accessed: June 2023.



include a Trucks with TRU Scenario, which represents a warehouse that can accommodate 40 trucks per day and 300 hours of TRU operation per week, and a Truck Only Scenario, which represents a warehouse that accommodates 100 trucks per day. Ramboll then compared the results of the analysis to the analysis conducted by CARB to establish the recommended 1,000-foot buffer. The results showed that cancer risk estimates were below 100-in-a-million at most distances away from the warehouse boundary. Therefore, Ramboll concluded that due to federal and State regulations have led to significantly lower-emitting trucks and TRUs, even with the latest risk assessment methodology, CARB's 2005 Land Use Handbook recommendation of a minimum siting distance of 1,000 feet for sensitive receptors located in the vicinity of warehouses is now overly conservative. Ramboll concluded that that CARB's recommended minimum siting distance of 1,000 feet could be substantially reduced or eliminated in the land use guidance. (Ramboll, n.d., pp. 17-19)

Notwithstanding, the analysis presented within the Project's HRA (*Technical Appendix B2*) evaluates potential health risk impacts to nearby sensitive receptors, including all existing and future land uses within 1,000 feet of the Project site, regardless as to the distance between Project sources of TACs and the sensitive receptor locations.

#### **Related Projects Contribution to Cumulative TAC Impacts**

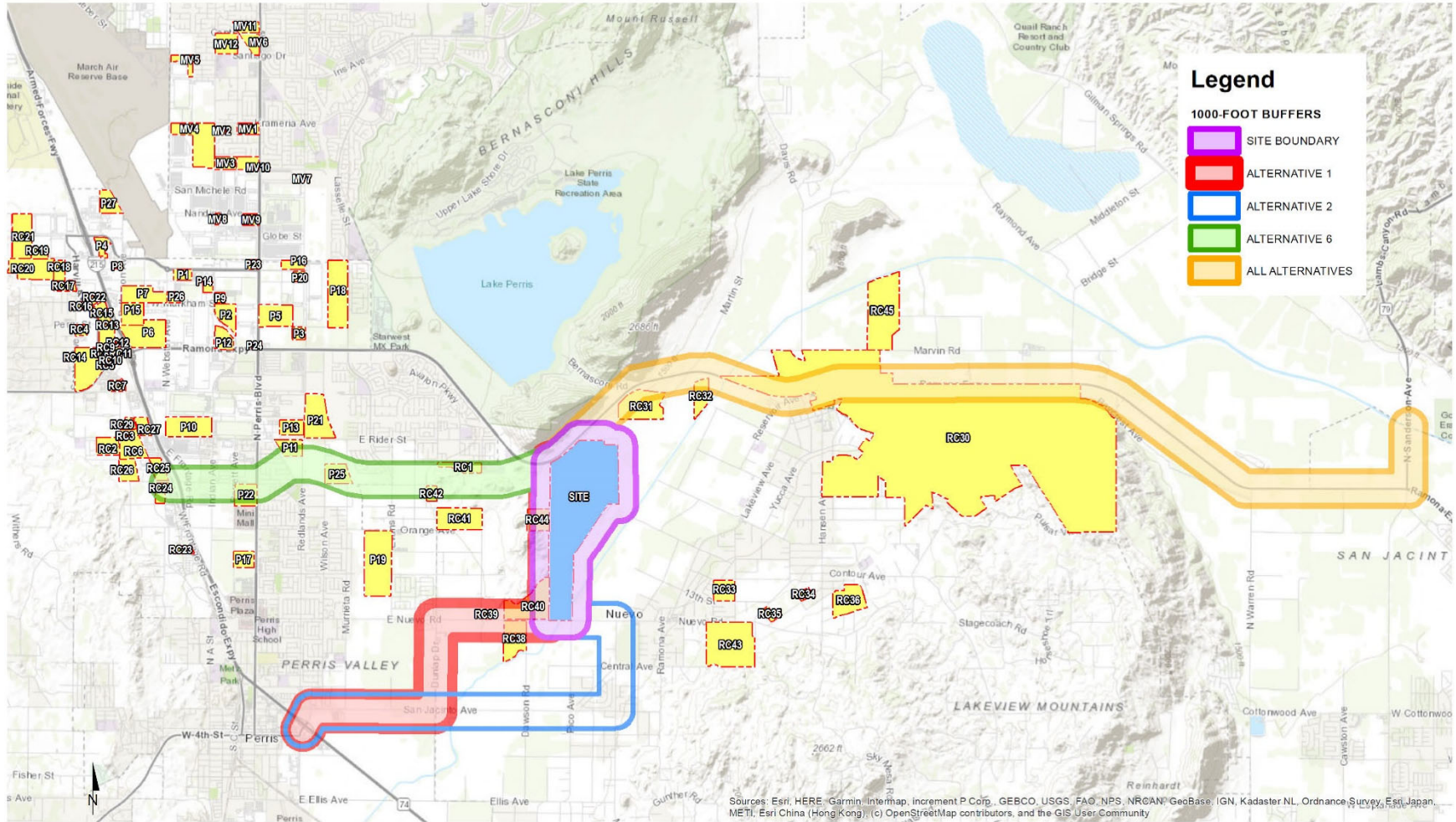
In addition to the MATES-V cumulative TAC-source cancer risk noted above, other new or proposed potential TAC-generating projects (related projects) in the Study Area could contribute to cumulative TAC impacts. These related projects, due to their recent and/or tentative nature, may not be reflected in the cumulative TAC impacts identified in the MATES-V study. (Urban Crossroads, 2023b, p. 49)

In consultation with the Lead Agency (Riverside County), related TAC-generating projects located within a 1,000-foot radius of the Project site and the Project's off-site truck travel routes were identified and are reflected in this cumulative TAC analysis. As noted above, the 1,000-foot-buffer distance reflects CARB's 2005 Land Use Handbook recommendation, which in turn was based on DPM emissions from trucks and TRUs operating in calendar year 2000. As discussed in further detail above in the preceding subsection, due to federal and State regulations that have led to significantly lower-emitting trucks and TRUs, Ramboll concluded that the use of a 1,000-foot buffer is highly conservative and should not be used to influence policy (Ramboll, n.d., p. 28). Thus, while CARB's recommended 1,000-foot buffer is overly conservative and is no longer appropriate given the significant reductions in truck and TRU-related emissions throughout the SCAB since 2000, a distance of 1,000 feet conservatively has been used to evaluate the Project's potential cumulatively-considerable impacts due to TAC emissions.

The related projects listed below were selected based on their propensity to generate TACs that would contribute to, or interact with, TACs generated by the Project. Figure 4.3-17, *Cumulative Development Projects Location Map for Cumulative TAC Impacts*, illustrates cumulative projects in the study area and a 1,000-foot buffer. It should be noted that under Alternative Truck Routes 1 and 2, there are no warehouse or distribution center facility projects within 1,000 feet of the Project site or the Project's primary truck routes. While cumulative developments do occur within 1,000 feet of Alternative Truck Routes 1 and 2, these cumulative developments consist of residential, public facilities, and/or commercial developments that are not associated



Figure 4.3-17 Cumulative Development Projects Location Map for Cumulative TAC Impacts



(Urban Crossroads, 2023b, Exhibit 3-A)





with the generation of substantial amounts of TACs. Of the cumulative projects previously identified in EIR Table 4.0-1 and shown on EIR Figure 4.0-1, the following projects have the potential to emit TACs and are located within the 1,000-foot buffer of the primary truck routes under Truck Route Alternative 6:

- P25: SEC of Wilson Avenue and Rider Street (303,000 sf warehouse)<sup>7</sup>
- P11: SWC of Redlands Avenue and Rider Street (350,000 sf warehouse)<sup>8</sup>
- RC24: SEC of Harvill Avenue and Placentia Street (23,600 sf warehouse)<sup>9</sup>
- RC25: East of Harvill Avenue, north of Placentia Street (66,000 sf warehouse)<sup>10</sup>

The primary TAC-source emission associated with the cumulative projects would be DPM associated with any truck trips accessing the cumulative projects and traveling on roadways in the study area. As such, the estimated health risks from these cumulative projects has been totaled. The total maximum estimated cancer risk associated with the cumulative projects identified above is estimated to be 18.37 in one million. This estimate is based on based on the proposed square footage of all industrial-related land uses, previously completed environmental documentation, and Urban Crossroads' professional expertise in the preparation of health risk assessments. It is important to note that the risk value of 18.37 from related projects is likely a very conservative overstatement of the actual risk that is likely to occur at any given location. As a conservative measure to overstate rather than understate the potential risk impacts this analysis assumes that the maximum impact from each related project overlaps and would occur at the same location in the Project vicinity. (Urban Crossroads, 2023b, pp. 38-39, 52)

### **Project Maximum Contribution to Cumulatively-Considerable TAC Impacts**

Project-source TACs would incrementally increase the background cancer risk by a maximum of 9.67, 10.59, and 9.20 incidents per million population under Alternative Truck Routes 1, 2, and 6, respectively. The applicable SCAQMD significance threshold for Project-level TAC-source cancer risk impacts is 10 incidents per million population. Similarly, SCAQMD significance thresholds state that Project contributions to cumulative TAC-source cancer risks would be cumulatively considerable if greater than 10 incidents per million population would occur. Thus, the maximum incremental risk resulting from implementation of Alternative Truck Routes 1 and 6 therefore would not be significant, nor cumulatively considerable. However, implementation of Alternative Truck Route 2 would result in an increase in cancer risk of 10.59 in one million, which would exceed the SCAQMD threshold of significance. Thus, prior to mitigation, implementation of Alternative Truck Route 2 would result in significant cumulatively-considerable impacts due to TAC emissions. (Urban Crossroads, 2023b, p. 52)

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<sup>7</sup> The potential health risk is estimated at 7.50 in one million based on the health risk assessment prepared for the First Industrial Warehouse at Wilson Avenue.

<sup>8</sup> The potential health risk is estimated at 8.66 in one million based on Urban Crossroads' professional opinion and analysis previously prepared for the First Industrial Warehouse at Wilson Avenue.

<sup>9</sup> The potential health risk is estimated at 0.58 in one million based on Urban Crossroads' professional opinion and analysis previously prepared for the First Industrial Warehouse at Wilson Avenue.

<sup>10</sup> The potential health risk is estimated at 1.63 in one million based on Urban Crossroads' professional opinion and analysis previously prepared for the First Industrial Warehouse at Wilson Avenue.



**D. Odors (Threshold d.)**

With respect to odors, and as discussed under the analysis of Threshold d., the proposed Project would be required to comply with SCAQMD Rules 113, 402, and 431.2 to prevent occurrences of public nuisances (including odors) during both construction and long-term operation, and would be subject to Riverside County’s solid waste regulations. Other developments within the cumulative study area similarly would be required to comply with SCAQMD rules and regulations and the solid waste regulations of the applicable jurisdictions. Therefore, Project impacts due to other emissions (such as those leading to odors) would be less-than-cumulatively considerable.

**4.3.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION**

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project’s construction-related air quality emissions would not exceed the SCAQMD regional thresholds or LSTs, and would not conflict with the SCAQMD AQMP. Additionally, the Project’s long-term operational impacts due to LSTs also would be below the SCAQMD thresholds of significance. However, the Project’s long-term emissions of VOCs, NO<sub>x</sub>, and CO would exceed the SCAQMD regional thresholds. Additionally, due to the land use changes proposed as part of the Project, the Project would generate operational-source emissions not reflected within the current 2022 AQMP regional emissions inventory for the SCAB. Thus, prior to mitigation, the Project would be inconsistent with the SCAQMD AQMP, resulting a significant impact on both a direct and cumulatively-considerable basis.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. Construction-related emissions associated with the Project would not exceed any of the SCAQMD regional thresholds. However, under long-term operating conditions under both the Primary Land Use Plan and Alternative Land Use Plan, Project-related emissions of VOCs, NO<sub>x</sub>, and CO would exceed the SCAQMD regional thresholds. As previously indicated in Table 4.3-2, the SCAB is designated as nonattainment for O<sub>3</sub>, and VOCs and NO<sub>x</sub> are precursors to ozone formation. Thus, the Project’s emissions of VOCs and NO<sub>x</sub> would cumulatively contribute to a net increase of a criteria pollutant (O<sub>3</sub>) for which the SCAB is considered nonattainment. Although the SCAB is considered attainment for CO, because the Project would exceed the SCAQMD regional threshold for this pollutant, impacts due to emissions of CO are conservatively evaluated as significant. Accordingly, the Project’s long-term operational emissions of VOCs, NO<sub>x</sub>, and CO would represent a significant impact for which mitigation would be required.

Threshold c.: Significant Direct and Cumulatively-Considerable Impact. The Project’s construction-related and long-term operational emissions would not exceed any of the SCAQMD LSTs, and impacts would be less than significant. In addition, the Project, even when considered in the context of cumulative developments, would not produce the level of traffic volumes necessary to create a CO “hot spot”; thus, impacts due to CO “hot spots” would be less than significant. Construction-related activities associated with the Project would not expose nearby sensitive receptors to cancer or non-cancer health risks exceeding the SCAQMD thresholds of significance of 10 in one million or 1.0, respectively, and impacts would be less than significant. In addition, implementation of Alternative Truck Routes 1 and 6 would not expose nearby sensitive receptors to cancer or



non-cancer health risks exceeding the SCAQMD thresholds of significance. Additionally, the analysis presented herein demonstrates that combined health risks associated with the Project's combined construction and long-term operational TAC emissions would not exceed the SCAQMD's thresholds of significance for cancer or non-cancer health risks at the MEIR with implementation of Alternative Truck Routes 1, 2, and 6. Although non-cancer health risks associated with implementation of Alternative Truck Route 2 would be below the SCAQMD threshold of significance, cancer risks associated with Alternative Truck Route 2 would be approximately 10.59 in one million at the MEIR, which would exceed the SCAQMD's threshold of significance of 10 in one million; thus, health risk impacts associated with implementation of Alternative Truck Route 2 would be significant prior to mitigation. Although there is not yet an established significance threshold for ambient cumulative TAC impacts, the Project-specific analysis demonstrates that implementation of Alternative Truck Route 2 would expose nearby sensitive receptors to cancer-related health risks of up to 10.59 in one million; thus, based on the Project-level cumulative analysis presented herein, cancer-related health impacts associated with Alternative Truck Route 2 also would be cumulatively considerable. (Urban Crossroads, 2023b, p. 48)

Threshold d.: Less-than-Significant Impact. The Project does not propose land uses typically associated with emitting objectionable odors. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Additionally, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

#### 4.3.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust" by implementing the following dust control measures during construction activities, such as earth moving activities, grading, and equipment travel on unpaved roads. Prior to grading permit issuance, the County shall verify that the following notes are included on the grading plan. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.
  - All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.



- The contractor shall ensure that 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 times a day, preferably in the midmorning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.
- The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 1113, *Architectural Coatings*, by requiring that all architectural coatings must consist of low VOCs (i.e., VOCs of less than 50 grams per liter [g/L]) unless otherwise specified in the Rule 1113.
- The Project is required to comply with applicable SCAQMD rules for construction activities on the Project site. In addition to the SCAQMD requirements listed above, additional SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1403 (Asbestos); Rule 431.2 (Low Sulfur Fuel); and Rule 1186 / 1186.1 (Street Sweepers).
- The Project is required to comply with the provisions of SCAQMD Rule 402, “Nuisance” which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

### **Mitigation**

MM 4.3-1 Prior to issuance of building permits for Tenant Improvements, in the event that the tenant is proposing high-cube cold storage uses (i.e., warehouse uses involving refrigeration and refrigerated trucks), Riverside County shall review previous uses within the Stoneridge Commerce Center Specific Plan No. 239 to ensure that the total building area dedicated to high-cube cold storage uses does not exceed 20% of the Project’s total Light Industrial building area (or a maximum of 1,470,000 s.f. of high-cube cold storage building area throughout the SP 239 area). Alternatively, if it can be demonstrated that a minimum of 50% of the transportation refrigeration units (TRUs) associated with the Project’s overall high-cube cold storage uses are or would be fully electric, then the maximum amount of building area dedicated to high-cube cold storage uses may increase to 40% of the Project’s total Light Industrial building area (or a maximum of 2,940,000 s.f.). Accordingly, prior to issuance of building permits for Tenant Improvements, the building permit applicant shall provide the following information to Riverside County: 1) the total amount of area dedicated to high-cube cold storage uses within SP 239 prior to approval of the building permit; 2) the total amount of area dedicated to high-cube cold storage uses with approval of the implementing building permit; and 3) the amount by which the implementing building permit exceeds the allowable maximum of 1,470,000 s.f. of high-cube cold storage uses, if at all. In the event that the total amount of high-cube cold storage uses with approval of the implementing building permit would be less than the maximum 1,470,000 s.f., then no additional requirements shall apply. Any implementing Tenant Improvement building permit applications that include high-cube cold storage uses that would exceed the maximum building area of 1,470,000 shall be



conditioned to require that 100% of the TRUs associated with the implementing building permit must be fully electric. The percentage of required electrified TRUs for the implementing building permit may be reduced if the building permit applicant can demonstrate that existing high-cube cold storage uses within SP 239 already include fully electric TRUs, such that the total high-cube cold storage warehouse building area that would be served by non-electric TRUs with approval of the implementing building permit shall not exceed 1,470,000 s.f.

MM 4.3-2 Prior to issuance of building permits for Tenant Improvements involving high-cube cold storage warehouse uses, Riverside County shall review the plans to ensure that electrical hookups are provided to eliminate idling of main and auxiliary engines during the loading and unloading process for Transport Refrigeration Units (TRUs). Signs also shall be posted in the docking areas restricting idling to a maximum of 15 minutes, and prohibiting the use of Transportation Refrigeration Units (TRUs) for more than 30 minutes at a time. Riverside County shall verify the installation of electrical hookups and required signage prior to final building inspection.

MM 4.3-3 The minimum number of automobile electric vehicle (EV) charging stations required by the California Code of Regulations Title 24 shall be provided. In addition, and to facilitate the possible future installation of infrastructure that would charge the batteries that power the motors of electric-powered trucks, the following shall be installed:

- a. At Shell building permit, an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks. Conduit shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be located where electric-powered trucks would park and connect to charging facilities to charge the batteries that power the motors of the electric-powered trucks.
- b. At issuance of a building permit for Tenant Improvements, if the tenant is served by electric trucks, the electrical panel and charging units shall be installed, and the electrical wiring connections shall be made from the electrical panel to the charging units. If the tenant is not served by electric trucks, this requirement shall not apply.

MM 4.3-4 Prior to issuance of building permits for future uses on site, Riverside County shall verify that passenger car Electric Vehicle (EV) charging stations and designated carpool parking stalls have been accommodated per the provisions of the California Green Building Standards Code and shall verify that the plans require that each building be constructed with an adequately sized electrical panel(s) and conduit to accommodate future EV charging stations at a minimum of 5 percent of the passenger car parking spaces.



- MM 4.3-5 All on-site equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts) shall be required to be powered by electricity, and an appropriate numbers of charging stations for the on-site equipment shall be accommodated on site.
- MM 4.3-6 In order to promote alternative fuels, and help support “clean” truck fleets, as part of future lease agreements the developer/successor-in-interest shall be required to provide building occupants with information related to SCAQMD’s Carl Moyer Program, or other such programs that promote truck retrofits or “clean” vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of: 1) alternatively fueled cargo handling equipment; 2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; 3) designated truck parking locations in the project vicinity; 4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the United States Environmental Protection Agency’s SmartWay program.
- MM 4.3-7 All future construction activities associated with the Project shall be subject to adherence with the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses), regardless as to the size of proposed buildings. The following provisions shall apply to all future construction activities on site:
- a. All diesel fueled off-road construction equipment greater than 50 horsepower, including but not limited to excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be equipped with CARB Tier 4 Compliant engines. If the operator lacks Tier 4 equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to County approval.
  - b. All excavators, graders, rubber-tired dozers, and similar “off-road” construction equipment shall be CARB Tier 3 Certified engines or better.
  - c. The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day.
  - d. Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers’ standards.
  - e. The surrounding streets shall be swept on a regular basis to remove any construction related debris and dirt.
  - f. Appropriate dust control measures that meet the SCAQMD standards shall be implemented for grading and construction activity.
  - g. Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.



- h. Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with the items listed above, shall be kept onsite and furnished to the County upon request.
- i. During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.

Project contractors shall be required to ensure compliance with these requirements and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. These requirements also shall be specified in bid documents issued to prospective construction contractors.

MM 4.3-8 All future operations on site shall adhere to the germane policy provisions in the Riverside County Board of Supervisors Policy F-3 (“Good Neighbor Policy” for Logistics and Warehouse/Distribution Uses). Applicable requirements of Policy F-3 shall be specified in future lease agreements with all future tenants, and future tenants shall be required to permit periodic inspection by Riverside County to ensure compliance. In addition, buildings smaller than 250,000 square feet shall comply with applicable policy provisions of the Good Neighbor Policy except as indicated below. Applicable feasible provisions of the Good Neighbor Policy that would serve to measurably reduce Project-related operational emissions include, but are not limited to, the following:

- a. Warehouse/distribution facilities greater than 250,000 square feet shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.
- b. Truck driveways shall generally be placed, on streets that do not have fronting sensitive receptors.
- c. Sites shall clearly mark entry and exit points for trucks and service vehicles.
- d. Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36- inch box trees. Facility operators will be responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.
- e. Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”)



accessing the site use year CARB 2010 or newer engines. The records shall be maintained on-site and be made available for inspection by the County.

- f. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes; and 3) telephone numbers of the building facilities manager and CARB to report violations.
- g. Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- h. Signs shall be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services.
- i. Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information shall be provided to the County and updated annually, and signs shall be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. The Compliance Officer also shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- j. Signs shall be posted in the appropriate locations heavy truck drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.
- k. The future applicants for any new facility larger than 250,000 square feet shall be required to enter into agreement with the County of Riverside to provide a supplemental funding contribution, which would be applied to further off set potential air quality impacts to the community and provide a community benefit. Said financial contribution will be determined by the Transportation and Land Management Agency based on the level of NO<sub>x</sub> emissions estimated to generated. Said supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors and will generally be used for projects that directly benefit the impacted community wherein the project is located. The types of projects that the Board of Supervisors may designate for use of these funds include, but are not limited to (1) projects that directly offset NO<sub>x</sub> reductions above and beyond what is required by existing air quality regulations, (2) projects that generally improve air quality such as paving of dirt roads, installation of additional trees and landscaping, (3) projects that provide an enhanced buffer between the new facility and sensitive receptors, and (4) Projects that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses.





- l. All future warehouse/distribution facilities generally shall be designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.
- m. Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.

Regardless as to whether they are listed above in Mitigation Measure MM 4.3-8, the Project shall comply with all other applicable provisions of Board of Supervisors' Policy F-3.

#### 4.3.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. As discussed below under the discussion of Threshold b., implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6 and MM 4.3-8 would reduce the Project's long-term air quality emissions, but would not reduce the Project's long-term emissions of VOCs, NO<sub>x</sub>, and CO to below the SCAQMD regional thresholds of significance. Additionally, the Project's proposed land uses are not consistent with the growth forecasts included in the 2022 SCAQMD AQMP. Thus, Project's direct and cumulatively-considerable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP would represent a significant and unavoidable impact for which additional mitigation measures are not available.

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of Mitigation Measures MM 4.3-1 through MM 4.3-6 and MM 4.3-8 would reduce the Project's long-term air quality emissions, although the exact reduction amount cannot be quantified for most. For some measures it would be overly speculative to quantify resulting emissions reductions. For instance, while the Project would install passenger car EV charging stations it cannot be determined how many zero emission vehicles would replace gasoline-fueled vehicles as a result. Additionally, in order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest at the Project must provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles. Yet it cannot be reasonably predicted how many clean trucks would replace diesel-fueled trucks as a result. With other measures the reduction values cannot be quantified due to limitation in the modeling software, such as the requirement that all future cold storage warehousing be equipped with electrical hookups to eliminate idling of main and auxiliary engines during the loading and unloading process. Thus, even with implementation of these mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB for O<sub>3</sub>. In addition, regarding VOC, it is important to note that approximately 43% of the total operational VOC emissions



are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project Applicant cannot meaningfully control the use of consumer products by future building users via mitigation. Similarly, the predominance of the Project's operational-source emissions (approximately 41% of VOC emissions, 83% of NO<sub>x</sub> emissions, and 61% of CO emissions by weight) would be generated by passenger cars and trucks accessing the Project site. Neither the Project Applicant nor the County have regulatory authority to control tailpipe or consumer product emissions, and no feasible mitigation measures beyond the measures identified herein exist that would reduce Project operational-source VOC, NO<sub>x</sub>, and CO emissions to levels that are less than significant. Therefore, for both the Primary Land Use Plan and Alternative Land Use Plan, the proposed Project's operational emissions of VOC, NO<sub>x</sub>, and CO would represent a significant and unavoidable impact for which additional mitigation is not available.

Threshold c.: Less-than-Significant Impact with Mitigation Incorporated. Although health risk impacts with implementation of Alternative Truck Routes 1 and 6 would be less than significant on a direct basis, the Project's HRA analysis determined that health risk impacts associated with Alternative Truck Route 2 would expose nearby sensitive residential receptors to cancer risks exceeding the SCAQMD threshold of significance of 10 in one million; specifically, the maximum cancer and non-cancer health risks at future receptor locations would be 10.59 in one millions and  $\leq 0.01$ , respectively (*Technical Appendix B2*, Table ES-3). As such, Mitigation Measures MM 4.3-1 and MM 4.3-2 have been identified to reduce potential cancer-related health risk impacts to below a level of significance, with the highest cancer and non-cancer health risks being 8.38 in one million and  $\leq 0.01$ , respectively (refer also to Table 4.3-11, Table 4.3-13, and Table 4.3-15, previously presented, and Tables 2-5, 2-7, and 2-9 of the Project's HRA, included as *Technical Appendix B2*). The required mitigation would result in a larger reduction in on-site emissions. Thus, although cancer-related health risk impacts prior to mitigation only would be significant with implementation of Alternative Truck Route 2, calculations also have been performed for Alternative Truck Routes 1 and 6 to verify that health risk impacts at the MEIR, MEIW, and MEISC would continue to be less than significant with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2, as shown in Table 4.3-26, *Summary of Operational Cancer and Non-Cancer Risks (With Mitigation)*. The significance of impacts following implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 is discussed below for the Project's operational impacts, impacts due to combined construction and operational health risks, and cumulatively-considerable impacts.

### **Operational Impacts with Mitigation**

#### ***Residential Exposure Scenario***

With implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R12 (refer to Figure 4.3-11), which is located approximately 5,995 feet west of the Project site at an existing residence located at 27078 Nuevo Road. Since there are no private outdoor living areas (backyards) facing the Project site, R12 is placed at the building façade. Location R12 would experience the highest



**Table 4.3-26 Summary of Operational Cancer and Non-Cancer Risks (With Mitigation)**

Project Scenario	Receptor	Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
ATR 1	R12	30 Year Exposure	Maximum Exposed Sensitive Receptor	7.09	10	NO
ATR 2	R13			8.38	10	NO
ATR 6	FUT-7			6.53	10	NO
ATR 1	R14	25 Year Exposure	Maximum Exposed Worker Receptor	0.70	10	NO
ATR 2	R11			0.64	10	NO
ATR 6	R11			0.05	10	NO
ATR 1	R2	9 Year Exposure	Maximum Exposed Individual School Child	0.10	10	NO
ATR 2	R2			0.11	10	NO
ATR 6	R2			0.10	10	NO
Project Scenario	Receptor	Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
ATR 1	R12	Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1	NO
ATR 2	R13			≤0.01	1	NO
ATR 6	FUT-7			≤0.01	1	NO
ATR 1	R14	Annual Average	Maximum Exposed Worker Receptor	≤0.01	1	NO
ATR 2	R11			≤0.01	1	NO
ATR 6	R11			≤0.01	1	NO
ATR 1	R2	Annual Average	Maximum Exposed Individual School Child	≤0.01	1	NO
ATR 2	R2			≤0.01	1	NO
ATR 6	R2			≤0.01	1	NO

Note: ATR = Alternative Truck Route.  
(Urban Crossroads, 2023b, Table ES-3)

concentrations of DPM from Project operation under Alternative Truck Route 1 due to its location relative to the Project’s truck routes as well as meteorological conditions in the Project vicinity. As summarized in Table 4.3-26, with implementation of the required mitigation, the maximum incremental cancer risk is estimated at 7.09 in one million, and non-cancer risks are estimated to be ≤0.01, which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled receptors would be exposed to lower concentrations of DPM, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby residences, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 38)

With implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R13 (refer to Figure 4.3-11), which is located approximately 2,994 feet southeast of the Project site at an existing residence located at 22259 Menifee Road. Since there are no private outdoor living areas (backyards) facing the Project site, R12 is placed at the building façade. Location R13 would experience the



highest concentrations of DPM from Project operation under Alternative Truck Route 2 due to its location relative to Project trucks routes as well as meteorological conditions in the Project vicinity. As summarized in Table 4.3-26, with implementation of the required mitigation, the maximum incremental cancer risk is estimated at 8.38 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled receptors would be exposed to lower concentrations of DPM, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby residences, and impacts would therefore be reduced to less-than-significant levels. (Urban Crossroads, 2023b, pp. 38-39)

With implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R12 (refer to Figure 4.3-11), which is located approximately 5,995 feet west of the Project site at an existing residence located at 27078 Nuevo Road. Since there are no private outdoor living areas (backyards) facing the Project site, R12 is placed at the building façade. Location R6 would experience the highest concentrations of DPM from Project operation under Alternative Truck Route 6 due to its location relative to Project trucks routes as well as meteorological conditions in the Project vicinity. As summarized in Table 4.3-26, with implementation of the required mitigation, the maximum incremental cancer risk is estimated at 6.53 in one million, and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled receptors would be exposed to lower concentrations of DPM, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby residences, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 40)

### ***Worker Exposure Scenario***

With implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R14 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 6,463 feet southwest of the Project site. As summarized in Table 4.3-26, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.70 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled worker receptors would be exposed to lower concentrations of DPM, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby workers, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 40)



With implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R11 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 196 feet southeast of the Project site. As summarized in Table 4.3-26, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.64 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled worker receptors would be exposed to lower concentrations of DPM, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby workers, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, pp. 40-41)

With implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R11 (refer to Figure 4.3-11), which represents the potential worker receptor located approximately 196 feet southeast of the Project site. As summarized in Table 4.3-26, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.05 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled worker receptors would be exposed to lower concentrations of DPM, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby workers, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 41)

### ***School Child Exposure Scenario***

The nearest school is Lakeside Middle School, located approximately 2,540 feet west of the Project site (refer to Figure 4.3-11). As summarized in Table 4.3-26, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.10 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the of the Project would be exposed to less emissions and therefore less risk than the MEISC identified herein. As such, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby school children, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 41)

The nearest school is Lakeside Middle School, located approximately 2,540 feet west of the Project site (refer to Figure 4.3-11). As summarized in Table 4.3-26, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.11 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of



significance of 10 in one million and 1.0, respectively. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the of the Project would be exposed to less emissions and therefore less risk than the MEISC identified herein. As such, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby school children, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, pp. 41-42)

The nearest school is Lakeside Middle School, located approximately 2,540 feet west of the Project site (refer to Figure 4.3-11). As summarized in Table 4.3-26, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the maximum incremental cancer risk is estimated at 0.10 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the of the Project would be exposed to less emissions and therefore less risk than the MEISC identified herein. As such, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to nearby school children, and impacts would therefore be less than significant. (Urban Crossroads, 2023b, p. 42)

### **Combined Construction and Operational Impacts with Mitigation**

This analysis considers a conservative scenario in which a child at a nearby residence is exposed to Project construction-related DPM emissions from birth for the expected 8.38 years of Project construction, and is then exposed to Project operational emissions for the remaining 21.62 years of the 30 year residential exposure scenario. It should be noted that in many cases the combined construction and operational risk is less than the operational risk alone due to varying DPM concentrations at receptors for the construction and operational phases of the Project, as well as the assumed exposure durations and scenarios, which place a greater emphasis on pollutant exposures that occur early in life. (Urban Crossroads, 2023b, p. 42)

With implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is location R15 (refer to Figure 4.3-11). At the MEIR, the maximum incremental cancer risk is estimated at 3.72 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. All other receptors during construction and operational activity would experience less risk than what is identified for this location. As such, with implementation of Alternative Truck Route 1 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project combined construction-source and operational-source DPM emissions, and impacts would be less than significant. (Urban Crossroads, 2023b, pp. 42-43)

With implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is location FUT-5 (refer to Figure 4.3-11). At the MEIR, the maximum incremental cancer risk is estimated at 3.20 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD



thresholds of significance of 10 in one million and 1.0, respectively. All other receptors during construction and operational activity would experience less risk than what is identified for this location. As such, with implementation of Alternative Truck Route 2 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project combined construction-source and operational-source DPM emissions, and impacts would be less than significant. (Urban Crossroads, 2023b, p. 43)

With implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is location FUT-7 (refer to Figure 4.3-11). At the MEIR, the maximum incremental cancer risk is estimated at 6.53 in one million and non-cancer risks are estimated to be  $\leq 0.01$ , which are below the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. All other receptors during construction and operational activity would experience less risk than what is identified for this location. As such, with implementation of Alternative Truck Route 6 and Mitigation Measures MM 4.3-1 and MM 4.3-2, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project combined construction-source and operational-source DPM emissions, and impacts would be less than significant. (Urban Crossroads, 2023b, p. 43)

#### **Cumulatively-Considerable Health Risk Impacts with Mitigation**

As an extremely conservative measure to overstate rather than understate the potential risk impacts, the analysis provided herein conservatively assumes that the maximum impact from each related project would overlap and would occur at the same location in the Project vicinity for the residential, school child, and worker exposure scenarios, which is not a realistic scenario and is disclosed to provide a “worst case” evaluation of the Project’s potential health risk impacts. Additionally, it should be noted that although there will be ambient growth in the Project vicinity, any increase in emissions and consequently cancer risk from ambient growth would be offset by the expected decrease in future risk estimates due to the natural turnover of older fleets and equipment being replaced by more efficient, less polluting engines and regulatory actions being phased in, including regulations that ultimately will require electrification of the truck fleet. (Urban Crossroads, 2023b, p. 52)

As indicated above, with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 and Alternative Truck Routes 1, 2, or 6, Project-source TACs would incrementally increase the background cancer risk by a maximum of 7.09, 8.38, or 6.53 incidents per million population, respectively. The applicable SCAQMD significance threshold for Project-level TAC-source cancer risk impacts is 10 incidents per million population. Similarly, SCAQMD significance thresholds state that a project’s contributions to cumulative TAC-source cancer risks would be cumulatively considerable if greater than 10 incidents per million population would occur. Therefore, with implementation of Mitigation Measures MM 4.3-1 and MM 4.3-2 and Alternative Truck Routes 1, 2, or 6, the maximum incremental risk resulting from the Project would be less than significant on a cumulatively-considerable basis. (Urban Crossroads, 2023b, p. 52)



#### 4.4 BIOLOGICAL RESOURCES

The analysis in this Subsection is based, in part, on information from the report titled “Biological Technical Report for the Stoneridge Commerce Center Project” (herein, “BTR”), prepared by Noreas, dated August 2023, and included as *Technical Appendix C* to this EIR (Noreas, 2023a). The Project’s BTR addresses potential impacts associated with development of the Project as proposed, off-site impacts required to implement the Project, as well as potential impacts associated with improvements needed to implement Alternative Truck Routes 1, 2, or 6, as described in EIR subsection 3.6.2.B (refer to EIR Section 3.0, *Project Description*, for a complete discussion of the Project and its anticipated physical impacts). The BTR relies on two separate reports that are included in BTR Appendix E. The first report addresses potential impacts to waters subject to regulation as Waters of the United States (WoUS), is entitled, “The Stoneridge Commerce Center Project, Jurisdictional Waters of the United States Assessment,” is dated August 2023, and included as Appendix E1 to the Project’s BTR (Noreas, 2023b). The second report addresses potential impacts to waters subject to regulation by the State of California, and is entitled, “The Stoneridge Commerce Center Project, Water of the State Assessment,” is dated August 2023, and is included as Appendix E2 to the Project’s BTR (Noreas, 2023c). EIR Section 7.0, *References*, provides a complete list of reference sources.

For purposes of discussion within this subsection, the Project’s BTR separates potential impacts into three separate categories: a) “Project Footprint,” which encompasses all areas anticipated to be physically impacted on site as part of the Project, including 482.9 acres of physical impacts within Planning Areas 1 through 8B of proposed SP 239A1, approximately 1.9 acres of grading-related impacts within “Open Space – Conservation (OS-C)” Planning Area 9, and approximately 0.7-acre of impact associated with frontage improvements to Nuevo Road within “Open Space – Conservation Habitat (OS-CH)” Planning Area 11); b) “Conservation Areas,” which encompasses the 16.2 acres within OS-C Planning Area 9 and the 80.9 acres within OS-CH Planning Areas 10 and 11 that would not be disturbed as part of the Project<sup>1</sup>; and c) “Offsite,” which encompasses approximately 154 acres off-site that are subject to off-site water-related improvements, off-site roadway improvements, and/or off-site intersection improvements that are identified by the Project’s Traffic Analysis (“TA”; EIR *Technical Appendix L3*) in association with each of the Project’s three Alternative Truck Routes. For purposes of discussion within this Subsection, the term “Study Area” encompasses all areas included in the Project Footprint, Conservation Areas, and Offsite categories.

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<sup>1</sup> For purposes of discussion within this Subsection, the 81.6 acres that are proposed for dedication to the MSHCP Reserve System (inclusive of the approximately 0.7-acre that would consist of improvements to Nuevo Road) also may be referred to as the “proposed OS-CH areas,” while open space areas that are not planned for dedication to the Western Riverside County Regional Conservation Authority (RCA) and that would be designated for OS-C uses (inclusive of 16.2 acres of undisturbed open space and 1.9 acres of open space that would be disturbed as part of Project grading) also may be referred to as “proposed OS-C areas.” This distinction is being made in order to distinguish between areas planned for dedication to the RCA and lands that would be designated for OS-C uses but are not proposed to be dedicated to the RCA.





#### 4.4.1 EXISTING CONDITIONS

##### *On-Site Conditions*

The Project site occurs between Ramona Expressway to the north and Nuevo Road to the south; the San Jacinto River, River Park Mitigation Bank, and agricultural lands occur to the east; and undeveloped land occurs to the west, with existing residential development beyond. Based on historical aerial photography dating back to the 1960s, the Project site has been developed for agricultural uses resulting in extensive ground disturbances and hydrologic alterations. Existing conditions have varied over the last few years as the northern half of the Project site has mainly been utilized for agriculture, while the southern half is maintained by regular mowing and discing. (Noreas, 2023a, p. 10)

The topography within the Project site slopes downward from the northwest to southeast from 1,695 feet to 1,425 feet above mean sea level (amsl). Soils on-site previously were described in EIR subsection 2.5.7 and EIR Table 2-3, and include a variety of silty clay, sandy loam, and course or rocky sandy loam. A depiction of soils found throughout the Project site can be found on Exhibit 4A of Appendix E1 to EIR *Technical Appendix C*.

For decades, the majority of the Project site has been subject to agricultural use, resulting in intensive ground and soil disturbance. Activities have included, but not been limited to irrigated alfalfa farming, barley and oat dry-land farming, commercial nursery operations, potato farming, discing for weed abatement, fire suppression, and sheep grazing. Existing and past farming activities have resulted in the removal of native vegetation and alterations to floodplain topography. A portion of the San Jacinto River occurs within the eastern and southeastern Project boundaries and is an ephemeral-to-intermittent drainage, only flowing directly following storm events, and with the discharge of municipal water for groundwater recharge, flowing in a southwesterly direction through the southeastern portion of the Project site and under the Nuevo Road Bridge adjacent to Eastern Municipal Water District (EMWD) property. No other blue-line drainages occur within the Study Area, but the Project site does support non-riparian earthen ephemeral drainages. (Noreas, 2023a, p. 10)

Under existing conditions, approximately 98% of the Project Footprint and 60% of the Conservation Areas are characterized as “Anthropogenic Biomes.” Anthropogenic Biomes are ecosystems that have been significantly altered by human activities. This includes everything from agricultural lands shaped by farming practices, developed lands transformed by urbanization and construction, to areas dominated by non-native species due to human influence, and ruderal habitats colonizing lands disturbed by human activities. Although the Project is large in total size, it has very low species richness and diversity, and lacks high quality breeding and refuge habitats for special status species. This is to be expected as a result of the significant ground disturbance (i.e., grading, discing, tilling and deep ripping, weed abatement, fire suppression, and livestock grazing) associated with crop cultivation, and numerous other human related undertakings that have occurred over the past quarter of a century. (Noreas, 2023a, p. 10)



### ***Off-Site Conditions***

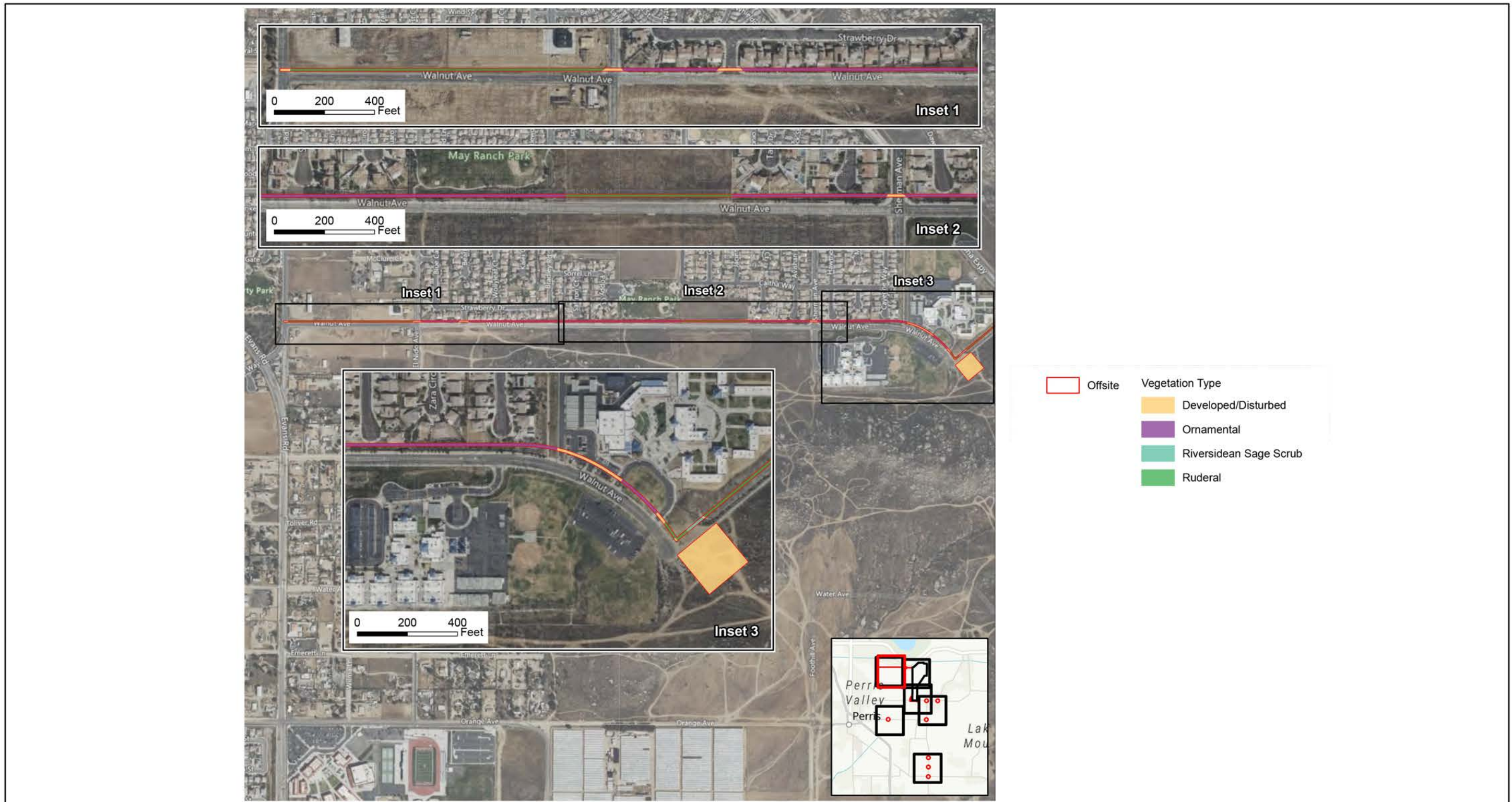
Roadways planned for improvement as part of the Project include the construction of Antelope Road off-site between the Project boundary and Nuevo Road, as well as frontage improvements to Nuevo Road and the construction of a sewer lift station at the southeast corner of the future intersection of Antelope Road and Nuevo Road. The Project also would entail the demolition of an existing off-site water tank, the construction of two new water tanks, and the construction of off-site water lines within Walnut Avenue and a portion of the Ramona Expressway (i.e., between the existing point of connection at Old Evans Road and proposed Antelope Road). Additionally, the Project would be required to implement several off-site intersection improvements, depending on which Alternative Truck Route is implemented. The list of required improvements to study area intersections are identified in Tables 1-4, 1-5, and 1-9 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) for Alternative Truck Routes 1, 2, and 6, respectively. As documented by the Project's BTR, 98% of the Offsite areas are characterized as "Anthropogenic Biomes," as described above under the discussion of On-Site Conditions. (Noreas, 2023a, p. 10)

#### **A. Vegetation Mapping**

##### ***Project Footprint and Conservation Areas***

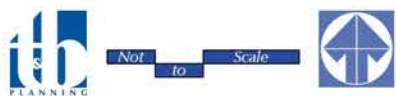
The Project site and Offsite areas (herein, "Study Area") support the following vegetation/land cover types: agriculture, disturbed alkali playa, disturbed/developed, non-native grassland, ornamental, Riversidean sage scrub, ruderal, and southern riparian scrub, as depicted on Figure 4.4-1 through Figure 4.4-6, *Vegetation Communities*. Table 4.4-1, *Summary of Vegetation/Land Use Types*, provides a summary of the vegetation/land cover types and their corresponding acreage. Descriptions of each vegetation/land cover type is provided below. Photographs depicting the Project site are shown in Exhibit 12 of the Project's BTR (*Technical Appendix C1*). (Noreas, 2023a, pp. 10-11)

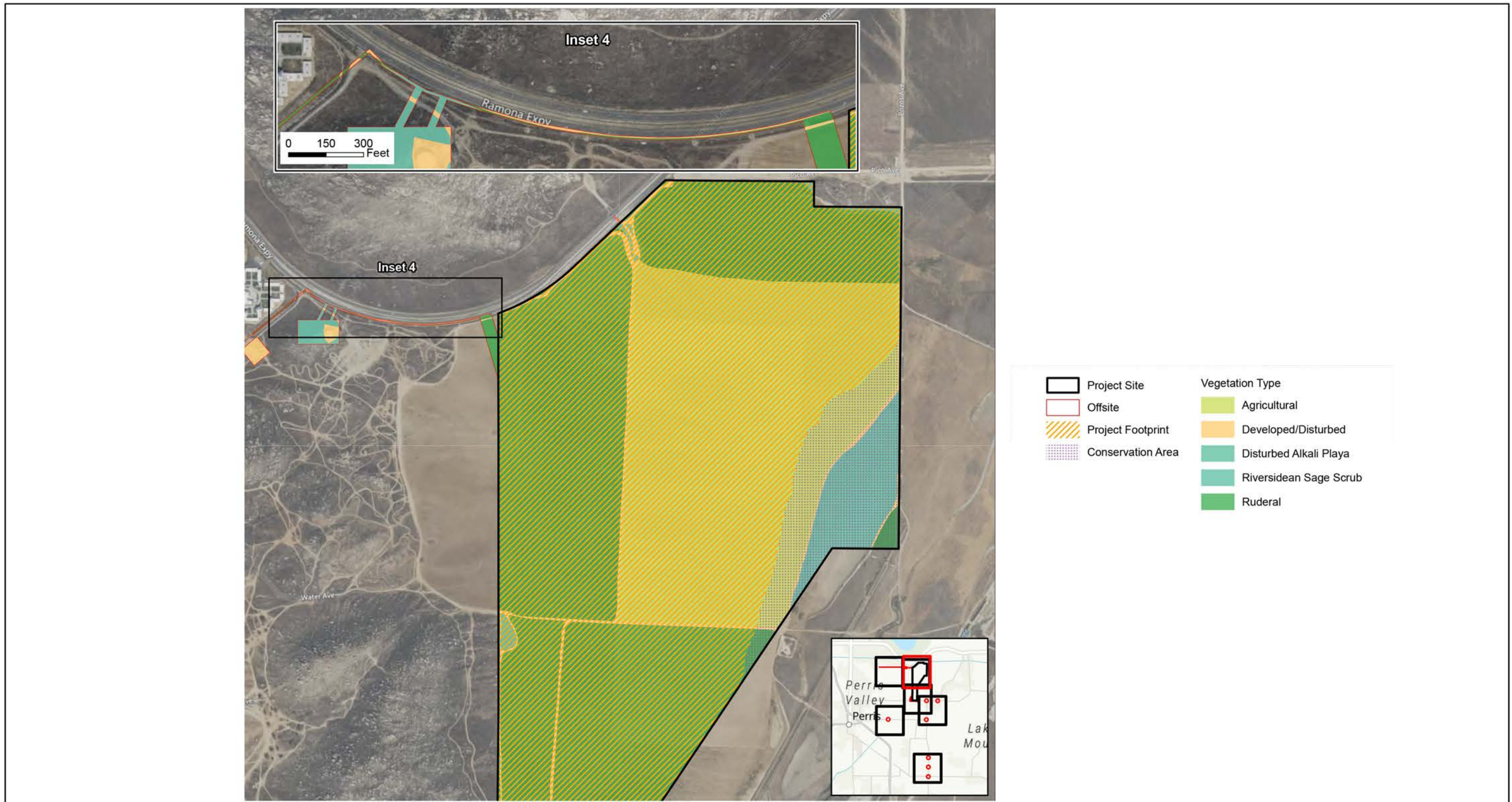
- **Agriculture:** The Project site (i.e., Project Footprint and Conservation Areas) supports 176.82 acres of active agriculture, located within the northeastern portion of the Project site and within or adjacent to areas subject to disturbance as part of the Project's off-site intersection improvements. Agriculture practices (e.g., cultivated watermelon, irrigated alfalfa farming, barley and oat dry-land farming, potato farming, etc.) have been noted on the Project site historically and are subject to varying crop types and acreages. (Noreas, 2023a, p. 12)
- **Disturbed/Developed.** Approximately 14.31 acres of disturbed/developed areas occur throughout the Project site in the form of unpaved access roads, paved vehicular roads, and developed infrastructure such as the San Jacinto River levee. These areas are routinely maintained and are primarily unvegetated. (Noreas, 2023a, p. 12)
- **Disturbed Alkali Playa.** The Project site supports 21.45 acres of disturbed alkali playa, with the largest area occurring along the northeastern Project boundary, and several smaller patches occurring within the southern portion of the Project site. The disturbed alkali playa exhibits sign of temporary inundation and is within the historic floodplain of the San Jacinto River. The disturbed alkali playas



Source(s): Noreas Inc. (08-31-2023)

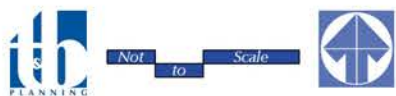
Figure 4.4-1

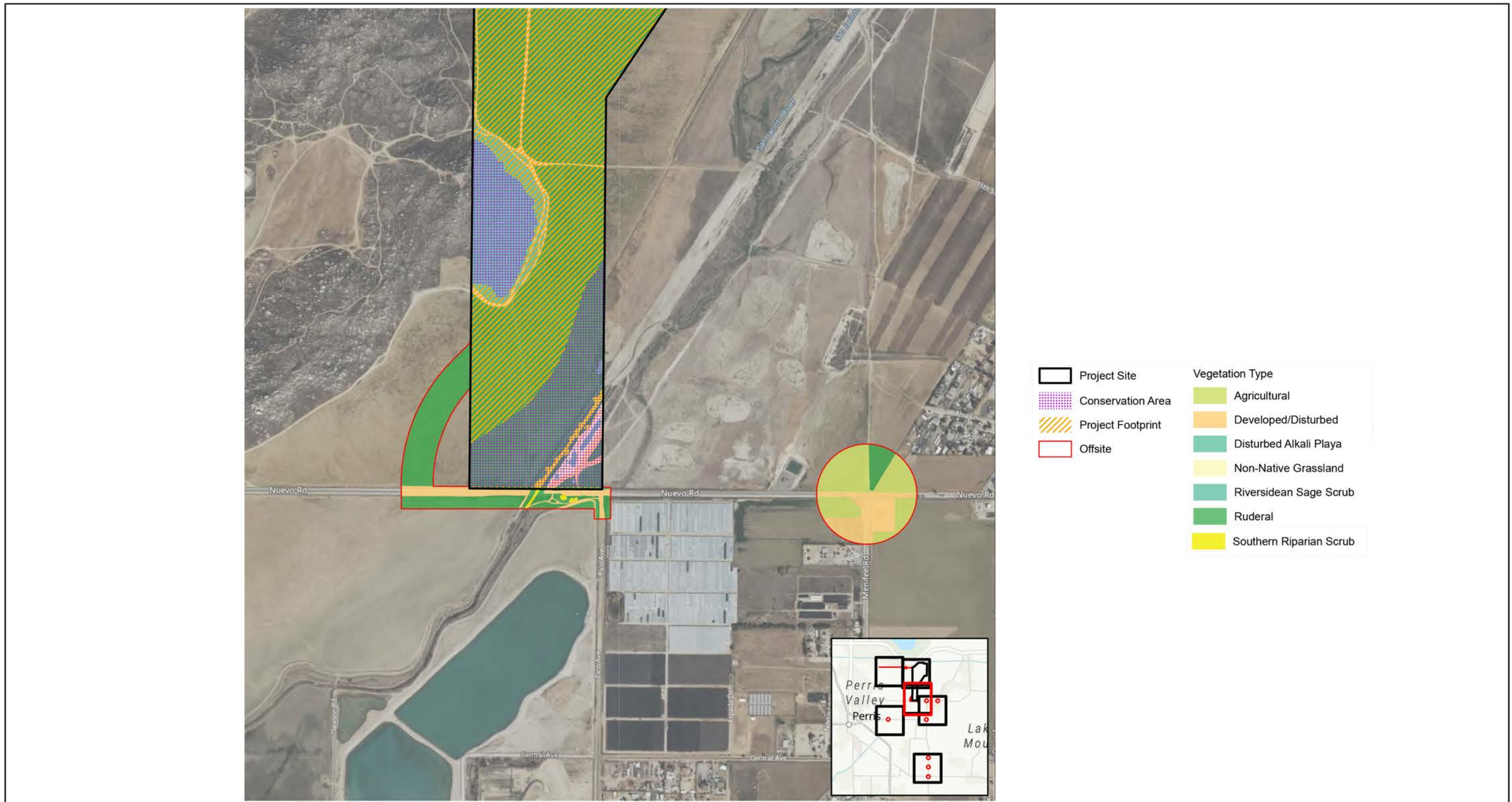




Source(s): Noreas Inc. (08-31-2023)

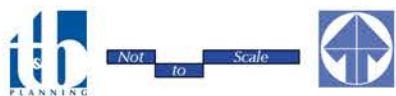
Figure 4.4-2

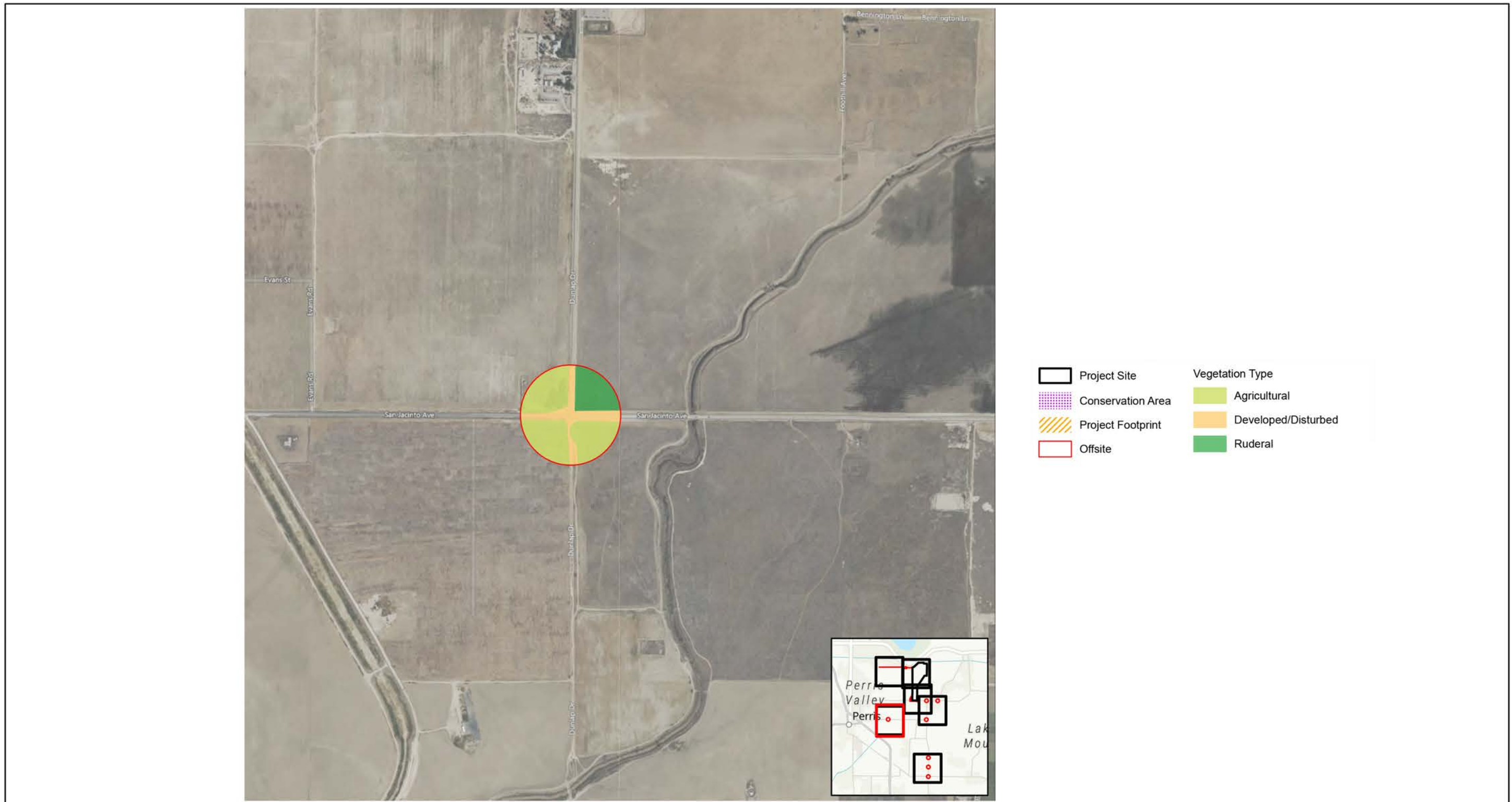




Source(s): Noreas Inc. (08-31-2023)

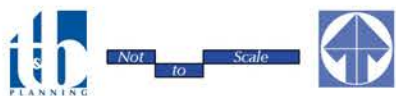
Figure 4.4-3

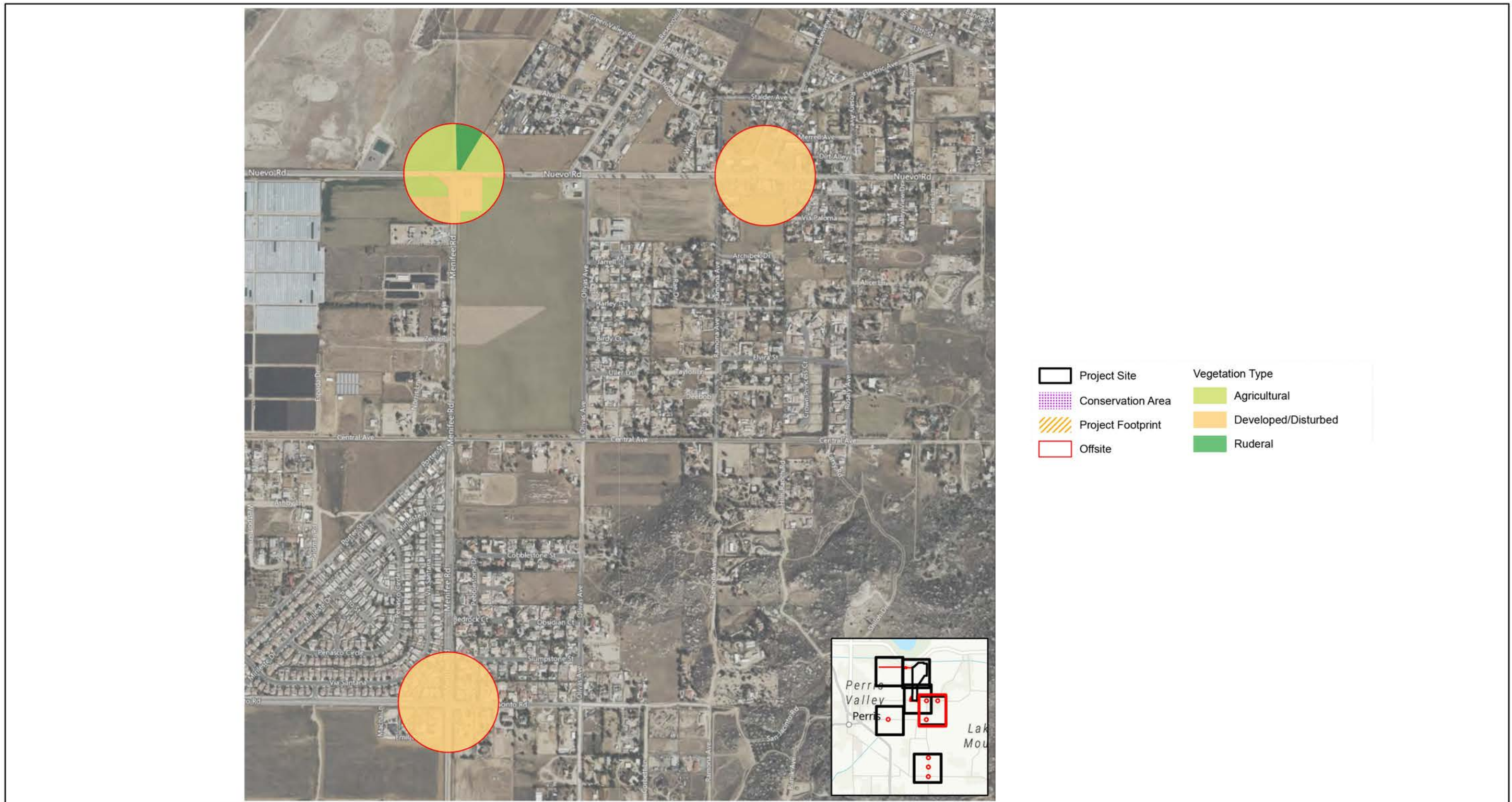




Source(s): Noreas Inc. (08-31-2023)

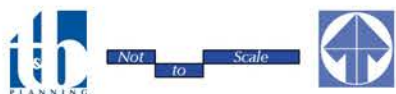
Figure 4.4-4

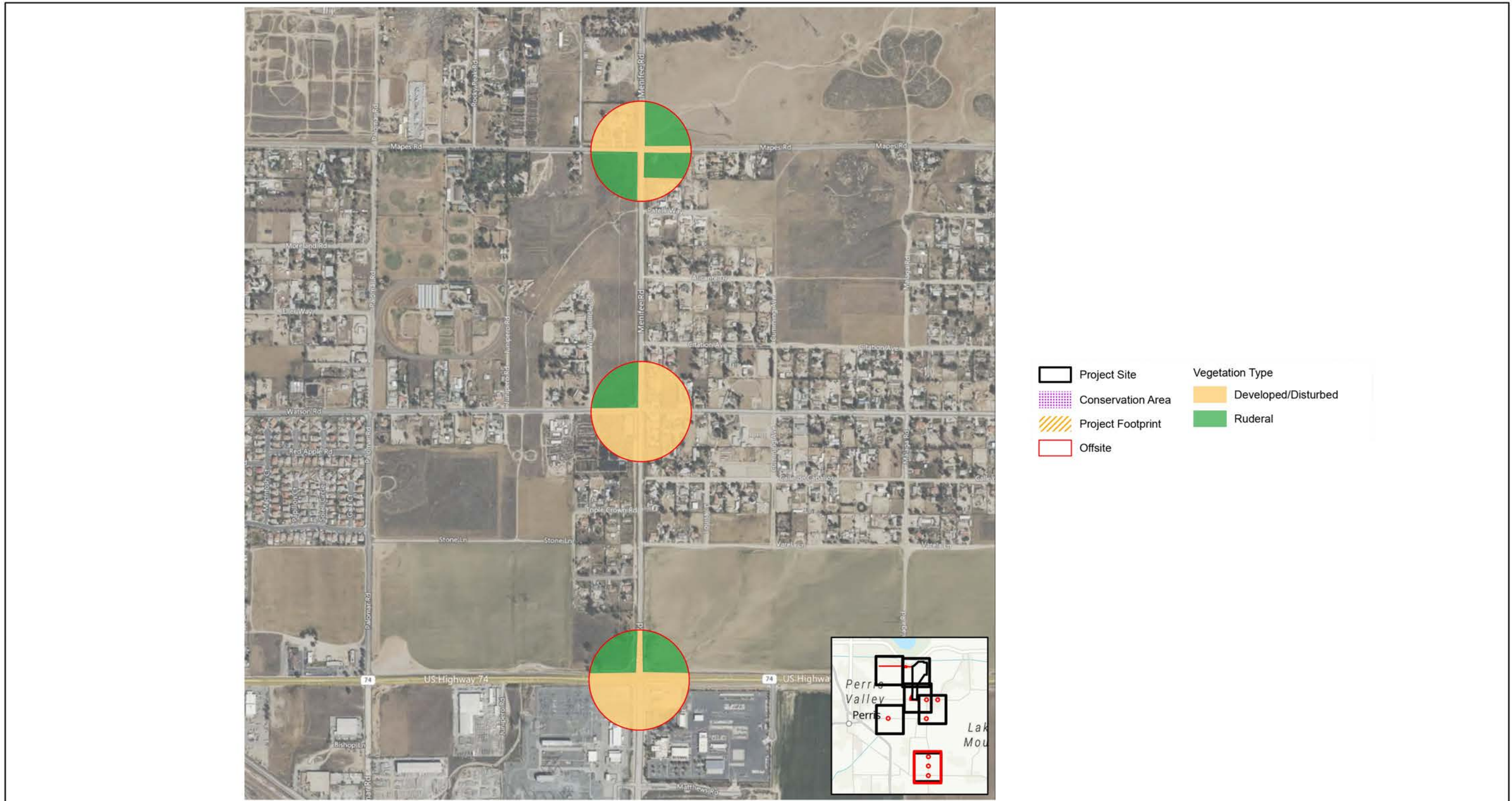




Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-5





Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-6

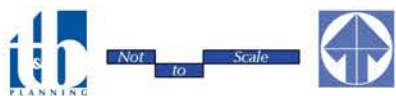






Table 4.4-1 Summary of Vegetation/Land Use Types

Vegetation Communities and Land Cover Types	Acreage
<b>Vegetation Communities On Site (Project Footprint and Conservation Areas)</b>	
Agricultural	176.82
Developed/Disturbed	14.31
Disturbed Alkali Playa	21.45
Non-Native Grassland	1.39
Riversidean Sage Scrub	24.51
Ruderal	342.95
Southern Riparian Scrub	1.21
<b>Subtotal – On Site</b>	<b>582.64</b>
<b>Vegetation Communities Offsite (Offsite Areas)</b>	
Agricultural	21.47
Developed/Disturbed	85.01
Non-Native Grassland	0.01
Ornamental	0.97
Riversidean Sage Scrub	2.04
Ruderal	43.64
Southern Riparian Scrub	0.29
<b>Subtotal Off Site:</b>	<b>153.53</b>

(Noreas, 2023a, Table 2)

include a mosaic of alkali adapted species including silverscale saltbush (*Atriplex argentea*), alkali weed (*Cressa truxillensis*), bush seepweed (*Suaeda nigra*), salt heliotrope (*Heliotropium curassavicum*), alkali mallow (*Malvella leprosa*), and special-status San Jacinto Valley crownscale (*Atriplex coronata* var. *notatior*). However, dense patches of non-native species also occur within these areas, including foxtail barley (*Hordeum murinum*), summer mustard (*Hirschfeldia incana*), prickly lettuce (*Lactuca serriola*), salt cedar (*Tamarix ramosissima*). Native ground cover species within these areas included Jimsonweed (*Datura wrightii*) and doveweed (*Croton setiger*). (Noreas, 2023a, p. 12)

- **Non-Native Grasslands.** The Project site contains 1.39 acres of non-native grassland in two discrete areas within the Project site. The non-native grassland areas were differentiated from the ruderal vegetation classification as they are not as routinely maintained and were allowed to develop into a functioning grassland ecosystem. Dominant species found within the non-native grassland areas were common fiddleneck (*Amsinckia menziesii*), ripgut grass (*Bromus diandrus*), red brome (*Bromus madritensis* ssp. *rubens*), tocalote (*Centaurea melitensis*), Russian thistle (*Salsola tragus*), and barbwire Russian thistle (*Salsola australis*). (Noreas, 2023a, p. 12)
- **Riversidean Sage Scrub.** Approximately 24.51 acres of Riversidean sage scrub occurs sporadically throughout the Project site, with the largest area occurring along the southwestern Project site boundary. While the majority of these areas have been disturbed due to off-road vehicles, the largest area on-site has remained primarily undisturbed due to the steepness of the terrain and large boulders that occur throughout. These areas are dominated with California buckwheat (*Eriogonum fasciculatum*



var. *polifolium*), California sagebrush (*Artemisia californica*), sticky monkeyflower (*Diplacus aurantiacus*), brittlebush (*Encelia farinosa*), ripgut brome, and red brome. (Noreas, 2023a, p. 12)

- **Ruderal.** Ruderal vegetation covers the majority of the Project site, accounting for approximately 342.95 acres. These areas are routinely disced for weed abatement, as was the case during the biological study. Dominant plant species observed included stinknet (*Oncosiphon piluliferum*), puncture vine (*Tribulus terrestris*), London rocket (*Sisymbrium irio*), red-stemmed filaree (*Erodium cicutarium*), cheeseweed (*Malva parviflora*), common fiddleneck, ripgut grass, red brome, tocalote, Russian thistle, barbwire Russian thistle, and doveweed. (Noreas, 2023a, p. 13)
- **Southern Riparian Scrub.** The Project site supports 1.21 acres of Southern Riparian Scrub within and along the banks of the San Jacinto River, which traverses the southeastern portion of the Project site (i.e., within the Conservation Areas). This area is primarily dominated with riparian species including Goodding's black willow (*Salix gooddingii*), salt cedar, and mulefat (*Baccharis salicifolia*), with herbaceous species including common spikerush (*Eleocharis palustris*) and toothed dock (*Rumex dentatus*). Non-native species such as summer mustard, foxtail barley, and annual brome grasses are also dominant along the banks of the river. (Noreas, 2023a, p. 13)

### **Offsite Areas**

As depicted on Figure 4.4-1 through Figure 4.4-6, and as summarized in Table 4.4-1, the 153.53 acres of Offsite areas support approximately 21.47 acres of agricultural areas, 85.01 of developed/disturbed areas, 0.01-acre of non-native grassland, ornamental vegetation on approximately 0.97-acre, Riversidean sage scrub on approximately 2.04 acres, ruderal areas on approximately 43.64 acres, and southern riparian scrub on 0.29-acre. With exception of ornamental vegetation, the vegetation communities within the Offsite areas are described above. Ornamental vegetation is described below. (Noreas, 2023a, Table 2)

- **Ornamental.** The Offsite areas support approximately 0.97-acre of ornamental areas. Ornamental plantings are associated with residential land uses, predominately adjacent to proposed Offsite areas (Noreas, 2023a, p. 12).

### **B. Special-Status Vegetation Communities**

The California Natural Diversity Database (CNDDB) identifies the following four special-status vegetation communities for the Perris, California and surrounding quadrangle maps: southern coast live oak riparian forest, southern cottonwood willow riparian forest, southern riparian scrub, and southern sycamore alder riparian woodland. As previously discussed, the Project site contains approximately 1.21-acre of southern riparian scrub within the Conservation Areas (specifically, the proposed OS-CH areas), while the Offsite areas contain approximately 0.29-acre of southern riparian scrub. No other special-status vegetation communities occur within the Project site or Offsite areas.

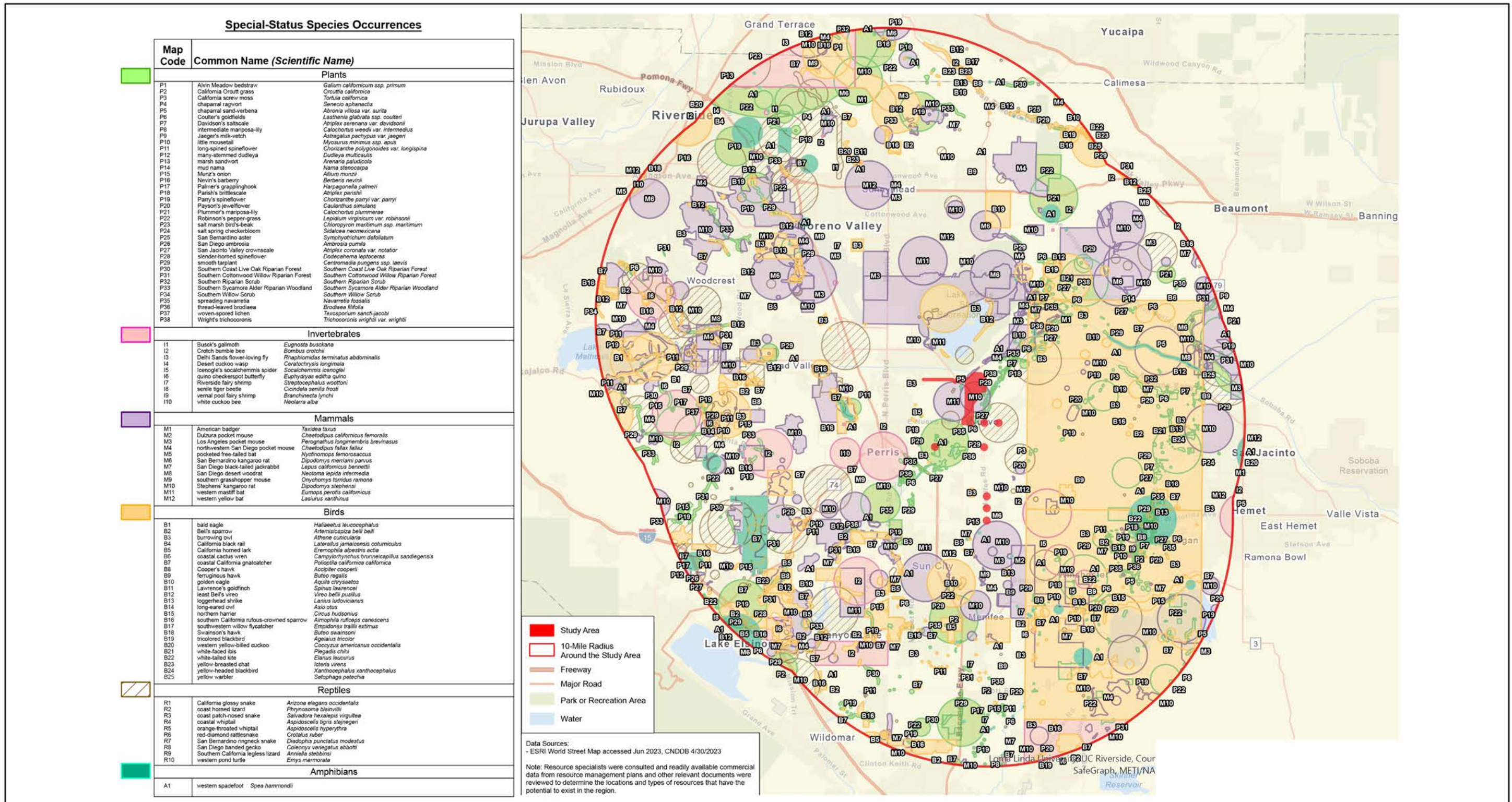


### C. Special-Status Plants

Several federal or State listed plant species have been documented within 10 miles the Project site and Offsite areas, as shown on Figure 4.4-7, *Special-Status Species Occurrences*. Additionally, discrete portions of the Offsite and Conservation areas overlap with USFWS-designated critical habitat for spreading navarretia, as shown on Figure 4.4-8, *Critical Habitat*. As noted above, the Project Footprint, Offsite areas, and Conservation Areas lie partially or completely within predetermined survey areas for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Area Plant Species Survey Area (CAPSSA), Narrow Endemic Plant Species Survey Area (NEPSSA). According to the Western Riverside County Regional Conservation Authority (RCA) MSHCP Information Map, Project components are within MSHCP NEPSSA designated Survey Areas 3 and/or 10, as well as CAPSSA designated Survey Area 3. (Noreas, 2023a, p. 13)

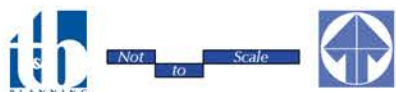
Appendix C to the Project's BTR (*Technical Appendix C*), provides a list of special-status plants evaluated by means of general biological surveys, habitat assessments, and focused surveys. The following special-status plants were detected within the Conservation areas and are identified as Xerophytic Communities: Coulter's goldfields (California Rare Plant Rank [CRPR] 1B.1); San Jacinto Valley crownscale (federally-endangered, CRPR 1B.1); smooth tarplant (CRPR 1B.1); and spreading navarretia (federally-Threatened, CRPR 1B.1). No special status plants or associated suitable habitat were identified within the Project Footprint or the Offsite areas. Special-status plants detected within the Conservation Areas are described in more detail below. (Noreas, 2023a, p. 13)

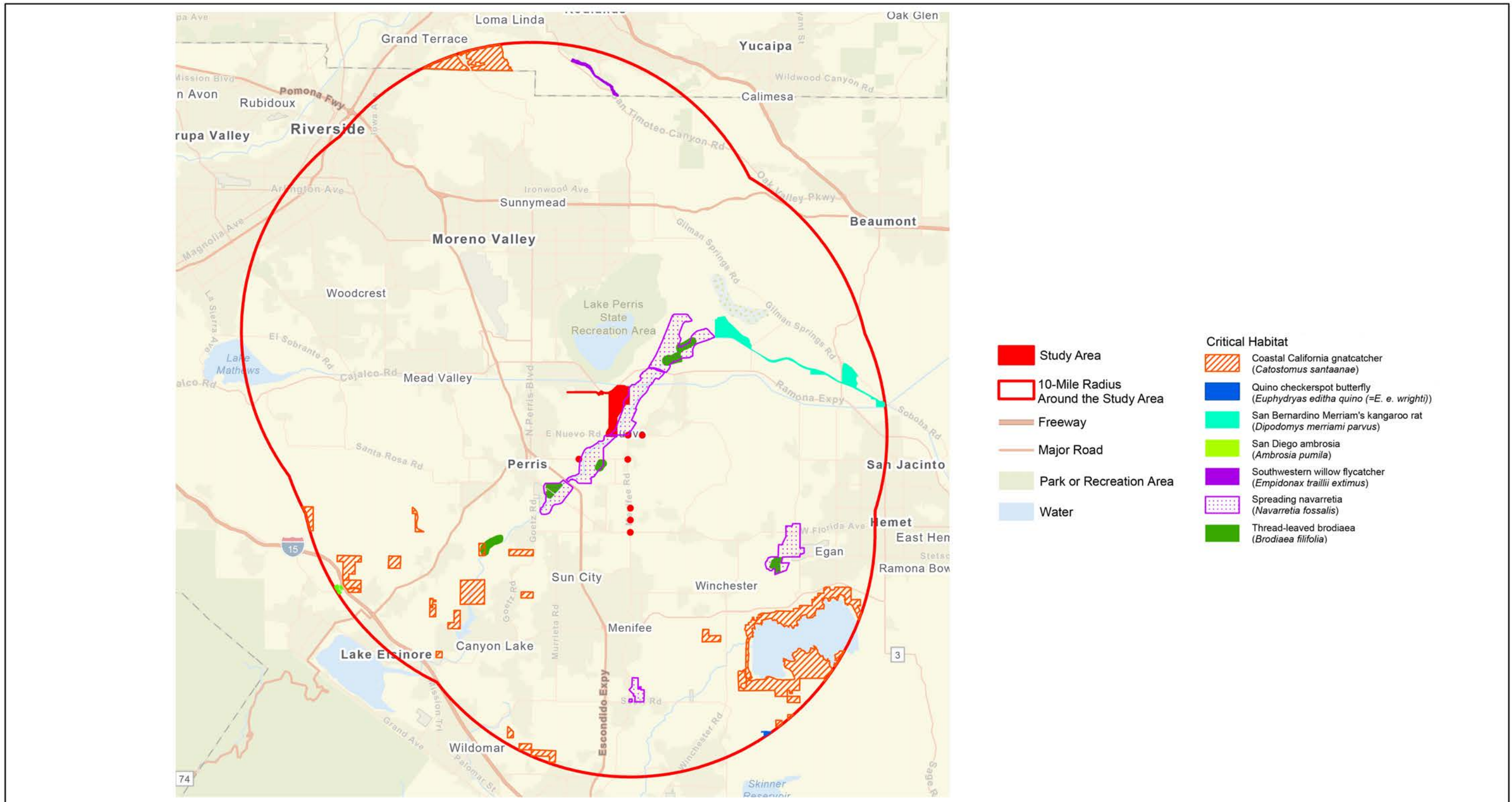
- **Coulter's Goldfields.** This species is designated as a California Native Plant Society (CNPS) List 1B.1, but is not a State- or federally-listed species. This annual herb is known to occur in marshes and swamps, as well as playas and vernal pools below 4,000 feet (1,220 meters) amsl. Coulter's goldfields are known to occur from San Luis Obispo, Santa Barbara, Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego Counties. It is known to bloom from February through June. Coulter's goldfields were observed within disturbed alkali playa vegetation community in the on-site Conservation Areas. The Coulter's goldfields were initially observed on March 26, 2019. (Noreas, 2023a, p. 13)
- **San Jacinto Valley Crownscale.** This species is designated as federally Endangered, as well as a CNPS List 1B.1. This annual herb is known to occur in playas, valley and foothill grasslands, and alkaline vernal pools from 456 to 1,640 feet (139 to 500 meters) amsl. San Jacinto valley crownscale is known to occur from Kern and Riverside Counties and is known to bloom from April through August. San Jacinto Valley crownscale individuals were observed and documented within the disturbed alkali playa vegetation community within the on-site Conservation Areas. The population occurs in multiple discrete patches and was initially observed on March 26, 2019. (Noreas, 2023a, p. 14)
- **Smooth Tarplant.** This species is designated as a CNPS List 1B.1, but is not a State- or federally-listed species. This annual herb is known to occur in chenopod scrub, meadows and seeps, playas, riparian woodland and saline valley and foothill grasslands below 2,100 feet (640 meters) amsl.



Source(s): Noreas Inc. (08-31-2023)

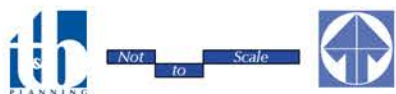
Figure 4.4-7





Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-8





Smooth tarplant is known to occur from Riverside, San Bernardino, and San Diego Counties and is known to bloom from April through September. Smooth tarplant individuals were observed within the disturbed alkali playa vegetation community within the on-site Conservation Areas. (Noreas, 2023a, p. 14)

- **Spreading Navarretia.** This species is federally Threatened, as well as a CNPS List 1B.1. This annual herb is known to occur in chenopod scrub, marshes and swamps, as well as playas and vernal pools from 30 to 4,265 feet (1,300 meters) amsl. Spreading navarretia is known to occur from San Luis Obispo, Los Angeles, Riverside, and San Diego Counties, and is known to bloom from April through June. Spreading navarretia individuals were observed within disturbed alkali playa vegetation community in the on-site Conservation Areas. (Noreas, 2023a, p. 14)

#### D. Wildlife

Wildlife species observed within the Study Area consisted of commonly-occurring species, including, but not limited to, house finch (*Haemorhous mexicanus*), western meadowlark (*Sturnella neglecta*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), California ground squirrel (*Otospermophilus beecheyi*) and western cottontail (*Sylvilagus audubonii*). Wildlife detected during the surveys are identified in Appendix H to the Project's BTR (EIR *Technical Appendix C*). (Noreas, 2023a, p. 14)

##### 1. **Special-Status Wildlife**

Several federal- or State-listed wildlife species have been documented within 10 miles the Study Area (refer to Figure 4.4-7, previously presented). Nonetheless, the Study Area does not overlap with any USFWS-designated critical habitat for wildlife (refer to Figure 4.4-8, previously presented). Appendix C to the Project's BTR (EIR *Technical Appendix C*) provides a list of the special-status animals evaluated through general biological surveys, habitat assessments, and focused surveys. The following special-status animals were detected within the Project Footprint and Conservation Areas: ferruginous hawk (CDFW Species of Special Concern [SSC]); northern harrier (CDFW-SSC); white-tailed kite (CDFW Fully Protected [FP]); loggerhead shrike (CDFW-SSC); LAPM (CDFW-SSC); northwestern San Diego pocket mouse (CDFW-SSC); San Diego desert woodrat (CDFW-SSC); Stephens' kangaroo rat (State Threatened [ST], Federally Endangered [FE]); and San Diego blacktailed jackrabbit (CDFW-SSC). No special-status animals were detected within the Offsite areas. Special-status animals detected within the Project Footprint and Conservation Areas are described in more detail below. (Noreas, 2023a, pp. 14-15)

- **Ferruginous Hawk.** The ferruginous hawk does not have a federal or State designation; however, this species is considered locally rare when wintering and is a California Species of Special Concern (SSC). The ferruginous hawk is a fairly common winter resident of grassland and agricultural areas in southwestern California. The ferruginous hawk breeds in northern Nevada, eastern Oregon and Washington, and eastward to the western Dakotas. A single ferruginous hawk was observed foraging over the Project Footprint and Conservation Areas in March of 2019. This species is not expected to nest within the Project Footprint, Offsite, or Conservation Areas, as they are all located outside of the breeding range for this species. (Noreas, 2023a, p. 15)



- **Loggerhead Shrike.** The loggerhead shrike is designated as an SSC when nesting and is a covered species under the MSHCP. The loggerhead shrike is found throughout the foothills and lowlands of California as a resident (Zeiner et al. 1990). The loggerhead shrike is known to forage over open ground within areas of short vegetation, pastures with fence rows, grasslands, riparian areas, open woodland, agricultural fields, desert washes, and desert scrub. This species commonly nests within dense, mainly thorny, vegetation and may use areas where tumbleweed has concentrated. Individual loggerhead shrikes were observed multiple times foraging near the San Jacinto River in 2019 and 2020. The loggerhead shrike is expected to forage in the Project Footprint and Conservation Areas. It is not expected to occur within the Offsite areas. (Noreas, 2023a, p. 15)
- **Northern Harrier.** The northern harrier is designated as an SSC when nesting and is a covered species under the MSHCP. The northern harrier frequents open wetlands, upland prairies, mesic grasslands, drained marshlands, croplands, shrub-steppe, meadows, grasslands, desert sinks, fresh and saltwater emergent wetlands, and is seldom found in wooded areas. Harriers nest on the ground in marshland habitats and prefer dense areas of grasses, willows, and cattails. An individual northern harrier foraging on three separate visits to the Project Footprint and Conservation Areas was detected in 2019. It is unknown if the same individual was observed on each occasion. This species is expected to forage in the Project Footprint and Conservation Areas. It is not expected to occur within the Offsite areas. (Noreas, 2023a, p. 15)
- **White-Tailed Kite.** The white-tailed kite does not have a federal or state designation, however this species is considered locally rare when nesting and is a California Fully Protected (CFP) species and is a covered species under the MSHCP. The white-tailed kite inhabits low elevation, open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Riparian areas and forest edges adjacent to open areas are used for nesting. Multiple individual white-tailed kites were observed foraging on separate visits to the Project Footprint and Conservation Areas in 2019. This species is expected to forage in the Project Footprint and Conservation Areas. It is not expected to occur within the Offsite areas. (Noreas, 2023a, p. 15)
- **Los Angeles Pocket Mouse.** The Los Angeles Pocket Mouse (LAPM) is designated as an SSC and is a covered species under the MSHCP. The LAPM prefers fine, sandy soils and may utilize these soil types for burrowing. Vegetation communities associated with LAPM habitat include non-native grassland, Riversidean sage scrub, Riversidean alluvial fan sage scrub, and chaparral. An LAPM Trapping Report and Habitat Assessment are included as Appendix D to the Project's BTR (EIR *Technical Appendix C*). As documented therein, protocol trapping for the LAPM was conducted, as required by the MSHCP, from June 27 to July 5, 2020. Fourteen (14) LAPM individuals were captured during the survey within the Project Footprint and Conservation Areas. No suitable LAPM habitat was detected within the Offsite Areas. Refer to Appendix D to the Project's BTR for a more detailed discussion of the methodology and results associated with the LAPM trapping and habitat assessment. (Noreas, 2023a, p. 15)



- **Northwestern San Diego Pocket Mouse.** The northwestern San Diego pocket mouse is designated as an SSC and is a covered species under the MSHCP. The northwestern San Diego pocket mouse inhabits coastal sage scrub, sage scrub/grassland ecotones, and chaparral communities. It inhabits open, sandy areas of both the Upper and Lower Sonoran life-zones of southwestern California and northern Baja California. During LAPM protocol surveys, 27 northwestern San Diego pocket mice were captured within the Project Footprint, and Conservation Areas (Appendix D to the Project's BTR, included as EIR *Technical Appendix C*). No suitable San Diego pocket mice habitat was detected within the Offsite areas. (Noreas, 2023a, p. 16)
- **San Diego Black-Tailed Jackrabbit.** The San Diego blacktailed jackrabbit is designated as an SSC and is a covered species under the MSHCP. The blacktailed-jackrabbit occupies many diverse habitats, but primarily is found in arid regions supporting short-grass habitats. Jackrabbits typically are not found in high grass or dense brush where movement is difficult, and the openness of open scrub habitat probably is preferred over dense chaparral. Black-tailed jackrabbits are found in most areas that support annual grassland, Riversidean sage scrub, alluvial fan sage scrub, Great Basin sagebrush, chaparral, disturbed habitat, and agriculture. Individual black-tailed jackrabbits were observed within the Project Footprint and Conservation Areas on multiple occasions during general and focused surveys. This species is expected to occur on the marginal areas between the Riversidean sage scrub, the open non-native grasslands, and San Jacinto River banks where the vegetation is not disturbed as frequently. This species does not occur within the Offsite areas, as these locales mainly consists of paved roads and maintain road shoulders. (Noreas, 2023a, p. 16)
- **San Diego Desert Woodrat.** The San Diego desert woodrat is designated as an SSC and is a covered species under the MSHCP. The San Diego desert woodrat is a sub-species of the desert woodrat (*N. lepida*), which is more widespread and found throughout central and Southern California and the Great Basin, Mojave, and Colorado deserts. Woodrats are noted for their flexibility or plasticity in utilizing various materials, such as twigs and other debris (sticks, rocks, dung), to build elaborate homes or "middens," which typically include several chambers for nesting and food, as well as several entrances. Middens may be used by several generations of woodrats. The most common natural habitats utilized by the San Diego sub-species are chaparral, coastal sage scrub (including Riversidean sage scrub and Diegan coastal sage scrub) and grassland. During the LAPM protocol surveys, one (1) San Diego desert woodrat was captured during the surveys (refer to Appendix D to the Project's BTR, included as EIR *Technical Appendix C*). No suitable San Diego desert woodrat habitat was detected within the Offsite areas. (Noreas, 2023a, p. 16)
- **Stephens' Kangaroo Rat.** The Stephens' kangaroo rat (SKR) is designated as a federally-endangered species, a State-threatened species, and is a covered species under the USFWS Habitat Conservation Plan. The SKR is found almost exclusively in open grasslands or sparse shrublands with cover of less than 50 percent during the summer (Bleich 1973). As a fossorial (burrowing) animal, SKR typically is found in sandy and sandy loam soils with a low clay to gravel content, although there are exceptions where they can utilize the burrows of Botta's pocket gopher (*Thomomys bottae*) and California ground squirrel. During the LAPM protocol surveys, five SKR individuals were captured (refer to Appendix





D to the Project's BTR, included as EIR *Technical Appendix C*). No suitable SKR habitat was detected within the Offsite areas. (Noreas, 2023a, p. 16)

The following special-status wildlife species were confirmed absent via focused surveys of the Project Footprint, Offsite, and/or Conservation Areas: burrowing owl; Dulzura pocket mouse (*Chaetodipus californicus femoralis*); San Bernardino kangaroo rat (*Dipodomys merriami parvus*), and southern grasshopper mouse (*Onychomys torridus ramona*) (Noreas, 2023a, p. 16).

#### **E. Raptor Use & Nesting Birds**

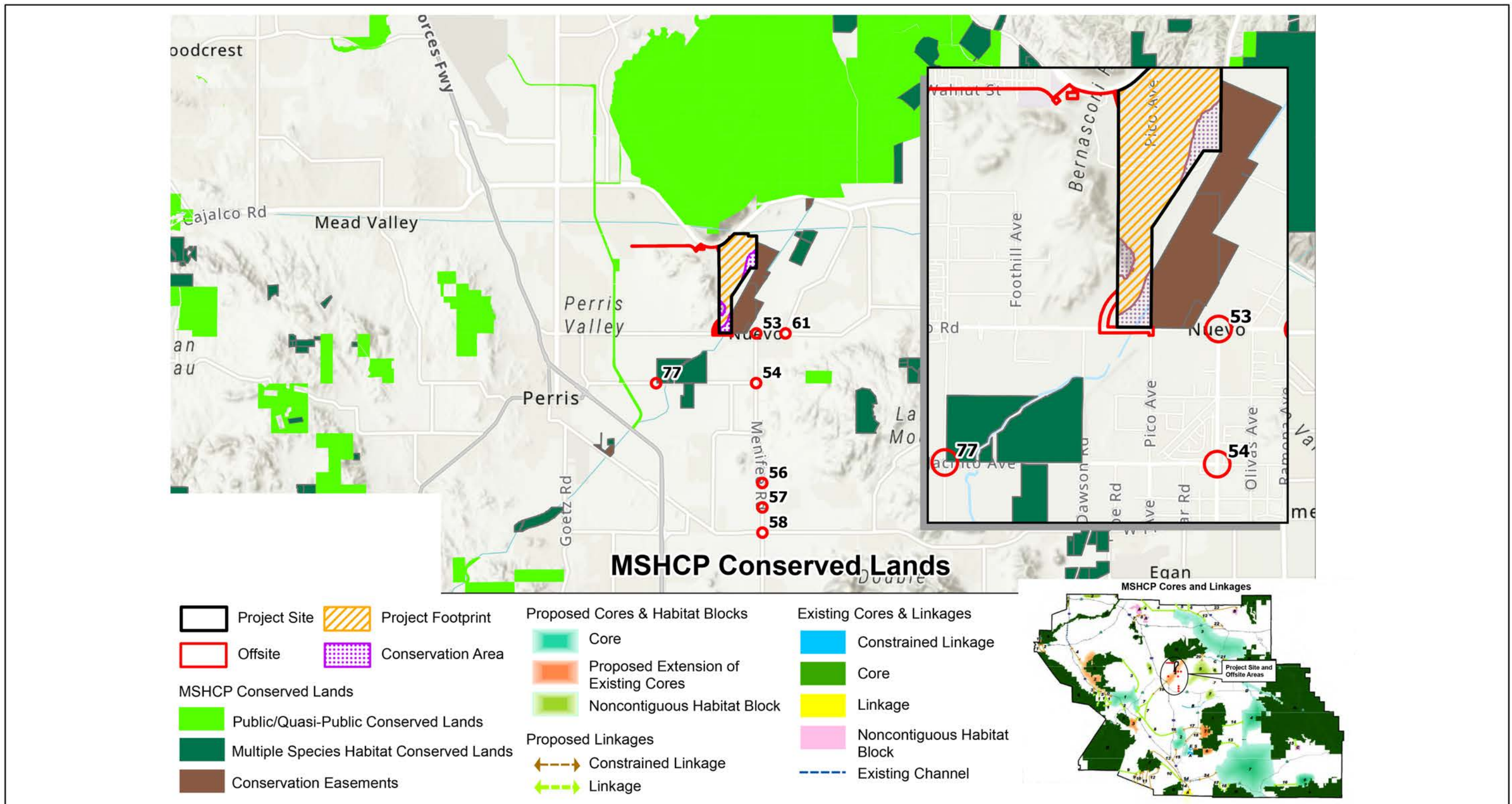
The Project Footprint and Conservation Areas provide suitable foraging and low-quality breeding habitat for a number of raptor species, including special-status raptors. As southern California holds a diversity of birds of prey (raptors), foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. Species, such as red-tailed hawk (*Buteo jamaicensis*) and American kestrel (*Falco sparverius*), are adaptable to human disturbance and can be readily observed adjacent to anthropogenically influenced environments. These species still require appropriate foraging habitat and insulation from disturbance in vicinity of nesting sites. Many of the raptors that would be expected to forage and nest within western Riverside are fully covered species under the MSHCP, with the MSHCP providing the necessary conservation of both foraging and nesting habitats. Even common raptor species (e.g., American kestrel and red-tailed hawk) are not covered by the MSHCP, but are expected to be conserved due to the parallel habitat needs with those raptors covered under the MSHCP. (Noreas, 2023a, p. 17)

It also is notable that the Project Footprint and Conservation Areas contain trees, shrubs, and ground cover that also provide suitable habitat for nesting native birds. Mortality of native birds (including eggs) is prohibited under the California Fish and Game Code. Even though the Project Footprint and Conservation Areas support suitable ground nesting habitat within the ruderal vegetation and disturbed areas. The San Jacinto River, adjacent to the Project, does not exhibit a dense canopy of riparian or old growth trees that would be utilized by larger raptors such as Cooper's hawk or red-tailed hawk. However, these areas may provide nesting habitat for smaller bird species. The Offsite areas, do not contain suitable habitat for nesting birds, as a majority of this area consists of existing paved roadways. (Noreas, 2023a, p. 17)

#### **F. Wildlife Linkages/Corridors and Nursery Sites**

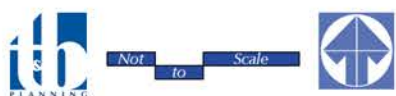
Habitat linkages are areas which provide a connection between two or more habitats, which are often larger or superior in quality to the linkage. Such linkages can be quite small or constricted, but may be vital to the long-term health of coupled habitats. Linkage values are often addressed in terms of "gene flow" between populations. Corridors are similar to linkages, but provide specific opportunities for individual animals to disperse or migrate between locales, and separated regions. Habitat in corridors may be quite different than that in the connected areas, but if used by the wildlife species of interest, the corridor has functional value. (Noreas, 2023a, p. 17)

The Project site is located within the proposed extension of MSHCP Existing Core 4, as shown on Figure 4.4-9, *Cores, Linkages, and Conserved Lands*. The MSHCP's proposed extension of Existing Core 4 includes the



Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-9



**Cores, Linkages, and Conserved Lands**



middle reach of the San Jacinto River, and is contiguous with existing conservation lands in the Lake Perris Recreation Area to the north of the Project. This linkage provides habitat for a number of Narrow Endemic Plant Species and movement for species connecting to Lake Perris, and additional areas downstream of the San Jacinto River, and Canyon Lake. Planning Species within the MSHCP's proposed extension of Existing Core 4 include San Jacinto Valley crownscale, thread-leaved brodiaea, arroyo toad, and LAPM. More specifically, the San Jacinto River drainage, to the south and east of the Project site, provides a movement corridor for medium to small mammals such as coyote, bobcat, and racoon between the adjacent open space associated with Lake Perris to the north and open space to the southwest of the Project. The river drainage also provides an aerial corridor for various bird and bat species moving through the region. (Noreas, 2023a, p. 17)

### **G. Critical Habitat**

Portions of the Offsite areas (13.11 acres) and Conservation Area (47.54 acres) lie partially or completely within USFWS Designated Critical Habitat for spreading navarretia, as previously depicted on Figure 4.4-8. The USFWS Designated Critical Habitat is within the floodplain of the San Jacinto River. As stated above, spreading navarretia was observed within the Conservation Areas associated with the disturbed alkali playa. (Noreas, 2023a, pp. 17-18)

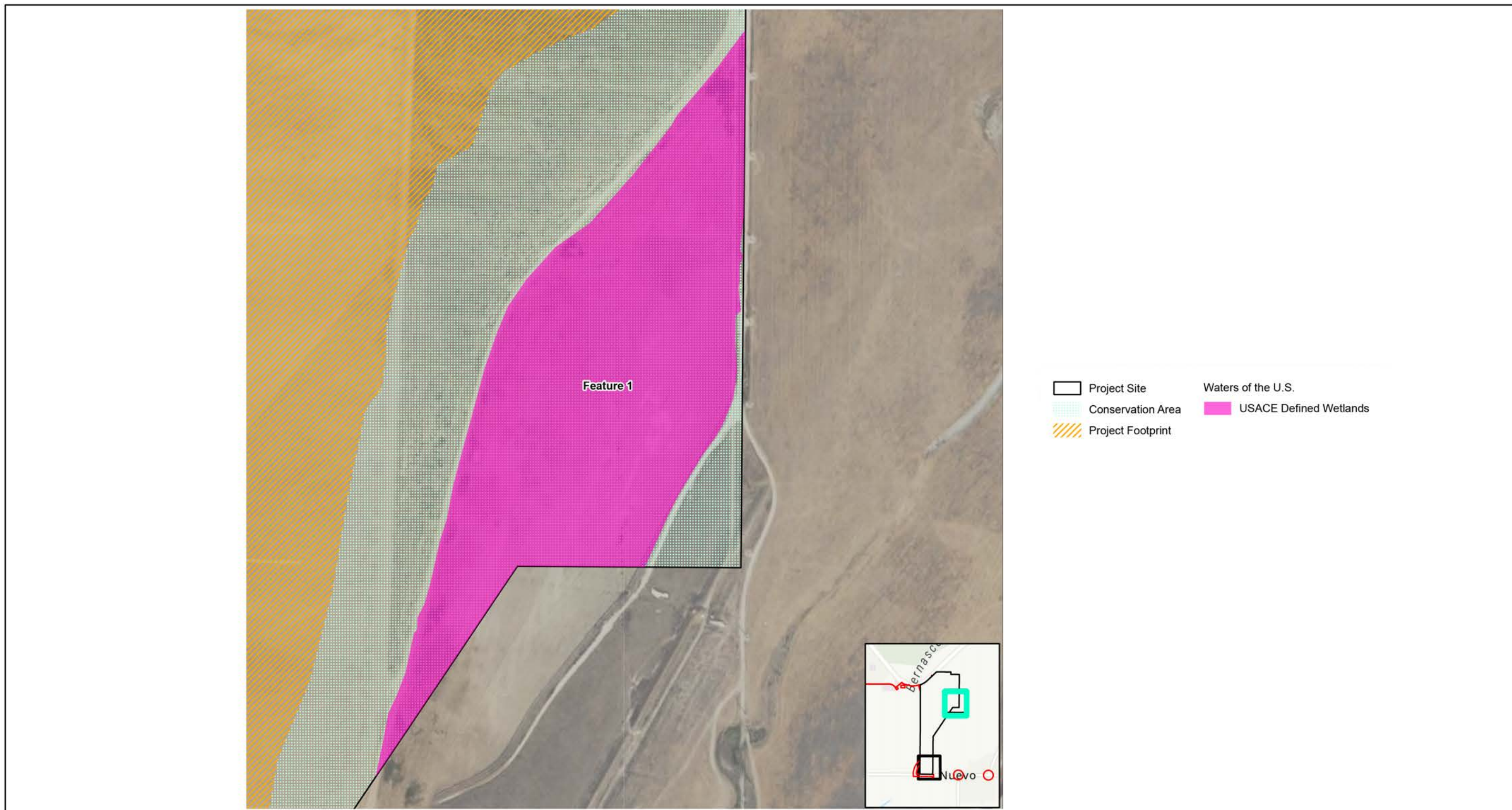
### **H. Wetlands and Waterways**

#### **1. Waters of the United States**

As depicted on Figure 4.4-10 and Figure 4.4-11, *Waters of the United States*, the evidence obtained implies that the Project includes a notable amount of Waters of the United States (WoUS) and United States Army Corps of Engineers (USACE) defined wetlands. As features either bear signs of an Ordinary High-Water Mark (OHWM), or satisfy the USACE criteria for hydrophytic vegetation, hydric soils, and wetland hydrology to be identified as a potential WoUS. The features observed are not isolated. Flows from these features, via the San Jacinto River, eventually connect with Canyon Lake, then to Lake Elsinore and the Santa Ana River, before reaching the Pacific Ocean. These physical connections reinforce their potential status as WoUS. Table 4.4-2, *Summary of Waters of the United States*, provides a summary of WoUS for the Study Area. (Noreas, 2023a, p. 18)

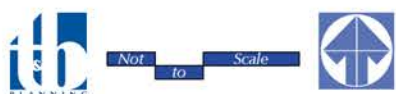
#### **2. Waters of the State**

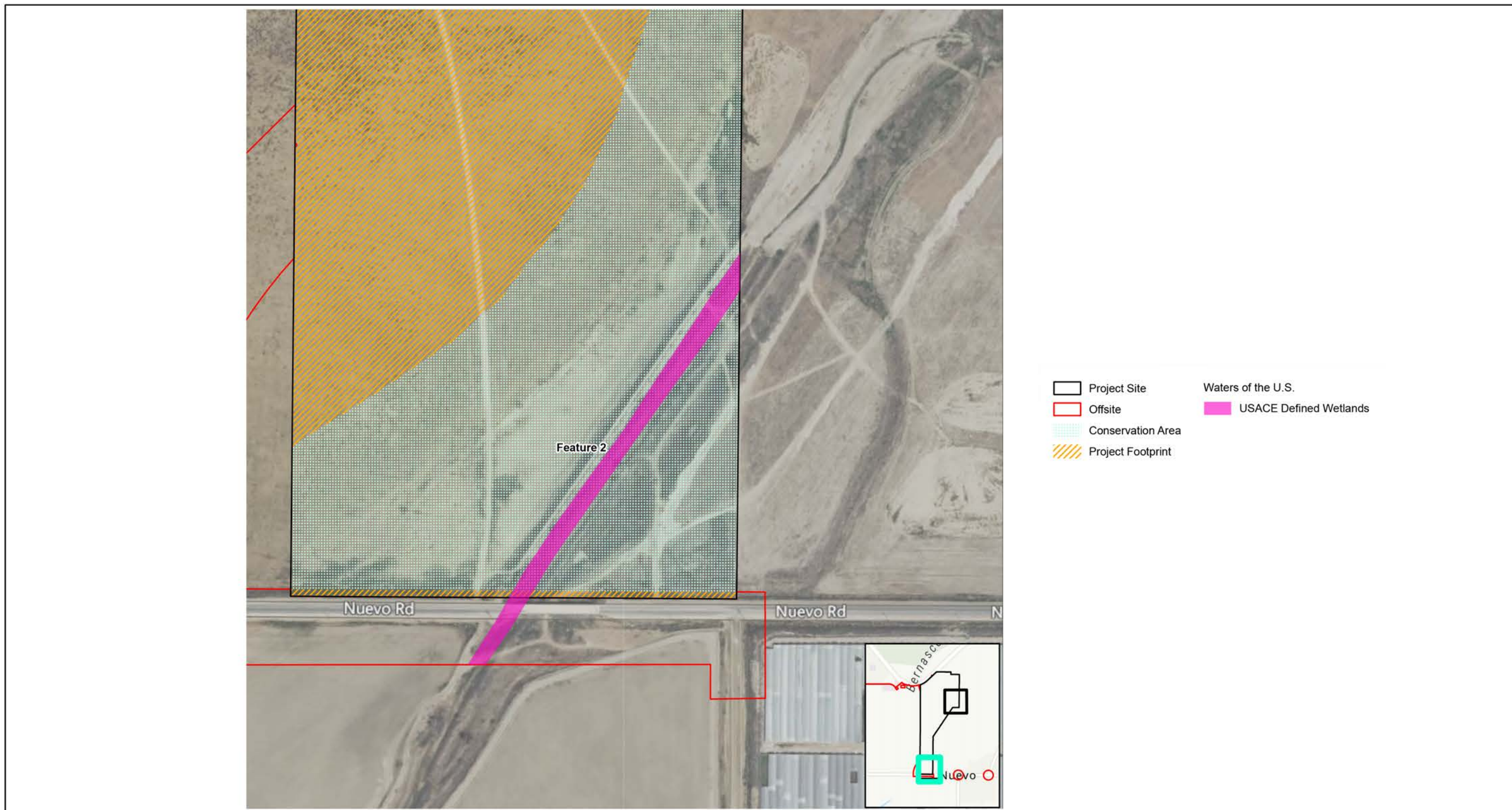
The vast majority of signatures (i.e., >99%) within the Project Footprint are not Waters of the State (WoS). Nonetheless, the Project includes riparian (22.30-acres) and non-riparian ephemeral dry washes and streambeds (7.92-acres) which total 5,211 linear feet, as depicted on Figure 4.4-12 through Figure 4.4-14, *Waters of the State*. These washes either connected, cross – or are within, the San Jacinto River. These distinct features have discernable bank lines with topographic relief, connectivity to the San Jacinto River, and subsequently to Canyon Lake, Lake Elsinore, the Santa Ana River and the Pacific Ocean. As a result, it has been determined that the aforementioned features consist of 30.22-acres of ephemeral, riparian and non-riparian streambeds which are characterized as WoS. Table 4.4-3, *Summary of Waters of the State*, provides a summary of WoS by Project Component. For the analysis herein, all features that qualify as CDFW Section



Source(s): Noreas Inc. (08-31-2023)

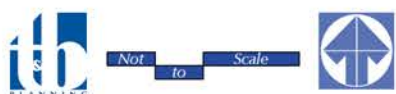
Figure 4.4-10





Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-11





**Table 4.4-2 Summary of Waters of the United States**

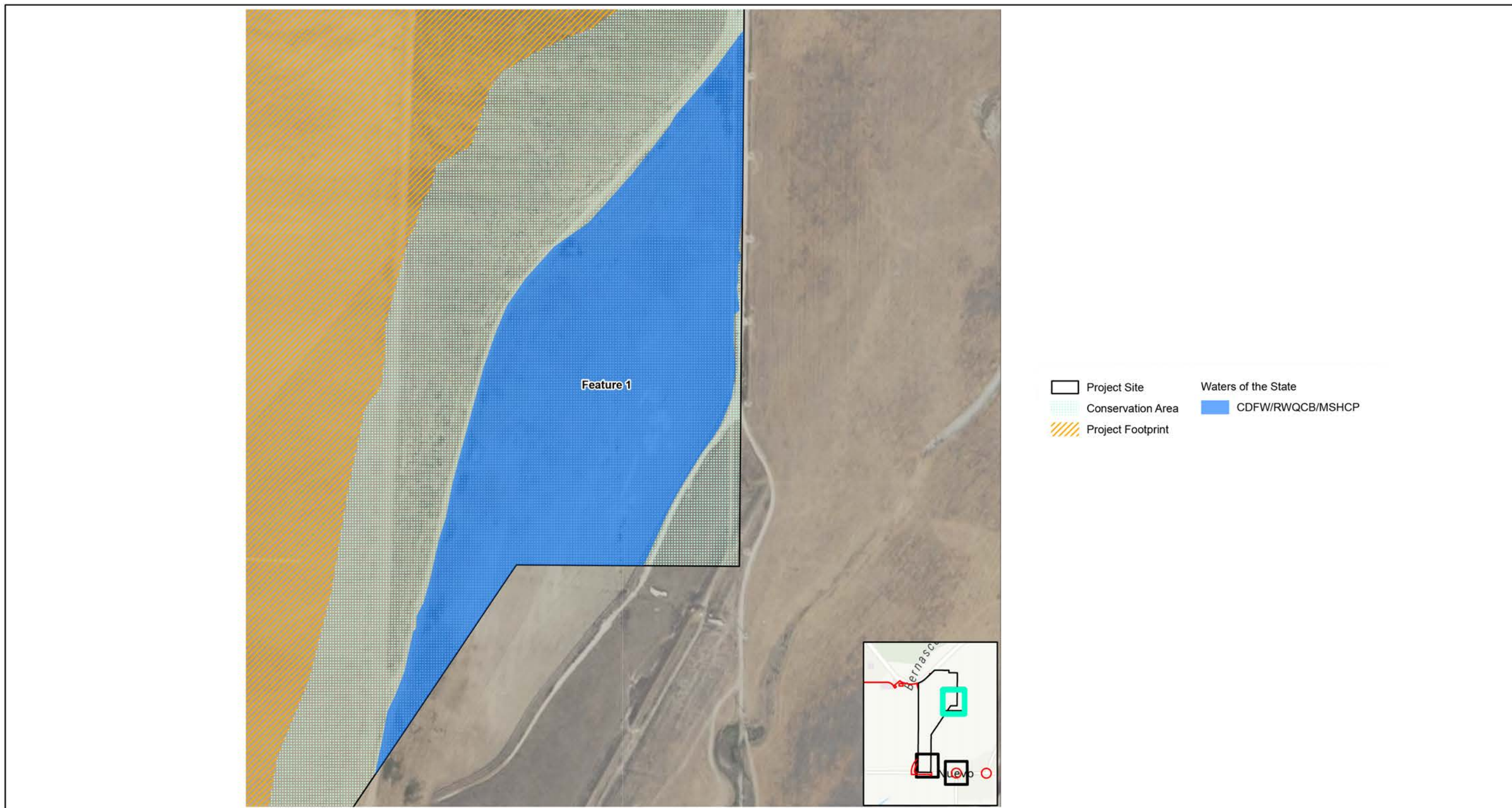
Unique Identifier	USACE Non-Wetland Waters (Acres)	USACE Defined Wetland (Acres)	Total USACE Jurisdiction (Acres)	Total Length
				(Linear Feet)
<b>Waters of the U.S. within the Project Footprint</b>				
Feature 1	0	0	0	0
Feature 2	0	0.03	0.03	22
<b>Waters of the U.S. within the Conservation Area</b>				
Feature 1	0	20.59	20.59	2,040
Feature 2	0	1.42	1.42	1,134
<b>Waters of the U.S. within the Offsite Areas</b>				
Feature 1	0	0	0	0
Feature 2	0	0.26	0.26	253
<b>TOTAL</b>	<b>0</b>	<b>22.30</b>	<b>22.30</b>	<b>3,449</b>

(Noreas, 2023a, Table 3)

**Table 4.4-3 Summary of Waters of the State**

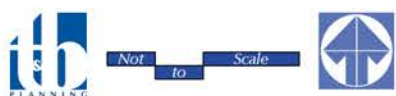
Unique Identifier	Total CDFW	Total CDFW	Total CDFW	Total Length
	Non-Riparian Stream (Acres)	Riparian Stream (Acres)	Jurisdiction (Acres)	(Linear Feet)
<b>Waters of the State within the Project Footprint</b>				
Feature 1	0	0	0	0
Feature 2	0.31	0.03	0.34	22
Feature 3	0	0	0	0
Feature 4	0	0	0	0
<b>Waters of the State within the Conservation Area</b>				
Feature 1	0	20.59	20.59	2,040
Feature 2	6.85	1.42	8.27	1,020
Feature 3	0	0	0	0
Feature 4	0	0	0	0
<b>Waters of the State within the Offsite Areas</b>				
Feature 1	0	0	0	0
Feature 2	0.39	0.26	0.65	253
Feature 3	0.26	0	0.26	960
Feature 4	0.11	0	0.11	916
<b>Total</b>	<b>7.92</b>	<b>22.30</b>	<b>30.22</b>	<b>5,211</b>

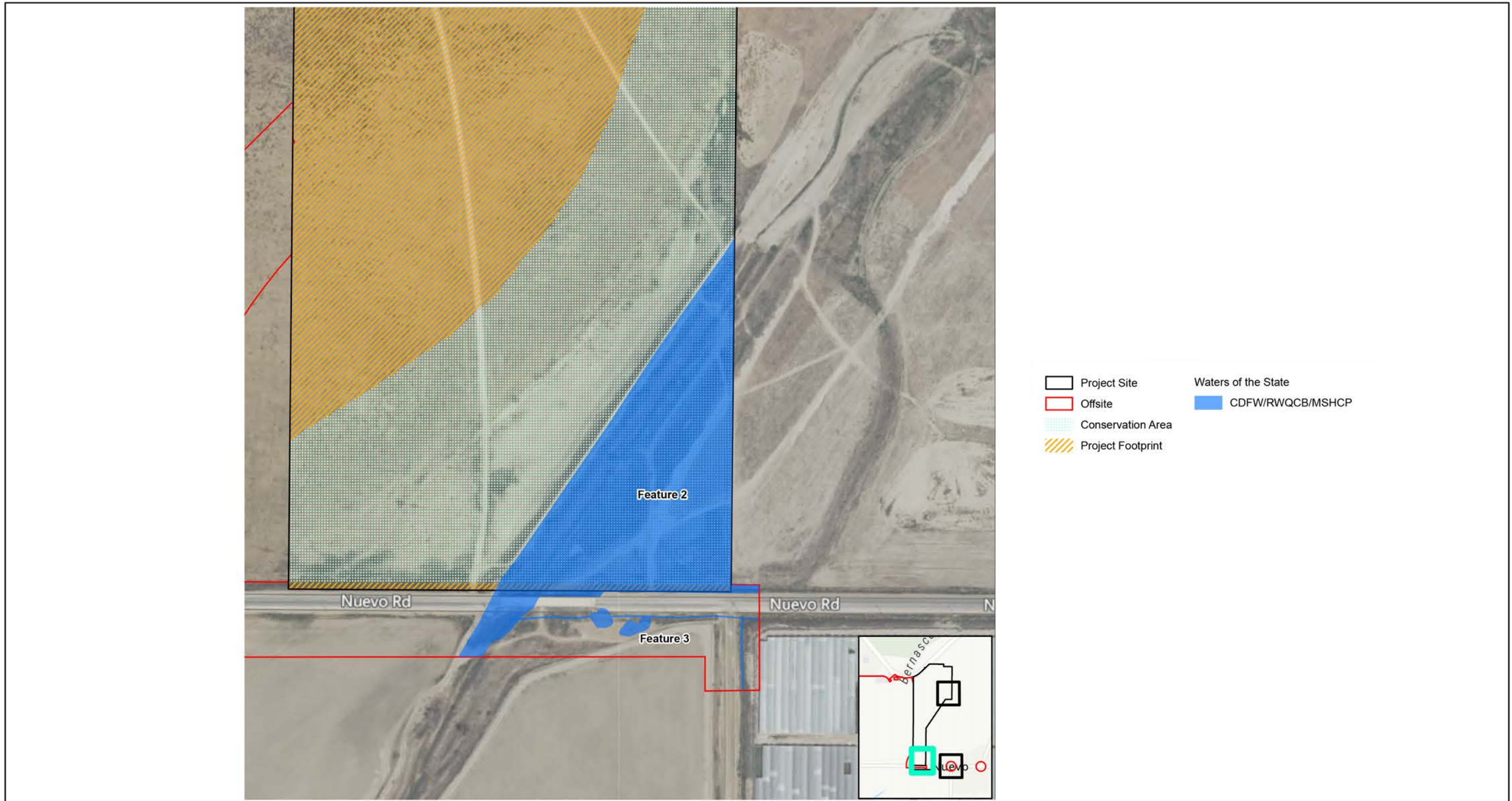
(Noreas, 2023a, Table 4)



Source(s): Noreas Inc. (08-31-2023)

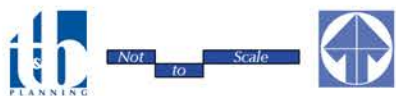
Figure 4.4-12



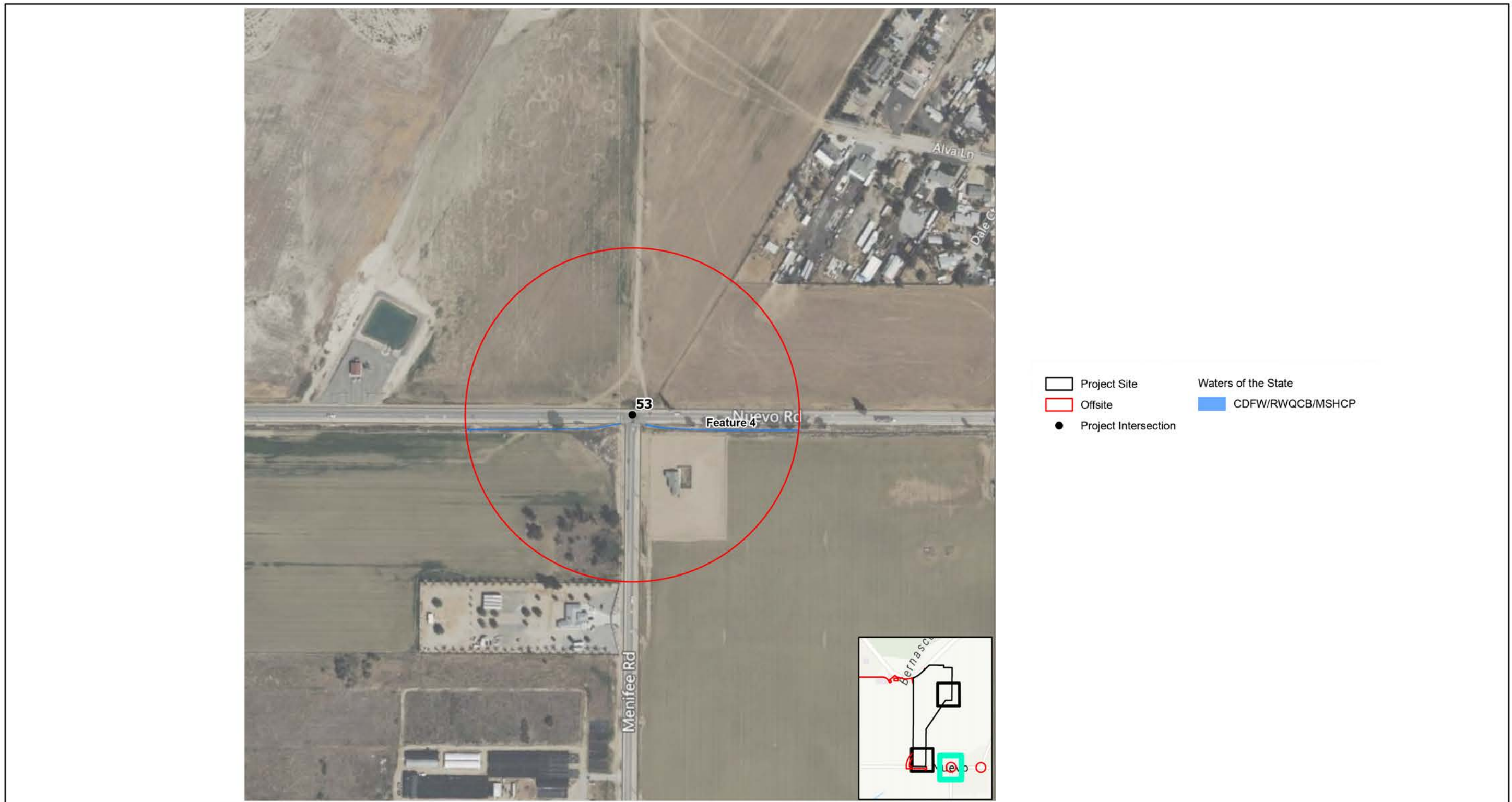


Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-13

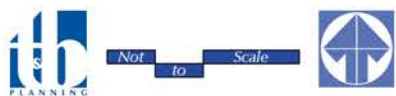






Source(s): Noreas Inc. (08-31-2023)

Figure 4.4-14





1600 (et seq.) jurisdictional as WoS, are considered MSHCP riparian/riverine resources. Detailed delineation methods, results, and assumptions are presented within Appendix E1 and E2 to the Project's BTR (EIR *Technical Appendix C*). (Noreas, 2023a, pp. 18-19)

### 3. *MSHCP Riparian and Riverine Resources and Vernal Pools*

According to Section 6.1.2 of the MSHCP, "Riparian/Riverine Areas are lands which contain Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." As also defined by Section 6.1.2, "[v]ernal pools are seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season. The determination that an area exhibits vernal pool characteristics, and the definition of the watershed supporting vernal pool hydrology, must be made on a case-by-case basis. Such determinations should consider the length of the time the area exhibits upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. Evidence concerning the persistence of an area's wetness can be obtained from its history, vegetation, soils, and drainage characteristics, uses to which it has been subjected, and weather and hydrologic records." (Noreas, 2023a, pp. 19-20)

As defined under Section 6.1.2 of the MSHCP, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, riparian/riverine areas are areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens which occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of these areas is intended to protect habitat that is essential to several listed or special-status water-dependent fish, amphibian, avian, and plant species. For purposes of analysis, all features that qualify as CDFW jurisdiction as WoS also are considered MSHCP riparian/riverine resources. Thus, MSHCP riparian/riverine resources for the Project include riparian (22.30 acres) and non-riparian ephemeral dry washes (7.92 acres) which total 5,211 linear feet, as previously summarized in Table 4.4-3. (Noreas, 2023a, p. 20)

The San Jacinto River and its terraces are subject to flooding, and exhibit topography that may support vernal pools under the appropriate suite of circumstances. However, these areas only occur within the on-site proposed OS-CH areas, and detailed mapping of potential vernal pool resources was not conducted within areas that would not be impacted by the Project. (Noreas, 2023a, p. 21)

### 4. *Soils*

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) website was used to assess soil characteristics and soil types within the Project Footprint, Conservation Areas, and Offsite areas. This database was also used to determine if the Project Component's mapped soils were



likely to include any hydrologically influenced areas. None of the soils are formally classified as hydric. (Noreas, 2023a, pp. 20-21)

#### 4.4.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of biological resources.

##### A. Federal Regulations

##### 1. *Endangered Species Act (ESA)*

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened. (USFWS, 2017)

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants. (USFWS, 2017)

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species. During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species. (USFWS, 2017)

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding



available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation. (USFWS, 2017)

## **2. Clean Water Act Section 401**

Clean Water Act (CWA) § 401 water quality certification provides states and authorized tribes with an effective tool to help protect water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. Under § 401, a federal agency cannot issue a permit or license for an activity that may result in a discharge to waters of the U.S. until the state or tribe where the discharge would originate has granted or waived § 401 certification. The central feature of CWA § 401 is the state or tribe's ability to grant, grant with conditions, deny, or waive certification. Granting certification, with or without conditions, allows the federal permit or license to be issued consistent with any conditions of the certification. Denying certification prohibits the federal permit or license from being issued. Waiver allows the permit or license to be issued without state or tribal comment. States and tribes make their decisions to deny, certify, or condition permits or licenses based in part on the proposed project's compliance with Environmental Protection Agency (EPA)-approved water quality standards. In addition, states and tribes consider whether the activity leading to the discharge will comply with any applicable effluent limitations guidelines, new source performance standards, toxic pollutant restrictions, and other appropriate requirements of state or tribal law. (EPA, 2019a)

Many states and tribes rely on § 401 certification to ensure that discharges of dredge or fill material into a water of the U.S. do not cause unacceptable environmental impacts and, more generally, as their primary regulatory tool for protecting wetlands and other aquatic resources. However, § 401 is limited in scope and application to situations involving federally-permitted or licensed activities that may result in a discharge to a water of the U.S. If a federal permit or license is not required, or would authorize impacts only to waters that are not waters of the U.S., the activity is not subject to the CWA § 401. (EPA, 2019a)

## **3. Clean Water Act Section 404**

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Wetlands subject to Clean Water Act Section 404 are defined as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g. certain farming and forestry activities). (EPA, n.d.)

The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment; or (2) the nation's waters would



be significantly degraded. Applications for permits must, to the extent practicable: (1) demonstrate steps have been taken to avoid wetland impacts; (2) demonstrate that potential impacts on wetlands have been minimized; and (3) provide compensation for any remaining unavoidable impacts. Proposed activities are regulated through a permit review process. (EPA, n.d.)

An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Army Corps of Engineers (USACE), which evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. However, for most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or State basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption. (EPA, n.d.)

#### **4. *Executive Order 11990 – Protection of Wetlands***

The purpose of Executive Order (EO) 11990 is to "minimize the destruction, loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands." To meet these objectives, the Order requires federal agencies, in planning their actions, to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided. (FEMA, 2020a) The Order applies to:

- Acquisition, management, and disposition of federal lands and facilities construction and improvement projects which are undertaken, financed, or assisted by federal agencies;
- Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities. (FEMA, 2020a)

The procedures require the determination of whether or not the proposed project will be in or will affect wetlands. If so, a wetlands assessment must be prepared that describes the alternatives considered. The procedures include a requirement for public review of assessments. (FEMA, 2020a)

#### **5. *Migratory Bird Treaty Act (16 USC Section 703-712)***

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds. (USFWS, 2020a)



***B. State Regulations***

***1. California Endangered Species Act (CESA)***

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met. (CDFW, n.d.)

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs). (CDFW, n.d.)

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit (federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA. (CDFW, n.d.)

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement. (CDFW, n.d.)

***2. Natural Community Conservation Planning Act (NCCP)***

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly. (CDFW, n.d.)

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants. (CDFW, n.d.)



There are currently 17 approved NCCPs (includes 6 subarea plans) and more than 9 NCCPs in various stages of planning (includes 2 subarea plans), which together cover more than 8 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. (CDFW, n.d.)

### **3. *California Fish and Game Code, Section 1600, et seq.***

CFGF section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or (3) deposit debris, waste or other materials that could pass into any river, stream, or lake. The CFGF indicates that "any river, stream or lake" includes those that are episodic (they are dry for periods of time) as well as those that are perennial (they flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. (CDFW, n.d.)

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when it determines that the activity, as described in a complete LSA Notification, may substantially adversely affect existing fish or wildlife resources. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a project that would eliminate or reduce harmful impacts to fish and wildlife resources. Before issuing an LSA Agreement, CDFW must comply with CEQA. (CDFW, n.d.)

### **4. *Native Plant Protection Act (NPPA) of 1977***

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. (CDFW, n.d.)

### **5. *Unlawful Take or Destruction of Nests or Eggs (CFGF Sections 3503.5-3513)***

Section 3503.5 of the CFGF specifically protects birds of prey, stating: "It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Section 3513 of the CFGF duplicates the federal protection of migratory birds, stating: "It is 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." (CA Legislative Info, n.d.)



## 6. *Porter-Cologne Water Quality Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- 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. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous Non-Point Source (NPS)-related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination System (NPDES) permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. 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 RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the State Water Board. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by the EPA, when approved they become water quality standards under the CWA. (SWRCB, 2014)





**C. Local and Regional Plans and Regulations**

**1. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)**

The continued loss of habitat to new development and the cumbersome process of environmental review and habitat mitigation on a project-by-project basis led to preparation of the MSHCP. The MSHCP is a multi-jurisdictional accomplishment that provides a regional conservation solution to species and habitat issues. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals within natural communities characteristic of western Riverside County and in return, provide take coverage and mitigation for projects throughout the plan area to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. (Riverside County, 2015, p. 4.8-49)

The MSHCP was adopted by Riverside County on June 17, 2003, and is a comprehensive, multijurisdictional Habitat Conservation Plan (HCP) pursuant to Section 10(a)(1)(B) of FESA, as well as an NCCP pursuant to the California Fish and Game Code. The USFWS issued a Biological Opinion and Federal ESA Section 10 permit for the MSHCP on June 22, 2004, and CDFW issued a Natural Community Conservation Planning (NCCP) Approval and Take Authorization on the same date. As long as adherence to the policies and requirements of the MSHCP is maintained, participants in the MSHCP, which include the County of Riverside and 18 cities, are allowed to authorize ‘incidental take’ of covered plant and wildlife species. (Riverside County, 2015, p. 4.8-49)

The MSHCP provides for the long-term survival of protected and sensitive species by designating a contiguous system of habitat to be added to existing public/quasi-public lands. The Plan includes an impact fee collected by the permittees and used in part to acquire these lands. Depending on the location of the private or public development project, certain biological studies are required for Plan compliance. These studies may identify the need for specific measures to avoid, minimize and reduce impacts to covered species and their habitat. (Riverside County, 2015, pp. 4.8-49 and 4.8-50)

The MSHCP defines two distinct consistency processes for development projects based on their location within the MSHCP’s coverage area, with separate processes for projects located outside of Criteria Areas and those within a Criteria Area. Criteria Areas consist of 160-acre ‘cells’ with identified conservation objectives. (Riverside County, 2015, p. 4.8-50)

**2. Stephens’ Kangaroo Rat Habitat Conservation Plan (SKR HCP)**

The Stephens’ Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens’ kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens’ kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)



On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. As of 2015, more than \$50 million had been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

### **3. Riverside County Oak Tree Management Guidelines**

In March 1993, the County of Riverside issued Oak Tree Management Guidelines to address the treatment of oak woodlands in areas where zoning and/or General Plan density restrictions allow the effective use of clustering. The guidelines are generally considered to be the most effective where minimum lot sizes are 2.5 acres or larger, or where oak woodlands are concentrated in a relatively small portion of a project site. The guidelines include recommendations for oak inventories, land use designs to cluster home sites in order to reduce impacts to oaks and mitigation measures for oak conservation. (Riverside County, 2015, p. 4.8-53)

### **4. Riverside County Ordinance No. 559 – Regulating the Removal of Trees**

Riverside County Ordinance No. 559 regulates the removal of living native trees on parcels of property greater than one-half acre, located above 5,000 feet within the unincorporated area of Riverside County without first obtaining a permit to do so. The purpose of the ordinance is to ensure that the timberlands of Riverside County are protected and the ecological balance of such timberlands is preserved. (Riverside County, 2015, p. 4.8-53)

### **5. Riverside County Ordinance No. 810 – Establishing an Interim Open Space Mitigation Fee**

This ordinance implements the Western Riverside County MSHCP and mitigates impacts of new development in western Riverside County. It establishes a development mitigation fee in order to help finance the acquisition of lands containing species protected by the MSHCP. By preserving these habitats and assessing a fee to develop in these open space areas, the ordinance helps to limit sprawl and encourage concentrated development, thereby reducing greenhouse gas emissions that would arise from trips between wider-flung land uses.

#### **4.4.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section IV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to biological resources, and includes the following threshold questions to evaluate the Project's impacts to biological resources (OPR, 2018a):

- *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,*



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

- *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*
- *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?*
- *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?*
- *Would the Project Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section IV of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on biological resources if construction and/or operation of the Project would:

- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan;*
- *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);*
- *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. Wildlife Service;*
- *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;*
- *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 Game or U. S. Fish and Wildlife Service;*



- *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; or*
- *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts to biological resources.

**4.4.4 IMPACT ANALYSIS**

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

The Project area is subject to two separate habitat conservation plans: the Stephens’ Kangaroo Rat HCP and the Western Riverside County MSHCP. Each is discussed below.

**A. Project Consistency with the SKR HCP**

As previously noted, the SKR HCP was prepared under the direction of the RCHCA Board of Directors, in consultation with USFWS and CDFW. Riverside County is a member agency of the RCHCA. According to Figure S-1 of the SKR HCP, the Study Area and Off-Site Improvement Areas are not located within or adjacent to any SKR core reserve areas. Additionally, the Project Applicant would be required to contribute fees towards the establishment and long-term maintenance of the SKR HCP core reserve pursuant to Riverside County Ordinance No. 663. The Project would not conflict with any provisions of the SKR HCP; thus, a less-than-significant impact would occur.

**B. Project Consistency with the MSHCP**

Provided below is an evaluation of the Project’s consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

**1. Project Relationship to MSHCP Reserve Assembly**

Development within the Project Footprint was previously determined to be consistent with the MSHCP as part of JPR 06-08-18-01, dated September 15, 2006. This JRP required the conservation of 80 acres of land along the San Jacinto River. A HANS determination letter (HANS 269) also was approved for the Project site, dated September 18, 2006. This letter determined that the RCA concurred with the conservation documented in the JPR. Nonetheless, it is expected that amendments to the HANS and JPR may be needed to cover the Project’s proposed improvements within the Offsite areas. A copy of the previously-approved HANS determination letter is attached as Appendix B to the Project’s BTR (EIR *Technical Appendix C*), which also contains the



JPR approval letter. The proposed improvements (roadway and utility improvements) within the Offsite areas are presumably Covered Activities in MSHCP Section 7.3.5 (Covered Activities Inside Criteria Area, Planned Roads Within the Criteria Area). However, the Project Footprint, Conservation Areas, and Offsite areas are located in Criteria Cells and are therefore subject to the HANS process. Because the Project is designed to avoid development of sensitive areas, providing additional conservation areas towards additional Reserve Assembly is not expected to be required when amending the previously-approved JPR. As described in EIR Subsection 3.0, the Project (under both the Primary Land Use Plan and Alternative Land Use Plan) would accommodate a total of 81.6 acres of “Open Space – Conservation Habitat (OS-CH)” within the eastern and southeastern portions of the Project site (inclusive of 80.9 acres that would not be disturbed by the Project and 0.7-acre that would consist of improvements to Nuevo Road), which are intended to achieve the conservation requirements for MSHCP Criteria Cells Criteria Cells 2969 and 3069 in Cell Group G. Notwithstanding, because the Project is anticipated to require amendments to the previously-approved HANS and JPR, prior to mitigation, the Project’s potential conflict with the MSCHP Reserve Assembly requirements represents a significant impact for which mitigation would be required. (Noreas, 2023a, p. 31)

## **2. *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools***

As more fully discussed under the analysis of Thresholds e. and f., below, the Project would impact 1.36 acres of MSCHP riparian/riverine habitat. No vernal pools were observed within the Project Footprint, Offsite Areas, or Conservation Areas, and as such no impacts to vernal pools would occur with Project implementation. However, several special-status plant species (e.g., Coulter’s goldfields, San Jacinto Valley crownscale, smooth tarplant, and spreading navarretia) associated with vernal pools and alkali playads were observed within the Conservation Areas. These specific locations are outside of the Project’s direct impact areas, and would be avoided and conserved. Furthermore, prior to construction these areas would be delineated with fencing and/or rope to demarcate the limits of disturbance and safeguard avoidance of these areas during construction, and fencing along the boundary of the Conservation Areas would be required under long-term conditions pursuant to Amendment No. 1 to the Stoneridge Commerce Center Specific Plan. Accordingly, Project permanent impacts to 1.36 acres of MSHCP riparian/riverine areas represent a potential conflict with Section 6.1.2, which is evaluated as a significant impact for which mitigation would be required. (Noreas, 2023a, p. 31)

## **3. *Protection of Narrow Endemic Plants***

As noted above, the Study Area lies partially or completely within predetermined CAPSSA and NEPSSA. According to the RCA MSHCP Information Map, the Study Area is within MSHCP NEPSSA-designated Survey Areas 3 and/or 9 and CAPSSA-designated Survey Area 3. The Conservation Areas were found to support spreading navarretia as discussed above in subsection 4.4.1.C. However, the areas in which these species were observed (i.e., within the proposed OS-CH areas) would be avoided by the Project and permanently conserved as open space, and spreading navarretia was not observed within the Project Footprint, Offsite areas, or within the proposed OS-C areas. As such, the Project would exceed the MSHCP requirement to avoid 90 percent of any population of these species by conserving 100% of the individuals observed within the Study Area (i.e., within the proposed OS-CH areas). In addition, surveys conducted for the Study Area did not identify the presence of San Diego ambrosia, California Orcutt grass, or Wright's trichocoronis. These species were confirmed absent through focused plant surveys. As such, the Project would be consistent with



Volume I, Section 6.1.3 of the MSHCP, and impacts would be less than significant. (Noreas, 2023a, pp. 31-32)

#### 4. **Guidelines Pertaining to the Urban/Wildland Interface**

The MSHCP Urban/Wildland Interface Guidelines (UWIG) are intended to address indirect effects associated with locating development in proximity to MSHCP Conservation Areas. As development is expected to occur adjacent to MSHCP Conservation Areas. Future development in proximity to MSHCP Conservation Areas may result in edge effects with the potential to adversely affect biological resources. To minimize such edge effects, the guidelines shall be implemented in conjunction with private development projects in proximity to MSHCP Conservation Areas, and address the following: (Noreas, 2023a, p. 32)

- Drainage;
- Toxics;
- Lighting;
- Noise;
- Invasive species;
- Barriers;
- Grading/Land Development.

A discussion of Project consistency with these components of the UWIG is provided below.

##### **Drainage**

Proposed projects located in proximity to the MSHCP Conservation Areas are required to incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Areas is not altered in an adverse way when compared with existing conditions. In particular, measures are required to be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Areas. Stormwater systems are required to be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Areas. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. Regular maintenance also is required to ensure effective operations of runoff control systems. The Project's construction contractor also would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) to address potential runoff and water quality effects during construction. Following the completion of activities, and pursuant to the Project's Water Quality Management Plan ("WQMP"; EIR *Technical Appendix H2*) the Project's drainage system would provide detention and water quality treatment to ensure runoff from the site does not result in increased drainage to the Santa Ana River, or affect the water quality of the river. Mandatory compliance with the future-required SWPPP during construction and the Project's WQMP under long-term operations would ensure that the Project does not conflict with the MSHCP provisions related to indirect drainage impacts. Accordingly, impacts would be less than significant. (Noreas, 2023a, p. 26)



### **Toxics**

Land uses proposed in proximity to the MSHCP Conservation Areas that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality are required incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Areas. As noted above, near-term construction activities would be subject to compliance with a SWPPP and long-term operations would be subject to compliance with the Project's WQMP, both of which would preclude the discharge of toxics from the Project site that could adversely affect the MSHCP Conservation Areas. As such, the Project would not conflict with the MSHCP provisions related to toxics, and impacts would be less than significant. (Noreas, 2023a, p. 27)

### **Lighting**

Night lighting is required to be directed away from the MSHCP Conservation Areas to protect species within the MSHCP Conservation Areas from direct night lighting. There is a potential that future implementing developments within the Project may require nighttime lighting during construction activities, specifically during night-time concrete pouring activities. Thus, during Project construction activities the Project has the potential to conflict with the lighting provisions of the MSHCP, resulting in a near-term significant impact.

Under long-term operating conditions, future development on site would be subject to compliance with Riverside County Ordinance No. 655 (Mt. Palomar Observatory), Riverside County Ordinance No. 915 (Regulating Outdoor Lighting), and the lighting requirements of the proposed Stoneridge Commerce Center Specific Plan (SP 239A1). In particular, Section 5 of Riverside County Ordinance No. 915 requires that "[a]ll outdoor luminaires in shall (*sic*) be located, adequately shielded, and directed such that no direct light falls outside the parcel of origin, or onto the public right-of-way." Riverside County would review future implementing projects (i.e., plot plans, building permits, etc.) to ensure compliance with Riverside County Ordinance Nos. 655 and 915 and the lighting provisions of the proposed Stoneridge Commerce Center Specific Plan, which would ensure that long-term operational lighting does not adversely affect the MSHCP Conservation Areas. As such, under long-term conditions the Project would not conflict with the lighting provisions of the MSHCP, and impacts would be less than significant.

### **Noise**

The MSHCP requires that proposed noise-generating land uses affecting the MSHCP Conservation Areas shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Areas resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Areas should not be subject to noise that would exceed residential noise standards (i.e., 65 dBA Leq). (Noreas, 2023a, p. 28) The currently-proposed Project consists of planning-level approvals, and no site-specific development plans are available. Notwithstanding, an analysis of Project impacts due to noise is presented in EIR Subsection 4.13, *Noise*. As indicated under the analysis of Threshold c. in Subsection 4.13, and as shown in EIR Table 4.13-7, *On-Site Construction Equipment Noise Level Summary*, the biological noise receptors within the proposed OS-CH areas would be subject to noise levels up to 65.1 dBA Leq, which would not exceed the residential construction-related noise threshold of 80 dBA Leq. In addition, EIR Table 4.13-10, *Nighttime Concrete Pour Noise Level Compliance*,



shows that during nighttime construction-related concrete pour activities, the proposed OS-CH areas would not be exposed to noise levels exceeding 52.2 dBA Leq, which is below the residential nighttime construction-related threshold of 70 dBA Leq. Accordingly, indirect noise impacts affecting the proposed OS-CH areas during construction would be less than significant.

With respect to long-term operations, EIR Table 4.13-13, *Daytime Project Operational Noise Levels (Biology and Future Receptor Locations)*, in EIR Subsection 4.13 shows that daytime operations would expose the proposed OS-CH areas to noise levels up to 62.1 dBA Leq, which would not exceed the residential daytime residential threshold of significance of 65 dBA Leq. In addition, Table 4.13-15, *Nighttime Project Operational Noise Levels (Biology and Future Receptor Locations)*, shows that the proposed OS-CH areas would be exposed to nighttime operational noise levels up to 62.1 dBA Leq, which also would not exceed the nighttime residential noise threshold of 65 dBA Leq. Accordingly, Project daytime and nighttime operational-related noise impacts affecting the proposed OS-CH areas would be less than significant.

### ***Invasive Species***

Projects adjacent to the MSHCP Conservation Areas are required to avoid the use of invasive plant species in landscaping, including invasive, non-native plant species listed in Volume I, Table 6-2 of the MSHCP. Future development on site would be subject to compliance with the proposed Stoneridge Commerce Center Specific Plan (SP 239A1). Section 4.7.2 of proposed SP 239A1 addresses prohibited plants, and includes a listing of prohibited plant species within Table 4-2, *Prohibited Plant Species*. Table 4-2 was added to SP 239A1 to specifically address the list of prohibited plant species included in MSHCP Volume I, Table 6-2. Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance with all applicable provisions of proposed SP 239A1, thereby ensuring that future landscaping on site does not include any of the prohibited plant species listed in Volume I, Table 6-2 of the MSHCP. Accordingly, indirect impacts due to invasive species would be less than significant.

### ***Barriers***

Proposed land uses adjacent to the MSHCP Conservation Areas are required to incorporate barriers, where appropriate in individual project designs, to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Areas. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms. Proposed SP 239A1 includes a conceptual wall and fence plan, which requires the installation of tubular steel fencing or steel rod fencing along all proposed open space areas on site, including areas proposed to be added to the MSHCP Conservation Areas. Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance with all applicable provisions of proposed SP 239A1, including the requirement to provide fencing along the MSHCP Conservation Areas. As such, the Project would not conflict with the MSHCP requirements related to barriers, and impacts would be less than significant.

### ***Grading/Land Development***

The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Areas. Proposed SP 239A1 includes a conceptual grading plan, which was previously depicted





on EIR Figure 3-10. As shown on Figure 3-10, no grading is proposed within the Conservation Areas, including areas that are proposed to be added to the MSHCP Conservation Area (i.e., the proposed OS-CH areas). Riverside County would review future implementing developments (i.e., plot plans, building permits, etc.) to ensure compliance with all applicable provisions of proposed SP 239A1, including compliance with the SP 239A1 conceptual grading plan, and the County would condition future grading and building permits to require the installation of construction fencing in order to preclude grading impacts within areas planned for OS-CH uses. As such, the Project would not conflict with the MSHCP requirements related to grading and land development, and impacts would be less than significant.

## 5. *Additional Survey Needs and Procedures*

Pursuant to Volume I, Section 6.3.2 of the MSHCP, focused surveys were completed for Criteria Area Plants. The MSHCP requires that projects avoid 90% of areas providing long-term conservation value for applicable species when NEPSSA and/or CAPSSA species are detected. If avoidance is infeasible, then mitigation must be provided and a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required. Where potentially significant, impacts to special-status plants are reduced to below a level of significance through compliance with the biological requirements of the MSHCP. The portions of the Study Area where these NEPSSA and CAPSSA species were identified occur within the Conservation Areas, which would be fully avoided by the Project and would be conserved as long-term open space. No sensitive, NEPSSA, or CAPSSA plant species were identified within the Project Footprint or the Offsite areas, further demonstrating that the Project would not result in impacts to any sensitive plant species. (Noreas, 2023a, p. 32)

MSHCP Objective 6 for burrowing owls requires pre-construction surveys prior to site grading. Although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact for which mitigation, in the form of pre-construction burrowing owl surveys, would be required. (Noreas, 2023a, p. 32)

Pursuant to Volume I, Section 6.3.2 of the MSHCP, focused surveys were completed for the LAPM. A total of 14 LAPM were detected during focused surveys. However, it was determined that there would be no significant impact to the LAPM, as the Project Footprint and Conservation Areas do not contain long-term conservation value for this species. The LAPM were distributed along the Project's dirt roads, development boundaries, and away from the active agricultural fields. LAPM does not currently occur within highly impacted agricultural fields. Densities within the Project Footprint and Conservation Areas are consistent with documented densities for this species of less than 2 animals per hectare. Based on current and past surveys, and data base records the LAPM, LAPM occurs sporadically in the area, and in trace densities. The aforementioned road network might allow for some marginal connectivity to other potential and documented LAPM habitat in the region, albeit tenuous. Movement of these animals within the Project Footprint would not be affected by Project implementation any more than they have been by ongoing agricultural activities in this area for decades. Therefore, the LAPM population within the Project Footprint is small, limited in area of distribution, relatively isolated and of limited value. Furthermore, animals within the Conservation Areas would not be impacted directly by Project implementation. Accordingly, the Project Footprint and Offsite areas do not have long-term conservation value for LAPM. As a result, Project impacts to the LAPM would



be less than significant. Additionally, a habitat assessment was conducted for the LAPM within the Offsite areas and it was determined that no suitable habitat for this species was present, thereby further indicating that potential impacts to the LAPM in the Offsite areas also would be less than significant. (Noreas, 2023a, p. 33)

**6. Conclusion of MSHCP Consistency**

As indicated in the preceding analysis, the proposed Project has the potential to conflict with the MSHCP Reserve Assembly requirements (due to the need to amend the previously-approved HANS and JPR), MSHCP Section 6.1.2 (due to Project impacts to 1.36 acres of MSHCP riparian/riverine areas), MSHCP Section 6.1.4 (due to nighttime lighting during construction-related concrete pouring activities) and MSHCP Section 6.3.2 (due to potential impacts to the burrowing owl). Accordingly, prior to mitigation, Project impacts due to a conflict with the MSHCP would represent a significant impact for which mitigation would be required.

***Threshold b:*** *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?*

***Threshold c:*** *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?*

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed Project.

**A. Impacts to Special-Status Plants**

Four special-status plant species were observed within the proposed OS-CH areas in the disturbed alkali playa habitat, including Coulter’s goldfields, San Jacinto Valley crownscale, smooth tarplant, and spreading navarretia. However, there would be no impacts to these species as all of these plant species occur within the undisturbed portions of the proposed OS-CH areas, which would be permanently conserved as open space as part of the Project and would be dedicated to the RCA for long-term management. Therefore, Project impacts to special-status plant species would be less than significant. (Noreas, 2023a, pp. 22-23)

Sections 6.1.3 and 6.3.2 of the MSHCP require that projects avoid 90% of areas providing long-term conservation value for applicable species when NEPSSA and/or CAPSSA species are detected. As discussed under the analysis of Threshold a., above, the Project occurs within a NEPSSA and CAPSSA, and four special-status plant species were observed during focused-plant surveys. However, the Project would completely avoid impacts to the disturbed alkali playas where these four species have been detected. These areas are also expected to be dedicated to the RCA for long-term management as part of the proposed OS-CH areas. Therefore, the Project would meet the MSHCP requirement for avoidance of the NEPSSA and CAPSSA species by avoiding these populations, and impacts would be less than significant. (Noreas, 2023a, p. 23)



No special-status plant species or their habitats occur within the Project Footprint and Offsite areas, including NEPSSA or CAPSSA species; therefore, no temporary or permanent impact to special-status plants would occur due to Project-related improvements within the Project Footprint and/or within the Offsite areas. Accordingly, impacts to sensitive plant species would be less than significant requiring no mitigation. (Noreas, 2023a, p. 23)

## ***B. Impacts to Special-Status Wildlife***

The Project would result in the loss of habitat that supports special-status species, including, but not limited to, the following: ferruginous hawk, northern harrier, white-tailed kite, loggerhead shrike, LAPM, northwestern San Diego pocket mouse, San Diego desert woodrat, Stephens' kangaroo rat, and San Diego black-tailed jackrabbit (refer to Appendix C to the Project's BTR, included as EIR *Technical Appendix C*, for a complete list of wildlife species and their potential to occur within the Study Area). Each is discussed below. (Noreas, 2023a, p. 23)

### ***1. Impacts to Birds***

Of the four special-status (non-listed) bird species known to occur within the Project Footprint and Conservation areas, the northern harrier and loggerhead shrike are not expected to nest within areas that would be directly impacted by the Project. Impacts to these species may be significant under CEQA; however, each of these species is covered under the MSHCP conservation goals and therefore, Project impacts to suitable nesting habitat are addressed through consistency with the MSHCP. However, there is a potential for nesting birds to occur within areas planned for development as part of the Project during the breeding season (February 1 to August 31). This is evaluated as a significant impact for which mitigation would be required. (Noreas, 2023a, p. 23)

### ***2. Impacts to Small Mammals***

Five special-status small mammal species are known to occur within the Project site. The Project would directly impact small mammal habitat. Impacts to these species may be significant under CEQA; however, each of these special-status small mammal species observed on site are covered under the MSHCP conservation goals and therefore, these impacts would be addressed through consistency with the MSHCP. Project impacts to small mammal suitable habitat, including the LAPM and SKR, would be offset through participation in the SKR HCP and compliance with the MSHCP (as discussed under Threshold a.). (Noreas, 2023a, pp. 23-24)

Although the Project is within the MSHCP Mammal Survey Area for LAPM and LAPM were detected during focused surveys, it was previously determined by the County of Riverside Environmental Programs Division (County EPD) that there would be no significant impact to the LAPM as the Project site does not contain long-term conservation value for this species, and the conservation area supporting the LAPM was offered to the RCA for long-term conservation of the species, but the RCA was not interested in conserving this area for the long-term conservation of the LAPM. The LAPM, in addition to other species of small mammals, were distributed along the Project's dirt roads, development boundaries, and away from the active agricultural fields. LAPM and other small mammals do not currently occur within highly impacted agricultural fields. LAPM



densities within the Project’s occupied habitat is consistent with documented densities for this species of less than 2 animals per hectare. Based on current and past surveys, and data base records of LAPM for the Project, LAPM occurs sporadically in this area, in trace densities. The Project’s road network might allow for some marginal connectivity to other potential and documented small mammal habitat in the region, albeit tenuous. Therefore, the LAPM population within the Project Footprint is small, limited in area of distribution, relatively isolated and of limited value. Movement of these animals within the Project Footprint would not be affected by Project implementation any more than they have been by ongoing agricultural activities in this area for decades. Furthermore, animals within the undisturbed portions of the Conserved Areas would not be impacted by Project implementation. (Noreas, 2023a, p. 24)

Based on the information noted above, the Project Footprint and Conservation Areas do not have long-term conservation value for LAPM or other small mammals. Development of the Offsite areas also would not result in the loss of habitat supporting special-status wildlife species, as a majority of those lands contains paved roadways, etc. Accordingly, with implementation and coverage of the Project under the SKR HCP and MSHCP conservation goals (refer to the discussion of Threshold a.), the Project would have a less-than-significant impact on special-status small mammal species. (Noreas, 2023a, p. 24)

**C. Conclusion**

Based on the foregoing analysis, the Project has the potential to result in impacts to nesting birds during the breeding season (February 1 to August 31), which represents a potentially significant impact of the Project for which mitigation would be required. Aside from Project impacts to nesting birds, Project impacts to sensitive plant and sensitive animal species would be less than significant.

***Threshold d: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Nurseries can be important to both special-status species as well as commonly occurring species. No wildlife nurseries or maternity bat colony roosts exist within the Study Area. As such, the Project would not result in any impacts to native wildlife nursery sites. (Noreas, 2023a, p. 25)

The Project site is located within the proposed extension of MSHCP Existing Core 4 (as previously shown on Figure 4.4-9). The MSHCP’s proposed extension of Existing Core 4 includes the middle reach of the San Jacinto River, and is contiguous with existing conservation lands in the Lake Perris Recreation Area to the north of the Project site. This linkage provides habitat for a number of Narrow Endemic Plant Species and movement for species connecting to Lake Perris, additional areas downstream of the San Jacinto River, and Canyon Lake. Planning Species within the MSHCP’s proposed extension of Existing Core 4 include San Jacinto Valley crowscale, thread-leaved brodiaea, arroyo toad, and LAPM. More specifically, the San Jacinto River drainage, provide a movement corridor for medium to small mammals such as coyote, bobcat, and racoon between the adjacent open space associated with Lake Perris to the north and open space to the southwest of



the Project. The river drainage also provides an aerial corridor for various bird and bat species moving through the region. (Noreas, 2023a, pp. 24-25)

The disturbed alkali playas and floodplain terraces of the San Jacinto River within the proposed OS-CH areas are contiguous with the proposed extension of MSHCP Existing Core 4. These areas also are expected to be dedicated to the RCA for long-term management. Therefore, the Project would have a beneficial long-term effect on wildlife movement, even though temporary disturbances may occur during construction. These disturbances would be limited to day-time hours during construction activities, and would not interfere significantly with wildlife movement on a landscape level. The Project’s consistency with the MSHCP, as would be assured through compliance with the mitigation measures presented in subsection 4.4.7 (refer to the analysis of Threshold a.) further would reduce impacts to wildlife movement. Therefore, Project impacts to wildlife movement corridors would be less than significant, requiring no mitigation. (Noreas, 2023a, p. 25)

***Threshold e: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?***

Although the Project would avoid impacts to 1.19-acre of southern riparian scrub within the on-site Conservation Areas, the Project would permanently impact 0.31-acre of Southern Riparian Scrub within the southern portion of the Conservation Areas and within the Offsite areas during construction of improvements to Nuevo Road along the Project site’s frontage with this roadway. The loss of riparian habitat must be mitigated pursuant to Volume I, Section 6.1.2 of the MSHCP. None of the other vegetation communities observed within the Project Footprint and Offsite areas (refer to Table 4.4-1) comprise sensitive vegetation communities or riparian habitat. Accordingly, prior to mitigation, Project impacts to 0.31-acre of Southern riparian scrub would be significant requiring mitigation. (Noreas, 2023a, p. 24)

***Threshold 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?***

The Project would result in impacts to federally-protected wetlands, and also would result in impacts to jurisdictional waters, as discussed below.

**A. Project Impacts to Wetlands**

As previously indicated in Table 4.4-2, there are approximately 22.01-acres of USACE-defined wetlands that occur within the disturbed alkali playa (20.59 acres) and the San Jacinto River (1.42 acres) within the proposed OS-CH areas, in addition to approximately 0.03-acre of USACE-defined wetlands within the Project Footprint and 0.26-acre of USACE-defined wetlands within the Offsite areas. However, the Project would avoid all impacts to areas within the portions of the Conservation Areas that contain wetlands (including proposed OS-CH areas), and as such, no impacts to wetland habitat within the Conservation Areas would occur with implementation of the Project. However, due to improvements to Nuevo Road along the Project site’s frontage, implementation of the Project would result in permanent impacts to approximately 0.29-acre of USACE-



defined wetlands within the Offsite areas (0.26-acre) and the southern portion of the Conservation Areas (0.03-acre). This is evaluated as a significant impact for which mitigation would be required. (Noreas, 2023a, p. 24)

***B. Project Impacts to Jurisdictional Waters***

***1. Impacts to RWQCB/USACE Jurisdictional Areas (Non-Wetland)***

There are no RWQCB or USACE non-wetland jurisdictional waters present within the Project footprint, Conservation Areas, or the Offsite areas (as shown in Table 4.4-2); thus, the Project would not result in any impacts to non-wetland waters subject to RWQCB/USACE jurisdiction. As discussed above, 0.29-acre (275 linear feet) of USACE-defined wetlands within the Offsite areas (0.26-acre) and the southern portion of the Conservation Areas (0.03-acre) would be permanently impacted by Project development. Since these features are considered WoUS, they also are subject to the USACE’s jurisdiction in accordance with Section 404 of the CWA and would be subject to Regional Board jurisdiction under Section 401 of the CWA as well. Accordingly, prior to mitigation, Project impacts to 0.29-acre of USACE-defined jurisdictional areas would represent a significant impact. (Noreas, 2023a, p. 29)

***2. Impacts to CDFW Jurisdictional Areas***

As previously indicated in Table 4.4-3, there are a total of 0.03-acre of riparian areas subject to CDFW jurisdiction within the Project Footprint, approximately 22.01 acres of riparian areas within the Conservation Areas, and 0.26-acre of riparian areas within the Offsite areas. Implementation of the Project, including Project-related improvements to Nuevo Road along the Project site’s frontage, would result in permanent impacts to a total of 1.36 acres of WoS (2,151 linear feet), which include riparian (0.29-acres) and non-riparian ephemeral dry washes and streambeds (1.07-acres). Since these features are considered WoS, they are also subject to jurisdiction by the CDFW pursuant to Section 1600 (et seq.) of the CFGC, and the Santa Ana RWQCB in accordance with Section 13260 of the CWC. Accordingly, Project impacts to 1.36 acres of WoS (2,151 linear feet) represents a significant impact for which mitigation would be required. (Noreas, 2023a, p. 28)

***3. Impacts to MSHCP Riparian Areas***

The Project’s impacts to MSHCP riparian/riverine areas are identical to impacts to WoS regulated CDFW, as discussed above. Therefore, impacts include a total of 1.36-acres of MSHCP Riparian/Riverine areas (2,151 linear feet), which include riparian (0.29-acres) and non-riparian ephemeral dry streambeds (1.07 acres) within the Offsite areas, would represent a potentially significant impact requiring mitigation. However, and as previously discussed, it should be noted that the Project’s riparian areas do not contain suitable habitat for riparian-associated birds including least Bell’s vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.

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

Aside from the SKR HCP and the MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree



Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). As previously indicated in Table 4.4-1, the Study Area does not contain any oak trees or vegetation communities containing oak trees. As such, the Project has no potential to result in a conflict with the County's Oak Tree Management Guidelines. Additionally, Riverside County Ordinance No. 559 applies to properties located above 5,000 feet above mean sea level (amsl) in elevation, while the maximum elevation at the Project site is approximately 1,865 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Accordingly, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur. (Noreas, 2023a, p. 26)

#### **4.4.5 CUMULATIVE IMPACT ANALYSIS**

The cumulative impact analysis considers development of the Project in conjunction with other development projects located within the purview of the Western Riverside County MSHCP. This study area for cumulatively-considerable impacts to biological resources is appropriate because the MSHCP encompasses a large area surrounding the Project site, and provides for the long-term protection of sensitive plant, animal, and plant communities throughout the MSHCP area. Additionally, most cumulative development projects within the Project vicinity would be subject to the provisions of the MSHCP, and the general range of habitats, species, climate, etc. are fairly consistent throughout the MSHCP.

As discussed under the analysis of Threshold a., the Project would preserve as open space areas identified by the MSHCP for long-term conservation. However, portions of the required improvements within the Offsite areas would traverse MSHCP Cells 2969 and 3069. As such, a JPR process through the RCA would be required in order to deem the improvements within the Offsite areas consistent with the MSHCP. As other cumulative developments also may require a JPR process through the RCA, impacts would be cumulatively considerable. Project permanent impacts to 1.36 acres of MSCHP riparian/riverine habitat associated with frontage improvements to Nuevo Road also would represent a potential conflict with Section 6.1.2 of the MSHCP. As other developments within the region also have the potential to impact MSHCP riparian/riverine habitat, Project impacts to 1.36 acres of MSCHP riparian/riverine habitat represent a cumulatively-considerable impact. The Project would, however, conserve the portions of the Project site that support spreading navarretia within planned open space areas, while the Project Footprint and Offsite areas do not contain any San Diego ambrosia, California Orcutt grass, or Wright's trichocoronis; thus, Project impacts to narrow endemic plants would be less-than-cumulatively considerable. Additionally, although the Project has the potential to result in indirect nighttime construction-related lighting impacts to MSHCP conservation areas, there are no cumulative developments within close proximity to the Project site and that could cumulatively affect the proposed OS-CH areas with nighttime lighting; thus, while lighting impacts would be significant on a direct basis, cumulatively-considerable impacts would be less than significant. In addition, the Project may result in potential impacts to burrowing owls if the site becomes occupied prior to the commencement of construction. As other cumulative developments in the region also have the potential to result in impacts to the burrowing owl, the Project's indirect impacts to MSHCP conservation areas represents a cumulatively-considerable impact.



As discussed under the analysis of Thresholds b. and c., the Project would not result in any impacts to any special-status plants, and cumulatively-considerable impacts would not occur. Although the Project would result in less-than-significant impacts to most special status animals observed within the Study Area, there is a potential that the Study Area may be occupied by nesting birds prior to the commencement of construction. As other cumulative developments within the region also have the potential to result in impacts to nesting birds, the Project's impacts to nesting birds would be cumulatively considerable.

As indicated under the analysis of Threshold d., the Study Area does not contain any wildlife nursery sites; thus, cumulatively-considerable impacts to wildlife nursery sites would not occur. The Project includes the dedication of 80.9 acres of permanently conserved open space (excluding the 0.7-acre of on-site proposed improvements to Nuevo Road) that would be dedicated to the RCA for long-term management, in addition to 18.1 acres of permanently conserved open space (inclusive of 1.9 acres that would be impacted by Project grading) along the western boundary of the site. The Project has been specifically designed to conserve areas within the MSHCP Criteria Cells that apply to the Project site, including the majority of the San Jacinto River and the adjacent areas, and as such the Project would have a beneficial long-term effect on wildlife movement, even though temporary disturbances may occur during construction. These disturbances would be limited to day-time hours during construction activities, and would not interfere significantly with wildlife movement on a landscape level. The Project's consistency with the MSHCP, as would be assured through compliance with the mitigation measures presented in subsection 4.4.7 (refer to the analysis of Threshold a.) further would reduce impacts to wildlife movement. As other cumulative developments within the region also would be required to comply with MSHCP conservation requirements, which were designed, in part, to facilitate regional wildlife movement corridors, the Project's impacts to wildlife movement corridors would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold e., the Project would result in impacts to 0.31-acre of southern riparian scrub, all of which would occur in Offsite areas. As other cumulative developments within the region also have the potential to result in impacts to sensitive natural communities and riparian habitats, the Project's impacts to 0.31-acre of southern riparian scrub would be cumulatively considerable.

As indicated in the analysis of Threshold f., implementation of the Project would result in permanent impacts to approximately 0.29-acre of USACE-defined wetlands that are subject to regulation by the USACOE and RWQCB. In addition, the Project would result in impacts to 1.36 acres of WoS (2,151 linear feet), which are subject to regulation by the CDFW and through the MSHCP. As other cumulative developments within the region also have the potential to impact wetlands, Corps jurisdictional areas, RWQCB jurisdictional areas, CDFW jurisdictional areas, and/or MSHCP Riparian/Riverine areas, the Project's impacts to wetlands and jurisdictional areas would be cumulatively considerable.

As indicated under the analysis of Threshold g., aside from the SKR HCP and MSHCP (which are addressed under the analysis of Threshold a.), the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Study Area does not contain any oak trees that would be subject to the County's Oak Tree Management Guidelines, and Riverside County Ordinance No. 559 applies





only to properties located above 5,000 feet amsl. Accordingly, Project impacts due to a conflict with local policies or ordinances protecting biological resources would be less-than-cumulatively considerable.

#### 4.4.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The proposed Project would not conflict with the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP), with the mandatory payment of fees pursuant to Riverside County Ordinance No. 663. Although on-site impacts to the MSHCP Reserve Assembly requirements were previously addressed as part of HANS 269, portions of the Offsite areas traverse MSHCP Criteria Cells 2969 and 3069, and these improvements were not addressed as part of HANS 269. Accordingly, prior to mitigation, the Project's potential conflict with the MSHCP Reserve Assembly requirements represents a significant impact for which mitigation would be required. Additionally, Project impacts to 1.36 acres of MSHCP riparian/riverine habitat would represent a potential conflict with Section 6.1.2 of the MSHCP, and impacts would therefore be significant. The Project would not result in impacts to narrow endemic plants, and thus would be consistent with Volume I, Section 6.1.3 of the MSHCP. However, Project-related nighttime lighting during construction has the potential to result in indirect impacts to the proposed OS-CH areas, representing a potential conflict with the MSHCP Urban/Wildland Interface requirements. In addition, although focused surveys conducted for the proposed Project determined that the burrowing owl is absent from the Study Area, there is nonetheless a potential for the site to become occupied with burrowing owls prior to construction activities. This is evaluated as a potentially significant impact due to a conflict with MSHCP Objective 6 for burrowing owls, for which mitigation would be required in the form of pre-construction surveys and avoidance of any nesting burrowing owls. With exception of the Project's indirect construction-related nighttime lighting impacts (which would not be cumulatively considerable), Project impacts due to a potential conflict with the MSHCP would be significant on both a direct and cumulatively-considerable basis.

Thresholds b. and c.: Significant Direct and Cumulatively-Considerable Impact. No special-status plant species or their habitats occur within the Project Footprint and Offsite areas, including NEPSSA or CAPSSA species; therefore, no temporary or permanent impact to special-status plants would occur due to Project-related improvements within the Project Footprint and/or within the Offsite areas. Accordingly, impacts to sensitive plant species would be less than significant requiring no mitigation. Although most impacts to special-status animals would be less than significant with the planned Conservation Areas and Project compliance with the MSHCP, there is a potential for nesting birds to occur within areas planned for development as part of the Project if construction activities were to occur during the breeding season (February 1 to August 31); thus, Project impacts to nesting birds would be potentially significant prior to mitigation.

Threshold d.: Less-than-Significant Impact. The Project would not 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, and impacts would be less than significant.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. Implementation of the Project would result in impacts to 0.31-acre of southern riparian scrub, which is the only sensitive natural community that



occurs within the Study Area; thus, Project impacts to 0.31-acre of southern riparian scrub would be significant prior to mitigation.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. The Project would avoid all impacts to areas within the portions of the Conservation Areas that contain wetlands (including proposed OS-CH areas), and as such, no impacts to wetland habitat within the Conservation Areas would occur with implementation of the Project. However, due to improvements to Nuevo Road along the Project site's frontage, implementation of the Project would result in permanent impacts to approximately 0.29-acre of USACE-defined wetlands within the Offsite areas (0.26-acre) and the southern portion of the Conservation Areas (0.03-acre). This is evaluated as a significant impact for which mitigation would be required. In addition, the Project would result in impacts to 0.29-acre (275 linear feet) of USACE-defined jurisdictional areas subject to regulation by the USACE and RWQCB, as well as impacts to 1.36 acres of WoS (2,151 linear feet) that are regulated by the CDFW and MSHCP, inclusive of 0.29-acre of impact to riparian areas and 1.07 acres of non-riparian ephemeral dry streambeds. Accordingly, prior to mitigation Project impacts to wetlands and jurisdictional waters subject to regulation by the USACOE, RWQCB, CDFW, and/or MSHCP would be significant.

Threshold g.: No Impact. Aside from the SKR HCP and MSHCP, which are addressed under the analysis of Threshold a., the only other local policies or ordinances protecting biological resources are the Riverside County Oak Tree Management Guidelines and Riverside County Ordinance No. 559 (Regulating the Removal of Trees). However, the Project site does not contain any oak trees subject to the Riverside County Oak Tree Management Guidelines. Additionally, the Project site does not occur at an elevation exceeding 5,000 feet amsl; thus, Riverside County Ordinance No. 559 is not applicable to the proposed Project. Therefore, and aside from potential impacts due to a conflict with the MSHCP (as addressed under the analysis of Threshold a.), the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur.

#### 4.4.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Prior to issuance of grading permits, the Project Applicant shall make payment of Western Riverside County MSHCP fees pursuant to Riverside County Ordinance No. 810, *Establishing an Interim Open Space Mitigation Fee*.
- Prior to issuance of grading permits, the Project Applicant shall make payment of fees pursuant to the Stephen's Kangaroo Rat Habitat Conservation Plan and Riverside County Ordinance No. 663, *Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan and Setting Mitigation Fees*.



- As a condition of approval for future grading and building permits, the County of Riverside shall require that the Project Applicant must delineate areas planned for long-term conservation as open space (i.e., open space within Planning Areas 10 and 11 of the Stoneridge Commerce Center Specific Plan No. 239, Amendment No. 1) with construction fencing in order to preclude direct and indirect impacts to sensitive biological resources within the open space areas. These areas also shall be delineated with fencing under long-term conditions, as required by Figure 4-13 of Amendment No. 1 to the Stoneridge Commerce Center Specific Plan.
- Prior to issuance of grading permits or other permits authorizing ground disturbance, the Project Applicant shall provide evidence to Riverside County demonstrating that the appropriate permits have been obtained from the United States Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife addressing Project impacts to 0.29-acre of USACE-defined wetlands within the Offsite areas, 0.29-acre of USACE-defined jurisdictional areas subject to regulation by the USACE and RWQCB, as well as permits from the CDFW for impacts to 1.36 acres of WoS (2,151 linear feet), inclusive of 0.29-acre of impact to riparian areas and 1.07 acres of non-riparian ephemeral dry streambeds.

### ***Mitigation Measures***

MM 4.4-1 Prior to the certification of the Final Recirculated Environmental Impact Report for the Stoneridge Commerce Center Specific Plan Project by the Riverside County Board of Supervisors, the Project Applicant shall contract with a qualified biologist to prepare a Determination of Biologically Equivalent or Superior Preservation (DBESP), in accordance with Section 6.1.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The required DBESP shall address Project impacts to riverine/riparian resources subject to regulation by the USACOE, RWQCB, CDFW, and/or MSHCP. The DBESP shall identify compensatory mitigation for impacts to CDFW/MSHCP riparian/riverine resources (which include USACOE and RWQCB resources) at a minimum 3:1 ratio. Mitigation for impacts are anticipated to include the purchase of a minimum of 4.08 acres of credits from an approved mitigation bank, such as the Riverpark Mitigation Bank, although the final compensation for the loss of 1.36-acres of MSHCP riparian/riverine areas will be determined through the DBESP process. Prior to certification of the Final Recirculated Environmental Impact Report for the Stoneridge Commerce Center Specific Plan Project by the Riverside County Board of Supervisors, the required DBESP shall be subject to review and approval by the Riverside County Environmental Programs Department (EPD), and also shall be subject to a 60-day review and response period by the Wildlife Agencies as required by the MSHCP. Following approval of the DBESP by County EPD and the Wildlife Agencies, and prior to issuance of grading permits, the Project Applicant shall provide evidence to Riverside County that the required compensatory mitigation has been achieved in accordance with the approved DBESP. Should compensatory mitigation credits be unavailable at the Riverpark Mitigation Bank, the Project Applicant shall coordinate with Riverside County and the Wildlife Agencies to secure alternate mitigation in conformance with the approved DBESP.



MM 4.4-2 In the event that nighttime construction is proposed as part of future building permits, Riverside County shall review the plans to ensure the following note is included on the plans. This note also shall be specified in bid documents issued to prospective construction contractors.

- *“During any nighttime construction activities, all lighting shall direct lighting away from the MSHCP conserved lands located along the San Jacinto River in the eastern and southeastern portions of the Project site (i.e., within Planning Areas 10 and 11 of the Stoneridge Commerce Center Specific Plan No. 239, Amendment No. 1).”*

Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance.

MM 4.4-3 In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project’s limits of disturbance within 30 days of the commencement of any ground-disturbing activities at the Project site, as discussed below.

- **Pre-Construction Survey:** The pre-construction survey shall be performed by a qualified biologist that will survey the site for the presence/absence of burrowing owls within 30 days prior to commencement of ground-disturbing activities at the Project site. If burrowing owls are detected on-site during the pre-construction survey, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA and Wildlife Agencies (i.e., CDFW and/or USFWS).
- **Burrowing Owl Management Plan:** In the event that burrowing owl is determined to be present, or in the event that an assumption is made that the burrowing owl occurs on-site, a burrowing owl management plan shall be prepared and implemented in coordination with the Western Riverside County Regional Conservation Authority (RCA) and CDFW that shall detail the relocation of owls from the Project site, passively and/or actively. If additional site visits determine the species is absent, then the pre-construction survey (as discussed above) shall instead be implemented.

A copy of the results of the pre-construction survey (and all additional surveys), as well as copies of the Burrowing Owl Management Plan, if required, shall be provided to the County of Riverside Planning Department for review and approval (in the case of the Burrowing Owl Management Plan) prior to any vegetation clearing and ground disturbance activities.



MM 4.4-4 Prior to the issuance of grading permits, Riverside County shall ensure that the following note is included on the Project's grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by Riverside County staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.

*"Vegetation clearing shall be conducted outside of the bird nesting season (February 1 to August 31) to the extent feasible. If avoidance of the nesting season is not feasible, a nesting bird survey shall be conducted by a qualified biologist within no more than 72 hours of such scheduled disturbance, to determine the presence of nests or nesting birds. If active nests are identified, the biologist shall establish appropriate buffers around the vegetation (typically 500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The biologist shall review and verify compliance with these nesting boundaries and shall verify the nesting effort has finished. Work may resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to Riverside County for mitigation monitoring compliance record keeping. If vegetation removal is not completed within 72 hours of a negative survey during nesting season, the nesting survey must be repeated to confirm the absence of nesting birds."*

MM 4.4-5 Prior to the certification of the final Environmental Impact Report for the Stoneridge Commerce Center Project, and if required by the Regional Conservation Authority (RCA), the Project Applicant shall prepare a HANS application to amend the previously-approved HANS 269 determination to include required improvements due to off-site improvements, including improvements to roadways, infrastructure, and intersections, as the Offsite areas traverse MSHCP Criteria Cells 2969 and 3069 in Cell Group G. The HANS application shall be submitted to the RCA and shall be subject to the Western Multiple Species Habitat Conservation Plan (MSHCP) Joint Project Review (JPR) process. Prior to issuance of grading permits or improvement plans affecting areas within the Offsite improvement areas, the Project Applicant shall provide a copy of the approved amended HANS 269 determination. These requirements shall not apply in the event that the RCA does not require an amendment to HANS 269 for the Project's off-site improvements.

#### 4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-5 would ensure that the Project's Offsite areas are subject to a HANS process to determine whether any portion of the Offsite areas would conflict with the MSHCP Reserve Assembly requirements.



Implementation of the required mitigation would reduce potential impacts due to a conflict with the Reserve Assembly requirements to below a level of significance. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project-related impacts to 1.36 acres of MSHCP riparian/riverine areas within the Offsite areas are subject to a DBESP process prior to public hearings, and would further ensure that Project impacts would be mitigated at a minimum 3:1 ratio in a manner consistent with the approved DBESP. Implementation of Mitigation Measure MM 4.4-2 would ensure that any lighting associated with nighttime concrete pouring activities during construction are directed away from the proposed on-site OS-CH areas, and would reduce Project indirect lighting impacts to less-than-significant levels. Implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate pre-construction surveys are conducted prior to ground-disturbing activities, in accordance with MSHCP Objective 6 for the burrowing owl. With implementation of the required mitigation, the Project would be fully consistent with all applicable MSHCP requirements, and impacts to the burrowing owl would be reduced to below a level of significance. Implementation of the required mitigation would reduce Project impacts due to a conflict with the MSHCP to below a level of significance.

Thresholds b. and c.: Less-than-Significant Impact with Mitigation Incorporated. In the event that Project construction activities occur during the nesting season for birds (February 1 to August 31), implementation of Mitigation Measure MM 4.4-4 would ensure that appropriate pre-construction nesting surveys are conducted prior to commencement of construction activities, and further would require appropriate avoidance of any active nests that may be identified. Implementation of the required mitigation would reduce Project impacts to nesting birds to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would require approval of a DBESP prior to Project approval, which will specify compensatory mitigation for Project impacts to 0.31-acre of southern riparian scrub, and would include mitigation at a minimum 3:1 ratio (or as otherwise specified by the approved DBESP). Implementation of the required mitigation would reduce Project impacts to 0.31-acre of southern riparian scrub habitat to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.4-1 would ensure that Project impacts to wetlands and jurisdictional areas are mitigated at a minimum 3:1 ratio in accordance with the DBESP that must be approved prior to Final EIR certification. Accordingly, implementation of Mitigation Measure MM 4.4-1 would address Project impacts to 0.29-acre (275 linear feet) of USACE-defined jurisdictional areas subject to regulation by the USACE and RWQCB, as well as impacts to 1.36 acres of WoS (2,151 linear feet), inclusive of 0.29-acre of impact to riparian areas and 1.07 acres of non-riparian ephemeral dry streambeds, that are regulated by the CDFW and MSHCP. Implementation of the required mitigation would reduce the Project's impacts to below a level of significance.



## 4.5 CULTURAL RESOURCES

The analysis in this subsection is based on a site specific Cultural Resources Assessment (herein, “CRA”) prepared by ECORP Consultants, Inc. (“ECORP”), entitled “*Phase I Cultural Resources Assessment for the Stoneridge Project, Riverside County, California*” and dated July 2019 (ECORP, 2019a), and a survey of off-site impact areas (herein, “Off-Site CRA”), entitled “*Addendum Phase I Cultural Resources Assessment for the Stoneridge Project, Offsite Limits of Disturbance, Riverside County, California*” and dated February 2020 (ECORP, 2020). The Project’s CRA and Off-site CRA are included as *Technical Appendix D1* and *Technical Appendix D2* to this EIR, respectively. The analysis in this section also is based on a Phase II Cultural Resources Assessment (herein, “Phase II CRA”) conducted by Brian F. Smith and Associates (BFSA), entitled, “*A Phase II Cultural Resources Significance Evaluation Program for the Stoneridge Commerce Center Project,*” dated August 6, 2020, and included as *Technical Appendix D3* to this EIR (BFSA, 2020). In addition, a supplemental cultural resources report was prepared by BFSA to evaluate additional resources within proposed Planning Area 9 of SP 239A1, which is entitled, “*Archaeological Site Inventory of Planning Area 9 of the Stoneridge Commerce Center Project (GPA190008; CZ1900024; SP239A1), County of Riverside, California,*” is dated June 14, 2021, and is included as *Technical Appendix D4* to this EIR (BFSA, 2021). Additionally, ECORP prepared a supplemental report to evaluate potential impacts to cultural resources associated with improvements required for previously-proposed off-site intersection improvements (some of which still are proposed; please refer to EIR Section 3.0, *Project Description*). This report is entitled, “*Addendum Phase I Cultural Resources Assessment for the Stoneridge Project, Offsite Intersection Improvement Areas, Riverside County, California,*” is dated May 2021, and is included as *Technical Appendix D5* to this EIR (ECORP, 2021). In addition, and in order to address potential cultural resources impacts associated with the Project’s Alternative Truck Routes 1 and 2, ECORP prepared a supplemental report for the off-site improvement areas, entitled, “*Recommendations for Cultural Resources Associated with Seven Proposed Intersection Improvement Alternatives to Support the Proposed Stoneridge Project, Riverside County,*” dated January 12, 2023, and included as EIR *Technical Appendix D6* (ECORP, 2023). All references used in this Subsection are included in EIR Section 7.0, *References*.

It should be noted that confidential information has been redacted from *Technical Appendix D1* through *D5* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and ECORP/BFSA is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

### 4.5.1 EXISTING CONDITIONS

#### A. Cultural Setting

The Project site is located in unincorporated western Riverside County, California. The following provides a brief discussion on the prehistoric and historic context of the Project area for better understanding the relevance



of resources identified within its proximity. Refer to Section II of the Project's CRA (*Technical Appendix D1*) for a complete discussion of the prehistoric and historic setting.

### 1. **Prehistoric Period Setting**

#### ***Paleo-Indian Period/Terminal Pleistocene (12,000 to 10,000 Before Present [BP])***

The first inhabitants of southern California were big game hunters and gatherers exploiting extinct species of Pleistocene megafauna (e.g., mammoth and other Rancholabrean fauna). Local fluted point assemblages composed of large spear points or knives are stylistically and technologically similar to the Clovis Paleo-Indian cultural tradition dated to this period elsewhere in North America. Archaeological evidence for this period in southern California is limited to a few small temporary camps with fluted points found around late Pleistocene lake margins in the Mojave Desert and around Tulare Lake in the southern San Joaquin Valley. Single points are reported from Ocotillo Wells and Cuyamaca Pass in eastern San Diego County and from the Yuha Desert in Imperial County. (ECORP, 2019a, p. 5)

#### ***Early Archaic Period/Early Holocene (10,000 to 8,500 BP)***

Approximately 10,000 years ago at the beginning of the Holocene, warming temperatures and the extinction of the megafauna resulted in changing subsistence strategies with an emphasis on hunting smaller game and increasing reliance on plant gathering. Southern California Early Holocene sites have been found along the Santa Barbara Channel, in western Riverside County. The San Dieguito Complex was defined based on material found at the Harris site on the San Dieguito River near Lake Hodges in San Diego County. San Dieguito artifacts include large leaf shaped points; leaf-shaped knives; large ovoid, domed, and rectangular end and side scrapers; engraving tools; and crescentics. The San Dieguito Complex at the Harris site dates to 9,000 to 7,500 BP. However, sites from this time period in coastal San Diego County have yielded artifacts and subsistence remains characteristic of the succeeding Encinitas Tradition, including manos, metates, core-cobble tools, and marine shell. (ECORP, 2019a, p. 5)

#### ***Encinitas Tradition or Milling Stone Period/Middle Holocene (8,500 to 3,500 BP)***

The Encinitas Tradition and the Milling Stone Period refer to a long period of time during which small mobile bands of people who spoke an early Hokan language foraged for a wide variety of resources including hard seeds, berries, and roots/tubers (yucca in inland areas), rabbits and other small animals, and shellfish and fish in coastal areas. Sites from the Encinitas Tradition consist of residential bases and resource acquisition locations. Residential bases have hearths and fire-affected rock indicating overnight stays and food preparation. Residential bases along the coast have large amounts of shell and are often termed shell middens. The resource acquisition locations have no evidence for overnight stays. (ECORP, 2019a, p. 5)

The Encinitas Tradition in inland areas east of the Topanga Pattern (southwestern San Bernardino County and western Riverside County) is the Greven Knoll Pattern. Greven Knoll I (9,400 to 4,000 BP) has abundant manos and metates. Projectile points are few and are mostly Pinto points. Greven Knoll II (4,000-3,000 BP) has abundant manos and metates and core tools. Projectile points are mostly Elko points. The Elsinore site on the east shore of Lake Elsinore was occupied during Greven Knoll I and Greven Knoll II. The recovered archaeological material suggests that a highly mobile population visited the site at a specific time each year.





Tools were mostly manos, metates, and hammerstones. Scraper planes were absent. Flaked stone tools consisted mostly of utilized flakes used as scrapers. The Elsinore site during the Middle Holocene was a “recurrent extended encampment” which could have been occupied during much of the year. (ECORP, 2019a, p. 6)

The Encinitas Tradition lasted longer in inland areas because Takic speakers did not move east into these areas until circa 1,000 BP. Greven Knoll III (3,000 to 1,000 BP) is present at the Liberty Grove site in Cucamonga and at sites in Cajon Pass that were defined as part of the Sayles Complex. Greven Knoll III sites have a large proportion of manos and metates and core tools as well as scraper planes. Kowta (1969) suggested the scraper planes may have been used to process yucca and agave. The faunal assemblage consists of large quantities of lagomorphs (rabbits and hares) and lesser quantities of deer, rodents, birds, carnivores, and reptiles. (ECORP, 2019a, p. 6)

### ***Del Rey Tradition/Late Holocene (3,500 to 150 BP)***

The native people of southern California (north of a line from Agua Hedionda to Lake Henshaw in San Diego County) spoke Takic languages that form a branch or subfamily of the Uto-Aztecan language family. The material culture of the ancestors of the Gabrielino is termed the Del Rey Tradition (3,500 to 150 BP). With the arrival of the Takic speakers, settlement and subsistence systems changed. Mobility was greatly decreased compared to the Encinitas Tradition and small groups of related people lived in semipermanent residential bases near a water source. Subsistence changed from a mobile foraging pattern to a collector pattern. People collected resources and brought them back to the residential base. People stayed overnight in temporary camps when away from the residential base. (ECORP, 2019a, pp. 6-7)

One of the most important food resources for inland groups was acorns gathered from oak groves in canyons, drainages, and foothills. Acorn processing was labor intensive, requiring grinding in a mortar and leaching with water to remove tannic acid. Many of the mortars are bedrock mortars. Seeds from sage and grasses, goosefoot, and California buckwheat were collected and ground into meal with manos and metates. Seeds were used as the storable staple in areas which lacked acorn-producing oak groves. Protein was supplied through the meat of deer, rabbits, and other animals, hunted with bow and arrow or trapped using snares, nets, and deadfalls. Trade among local groups and inland and coastal groups was important as a means of obtaining resources from outside the local group’s territory. (ECORP, 2019a, p. 6)

### ***Palomar Tradition (1,250 to 150 BP)***

Takic people moved inland from southern Orange County about 1,000 BP, becoming the ancestors of the Luiseño, Cupeño, and Cahuilla. At the same time, Takic people from the Kitanemuk area moved east along the northern slopes of the San Gabriel Mountains and spread into the San Bernardino Mountains and along the Mojave River, becoming the ancestors of the Serrano and the Vanyume. The material culture of the inland areas where Takic languages were spoken at the time of Spanish contact is part of the Palomar Tradition. San Luis Rey, I Phase (1,000 BP to 500 BP) and San Luis Rey II Phase (500 BP to 150 BP) pertain to the area occupied by the Luiseño at the time of Spanish contact. The Peninsular I (1,000 BP to 750 BP), II (750 BP to 300 BP), and III (300 BP to 150 BP) Phases are used in the areas occupied by the Cahuilla and Serrano. San



Luis Rey I was characterized by Cottonwood Triangular arrow points, use of bedrock mortars, stone pendants, shell beads, quartz crystals, and bone tools. San Luis Rey II sees the addition of ceramics, including ceramic cremation urns, red pictographs on boulders in village sites, and steatite arrow straighteners. San Luis Rey II represents the archaeological manifestation of the antecedents of the historically known Luiseño. There were a series of small permanent residential bases at water sources during San Luis Rey I, each occupied by a kin group (probably a lineage). During San Luis Rey II, people from several related residential bases moved into a large village located at the most reliable water source. Each village had a territory that included acorn harvesting camps at higher elevations. Villages have numerous bedrock mortars, large dense midden areas with a full range of flaked and ground stone tools, rock art, and a cemetery. (ECORP, 2019a, p. 8)

### ***Summary of Known Archaeology in the Project area***

The records search indicated that there are nine previously recorded resources within or adjacent to the Project area consisting of seven pre-contact milling feature sites, one ground stone isolated find, and the historic-period San Jacinto Levee. Based on the available literature, it appears that only one of these sites, a bedrock milling site, has been tested for the presence of subsurface resources. As a result, no subsurface deposits were identified. Over 100 previously recorded cultural resources are located within the vicinity of the Project area. These consist of a mix of prehistoric (pre-contact) and historic-period sites; however, the majority consist of precontact milling sites located within the Bernasconi hills to the north and west of the Project area. Precontact occupation sites are also present within the vicinity, as are sites containing rock art and a rock shelter site. One occupation site (P-33-00111), located near Lakeview Hot Springs to the northeast of the Project area, contained multiple milling features, cupules, a surface artifact scatter, and subsurface. (ECORP, 2019a, p. 8)

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## **2. *Ethnographic Setting***

The Project area is located within the territory known to have been occupied by the Serrano group of Native Americans, and near territory occupied the Gabrielino group of Native Americans, at the time of contact with Europeans, around A.D. 1769. The Project area also is located in the traditional territory of the Luiseño and Gabrielino.

### ***Luiseño***

When contacted by the Spanish in the sixteenth century, the Luiseño occupied a territory bounded on the west by the Pacific Ocean, on the east by the Peninsular Ranges mountains at San Jacinto (including Palomar



Mountain to the south and Santiago Peak to the north), on the south by Agua Hedionda Lagoon, and on the north by Aliso Creek in present-day San Juan Capistrano. The Luiseño were a Takic-speaking people more closely related linguistically and ethnographically to the Cahuilla, Gabrielino, and Cupeño to the north and east rather than the Kumeyaay who occupied territory to the south. The Luiseño differed from their neighboring Takic speakers in having an extensive proliferation of social statuses, a system of ruling families that provided ethnic cohesion within the territory, a distinct worldview that stemmed from the use of datura (a hallucinogen), and an elaborate religion that included the creation of sacred sand paintings depicting the deity Chingichngish.

### ***Cahuilla***

At the time of Spanish contact in the sixteenth century, the Cahuilla occupied territory that included the San Bernardino Mountains, Orocopia Mountain, and the Chocolate Mountains to the west, Salton Sea and Borrego Springs to the south, Palomar Mountain and Lake Mathews to the west, and the Santa Ana River to the north. The Cahuilla are a Takic-speaking people closely related to their Gabrielino and Luiseño neighbors, although relations with the Gabrielino were more intense than with the Luiseño. They differ from the Luiseño and Gabrielino in that their religion is more similar to the Mohave tribes of the eastern deserts than the Chingichngish religious group of the Luiseño and Gabrielino.

### ***Serrano***

At contact, the Serrano occupied an area in and around the San Bernardino Mountains and northward into the Mojave Desert. Their territory also extended west along the north slope of the San Gabriel Mountains, east as far as Twentynine Palms, north into the Victorville and Lucerne Valley areas, and south to the Yucaipa Valley and San Jacinto Valley. The Serrano speakers in the Mojave Desert who lived along the Mojave River were known as Vanyume. Serrano is a language within the Takic family of the Uto-Aztecan language stock. The Serrano were mainly hunters and gatherers who occasionally fished. Settlement locations were determined by water availability, and most Serranos lived in villages near water sources. Partly due to their mountainous and desert inland territory, contact between Serrano and European-Americans was minimal prior to the early 1800s. In 1819, an asistencia (mission outpost) was established near present-day Redlands and was used to help relocate many Serrano to Mission San Gabriel. However, small groups of Serrano remained in the area northeast of the San Gorgonio Pass and were able to preserve some of their native culture. Today, most Serrano live either on the Morongo or San Manuel reservations. (ECORP, 2019a, p. 9)

### ***Gabrielino***

Ethnographic accounts of Native Americans indicate that the Gabrielino occupied a region near the Project area. At the time of contact with Europeans, the Gabrielino were the main occupants of the southern Channel Islands, the Los Angeles basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The Gabrielino are believed to have been one of the most populous and wealthy Native American tribes in southern California prior to European contact. The Gabrielino occupied villages located along rivers and at the mouths of canyons. Settlement patterns varied according to the availability of floral and faunal resources. By the late eighteenth century, the Gabrielino population had significantly dwindled due to introduced European diseases and dietary deficiencies. Gabrielino communities disintegrated as families were



taken to the missions. However, current descendants of the Gabrielino are preserving Gabrielino culture. (ECORP, 2019a, p. 10)

### **3. Historic Setting**

#### ***Early Southern California History***

Colonization of California began with the Spanish Portolá land expedition. The expedition, led by Captain Gaspar de Portolá of the Spanish army and Father Junipero Serra, a Franciscan missionary, explored the California coast from San Diego to the Monterey Bay Area in 1769. As a result of this expedition, Spanish missions to convert the native population, presidios (forts), and towns were established. The purpose of the missions and presidios was to establish Spanish economic, military, political, and religious control over the Alta California territory. (ECORP, 2019a, p. 10)

An asistencia (mission outpost) of Mission San Luis Rey, known as San Antonio de Pala, was built in Luiseño territory along the upper San Luis Rey River near Mount Palomar in 1810. A chapel administered by Mission San Gabriel Archangel was established in the San Bernardino area in 1819. The present asistencia within the western outskirts of present-day Redlands was built circa 1830. The missions sustained themselves through cattle ranching and traded hides and tallow for supplies brought by ship. The Spanish also constructed presidios, or forts, at San Diego and Santa Barbara, and a pueblo, or town, was established at Los Angeles. The Spanish period in California began in 1769 with the Portolá expedition and ended in 1821 with Mexican independence. (ECORP, 2019a, pp. 10-11)

After Mexico became independent from Spain in 1821, what is now California became the Mexican province of Alta California. The Mexican government closed the missions in the 1830s and former mission lands were granted to retired soldiers and other Mexican citizens for use as cattle ranches. Much of the land along the coast and in the interior valleys became part of Mexican land grants or ranchos. The Mexican Period includes the years 1821 to 1848. The American Period began when the Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848. As a result of the treaty, Alta California became part of the United States as the territory of California. Rapid population increase occasioned by the Gold Rush of 1849 allowed California to become a state in 1850. Most Mexican land grants were confirmed to the grantees by U.S. courts, but usually with more restricted boundaries which were surveyed by the U.S. Surveyor General's office. Land that was not part of a land grant was owned by the U.S. government until it was acquired by individuals through purchase or homesteading. Floods and drought in the 1860s greatly reduced the cattle herds on the ranchos, making it difficult to pay the new American taxes on the thousands of acres they owned. Many Mexican-American cattle ranchers borrowed money at usurious rates from newly arrived Anglo-Americans. The resulting foreclosures and land sales transferred most of the land grants into the hands of Anglo-Americans. (ECORP, 2019a, p. 11)

#### ***Perris History***

The City of Perris is located on a portion of the land known during the Spanish Period and the Mexican Period as both Rancho San Jacinto and Rancho San Jacinto Nuevo y Potrero. The patent for Rancho San Jacinto Nuevo y Potrero issued in 1883 to Thomas W. Sutherland, legal guardian of Pedorena's widow and children,



excluded the land later occupied by Perris. Alternate sections of the public land outside the land grant boundaries were granted to the Southern Pacific Company to subsidize construction of the Southern Pacific Railroad. Settlers bought land from the Southern Pacific Company and homesteaders obtained public land. (ECORP, 2019a, p. 11)

In 1882 and 1883, the California Southern Railroad, a subsidiary of the Atchison, Topeka, & Santa Fe Railroad, was established and built from National City, south of San Diego, to San Bernardino. A small settlement called Pinacate was established in 1885 along the San Jacinto River as settlers came into the area to start homesteads. Disputes over land title soon led to a large number of Pinacate residents relocating about two miles north, where a well was dug to start a new settlement. The new community was named Perris, in honor of Frederick Thomas Perris, the chief engineer and supervisor of the California Southern Railroad. When the northern portion of the county was split off to form Riverside County in 1893, Perris became one of the new county's original towns. The City of Perris was incorporated on May 16, 1911. (ECORP, 2019a, pp. 11-12)

By 1887, six passenger trains and two freight trains stopped at Perris daily, and numerous houses and businesses had been built during the real estate boom. Growth of the town slowed when heavy storms repeatedly washed out the railroad tracks in the Temecula Gorge in the early 1890s, causing the Atchison, Topeka & Santa Fe Railroad to abandon service to San Diego by way of the California Southern Railroad line through Perris after 1892. (ECORP, 2019a, p. 12)

Once it became clear that Perris would need more than the railroad to support it, residents turned to agriculture for the future development of the town. Because of limited groundwater, dry grain farming and wool from sheep were the main agricultural enterprises before water was brought to the valley from Bear Valley Reservoir (Big Bear Lake) by the Perris Irrigation District, organized in 1890. Soon, however, the Bear Valley Water Company became unable to supply the Perris Irrigation District with the water it had promised. By 1895, the supply was completely cut off, and Perris farmers began to replace their lost supply of imported water by digging wells. By 1905, wells and pumping plants were located throughout the valley, and agriculture began to flourish. An improved, more reliable water supply was brought to the San Jacinto Valley by the Eastern Municipal Water District in the early 1950s. With the construction of Lake Perris in the late 1960s and early 1970s, Perris has become, in addition to an agricultural center, a popular recreational area. (ECORP, 2019a, p. 12)

### ***Historic-Period Native American Settlement***

The Luiseño occupied sedentary villages most often located in sheltered areas in valley bottoms, along streams, or along coastal strands near mountain ranges. Villages were located near water sources to facilitate acorn leaching and in areas that offered thermal and defensive protection. Inland groups had fishing and gathering sites along the coast that were intensively used from January to March when inland food resources were scarce. During October and November, most of the village would relocate to mountain oak groves to harvest acorns. The Luiseño remained at village sites for the remainder of the year, where food resources were within a day's travel.



Cahuilla villages were typically permanent and located on low terraces within canyons in proximity to water sources. These locations proved to be rich in food resources and also afforded protection from prevailing winds. Villages had areas that were publicly owned and areas that were privately owned by clans, families, or individuals. Each village was associated with a particular lineage and series of sacred sites that included unique petroglyphs and pictographs. Villages were occupied throughout the year; however, during a several-week period in the fall, most of the village members relocated to mountain oak groves to take part in acorn harvesting

Serrano villages were spread across a variety of environmental zones, but typically located in the foothill Upper Sonoran life-zone, with a few on the desert floor near permanent water sources. Gabrielino villages were likewise spread across a variety of environmental zones. Gabrielino settlements in the areas flanking interior mountains and foothills consisted of primary and secondary subsistence villages near watercourses or springs. The immediate Project area does not retain documentation of any protohistoric villages; however, the presence of many bedrock milling features in the area is testament to the history of food processing and habitation activity in the area. The intensive ownership of land by Euro-Americans from the Spanish Period through the Mexican Period to the American Period reduced the footprint of many Serrano and Gabrielino villages in historic times. (ECORP, 2019a, p. 12)

### ***Land Granting and Modern Use of the Area***

Rancho San Jacinto was first granted to José Antonio Estudillo in 1842, subsequently being split in half three years later with Estudillo's son forming Rancho San Jacinto Nuevo y Potrero. Private lands gradually shrank during the latter half of the nineteenth century and the early twentieth century due to increased railroad and economic activity and the sale of land for new settlements and homesteads. Agriculture remained a staple of the region with periodic downturns due to variability in access to water. The earliest available aerial photos of the Project area date to 1938. Aerial photographs from the 1930s through the present show that the Project area was used for agriculture. Available topographical maps do not record any structures on the property since at least 1901. No buildings appear on the Project area in any of the aerial photographs, although the San Jacinto Levee was constructed sometime in the 1940s or early 1950s. Roads have existed for some time around the perimeter of the Project area, and the increase in residential and commercial development in the region can be seen through time to the present day. (ECORP, 2019a, pp. 12-13)

### ***B. Methods***

A records search at the Eastern Information Center (EIC) at the University of California, Riverside (UCR) was completed by ECORP Consulting, Inc. and is included as Appendix D to the Project's CRA (*Technical Appendix D1*) and Appendix D to the Project's Off-Site CRA (*Technical Appendix D2*). The records search consisted of a check for previously recorded archaeological resource sites and isolates and previous studies on or within a one-mile radius of the Project site. The records search also included a review of the NRHP, Archaeological Determinations of Eligibility (ADOE), and the OHP Historic Property Data File (HPDF). ECORP Consulting, Inc. also reviewed information available from the Bureau of Land Management (BLM), including maps and General Land Office (GLO) records pertinent to the Project site. Archival topographic maps and aerial photographs containing the Project site were also reviewed. Documents available from the State Historic Preservation Office (SHPO), including California Historic Landmarks (CHL), California Points



of Historical Interest (CPHI), and the National Register of Historic Places (NRHP), also were reviewed. Refer to Section IV of the Project's CRA and Section IV of the Project's Off-Site CRA for a detailed description of the methodology employed to conduct records searches for the Project site and surrounding areas. (ECORP, 2019a, p. 13)

In addition, archaeological field work was conducted by ECORP archaeologists on April 29 and 30, May 28, June 17 through 21, June 24 through 28, July 1 and 2, 2019, and in January 2023 and consisted of an intensive systematic pedestrian survey of the Project site. Archaeological field work for the off-site improvement areas was conducted on January 9 and 10, 2020 and in January 2023 for the intersection improvements required for the Alternative Truck Route. Areas on site and within off-site improvement areas were examined for the presence of cultural artifacts and features by walking the area using parallel transects at 15-meter intervals. An attempt was made to relocate all previously recorded resources that were within or adjacent to the Project area. Refer to Section IV of the Project's CRA (*Technical Appendix D1*), the Off-Site CRA (*Technical Appendix D2*), and for a detailed description of the field survey methods. (ECORP, 2019a, p. 14; ECORP, 2020, pp. 17, 20; ECORP, 2023)

Additionally, an archaeological testing program was conducted by BFSa for Sites SR-001 and SR-002. The archaeological test program was conducted by BFSa on July 15, 2020. The testing program consisted of the detailed recordation of the bedrock milling features and collection of any surface artifacts, completion of subsurface investigations, and significance evaluations. Refer to Section 3.0 of the Project's Phase II CRA (*Technical Appendix D3*) for a complete description of the methodology utilized as part of the Phase II CRA. (BFSa, 2020, p. 3.0-2)

A supplemental archaeological site inventory also was conducted by BFSa within proposed Planning Area 9 of SP 239A1. In accordance with County of Riverside requests, an updated pedestrian survey of Planning Area 9 and the surrounding area was conducted by BFSa on April 20, 2021. Tribal representatives from the Soboba Band of Luiseño Indians and a tribal representative from the Cahuilla Band of Indians were present to observe and participate in the survey. The survey employed a series of parallel survey transects spaced at 10-meter intervals to locate archaeological sites within Planning Area 9. The entirety of Planning Area 9 was covered by the survey process. Detailed recordation of the resources identified within and directly adjacent to Planning Area 9 took place on May 27, 2021. All milling features within Planning Area 9 were mapped using a Trimble Geo XT Global Positioning System (GPS) unit equipped with TerraSync software. Documentation of milling features included mapping each feature with the GPS instrument and recording the measurements of each bedrock feature and milling surface. The attributes of each surface were recorded on data forms developed specifically for the recordation of milling surfaces; the length, width, and depth of each surface was noted, in addition to the general overall characteristic of the surface (i.e., slick, oval, mortar, etc.). The features were sketched and photographed as part of the recordation process. No archaeological testing or evaluation program occurred as part of the supplemental investigation conducted by BFSa. (BFSa, 2021, pp. 2-3)

In addition, ECORP conducted supplemental evaluations for the Project's off-site utility, roadway, and intersection improvements (as described in EIR Subsection 3.6). Implementation of the Project would require several improvements to accommodate Project-related truck traffic, depending on which Alternative Truck



Route is implemented. Tables 1-4, 1-5, and 1-9 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) identify the improvements that would be required with implementation of Alternative Truck Routes 1, 2, and 6, respectively. As part of the analysis, ECORP conducted records searches using the California Historical Resources Information System at the Eastern Information Center (EIC), which occurred on April 17 and April 18, 2019, January 6, 2020, and March 8, 2021. The purpose of the records searches was to determine the extent and location of previous surveys, previously identified pre-contact or historic archaeological site locations, architectural resources, historic properties, cultural landscapes, or ethnic resources within a 0.5-mile radius of the off-site improvement areas for the Southern Truck Route. In addition to the record search, ECORP Consulting, Inc. contacted the California Native American Heritage Commission (NAHC) on March 8, 2021, to request a search of the Sacred Lands File for the off-site improvement areas associated with the Southern Truck Route. (ECORP, 2021, pp. 12-13)

### **C. Results**

Provided below is a summary of the results of the cultural resources investigations conducted for the Project site and off-site improvement areas. Refer to Section V of the Project's CRA (*Technical Appendix D1*), Section V of the Project's Off-Site CRA (*Technical Appendix D2*), Section 4.0 of the Phase II CRA (*Technical Appendix D3*), the supplemental investigation report prepared by BFSa for Planning Area 9 (*Technical Appendix D4*), and Section V of the ECORP supplemental investigation for the Southern Truck Route (*Technical Appendix D5*) for a detailed description of the results of the archaeological/historical records search.

#### **1. Records Search Results**

##### **On-Site Records Search Results**

Forty-one cultural resource investigations have been conducted within the one-mile records search radius between 1953 and 2017. Of these studies, 11 investigations took place within 0.5 mile of the Project site between 1979 and 2006, nine investigations took place within a 0.25 mile of the Project site between 1974 and 2014, and five investigations overlapped the Project site from between 1989 and 2014. The records search indicated that approximately 95 percent of the Project site had been previously surveyed for cultural resources. The Historic Property Data File for Riverside County was searched and revealed that there are no resources listed on the NRHP, CRHR, and there are no California Points of Historical Interest, California Historical Landmarks, or National Historic Landmarks within the Project site or within the one-mile record search radius. (ECORP, 2019a, p. 15)

Nine cultural resources have been recorded within or adjacent to the Project site, of which five cultural resources sites occur within the Project site boundaries. Resources within the Project site include seven pre-contact milling sites, an isolated pre-contact metate, and a segment of the historic-period San Jacinto levee. In addition, 105 previously recorded cultural resources are located within one mile of the Project site. Of these 105 previously recorded resources, 25 are located within 0.5 mile of the Project site, and thirty-six are located within 0.25 mile of the Project site. Documented resources are a mix of pre-contact and historic-period sites, with the majority of sites being pre-contact resources. In total, previously recorded pre-contact sites include 74 milling feature sites, two occupation sites, one rock art site, three rock art sites with milling features, one





rock shelter/occupation site, one ground stone scatter, and seven isolated finds consisting of four flakes, one biface, metate fragments, and ground stone. (ECORP, 2019a, p. 20)

In total, historic-period sites include nine building/residence resources, one ranch, three irrigation/water conveyance resources, one reservoir, Perris Dam, two roads, the San Jacinto River levees, one USGS marker, one railroad segment, two refuse deposits, and two isolated finds consisting of a sun-colored amethyst glass fragment and a bottle fragment. One multi-component site consisting of a pre-contact milling feature and a historic-period benchmark is located within 0.25 mile of the off-site improvement areas. The presence of more than 70 sites containing bedrock milling features, seven of which are located within the vicinity of the Project site, supports a pattern of pre-contact land use centered on the processing of local plant materials. (ECORP, 2019a, p. 20)

Refer to Tables 1 and 2 of the Project's CRA (*Technical Appendix D1*) for a detailed discussion of the on-site records search.

### **Off-Site Records Search Results**

Seventy-two cultural resource investigations have been conducted within the one-mile records search radius for the Project's off-site improvement areas between 1974 and 2019. Of these studies, 12 investigations took place within 0.25 mile of the off-site improvement areas between 1979 and 2016, 15 investigations took place within a 0.5 mile of the off-site improvement areas between 1980 and 2017, and two investigations overlapped the off-site improvement areas from between 2005 and 2014. Details of all 72 investigations are presented in Table 3 of the Project's Off-Site CRA (*Technical Appendix D2*). The records search indicated that approximately 95 percent of the off-site improvement areas had been previously surveyed for cultural resources. (ECORP, 2019a, p. 21)

A total of 112 previously recorded cultural resources are located within one mile of the offsite improvement areas. Of these 112 previously recorded resources, 36 are located within the 0.25 mile of the off-site improvement areas, and 33 are located within the 0.5 mile of the off-site improvement areas. One previously recorded resource, a section of the Lakeview Line of the California Southern Railway (P33-26835) was mapped by the information center as crossing the off-site improvement areas. However, the original site record for that resource notes that the tracks were removed in the 1930s and the railway location is based historic aerial photographs with little to no remnants of the railroad features remaining on the ground. In addition, three cultural resources have been recorded adjacent or in the near vicinity to the offsite improvement areas; all are precontact Native American milling features and were confirmed to be outside of the proposed off-site improvement areas during the survey. (ECORP, 2020, p. 27)

In total historic-period sites include 19 building/residence resources, one ranch, one residential site, three irrigation/water conveyance resources, one isolate find consisting of amethyst glass fragment, one refuse deposit, one barracks, one road, and one USGS survey marker. One multi-component site consisting of a pre-contact milling feature and a historic-period benchmark is located within 1 mile of the off-site improvement areas. The presence of more than 61 sites containing bedrock milling features, three of which are located



adjacent to the off-site improvement areas, supports a pattern of pre-contact land use centered on the processing of local plant materials. (ECORP, 2020, p. 27)

Refer to Tables 3 and 4 of the Project's Off-Site CRA (*Technical Appendix D2*) for a detailed discussion of the off-site records search.

### **Off-Site Improvement Areas Records Search Results**

Seven cultural resource investigations have been conducted between 1989 and 2019 within the 0.5-mile records search radius of the offsite improvement areas associated with the Project. The results also indicated that 114 previously recorded cultural resources have been identified within the 0.5-mile radius; however, no cultural resources are located within the intersection improvement areas. Details of the investigations are presented in Table 2 to *Technical Appendix D5*. The records search conducted as part of *Technical Appendix D5* indicated that at least 95 percent of the off-site improvement areas associated with the off-site improvement areas had been previously surveyed for cultural resources. (ECORP, 2021, pp. 13-14)

### **On-Site NAHC Sacred Lands File Search Results**

A search of the Sacred Lands File was conducted by the NAHC in Sacramento, California. The search was requested to determine whether there are sensitive or sacred Native American resources in the vicinity of the Project site that could be affected by the proposed Project. The NAHC Sacred Lands File search failed to indicate the presence of Native American sacred lands in the vicinity of the Project site. The NAHC provided ECORP with a list of 15 Native American individuals and organizations with traditional ties to the Project site. Letters were sent by U.S. Postal Service and by email (if listed in the NAHC database) on June 26, 2018, inquiring as to the interest various tribal organizations may have in the proposed Project. Responses received by Native American individuals and organizations at the time of writing may be found in Appendix F to the Project's CRA (*Technical Appendix D1*). (ECORP, 2019a, p. 29)

### **Off-Site NAHC Sacred Lands File Search Results**

The results of the search of the Sacred Lands File conducted by the NAHC were received by ECORP on January 13, 2020. The search was requested to determine whether there are sensitive or sacred Native American resources in the vicinity of the off-site improvement areas that could be affected by the proposed Project. The NAHC Sacred Lands File search did not identify the presence of Native American sacred lands in the vicinity of the off-site improvement areas. The NAHC provided ECORP with a list of 17 Native American individuals and organizations with traditional ties to the off-site improvement areas. Letters were sent by U.S. Postal Service and by email (if listed in the NAHC database) on January 14 and 15, 2020, inquiring as to the interest various tribal organizations may have in the proposed Project. Responses received by Native American individuals and organizations may be found in Appendix F to the Project's Off-Site CRA (*Technical Appendix D2*). (ECORP, 2020, p. 34)

The results of the search of the Sacred Lands File conducted by the NAHC for the Project's off-site roadway and intersection improvements were received by ECORP on March 17, 2021. The NAHC Sacred Lands File search failed to indicate the presence of Native American sacred lands in the vicinity of the intersections that



would require improvement as part of the Project. However, the NAHC provided a list of 21 Native American tribal entities that may be culturally affiliated with the Project Area. A copy of correspondence with the NAHC is provided as Appendix D to *Technical Appendix D5*. (ECORP, 2021, p. 15)

## 2. Field Survey Results

### On-Site Field Survey Results

Previously recorded resources were updated as part of the current on-site survey and several newly recorded resources were identified during the survey. Previously recorded sites consisted of four bedrock milling features (P-33-003742, P-33-003743, P-33-003744, and P-33-003745), and the San Jacinto River Levee (P-33-026833). As a result of the field survey, four new sites (Sites SR-001, SR-002, Temp-1, and Temp-2) and one isolated find (SR-005-I) were identified. Three of the newly-recorded sites consist of bedrock milling feature sites, with one site (Site Temp-2) identified as a mortar feature. The isolated find is a historic-period bottle base fragment located north of Nuevo Road near the junction of the Nuevo Road and the San Jacinto River Levee (P-33-026833). These resources are described in greater detail below. Surface visibility during the surveys conducted by ECORP and BFSA ranged from poor to nonexistent throughout the entire Project site. Due to poor ground visibility, additional resources may be present within the Project site. Photos of the study area can be found in Appendix C of the Project's CRA. (ECORP, 2019a, p. 29)

### Previously-Recorded Resources On-Site

- P-33-003742/CA-RIV-3742. This site was originally recorded in 1989 and was described as two bedrock mortars on a granitic outcrop. The site was revisited by ECORP archaeologists on April 30, 2019 and by BFSA archaeologists on April 20, 2021. Despite intensive searching the crews were unable to find the site. After examining the recorded location of the site and examining all boulders in the general area, the crews were unable to identify any features associated with this site. Boulders within the area exhibit signs of extreme weathering and it is possible the surfaces could have spalled off of the boulders since it was originally recorded in 1989. Also, at the time of 2019 and 2021 surveys of the area, the area was overgrown with tall, dense brush that may have obscured the location of the feature. It is also possible that the location information provided in the original site record may be incorrect. (ECORP, 2019a, p. 29; BFSA, 2021, p. 2)
- P-33-003743/CA-RIV-3743. This site was originally recorded in 1989 and was described as a milling slick on a granitic boulder. The site was revisited by ECORP archaeologists on June 20, 2019. Despite intensive searching within the recorded area, the ECORPT crew was unable to find the site. Site conditions are similar to those described above for P-33-003742. However, on April 20, 2021, BFSA archaeologists identified features associated with Site RIV-3743. Detailed recordation of the resources by BFSA took place on May 27, 2021. The resources identified included three bedrock milling features, inclusive of features previously identified by ECORP as comprising a portion of Site SR-003. As a result of BFSA's supplemental investigation, Site SR-003 was incorporated into the expanded boundary of Site RIV-3743. As described by ECORP, the features previously identified in association with Site SR-003 included bedrock milling features composed of a large granitic boulder on the east-facing slope of the Bernasconi Hills. The boulder measures 3.3 meters east to west by 2.2 meters north



to south. The boulder contains a well-formed milling slick measuring 30 centimeters by 20 centimeters near the western edge of the boulder. BFSA identified two additional bedrock milling features associated with Site CA-RIV-3743, measuring between 30.0 cm to 66.0 cm in length and between 28.0 and 35.0 cm in width. No archaeological testing or evaluation program occurred as part of the supplemental investigation conducted by BFSA, as Site CA-RIV-3743 occurs within areas planned for open space as part of the Project and would not be disturbed as part of site development. (ECORP, 2019a, pp. 29, 31; BFSA, 2021, pp. 2-3)

- P-33-003744/CA-RIV-3744. This site was originally recorded in 1989 and was described as two milling slicks on two boulders. The site was revisited by ECORP archaeologists on June 20, 2019. Despite intensive searching within the recorded area, the crew was unable to find the site. However, on April 20, 2021, BFSA archaeologists identified features associated with Site RIV-3743. Detailed recordation of the resources by BFSA took place on May 27, 2021. As recorded by BFSA, Site CA-RIV-3744 consists of six bedrock milling features with nine surface features (slicks) varying in length from 15.0 cm to 66.0 cm and varying in width from 11.0 cm to 35.0 cm. No archaeological testing or evaluation program occurred as part of the supplemental investigation conducted by BFSA, as Site CA-RIV-3744 occurs within areas planned for open space as part of the Project and would not be disturbed as part of site development. (ECORP, 2019a, pp. 29-30; BFSA, 2021, pp. 2-3)
- P-33-003745/CA-RIV-3745. This site was originally recorded in 1989 and was described as a single bedrock milling slick on a granitic boulder outcrop. The site was revisited by ECORP archaeologists on June 20, 2019 and by BFSA archaeologists on April 20, 2021. Despite intensive searching within the recorded area, the crews were unable to find the site. Site conditions are similar to those described above for P-33-003742. (ECORP, 2019a, p. 30; BFSA, 2021, p. 2)
- P-33-026833. This site was originally recorded in 2017 and was described as two approximately 10-mile-long earthen levees along the eastern and western sides of the San Jacinto River. A 0.24-mile segment of the levee along the western edge of the San Jacinto River was revisited by ECORP archaeologists in June 2019. The site description, condition, and location information were found to be consistent with the previous site record. (ECORP, 2019a, p. 30)

#### **Newly-Recorded Resources On-Site**

- SR-001. This pre-contact site consists of a bedrock milling feature. The bedrock milling feature is composed of a granitic boulder measuring 4.87 meters east to west by 2.11 meters north to south. A well-formed milling slick measuring 31 centimeters east to west by 13 centimeters north to south is located near the center of the boulder. The feature is located along the western edge of the Bernasconi Hills. (ECORP, 2019a, p. 30)
- SR-002. This pre-contact site consists of a bedrock milling feature. The bedrock milling feature is composed of a deeply embedded boulder east of a large bedrock outcrop. The exposed surface of the boulder measures 1.2 meters east to west by 3.4 meters north to south. A discolored area near the



western edge of the boulder contains an area exhibiting evidence of grinding. The milling slick area measures 20 centimeters east to west by 40 centimeters north to south. (ECORP, 2019a, pp. 30-31)

- Site Temp-1. Site Temp-1 was identified by BFSA as part of the supplemental site investigations on April 20, 2021 and May 27, 2021. As identified by BFSA, Site Temp-1 consists of two bedrock milling features containing a total of 3 slicks varying in length between 14.0 cm and 54.0 cm and varying in width between 11.0 cm and 45.0 cm. No archaeological testing or evaluation program occurred as part of the supplemental investigation conducted by BFSA, as Site Temp-1 occurs within areas planned for open space as part of the Project and would not be disturbed as part of site development. (BFSA, 2021, p. 2)
- Site Temp-2. This pre-contact site is a bedrock milling feature identified by ECORP and subsequently evaluated by BFSA. The bedrock milling feature is composed of an embedded granitic boulder with an incipient mortar located near the western edge. The exposed surface of the boulder measures 2.4 meters north to south by 1.9 meters east to west. The mortar measures 14.0 cm in length, 14.0 cm wide, and 2.0 centimeters deep. The boulder is located on the east-facing slope of the Bernasconi Hills. This site was initially labelled Site SR-004 by ECORP, but was re-labeled by BFSA as Site Temp-2. No archaeological testing or evaluation program occurred as part of the supplemental investigation conducted by BFSA, as Site Temp-2 occurs within areas planned for open space as part of the Project and would not be disturbed as part of site development. (ECORP, 2019a, pp. 2-3; BFSA, 2021)
- SR-005-I. This historic-period isolated find consists of a historic-period bottle base fragment embedded in a berm north of Nuevo Road. The isolated find is an amber glass bottle base fragment embossed with an Obear-Nester Glass Company maker's mark. The base contains stippling consistent with bottles produced in the 1960s. (ECORP, 2019a, p. 31)

In summary, ECORP and BFSA determined the following for the on-site areas:

- 2 previously recorded pre-contact archaeological sites that could not be found (P-33-03742 and P-33-03745)
- 2 previously recorded pre-contact archaeological sites that were identified as part of the current surveys (P-33-003743 and P-33-003744)
- 1 previously recorded historic-era site that was confirmed inside the Project site (P-33-026833).
- 4 newly recorded pre-contact archaeological sites inside the Project site (SR-001, SR-002, Site Temp-1, and Site Temp-2).
- 1 newly recorded historic-era isolate inside the Project site (SR-005-I).



### **Off-Site Field Survey Results**

ECORP conducted supplemental evaluations for the Project's off-site utility, roadway, and intersection improvements (as described in EIR subsection 3.6.2) to determine whether areas off-site requiring improvements to implement Alternative Truck Routes 1, 2, and/or 6 contain cultural resources; however, the results of the analyses determined that there were no known cultural resources sites located within off-site improvement areas (ECORP, 2021; ECORP, 2023). However, as a result of the field survey for the off-site improvement areas associated with the Project (irrespective of which Alternative Truck Route ultimately is implemented), seven new sites (SR-006 through SR-012) were identified and one previously recorded site was updated. These resources consist of one previously recorded railroad alignment, one survey marker, two culverts, a historic-period bridge, and section of three historic-period roads. These resources are described in greater detail below; DPR 523 records for all resources are located in Confidential Appendix D to the Project's Off-Site CRA (*Technical Appendix D2*). A confidential site location map illustrating the location of these resources may be found in Confidential Appendix E to the Off-Site CRA. (ECORP, 2020, pp. 34-35)

Surface visibility during the off-site survey ranged from good (100%) to poor (10%) across the offsite disturbance off-site improvement areas. Due to poor ground visibility in some portions of the offsite disturbance areas, additional resources may be present within these areas. Photos of the study area can be found in Appendix C of the Project's CRA. (ECORP, 2020, p. 35; ECORP, 2023)

### **Previously-Recorded Resources Off-Site**

- P-33-26835. This site consists of a section of the Lakeview Line of the California Southern Railway. Historic period maps and photographs show the railroad crossing the southern portion of the off-site improvement areas. However, the original site record notes that the tracks were removed in the 1930s and little of the railroad features remain today. No sign of the railroad alignment or its associated features were observed within the off-site improvement areas. (ECORP, 2020, p. 35)

### **Newly-Recorded Resources Off-Site**

- SR-006. This historic-period brass survey marker is embedded in a large granite boulder located at the peak of a hill to the west of a water tower. The inscription on the marker reads, "State of California Department of Water Resources, GNAT, 1961." The marker is located at the center of a white "X" that has been painted on the boulder for use in aerial photography and siting. (ECORP, 2020, p. 35)
- SR-007. This historic-period culvert comprised of two corrugated steel drainage pipes running along an east-west orientation on the southern side of Nuevo Road and extending underneath Meniffee Road. A concrete wingwall exists between the Nuevo Road in order to direct water flow toward the entrance to the pipes. The pipes each measure 62 cm (approximately two feet) in diameter, with a height of 56 cm and a length of 344 cm. (ECORP, 2020, p. 36)
- SR-008. This historic-period culvert consisting of two corrugated steel pipes, on an east-west orientation and extending under Pico Avenue at the intersection of Pico Avenue and Nuevo Road. The



pipes are each three feet in diameter and located on the southern side of Nuevo Road. The pipes and associated ditch were partially filled with water at the time of documentation. (ECORP, 2020, p. 36)

- SR-009. This historic-period bridge is located at the point where Nuevo Road crosses the San Jacinto River. The bridge first appears in the historic record on historic aerial photographs from 1953 and 1966. The bridge is oriented east-to-west across the river. The bridge is constructed of concrete and steel and appeared in good condition at the time of the survey. At the time of this report, the bridge is surrounded by flowing water, riparian vegetation, and modern debris. (ECORP, 2020, p. 36)
- SR-010. SR-010 is a 1.17-mile section of Walnut Street. This section was historically a minor unpaved agricultural road, which can be seen on historic USGS maps from 1953. It is currently a two-lane paved road that runs between Ramona Expressway in the east to old Evans Road in the west. (ECORP, 2020, p. 38)
- SR-011. SR-011 is a 0.35-mile-long section of the Ramona Expressway. This section was originally called Martin Road, which can be seen on historic USGS maps from 1967. The road in this location is currently two to four lane divided highway that serves as the main artery between State Route 79 in the east and Interstate 215 (I-215) in the west. (ECORP, 2020, p. 38)
- SR-012. SR-012 is a 1.6-mile-long section of Nuevo Road. This section was historically an unpaved road, which can be seen on historic USGS maps from 1953 and may date back as early as 1901 based on historic-period maps. Nuevo road is currently a rural two-lane paved road that runs between the City of Perris in the west and the Community of Nuevo in the East. (ECORP, 2020, p. 38)

In summary, ECORP determined the following for the off-site improvement areas associated with the Project (regardless as to which truck route ultimately is implemented):

- One previously recorded historic-period railroad alignment (P-33-026835) was not relocated within the off-site improvement areas.
- Seven newly recorded historic-period sites inside the off-site improvement area limits (SR-006, SR-007, SR-008, SR-009, SR-010, SR-011, and SR-012).

#### 4.5.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations governing the protection of cultural resources.

##### A. Federal Regulations

##### 1. National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) was passed primarily to acknowledge the importance of protecting our nation's heritage. While Congress recognized that national goals for historic preservation



could best be achieved by supporting the drive, enthusiasm, and wishes of local citizens and communities, it understood that the federal government must set an example through enlightened policies and practices. In the words of the Act, the federal government's role would be to "provide leadership" for preservation, "contribute to" and "give maximum encouragement" to preservation, and "foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony." (NPS, n.d.)

NHPA and related legislation sought a partnership among the federal government and the states that would capitalize on the strengths of each. The federal government, led by the National Park Service (NPS) provides funding assistance; basic technical knowledge and tools; and a broad national perspective on America's heritage. The states, through State Historic Preservation Officers (SHPOs) appointed by the governor of each state, would provide matching funds, a designated state office, and a statewide preservation program tailored to state and local needs and designed to support and promote state and local historic preservation interests and priorities. (NPS, n.d.)

An Advisory Council on Historic Preservation, the first and only federal entity created solely to address historic preservation issues, was established as a cabinet-level body of Presidentially-appointed citizens, experts in the field, and federal, state, and local government representatives, to ensure that private citizens, local communities, and other concerned parties would have a forum for influencing federal policy, programs, and decisions as they impacted historic properties and their attendant values. (NPS, n.d.)

Section 106 of NHPA granted legal status to historic preservation in federal planning, decision-making, and project execution. Section 106 requires all federal agencies to take into account the effects of their actions on historic properties, and provide ACHP with a reasonable opportunity to comment on those actions and the manner in which federal agencies are taking historic properties into account in their decisions. (NPS, n.d.)

A number of additional executive and legislative actions have been directed toward improving the ways in which all federal agencies manage historic properties and consider historic and cultural values in their planning and assistance. Executive Order 11593 (1971) and, later, Section 110 of NHPA (1980, amended 1992), provided the broadest of these mandates, giving federal agencies clear direction to identify and consider historic properties in federal and federally assisted actions. The National Historic Preservation Amendments of 1992 further clarified Section 110 and directed federal agencies to establish preservation programs commensurate with their missions and the effects of their authorized programs on historic properties. (NPS, n.d.)

## **2. *National Register of Historic Places (NRHP)***

The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the NPS's National Register of Historic Places (NRHP) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. (NPS, 2020a)

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property's age, integrity, and significance, as follows:





- Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?
- Significance. Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archeological investigation about our past? (NPS, 2020a)

Nominations can be submitted to a SHPO from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the National Park Service (NPS) for a Determination of Eligibility (DOE). Listing in the National Register of Historic Places provides formal recognition of a property's historical, architectural, or archeological significance based on national standards used by every state. (NPS, 2020a)

Under Federal Law, the listing of a property in the National Register places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access. (NPS, 2020a)

### **3. *National Historic Landmarks Program***

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Today, just over 2,500 historic places bear this national distinction. Working with citizens throughout the nation, the National Historic Landmarks Program draws upon the expertise of National Park Service staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks. (NPS, 2020b)

### **4. *American Indian Religious Freedom Act***

The American Indian Religious Freedom Act (AIRFA) requires each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies also are required to maintain the confidentiality of sacred sites. Each executive branch agency with statutory or administrative responsibility for the management of Federal lands are required to implement procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. (NOAA, n.d.)



## 5. *Native American Graves Protection and Repatriation Act (NAGPRA)*

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. (NPS, 2020c)

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s). (NPS, 2020c)

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items. (NPS, 2020c)

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; (4) authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee. (NPS, 2020c)

## 6. *Federal Antiquities Act*

The Antiquities Act is the first law to establish that archeological sites on public lands are important public resources. It obligates federal agencies that manage the public lands to preserve for present and future generations the historic, scientific, commemorative, and cultural values of the archaeological and historic sites and structures on these lands. It also authorizes the President of the United States to protect landmarks, structures, and objects of historic or scientific interest by designating them as National Monuments. (NPS, 2020d)



***B. State Regulations***

***1. California Administrative Code, Title 14, Section 4308***

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: “No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value.” (CA State Parks, 2020)

***2. California Code of Regulations Title 14, Section 1427***

California Code of Regulations Title 14, Section 1427 provides that: “No person shall collect or remove any object or thing of archeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archeological or historical interest or value is found.” (NAHC, 2020)

***3. California Register of Historic Resources***

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. (OHP, 2020)

In order for a resource to be included on the Register of Historic Resources, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4). (OHP, 2020)

For resources included on the Register of Historic Resources, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource. (OHP, 2020)



Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the California Register if the resource owner objects. (OHP, 2020)

#### **4. Traditional Tribal Cultural Places Act (Senate Bill 18, "SB 18")**

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)

#### **5. Assembly Bill 52 (AB 52)**

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017a)

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed



project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017a)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017a)

§ 21074 of the Public Resources Code defines “tribal cultural resources.” In brief, in order to be considered a “tribal cultural resource,” a resource must be either:

- (1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
- (2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017a)

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017a)

## **6. State Health and Safety Code**

California Health and Safety Code (HSC) § 7050.5(b) requires that excavation and disturbance activities must 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 regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. § 7051 specifies that the 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 punishable by imprisonment in a state prison. Lastly, HSC §§ 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that “all California Indian human remains and cultural items are to be treated with dignity and respect.” It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims. (CA Legislative Info, n.d.)



## 7. California Code of Regulations Section 15064.5

The California Code of Regulations, Title 14, Chapter 3, § 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in State CEQA Guidelines § 15064.5, as follows: (Westlaw, 2020)

- *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).*
- *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.*
- *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:*
  - *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
  - *Is associated with the lives of persons important in our past;*
  - *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
  - *Has yielded, or may be likely to yield, information important in prehistory or history.*
- *The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*



**C. Local Regulations**

**1. *Ordinance No. 578 - Establishment of Historic Preservation Districts***

This ordinance is intended to facilitate the preservation of areas deemed historically important to the County of Riverside. The ordinance specifies that a Historic Preservation District may be established if the Riverside County Board of Supervisors adopts a resolution that includes the boundaries of the Historic Preservation District and finds that the proposed Historic Preservation District is in conformity with the Cultural and Paleontological section of the Multipurpose Open Space Element of the Riverside County General Plan. It must also find that, for the county, state or nation: the area exemplifies or reflects significant aspects of the cultural, political, economic or social history; the area is identified with historic personages or with important events in history; or, that the area embodies the distinguishing characteristics of a significant architectural period which is inherently valuable for the study of architecture unique to the history of the county, state or nation. (Riverside County, 2015a, p. 4.9-25)

Under this ordinance, no building or structure within the boundaries of an adopted Historic Preservation District can be constructed or altered, except in strict compliance with the plans approved in conjunction with the issuance of a Historic District Alteration Permit by the Riverside County Planning Director. The ordinance also outlines how such certificates are to be reviewed and processed in order to preserve the “historical significance and related construction theme” of the Historic District. (Riverside County, 2015a, p. 4.9-26)

**2. *Riverside County Historic Preservation Commission***

The Riverside County Historical Commission was established in 2005 to advise the Board of Supervisors on historical preservation matters. It is tasked with working to discover and identify persons, events and places of historical importance within Riverside County, and to make recommendations relating to the preservation of appropriate historic sites and structures. To accomplish this, the Commission established criteria and procedures to identify and recognize historic landmarks in Riverside County. These criteria should be used when reviewing a potentially historically or culturally significant site that could be affected by the proposed development. Such resources are noted in the countywide list provided in Table 4.9-A of Riverside County EIR No. 521. (Riverside County, 2015a, p. 4.9-26)

**3. *Riverside County Planning Department Procedures***

The Riverside County Archeologist reviews all proposed land use projects subject to CEQA and not otherwise deemed categorically exempt. The Riverside County Archeologist reviews various internal databases for information that might pertain to the age of any buildings found on site, grading permits, ground disturbance activities and building permits. Where buildings are 45 years or older, the project applicant is required to perform an architectural history evaluation to assess potential historic value as part of a Phase I Cultural Resources study. When the study is completed, and if historic-period resources were identified during a survey, a copy of the report is transmitted to the Riverside County Historic Preservation Officer (CHPO) for review and comment. The CHPO sends relevant comments back to the Riverside County Archeologist. (Riverside County, 2015a, p. 4.9-26)



Vacant parcels within areas known to have prehistoric or historic resources trigger a Phase I Cultural Resources study. Similarly, any parcels with environmental, geomorphological or vegetative features known to increase the likelihood of cultural resources being present trigger a “Phase I” cultural resources study. Such studies are required to follow the reporting formula found on the Riverside County Planning Department’s website which mirror the recommendations published by the State Historic Preservation Office (SHPO) in 1987. (Riverside County, 2015a, p. 4.9-26)

The Riverside County Archeologist reviews all Phase I cultural resources studies for completeness and reasonable conclusions based on current industry standards in archeology. The Phase I study serves to advise the Riverside County Archeologist on matters relating to any identified prehistoric or historic resources, provide the requisite information to complete the project-related CEQA analysis and guide the Riverside County Archeologist in determining which land use conditions of approval and/or mitigation measures apply to the proposed project. (Riverside County, 2015a, p. 4.9-26)

Copies of studies are provided to tribes, upon their request, as a confidential document. If a proposed project is subject to the requirements of the Traditional Tribal Places Act (commonly referred to as Senate Bill 18), a Phase I report is forwarded to tribes who request it as part of consultation under SB 18. Typically, official tribal consultations are scheduled after the report has been sent to the tribe(s) to maximize consultation efforts. (Riverside County, 2015a, p. 4.9-26)

### 4.5.3 BASIS FOR DETERMINING SIGNIFICANCE

Section V of Appendix G to the State CEQA Guidelines addresses typical adverse effects to cultural resources, and includes the following threshold questions to evaluate the Project’s impacts on cultural resources (OPR, 2018a):

- Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Significance thresholds set forth in the Riverside County’s Environmental Assessment Checklist form, are derived from Section V of Appendix G to the State CEQA Guidelines (listed above), as modified by the 2018 updates to the State CEQA Guidelines, and state that the proposed Project would have a significant impact on cultural resources if construction and/or operation of the Project would:

- Alter or destroy an historic site;*
- Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations, § 15064.5;*





- c. *Alter or destroy an archaeological site;*
- d. *Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, § 15064.5; or*
- e. *Disturb any human remains, including those interred outside of formal cemeteries.*

The significance thresholds set forth in the Riverside County’s Environmental Assessment Checklist form, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on cultural resources.

**4.5.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project alter or destroy an historic site?***

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

Based on an evaluation of the potential historical resource sites within the Project site boundaries, ECORP determined that the Project site contains one historic-period isolated find (SR-005-I) and the historic-period San Jacinto River levee (P-33-026833). Refer to Subsection V.e of the Project’s CRA for a discussion of criteria used to determine the significance of the historical resources, based on criteria identified by the California Register of Historical Resources (CRHR).

Isolates are artifacts that are not associated with other artifacts or features and are not connected with the human activity that produced them. Isolates do not individually contribute to the broad patterns of history because they cannot be connected to a particular historical event (CRHR Criterion 1). Isolates are similarly difficult to associate with specific individuals due to their lack of association with archaeological or historical sites, and generally no information exists in the archival record to associate isolates with important individuals in history (CRHR Criterion 2). Isolates do not embody the distinctive characteristics of a type, period, region, or method of construction, represent the work of an important creative individual, or possess high artistic values (CRHR Criterion 3). Finally, isolates in general do not provide important information in history or prehistory (CRHR Criterion 4). Isolated finds do not meet the eligibility criteria for inclusion in the CRHR as individual resources, and therefore, the isolated find SR-005-I is not a Historical Resource under CEQA. As such, proposed on-site impacts to the isolated find SR-005-I would be less than significant. (ECORP, 2019a, pp. 33-34)

The significance of the historic-period San Jacinto River levee (P-33-026833) cannot be determined based on survey data alone and additional information is needed to determine whether this site meets the criteria of a Historical Resource as defined by CEQA. However, no improvements are proposed as part of the Project that would affect the San Jacinto River levee. While the widening of the existing bridge crossing along Nuevo Road over the San Jacinto River levee is anticipated, such improvements would be conducted as part of the County’s Transportation Uniform Mitigation Fee (TUMF) program and is not proposed as part of the Project. As noted in the Project’s Traffic Impact Analysis (EIR *Technical Appendix L3*), no widening of Nuevo Road



is needed to accommodate Project traffic with buildout of the Project, although the Project would construct frontage improvements along the Project site's frontage with this roadway (but not including the bridge over the San Jacinto River); thus, any impacts associated with the widening of this bridge would not be attributable to the proposed Project. As such, the Project would not result in any impacts to the San Jacinto River levee (P-33-026833). (ECORP, 2019a, p. 34)

For the off-site improvement areas, one previously-recorded site and seven historic sites were identified. Site P-33-26835 consists of a section of the Lakeview Line of the California Southern Railway, a subsidiary of the AT&SF Railroad. This railroad alignment shows up on historic-period maps from 1901 but is gone by 1942. The original site record notes that the tracks were removed in the 1930s. No features associated with the railroad were observed within the off-site improvement areas. The majority of the historic-period railroad alignments in Southern California are considered significant for their associations with the early development of the area and the population growth and movement within the region. Thus, this historic-period railroad alignment may be eligible under CRHR Criterion 1, for its association with significant events in the region. It does not appear to be associated with a significant individual and is not eligible under Criterion 2. The tracks were removed in the 1930s and no features remain within the Project Area. Therefore, it does not represent the work of a master or display any unique characteristics and is not eligible under Criterion 3. The alignment is wholly represented by its representation on historic period maps and does not contain the potential to contain additional information to aid in understanding of the region's history. Thus, it is not eligible under Criterion 4. The integrity of the site is extremely poor, and the site lacks all integrity of location, design, setting, materials, workmanship, feeling, and association. Thus, even if the site may be eligible under Criterion 1, the site lacks enough integrity to be considered eligible for the CRHR. As such, Project impacts to Site P-33-26835 would be less than significant. (ECORP, 2020, p. 40)

Site SR-006 occurs within the off-site improvement areas, and is described as historic-period State of California Department of Water Resources brass survey marker that was installed in 1961. Although the site is associated with land surveys in the region, this marker postdates the early survey and sectioning of the area and was likely associated with the installation of a water tower located within 50 feet of it. Thus, the site is not associated with any significant event in the region; nor is it associated with a specific important person in history. Therefore, it is not eligible under CRHR Criteria 1 or 2. The site does not contain any structures or features that display unique characteristics, represent the work of a master, or display innovative technologies and are not eligible under CRHR Criterion 3. The limited data potential of this site has been nearly exhausted by the level of recordation that has already been conducted and the site is highly unlikely to yield any additional information to aid our understanding of the region's history. Thus, SR-006 is not eligible under Criterion 4. As a result, this site is not recommended eligible for the CRHR under any criteria. As such, Project impacts to Site SR-006 would be less than significant. (ECORP, 2020, p. 40)

Sites SR-007 and SR-008 consist of historic period culverts that occur within the off-site improvement areas. SR-007 is a historic-period culvert comprised of two corrugated steel drainage pipes running along an east-west orientation on the southern side of Nuevo Road and extending underneath Menifee Road. SR-008 is a historic-period culvert consisting of two corrugated steel pipes, on an east-west orientation and extending under Pico Avenue at the intersection of Pico Avenue and Nuevo Road. Both culverts are situated along an east-



west-trending drainage that runs along the southern side of Nuevo Road. Both sites function to allow water runoff to run underneath road crossings, thereby protecting the roads from damage. Both culverts were likely constructed at the time when Meniffee Road and Pico Road were paved, and both serve a utilitarian function in minor flood control. Neither site is associated with any significant event in the region, nor are they associated with a specific important person in history. Therefore, they are not eligible under CRHR Criteria 1 or 2. The sites are entirely utilitarian and are composed of common corrugated metal and concrete. They do not contain any structures or features that display unique characteristics, represent the work of a master, or display innovative technologies and are not eligible under CRHR Criterion 3. The limited data potential of these sites has been nearly exhausted by the level of recording that has already been conducted and the sites are highly unlikely to yield any additional information to aid our understanding of the region's history. Thus, SR-007 and SR-008 are not eligible under CRHR Criterion 4. As such, the two sites are not recommended eligible for the CRHR under any criteria. Accordingly, Project impacts to Sites SR-007 and SR-008 would be less than significant. (ECORP, 2020, p. 41)

Site SR-009 consists of a historic-period bridge that is located at the point where Nuevo Road crosses the San Jacinto River. The bridge appears on historic aerial photographs from 1953 and 1966. The bridge is associated with Nuevo Road, a minor rural road that runs between the City of Perris and the Community of Nuevo. This road is a minor rural road and the bridge functioned as a crossing of this road over the San Jacinto River. Thus, the site is not associated with any significant event in the region, nor is it associated with a specific important person in history. Therefore, it is not eligible under CRHR Criteria 1 or 2. The bridge is of a common, utilitarian design and does not contain any structures or features that display unique characteristics, represent the work of a master, or display innovative technologies and is not eligible under CRHR Criterion 3. The limited data potential of this site has been nearly exhausted by the level of recordation that has already been conducted and the site is highly unlikely to yield any additional information to aid our understanding of the region's history. Thus, SR-009 is not eligible under Criterion 4. As a result, this site is not recommended eligible for the CRHR under any criteria. Furthermore, improvements to the Nuevo Road bridge crossing are anticipated to occur as part of the County's TUMF program, and would not occur as part of the proposed Project. Thus, Project impacts to Site SR-009 would be less than significant. (ECORP, 2020, p. 41)

Rural Historic-Period Roads (SR-010, SR-011, SR-012) consist of three rural roads that were identified within the offsite improvement areas. These consist of sections of Walnut Road, Ramona Expressway, and Nuevo Road. A review of historic period USGS topographic maps has revealed that Walnut Avenue is first depicted as an unnamed, unpaved road on the 1942 USGS 7.5-minute Perris, California map. The road served as an east-west route through the vicinity in the 1940s and 1950s. However, with the construction of the Ramona Expressway in 1967, the route fell out of favor and into disuse. On photographs from the 1970s, portions of the road to the east are barely visible, and on the western end the road is an unpaved road demarcating agricultural fields. The road was finally paved between 2005 and 2009. The Ramona Expressway was constructed in 1967 and was originally called Martin Street. Although the Ramona Expressway currently acts as a major thoroughfare between State Route 79 and I-215, this was not associated with the early growth of the region or early transportation through the region. Nuevo Road runs between the community of Nuevo in the east to the City of Perris in the west. A road following roughly its current alignment is present on historic



maps from 1901, photographs from 1953 show that the road was, at that time, still unpaved and was likely considered a rural light duty road. (ECORP, 2020, pp. 41-42)

All three of the roads that cross the offsite improvement areas were historically minor, rural roads that provided limited access between small sections of the San Jacinto Valley. As such, they do not appear to have any significant historical associations. The roads were originally developed for access to rural lands with no other significant purpose. The roads do not demonstrate any association with the lives of persons significant in history and are, therefore, not eligible under CRHR Criterion 2. All three roads are currently paved roads that follow the same historical alignment as when they were originally constructed. The roads are not uniquely artistic or designed with any distinctive engineering characteristics. Therefore, these roads do not embody any distinctive characteristics of a type, period, or method of road construction, nor do they possess any artistic value. Therefore, these roads are not eligible under CRHR Criterion 3. The information potential in historic roads lies in its alignment and route. These three roads have been recorded relatively accurately in historical topographic maps and thus the information regarding their historical routes is provided in the archival record. The roads do not possess the potential to yield any additional information regarding the relationship or functionality of roads or provide any information that isn't already represented in the archival record and, therefore, they are not eligible under CRHR Criterion 4. In conclusion, SR-010, SR-011, and SR-12, do not meet the eligibility criteria for inclusion in the CRHR under any Criteria; thus, Project impacts to these sites would be less than significant. (ECORP, 2020, p. 42)

Accordingly, and based on the analysis presented in *Technical Appendices D1 through D6*, implementation of the proposed Project would not alter or destroy an historic site or cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5, either on site or off site within proposed improvement areas. However, the potential for the Project Area and off-site improvement areas to contain unidentified subsurface resources is considered high. Thus, there is a potential that historical resources may be uncovered during on- or off-site grading or ground-disturbing activities. This is evaluated as a potentially significant impact for which mitigation would be required.

***Threshold c.: Would the Project alter or destroy an archaeological site?***

***Threshold 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?***

There were no prehistoric resources identified within the off-site improvement areas either as a result of the records search or field surveys conducted by ECORP. The archaeological sites identified as part of the current archaeological surveys within and adjacent to the Project site consist of 2 previously-recorded pre-contact bedrock milling feature sites (Sites P-33-003743 and P-33-003744) and four newly-recorded bedrock milling feature sites (Sites SR-001, SR-002, Temp-1, and Temp-2). Based on the Project's impact limits (previously depicted on EIR Figure 3-11), Sites P-33-003743, P-33-003744, Temp-1, and Temp-2 occur within areas planned for long-term conservation as open space as part of the Project, and Project-related grading activities would not impact these sites. Accordingly, the Project would result in no impacts to Sites P-33-003743, P-33-003744, Temp-1, and Temp-2, and mitigation for these sites is not required. Notwithstanding, mitigation has



been identified to further ensure direct and indirect impacts to Sites P-33-003743, P-33-003744, Temp-1, and Temp-2 would not occur (refer to Mitigation Measure MM 4.5-1).

Sites SR-001 and SR-002 occur within or immediately adjacent to areas proposed for grading as part of the Project. In order to evaluate the significance of these sites, the sites were subject to a Phase II Cultural Resources Assessment (Phase II CRA), which is included as *Technical Appendix D3*. The results of the Phase II CRA are presented below. Refer to Section 3.0 of the Phase II CRA for a discussion of the methodology utilized to evaluate the significance of Sites SR-001 and SR-002, and refer to Section 4.0 of the Phase II CRA for a detailed discussion of the field investigations, surface recordation, and subsurface excavations conducted for these sites.

- Site SR-001: The investigation of Site SR-001 revealed that the site was a minimally used bedrock milling site. The identified features indicate that site activities primarily focused upon floral and/or faunal food processing. No surface artifacts were identified and the shovel test investigations did not identify any subsurface deposits. Although bedrock milling is typically associated with the Late Prehistoric occupation of the area, since no diagnostic artifacts were recovered, no definite cultural affiliation could be assigned to the resource. The bedrock milling feature has been drawn, photographed, and measured. The site exhibits no significant artifacts, artifact assemblages, or subsurface features, and the documentation of the milling feature has exhausted its research potential. A significance assessment of the site according to the criteria listed in Section 15064.5 of the State CEQA Guidelines clarifies that the site does not qualify as a significant archaeological resource under any of the stated criteria. No further archaeological investigations are recommended for Site SR-001. (BFSA, 2020, p. 4.0-8)
- Site SR-002: The investigation of Site SR-002 revealed that the site was a minimally used bedrock milling site. The identified feature indicates that site activities primarily focused upon floral and/or faunal food processing. One surface artifact was recovered from within highly disturbed contexts, and shovel test investigations did not identify any subsurface deposits. Although bedrock milling is typically associated with the Late Prehistoric occupation of the area, since no diagnostic artifacts were recovered, no definite cultural affiliation could be assigned to the resource. The bedrock milling feature has been drawn, photographed, and measured. The site exhibits no significant artifact assemblages, or subsurface features, and the documentation of the site has exhausted its research potential. A significance assessment of the site according to the criteria listed in Section 15064.5 of the State CEQA Guidelines clarifies that the site does not qualify as a significant archaeological resource under any of the stated criteria. No further archaeological investigations are recommended for Site SR-002. (BFSA, 2020, p. 4.0-14)

As indicated above, Sites SR-001 and SR-002 do not qualify as significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. Notwithstanding, as part of the Project's Native American consultation processes pursuant to AB 52 and SB 18, the Project Applicant has agreed to a requirement to design future grading plans to completely avoid disturbance to Site SR-001. This requirement has been included as part of the Project's mitigation for potential impacts to cultural resources in subsection



4.5.7 (refer to Mitigation Measure MM 4.5-1). Based on the location of Site SR-002 within the Project site, impacts to Site SR-002 cannot be avoided with future implementation of the Project; however, as noted above, and based on the criteria listed in Section 15064.5 of the State CEQA Guidelines, Site SR-002 does not comprise a significant archaeological resource. Accordingly, Project impacts to Sites SR-001 and SR-002 would be less than significant and would be further reduced to less-than-significant levels with implementation of Mitigation Measure MM 4.5-1 requiring avoidance of physical impacts to Site SR-001. Therefore, the Project would not alter or destroy any previously-identified archaeological sites and would not cause a substantial adverse change in the significance of a previously-discovered archaeological resource pursuant to Section 15064.5 of the California Code of Regulations, and impacts to previously-discovered archaeological resources would be less than significant.

Although impacts to known archaeological resources on the Project site and off-site improvement areas would be less than significant, both the Project site and off-site improvement areas have the potential to contain unidentified resources on the surface that were obscured by dense vegetation during the surveys conducted by ECORP. The records search revealed that the majority of the Project site has been surveyed in the past, with the majority covered during surveys in 1988 and 1989. As a result of those surveys, archaeological sites were limited to bedrock outcrops near the base and on the slopes of the Bernasconi Hills. No artifact scatters were identified within the flat, plowed land that makes up most of the Project Area. However, after a review of the reports associated with these surveys conducted by ECORP, the surveys consisted of either reconnaissance level surveys or pedestrian surveys with transect intervals that are much larger than the current established standards. As such, the absence of sites within the flat portion of the Project Area during these earlier surveys cannot be used to determine the presence or absence of sites within this portion of the Project Area. Given the presence of many milling and occupation sites within the immediate Project vicinity, the potential for the Project site or off-site improvement areas to contain unidentified surface or subsurface archaeological resources or sites is considered high. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be significant prior to mitigation. (ECORP, 2019a, pp. 31-32; ECORP, 2023)

***Threshold e.: Would the Project disturb any human remains, including those interred outside of formal cemeteries?***

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site and off-site improvement areas by ECORP did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, § 7050.5, “Disturbance of Human Remains.” According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a



discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. Notwithstanding the requirements of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097.98, due to the potential to discover buried human remains during Project construction activities (i.e., grading), a potentially significant impact would occur and mitigation would be required.

#### 4.5.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As noted above under Thresholds a. and b., no resources were identified on site or within the off-site improvement areas that meet the CEQA or CRHR definitions. As such, the Project would not result in any cumulatively-considerable impacts to known historical resources. However, there is a possibility that subsurface historical resources may be impacted by development of the Project as proposed. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to historical sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to previously-discovered historical resources on the Project site would be cumulatively considerable prior to mitigation.

As discussed under the analysis of Thresholds c. and d., several archaeological sites or resources were identified on site based on the evaluation conducted by ECORP. Based on the Project's conceptual grading plan (previously depicted on EIR Figure 3-10), Sites P-33-003743, P-33-003744, Temp-1, and Temp-2 occur within areas planned for long-term conservation as open space as part of the Project, and Project-related grading activities would not impact these sites. As previously indicated, the results of the Project's Phase II CRA (*Technical Appendix D3*) determined that Sites SR-001 and SR-002 do not comprise significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. Furthermore, as part of the Project's Native American consultation processes pursuant to AB 52 and SB 18, the Project Applicant has agreed to a requirement to design future grading plans to completely avoid disturbance to Site SR-001. This requirement has been included as part of the Project's mitigation for potential impacts to cultural resources in subsection 4.5.7 (refer to Mitigation Measure MM 4.5-1). Notwithstanding, because Sites SR-001 and SR-002 do not comprise significant archaeological resources, and because Sites P-33-003743, and P-33-003744, Temp-1, and Temp-2 are located in areas planned for long-term conservation of



open space, Project impacts to previously-discovered archaeological resources would be less than significant. However, there is a possibility that previously-undiscovered subsurface archaeological resources may be impacted by development of the Project as proposed. Other cumulative developments resulting from buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to archaeological sites or resources, including sites or resources that may be buried beneath the ground surface. As such, the Project's potential impacts to archaeological sites or resources would be cumulatively considerable prior to mitigation.

As discussed under Threshold e., although the Project would be subject to compliance with the provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097 et. seq., there is a potential that buried human remains could be uncovered during construction of the proposed Project. Other cumulative developments similarly would have the potential to uncover buried human remains. Accordingly, the Project's potential impacts to human remains would be cumulatively considerable prior to mitigation.

#### 4.5.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. & b.: Significant Direct and Cumulatively-Considerable Impact. Although no significant historical resources, as defined by the CRHR and CEQA, were identified on site or within the off-site impact areas, there is a potential for previously-undiscovered historical resources to occur on the site surface or beneath the surface of areas planned for physical impact (i.e., grading) as part of the Project. Potential impacts to previously-undiscovered historical resources on site or within the off-site improvement areas would be significant on both a direct and cumulatively-considerable basis prior to mitigation.

Threshold c. & d.: Significant Direct and Cumulatively-Considerable Impact. Based on the Project's conceptual grading plan (previously depicted on EIR Figure 3-10), Sites P-33-003743, P-33-003744, Temp-1, and Temp-2 occur within areas planned for long-term conservation as open space as part of the Project, and Project-related grading activities would not impact these sites. Although Sites SR-001 and SR-002 occur within or immediately adjacent to areas planned for grading and development as part of the Project, the results of the Project's Phase II CRA determined that these sites do not comprise significant archaeological resources based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. Furthermore, although impacts to Site SR-001 would be less than significant, the Project Applicant has agreed to a requirement to design future grading plans to completely avoid disturbance to Site SR-001 (refer to Mitigation Measure MM 4.5-1). Additionally, Mitigation Measure MM 4.5-1 requires controlled grading at Site SR-002 and the relocation of features associated with Site SR-002 to on-site open space areas. Although Project impacts to previously discovered archaeological resources would be less than significant, given the presence of so many milling and occupation sites within the immediate Project vicinity, the potential for the Project site or off-site improvement areas to contain unidentified surface or subsurface archaeological resources is considered high. Therefore, Project impacts to previously-undiscovered archaeological resources that may occur in the on- or off-site impact areas of the proposed Project would be significant prior to mitigation.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Although the Project Applicant would be required to comply with the applicable provisions of California Health and Safety Code





§ 7050.5 and California Public Resources Code § 5097 et. seq., the Project's potential impacts to buried human remains would be significant on a direct and cumulatively-considerable basis prior to mitigation.

#### 4.5.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

##### *Mitigation*

MM 4.5-1 Prior to the issuance of a grading permit, the Project Applicant shall retain a qualified Project Archaeologist to prepare and implement a Cultural Resource Monitoring Program (CRMP). The CRMP shall be developed in coordination with the consulting Tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce any impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this Project. This document shall be provided to the County Archaeologist for review and approval prior to issuance of the grading permit. The Archaeological Monitor and the Native American Monitor shall be provided with the CRMP to be used as reference in the field. The CRMP shall contain at a minimum the following:

- a. Archaeological Monitor. An adequate number of qualified archaeological monitors shall be onsite to ensure all earth moving activities are observed for areas being monitored. This includes all grubbing, grading, and trenching onsite and for all offsite improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist in conjunction with the Native American Monitor(s) have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The CRMP shall require the Project Applicant to provide written verification that a Riverside County-certified archaeologist has been retained. This verification shall be presented in a letter from the Archaeologist to the Riverside County Planning Department.
- b. Native American Monitoring. The CRMP shall require that prior to the issuance of a grading permit, the Project Applicant shall enter into a monitoring agreement with a Native



American Monitor. In conjunction with the Project Archaeologist, the CRMP shall require the Native American Monitor to attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, the CRMP shall require that an adequate number of Native American Monitor(s) must 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. The CRMP shall require the Project Applicant to submit a fully executed copy of the agreement to the Riverside County Planning Department to ensure compliance.

- c. Cultural Sensitivity Training. The Project Archaeologist and a representative designated by the consulting Tribe(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training shall include a brief review of the cultural sensitivity of the Project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; 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 sign in sheet for attendees of this training shall be included in a Phase IV Monitoring Report.
- d. Temporary Construction Fencing. The CRMP shall require that prior to issuance of grading permits, the County shall review the proposed grading plans to ensure that a note is included on the plans requiring the provision of temporary fencing for the protection of cultural Sites P-33-003743, P-33-003744, SR-001, Temp-1, and Temp- 2 during grading activities. In addition, the CRMP shall require that sites located adjacent to the Project boundaries shall have temporary fencing placed to protect them during construction activities. These include Sites P-33-019862 (CA-RIV-10108); P-33-016072 and P-33-016036. Prior to commencement of grading or brushing, the CRMP shall require the Project Archaeologist to confirm the site boundaries and determine an adequate buffer for protection of the site(s). The CRMP shall further require the Project Applicant to direct the installation of fencing under the supervision of the archaeologist and Native American Monitor(s). The CRMP shall require that the fencing can be removed only after grading operations have been completed.
- e. Site SR-001 Avoidance. The CRMP shall require complete avoidance of disturbance to Site SR-001, and Riverside County shall require that the site be appropriately treated so as to discourage human intrusion (i.e., through fencing or landscape treatments, such as the planting of cactus). Prior to final grading inspection, Riverside County shall ensure that this measure has been implemented to the satisfaction of the County Archaeologist.
- f. Site SR-002 Relocation. The CRMP shall require that prior to commencement of grading activities, the feature associated with Site SR-002 must be relocated to the planned open space area identified as Planning Area 9 of Specific Plan No. 239, Amendment No. 1. As a component of the relocation and prior to commencement of construction activities in the



affected area, any visible artifacts shall be recovered and recorded and the features recorded using professional archeological methods. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which feature was relocated, the process taken, and updated maps using sub-meter GIS technology to document the new location of the feature. The CRMP shall require the preparation of a Phase IV Monitoring Report, which shall document the relocation of Site SR-002 and shall clearly indicate that the feature is not in the original location and why it was relocated.

- g. Controlled Grading. A controlled grading plan for areas surrounding Site SR-002 shall be developed in coordination with the consulting Tribes and included in the CRMP by the Project Archaeologist. The controlled grading plan shall require, without limitation, the systematic, slow, and deliberate removal of the ground surface to allow for the identification, documentation, and recovery of any subsurface cultural deposits using light scrapers (for example, Caterpillar 623 or 627), dozers (for example D6, D8), and/or front-end loaders. Results of the controlled grading program shall be included in a Phase IV monitoring report.
- h. Preservation Plan. The Project Archaeologist, with input from the consulting Tribes, shall develop a Preservation Plan for the long-term care and maintenance of Sites P-33-003743, P-33-003744, SR-001, Temp-1, and Temp-2. The plan shall indicate at a minimum, access rights for the Consulting Tribe(s) for educational, cultural, and ceremonial practices, and for the gathering of native plant species, the specific areas to be included in and excluded from long-term maintenance, prohibited activities, methods of preservation to be employed, the party responsible for the long-term maintenance, appropriate protocols, monitoring and necessary emergency protocols. Specifically, the Consulting Tribes shall have access to the Preservation Area, identified as Planning Area 9 of Specific Plan No. 239, Amendment No. 1, for ongoing educational, cultural, and religious practices and gathering of native plant species as defined by the Consulting Tribes. The preservation and maintenance plan shall describe the process for access, including notification timelines, for all such practices and activities. In the event the Project requires creation of a Property Owner's Association, the Association shall include within its Covenants, Conditions, and Restrictions (CC&Rs) the right of the Consulting Tribe to access the Preservation Area for the intended practices and gathering of plant resources. The Project Applicant shall provide the approved CC&R language if required, developed in consultation with the Consulting Tribe(s). The preservation and maintenance plan shall be binding on and inure to the benefit of successor owners and assignees. The preservation and maintenance plan shall be included as an appendix to the CRMP.
- i. Previously-Undiscovered Resources. In the event that previously unidentified archaeological or historical resources are discovered, the CRMP shall require the Project Archaeologist to contact the Lead Agency (Riverside County) at the time of discovery. The CRMP shall require that the Project Archaeologist, in consultation with the County Archaeologist and Tribal Monitors, shall determine the significance of the discovered resources. The CRMP shall indicate that the Lead Agency must concur with the evaluation



before construction activities will be allowed to resume in the affected area. For significant cultural resources, the CRMP shall require a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist and approved by the County Archaeologist before being carried out using professional archaeological methods. Before construction activities are allowed to resume in the affected area, the CRMP shall require that the artifacts shall be recovered and features recorded using professional archaeological methods, and shall require that the Project Archaeologist determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. The CRMP shall require that evidence of compliance with the Research Design and Data Recovery Program, if a significant archaeological resource is found, shall be provided to Riverside County upon the completion of a treatment plan as part of a Phase IV Monitoring Report detailing the significance and treatment finding.

- j. Artifact Disposition. The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project site during any ground disturbing activities, including previous investigations and/or Phase III data recovery.
- k. Phase IV Monitoring Report. The CRMP shall require that prior to final grading inspection, in the event any resources are found on-site during construction activities, a final report documenting the field and analysis results, and interpreting the artifact and research data within the research context, shall be completed and submitted to the satisfaction of Riverside County. The report shall include (at a minimum) the following: a discussion of the monitoring methods and techniques used; the results of the monitoring program including any artifacts recovered; an inventory of any resources recovered; updated Department of Parks and Recreation Primary and Archaeological Site Forms for any new resources identified, and all sites affected by the development; final disposition of the resources including GPS data; artifact catalog; and any additional recommendations as may be determined by Riverside County. A final copy shall be submitted to the Riverside County Planning Department, the Project Applicant, the Eastern Information Center, and the affected Tribe (if Native American resources are uncovered).
- l. Reduced Monitoring. The Project Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for archaeological and tribal monitoring. The County shall consult with the consulting tribe(s) prior to determining the need for reduced archeological and tribal monitoring.

MM 4.5-2 In the event that human remains are discovered, pursuant to California Health and Safety Code § 7050.5, as well as the Public Resources Code § 5097 et. seq., the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation within 100 feet the area of discovery to allow for the evaluation of the human remains and the surrounding vicinity. If any human remains are discovered, the County Coroner and lead agency shall be contacted. The County Coroner shall determine that no investigation of the cause of death is



required, and determine if the remains are of Native American origin. In the event that the remains are determined to be of Native American origin, the NAHC shall be contacted within 24 hours of the discovery. The Most Likely Descendant, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. If the NAHC is unable to identify a Most Likely Descendant, or if the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the NAHC, or the Project Applicant rejects the recommendation of the Most Likely Descendant; the Project Applicant shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further ground disturbance. Evidence of compliance with this mitigation measure, if human remains are found, shall be provided to Riverside County upon the completion of a treatment plan and final report detailing the significance and treatment finding.

#### 4.5.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds a. & b.: Less-than-Significant Impact with Mitigation. Implementation of the Project has the potential to uncover previously-unknown historical resources both on site and within the off-site improvement areas. Implementation of Mitigation Measure MM 4.5-1 would ensure that a Project Archaeologist would be present during ground-disturbing activities, and would ensure that any significant historical resources that may be uncovered are appropriately treated as recommended by the Project Archaeologist. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Thresholds c. & d.: Less-than-Significant Impact with Mitigation. Mitigation Measure MM 4.5-1 would ensure that any previously-undiscovered archaeological sites or resources identified on site or within the off-site improvement areas during ground-disturbing activities are appropriately treated as directed by the Project Archaeologist, County Archaeologist, and Native American Monitor. Implementation of the required mitigation would reduce the Project's potential impacts to subsurface archaeological sites or resources to below a level of significance.

Threshold e.: Less-than-Significant Impact with Mitigation. In the event that human remains are discovered during construction activities, Mitigation Measure MM 4.5-2 would require the Project Applicant to comply with the applicable provisions of California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq. Mandatory compliance with Mitigation Measure MM 4.5-2, State law, and applicable regulatory requirements would reduce the Project's potential impacts to buried human remains to less-than-significant-levels.



## 4.6 ENERGY

This Subsection is based in part on the information contained in the Project’s Energy Analysis Report (herein, “EA”), titled “Stoneridge Commerce Center Specific Plan Energy Analysis,” dated May 4, 2023, and appended to this EIR as *Technical Appendix E* (Urban Crossroads, 2023c). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.6.1 EXISTING CONDITIONS

#### A. Overview

The most recent data for California’s estimated total energy consumption and natural gas consumption is from 2020, released by the United States (U.S.) Energy Information Administration’s (EIA) California State Profile and Energy Estimates in 2021 and included (Urban Crossroads, 2023c, p. 9):

- As of 2020, approximately 6,923 trillion British Thermal Unit (BTU) of energy was consumed
- As of 2020, approximately 524 million barrels of petroleum
- As of 2020, approximately 2,075 billion cubic feet of natural gas
- As of 2020, approximately 1 million short tons of coal

The California Energy Commission’s (CEC) Transportation Energy Demand Forecast released the 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation energy Demand Forecast 2018-2030 lays out graphs and data supporting CEC’s projections of California’s future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included (Urban Crossroads, 2023c, p. 9):

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.
- Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2019.

The most recent data provided by the EIA for energy use in California by demand sector is from 2020 and is reported as follows (Urban Crossroads, 2023c, p. 9):

- Approximately 34.0% transportation;
- Approximately 24.6% industrial;
- Approximately 21.8% residential; and
- Approximately 19.6% commercial.



In 2021, total system electric generation for California was 277,764 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 194,127 GWh which accounted for approximately 70% of the electricity it uses; the rest was imported from the Pacific Northwest (12%) and the U.S. Southwest (18%). Natural gas is the main source for electricity generation at 50.19% of the total in-state electric generation system power as shown in Table 4.6-1, *Total Electricity System Power (California 2021)*. (Urban Crossroads, 2023c, p. 9)

**Table 4.6-1 Total Electricity System Power (California 2021)**

Fuel Type	California In-State Generation (GWh)	% of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	% of Imports	Total California Energy Mix	Total California Power Mix
Coal	303	0.2%	181	7,788	7,969	9.5%	8,272	3.0%
Natural Gas	97,431	50.2%	45	7,880	7,925	9.5%	105,356	379.0%
Oil	37	0.0%	-	-	-	0.0%	37	0.0%
Other (Waste Heat/Petroleum Coke)	382	0.2%	68	15	83	0.1%	465	0.2%
Nuclear	16,477	8.5%	524	8,756	9,281	11.1%	25,758	9.3%
Large Hydro	12,036	6.2%	12,042	1,578	13,620	16.3%	25,656	9.2%
Unspecified	-	0.0%	8,156	10,731	18,887	22.6%	18,887	6.8%
Total Thermal and Non-Renewables	<b>126,666</b>	<b>65.2%</b>	<b>21,017</b>	<b>36,748</b>	<b>57,764</b>	<b>6910.0%</b>	<b>184,431</b>	<b>66.4%</b>
Biomass	5,381	2.8%	864	26	890	1.1%	6,271	2.3%
Geothermal	11,116	5.7%	192	1,906	2,098	2.5%	13,214	4.8%
Small Hydro	2,531	1.3%	304	1	304	0.4%	2,835	1.0%
Solar	33,260	17.1%	220	5,979	6,199	7.4%	39,458	14.2%
Wind	15,173	7.8%	9,976	6,405	16,381	19.6%	31,555	11.4%
Total Renewables	<b>67,461</b>	<b>34.8%</b>	<b>11,555</b>	<b>14,317</b>	<b>25,872</b>	<b>3090.0%</b>	<b>93,333</b>	<b>33.6%</b>
<b>SYSTEM TOTALS</b>	<b>194,127</b>	<b>100.0%</b>	<b>32,572</b>	<b>51,064</b>	<b>83,636</b>	<b>100.0%</b>	<b>277,764</b>	<b>100.0%</b>

Source: CECs 2021 Total System Electric Generation  
 (Urban Crossroads, 2023c, Table 2-1)

An updated summary of, and context for energy consumption and energy demands within the State is presented in “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” excerpted below (Urban Crossroads, 2023c, p. 11):

- In 2021, California was the seventh-largest producer of crude oil among the 50 states, and, as of January 2021, it ranked third in crude oil refining capacity.
- California is the largest consumer of jet fuel and second-largest consumer of motor gasoline among the 50 states and, the state accounted for 15% of the nation’s jet fuel consumption and 10% of motor gasoline consumption in 2020.



- In 2019, California was the second-largest total energy consumer among the states, but its per capita energy consumption was less than in all other states except Rhode Island, due in part to its mild climate and its energy efficiency programs.
- In 2021, California was the nation's top producer of electricity from solar, geothermal, and biomass energy. The state was fourth in the nation in conventional hydroelectric power generation, down from second in 2019, in part because of drought and increased water demand.
- In 2021, California was the fourth-largest electricity producer in the nation, but the state was also the nation's second-largest consumer of electricity, and in 2020, it received about 30% of its electricity supply from generating facilities outside of California, including imports from Mexico.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient. Given the nature of the Project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the project: namely, electricity, natural gas, and transportation fuel for vehicle trips associated with the uses planned for the Project. (Urban Crossroads, 2023c, p. 11)

#### **B. Electricity**

The usage associated with electricity use were calculated using CalEEMod Version 2022.1. The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California Independent Service Operator (ISO) studies revealed the extent to which the South Coast Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2021 IEPR provides information and policy recommendations on advancing a clean, reliable, and affordable energy system. (Urban Crossroads, 2023c, p. 11)

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 that electrical power is provided to consumers. The California ISO is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that sufficient power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities. (Urban Crossroads, 2023c, pp. 11-12)





Part of the ISO’s charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, utilities file annual transmission expansion/modification plans to accommodate the State’s growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State. (Urban Crossroads, 2023c, p. 12)

Electricity is currently provided to the Project site by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE’s 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: 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, including out-of-state suppliers. (Urban Crossroads, 2023c, p. 12)

Table 4.6-2, *SCE 2021 Power Content Mix*, identifies SCE’s specific proportional shares of electricity sources in 2021. As indicated in Table 4.6-2, the 2021 SCE Power Mix lists renewable energy as 31.4% of the overall energy resources. Geothermal resources are at 5.7%, wind power is at 10.2%, large hydroelectric sources are at 2.3%, solar energy is at 14.9%, and coal is at 0% (Urban Crossroads, 2023c, p. 12)

**Table 4.6-2 SCE 2021 Power Content Mix**

Energy Resources	2021 SCE Power Mix
<b>Eligible Renewable</b>	<b>31.4%</b>
Biomass & Waste	0.1%
Geothermal	5.7%
Eligible Hydroelectric	0.5%
Solar	14.9%
Wind	10.2%
<b>Coal</b>	<b>0.0%</b>
<b>Large Hydroelectric</b>	<b>2.3%</b>
<b>Natural Gas</b>	<b>22.3%</b>
<b>Nuclear</b>	<b>9.2%</b>
<b>Other</b>	<b>0.2%</b>
Unspecified Sources of power*	34.6%
<b>Total</b>	<b>100%</b>

\* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources  
(Urban Crossroads, 2023c, Table 2-2)



**C. Natural Gas**

Natural gas service to the Project site would be provided by SoCalGas. The following summary of natural gas resources and service providers, delivery systems, and associated regulation is excerpted from information provided by the California Public Utilities Commission (CPUC). (Urban Crossroads, 2023c, pp. 13-16)

*“The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.*

*California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800, 000 customers. In 2018, California gas utilities forecasted that they would deliver about 4740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.*

*The overwhelming majority of natural gas utility customers in California are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.”*

*A significant amount of gas (about 19%, or 1131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.*

*SDG&E and Southwest Gas' southern division are wholesale customers of SoCalGas, i.e., they receive deliveries of gas from SoCalGas and in turn deliver that gas to their own customers. (Southwest Gas also provides natural gas distribution service in the Lake Tahoe area.) Similarly, West Coast Gas, a small gas utility, is a wholesale customer of PG&E. Some other wholesale customers are municipalities like the cities of Palo Alto, Long Beach, and Vernon, which are not regulated by the CPUC.*

*Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora. Another pipeline, the North Baja - Baja Norte Pipeline takes gas off the El Paso Pipeline at the California/Arizona border and delivers that gas through California into Mexico. While the Federal Energy Regulatory Commission (FERC) regulates the transportation of natural gas on the interstate pipelines, and authorizes rates for that*



*service, the California Public Utilities Commission may participate in FERC regulatory proceedings to represent the interests of California natural gas consumers.*

*The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields. Some large volume noncore customers take natural gas delivery directly off the high-pressure backbone and local transmission pipeline systems, while core customers and other noncore customers take delivery off the utilities' distribution pipeline systems. The state's natural gas utilities operate over 100,000 miles of transmission and distribution pipelines, and thousands more miles of service lines.*

*Bypass customers take most of their deliveries directly off the Kern/Mojave pipeline system, but they also take a significant amount of gas from California production.*

*PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields, and four independently owned storage utilities - Lodi Gas Storage, Wild Goose Storage, Central Valley Storage, and Gill Ranch Storage - help meet peak seasonal and daily natural gas demand and allow California natural gas customers to secure natural gas supplies more efficiently. PG&E is a 25% owner of the Gill Ranch Storage field. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements.*

*Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services.*

*The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Contact information for core transport agents can be found on the utilities' web sites. Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.*

*Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields*



*in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service. In a 1997 decision, the Commission adopted PG&E's "Gas Accord", which unbundled PG&E's backbone transmission costs from noncore transportation rates. This decision gave customers and marketers the opportunity to obtain pipeline capacity rights on PG&E's backbone transmission pipeline system, if desired, and pay for that service at rates authorized by the Commission. The Gas Accord also required PG&E to set aside a certain amount of backbone transmission capacity in order to deliver gas to its core customers. Subsequent Commission decisions modified and extended the initial terms of the Gas Accord. The "Gas Accord" framework is still in place today for PG&E's backbone and storage rates and services and is now simply referred to as PG&E Gas Transmission and Storage (GT&S).*

*In a 2006 decision, the Commission adopted a similar gas transmission framework for Southern California, called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. As under the PG&E backbone transmission system, SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.*

*Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. That is, a noncore customer may simply arrange for a marketer to procure its supplies, and obtain any needed storage and backbone transmission capacity, in order to assure that it will receive its needed deliveries of natural gas supplies. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.*

*In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These*



*curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California.”*

As indicated in the preceding discussions, natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State. (Urban Crossroads, 2023c, p. 16)

#### **D. Transportation Energy Resources**

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California, and those vehicles consume an estimated 17.2 billion gallons of fuel each year<sup>1</sup>. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets. (Urban Crossroads, 2023c, p. 16)

California’s on-road transportation system includes 396,616 lane miles, more than 26.6 million passenger vehicles and light trucks, and almost 9.0 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel, California is the second-largest consumer of petroleum products, after Texas, and accounts for 10% of the nation's total consumption. The State is the largest U.S. consumer of motor gasoline and jet fuel, and 85% of the petroleum consumed in California is used in the transportation sector. (Urban Crossroads, 2023c, p. 17)

California accounts for less than 1% of total U.S. natural gas reserves and production. As with crude oil, California's natural gas production has experienced a gradual decline since 1985. In 2019, about 37% of the natural gas delivered to consumers went to the state's industrial sector, and about 28% was delivered to the electric power sector. Natural gas fueled more than two-fifths of the state's utility-scale electricity generation in 2019. The residential sector, where two-thirds of California households use natural gas for home heating, accounted for 22% of natural gas deliveries. The commercial sector received 12% of the deliveries to end users and the transportation sector consumed the remaining 1%. (Urban Crossroads, 2023c, p. 17)

#### **4.6.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations related to energy use and conservation.



**A. Federal Regulations**

**1. Intermodal Surface Transportation Efficiency Act (ISTEA)**

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for the County of Riverside is the Southern California Association of Governments (SCAG). SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area. (FHWA, n.d.)

**B. State Regulations**

**1. Integrated Energy Policy Report**

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR). (CEC, n.d.)

The 2021 IEPR was adopted February 2022, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Additionally, the 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. (Urban Crossroads, 2023c, p. 20)

**2. California Code Title 24, Part 6, Energy Efficiency Standards**

California Code Title 24, Part 6 (also referred to as the California Energy Code) was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. California's building efficiency standards are updated on an approximately three-year cycle. The 2019 Standards for building construction, which went into effect on January 1, 2020, improved upon the former 2016 Standards for residential and 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 PV systems,



homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code. The 2022 version of Title 24 was adopted by the CEC and will be effective on January 1, 2023. The 2022 Title 24 standards 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 standards for nonresidential buildings. (CEC, n.d.)

### **3. California Renewable Portfolio Standards (RPS)**

The California Energy Commission (CEC) implements and administers portions of California’s Renewables Portfolio Standard (RPS). 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 (kWh) 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 California Air Resources Board (CARB) to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal. (CEC, n.d.)

### **4. Pavley Fuel Efficiency Standards (AB 1493)**

In California, AB 1493 establishes fuel efficiency ratings for model year 2009-2016 passenger cars and light trucks. (CARB, n.d.)

### **5. Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015**

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California’s commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2023c, p. 16)

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.



- Reorganize the Independent System Operator (ISO) 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.

### C. Local Regulations

#### 1. **Riverside County Climate Action Plan (CAP)**

The County of Riverside’s most current Climate Action Plan, updated in November 2019 uses several methods to promote renewable energy and energy efficiency. The regulation most relevant to the project is R2-CE1: Clean Energy, which states: (Urban Crossroads, 2023c, p. 21)

- On-site renewable energy production (including but not limited to solar) shall apply to any tentative tract map, plot plan, or conditional use permit that proposes to add more than 75 new dwelling units of residential development or one or more new buildings totaling more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development.
- Renewable energy production shall be onsite generation of at least 20 percent of energy demand for commercial, office, industrial or 27 Partial Settlement Agreement, 2017. Petitioners: Sierra Club, Center for Biological Diversity, San Bernardino Audubon Society and Respondents: County of Riverside and Riverside County Board of Supervisors. County of Riverside Climate Action Plan Update 4-12 November 2019 manufacturing development, meet or exceed 20 percent of energy demand for multi-family residential development, and meet or exceed 30 percent of energy demand for single-family residential development. These renewable energy requirements should be updated with every CAP Update by the County based on most recent technology advancements.

The County of Riverside also has several other non-mandatory regulations that would serve to benefit the Project. For example, CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*, encourages residents and developers to plant trees to lower outdoor summer temperatures. CAP measure R2-L2, *Light Reflecting Surfaces for Energy Saving*, advocates for coating surfaces such as roofs and asphalt with substances that reflect sunlight, for example by painting them white or installing rooftop gardens. Other potential measures from the CAP Screening Tables are listed in Table 4.6-3, *Potential CAP Update Screening Table Measures*.

#### 4.6.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VI of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to energy consumption, and includes the following threshold questions to evaluate the Project’s impacts on energy resources (OPR, 2018a):

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





**Table 4.6-3 Potential CAP Update Screening Table Measures**

<b>Feature</b>	<b>Description</b>	<b>Points</b>
EE10.A.1 Insulation	Modestly Enhance Insulation (walls R-13, roof/attic R-38)	9
EE10.A.2 Windows	Enhanced Window Insulation (0.32 U-factor, 0.25 SHGC)	5
EE10.A.4 Air Infiltration	Blower Door HERS Verified Envelope Leakage or equivalent	6
EE10.A.5 Thermal Storage of Building	Enhanced Thermal Mass (20% of floor or 20% of walls 12'' or more thick exposed concrete or masonry with no permanently installed floor covering such as carpet, linoleum, wood, or other insulating materials)	4
EE10.B.1 Heating/Cooling Distribution System	Modest 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 within building have daylight (through use of windows, solar tubes, skylights, etc.)	1
EE10.B.6 Artificial Lighting	Very High Efficiency Lights (100% of in-unit fixtures are high efficiency)	8
W2.D.1 Water Efficient Landscaping	Only low water using plants	3
W2.D.2 Water Efficient Irrigation Systems	Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water)	3
W2.E.2 Toilets	Waterless Urinals (note that commercial buildings have both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	3
W2.E.3 Faucets	Water Efficient faucets (1.28 gpm)	2
T3.A.3 Employee Bicycle/Pedestrian Programs	Bike lockers and secure racks	1
T1.F.1 Parking	Provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles.	1
T4.B.1 Electric Vehicle (EV) Recharging	Provide circuit and capacity in garages/parking areas for installation of EV charging stations	16
	Install EV charging stations in garages/parking areas	32
S1.B.1 Recycling	Provide separated recycling bins within each commercial building/floor and provide large external recycling collection bins at central location for collection truck pick-up	2
<b>TOTAL POINTS:</b>		<b>115</b>



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

#### 4.6.4 IMPACT ANALYSIS

##### A. Methodology for Calculating Project Energy Demands

Information from the CalEEMod 2022.1 outputs for the Project’s Air Quality Assessment (EIR *Technical Appendix B*) was utilized in this analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands for both the Primary Land Use Plan and Alternative Land Use Plan. (Urban Crossroads, 2023c, p. 23)

In May 2022, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod) v2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>) and GHG emissions from direct and indirect sources as well as energy usage. Accordingly, the latest version of CalEEMod has been used to determine the proposed Project’s anticipated transportation and facility energy demands. Output from the model runs for construction and operational activity for the Primary and Alternative Land Use Plans are provided in Appendices 4.1 through 4.2 to the Project’s Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2023c, p. 23)

On May 2, 2022, the EPA approved the 2021 version of the EMISSIONS FACTOR model (EMFAC2021) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. The Project’s EA utilizes the different fuel types for each vehicle class from the annual EMFAC2021 emission inventory in order to derive the average vehicle fuel economy which is then used to determine the estimated annual fuel consumption associated with vehicle usage during Project construction and operational activities. For purposes of analysis, the 2023 and 2024 analysis years were utilized to determine the average vehicle fuel economy used throughout the duration of the Project. Outputs from the EMFAC2021 model run is provided in Appendix 4.3 to the Project’s Energy Analysis (*Technical Appendix E*). (Urban Crossroads, 2023c, pp. 23-24)

***Threshold a.: Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***

Provided below is an assessment of potential construction-related impacts to energy under both the Primary and Alternative Land Use Plans, as well as operational impacts that would be associated with implementation of either the Primary Land Use Plan or Alternative Land Use Plan.



## **B. Construction-Related Energy Demand**

The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed Project.

### **1. Construction Power Cost**

The total Project construction power costs is the summation of the products of the area (s.f.) by the construction duration and the typical power cost. For purposes of analysis, construction of Project is expected to commence in July 2023 and would end in November 2031. The construction schedule utilized in the analysis, previously shown in EIR Table 3-3, represents a “worst-case” analysis scenario. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet. (Urban Crossroads, 2023c, p. 24)

The *2022 National Construction Estimator* identifies a typical power cost per 1,000 sf of construction per month of \$2.41, which was used to calculate the Project’s total construction power cost. As shown on Table 4-2 of the Project’s EA technical report (*Technical Appendix E*), the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately \$3,307,523.28 under the Primary Land Use Plan (Without MCP) scenario and \$3,276,606.84 under the Alternative Land Use Plan (With MCP) scenario. (Urban Crossroads, 2023c, p. 24)

### **2. Construction Electricity Usage**

The total Project construction electricity usage is the summation of the products of the power cost (estimated in Table 4-2 of the Project’s EA technical report, included as EIR *Technical Appendix E*) by the utility provider cost per kilowatt hour (kWh) of electricity. The SCE’s general service rate schedule was used to determine the Project’s electrical usage. As of June 1, 2022, SCE’s general service rate is \$0.13 per kilowatt hours (kWh) of electricity for industrial services. As shown on Table 4.6-4, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 26,377,887 kWh under the Primary Land Use Plan (Without MCP) scenario and 26,131,325 kWh under the Alternative Land Use Plan (With MCP) scenario. (Urban Crossroads, 2023c, p. 25)

### **3. Construction Equipment Fuel Estimates**

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 4-4 of the Project’s EA (*Technical Appendix E*) would operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the County Code. (Urban Crossroads, 2023c, p. 26)

Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.6-5, *Construction Equipment Fuel Consumption Estimates*. The aggregate fuel consumption rate for all equipment is estimated at 18.5



**Table 4.6-4 Construction Electricity Usage**

Scenario	Land Use	Cost per kWh	Total Project Construction Electricity Usage (kWh)
Without MCP	High-Cube Cold Storage Warehouse	\$0.13	5,650,690
	High-Cube Fulfillment Center Warehouse	\$0.13	5,650,690
	High-Cube Warehouse	\$0.13	1,412,672
	Manufacturing	\$0.13	1,412,672
	Warehousing	\$0.13	822,154
	Industrial Park	\$0.13	1,233,232
	Commercial	\$0.13	234,423
	Landscape	\$0.13	4,452,453
	Parking	\$0.13	2,880,053
	Other Asphalt Surfaces	\$0.13	2,628,847
	<b>TOTAL PROJECT CONSTRUCTION ELECTRICTY USAGE (kWh) - WITHOUT MCP</b>		
With MCP	High-Cube Cold Storage Warehouse	\$0.13	5,650,690
	High-Cube Fulfillment Center Warehouse	\$0.13	5,650,690
	High-Cube Warehouse	\$0.13	1,412,672
	Manufacturing	\$0.13	1,412,672
	Warehousing	\$0.13	720,013
	Industrial Park	\$0.13	1,080,020
	Commercial	\$0.13	243,214
	Landscape	\$0.13	4,452,453
	Parking	\$0.13	2,880,053
	Other Asphalt Surfaces	\$0.13	2,628,847
	<b>TOTAL PROJECT CONSTRUCTION ELECTRICTY USAGE (kWh) - WITH MCP</b>		

(Urban Crossroads, 2023c, Table 4-3)



**Table 4.6-5 Construction Equipment Fuel Consumption Estimates**

Activity/Duration	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption (gal. diesel fuel)
Site Preparation	180	Crawler Tractors	87	8	8	0.43	2,394	23,295
		Rubber Tired Dozers	367	6	8	0.4	7,046	68,560
Grading/Blasting	465	Crawler Tractors	87	4	8	0.43	1,197	30,090
		Excavators	36	4	8	0.38	438	11,003
		Graders	148	2	8	0.41	971	24,403
		Scrapers	423	4	8	0.48	6,497	163,310
		Rubber Tired Dozers	367	2	8	0.4	2,349	59,037
Building Construction	1474	Cranes	367	2	8	0.29	1,703	135,678
		Tractors/Loaders/Backhoes	84	6	8	0.37	1,492	118,863
		Forklifts	82	6	8	0.2	787	62,721
		Generator Sets	14	2	8	0.74	166	13,207
		Welders	46	2	8	0.45	331	26,389
Paving	1474	Pavers	81	4	8	0.42	1,089	86,738
		Paving Equipment	89	4	8	0.36	1,025	81,690
		Rollers	36	4	8	0.38	438	34,879
Architectural Coating	1474	Air Compressors	37	2	8	0.48	284	22,641
<b>CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)</b>								<b>962,504</b>

(Urban Crossroads, 2023c, Table 4-5)

horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered, which is consistent with industry standards. (Urban Crossroads, 2023c, p. 27)

Diesel fuel would be supplied by existing commercial fuel providers serving the Project area and region. As presented in Table 4.6-5, Project construction activities would consume an estimated 962,504 gallons of diesel fuel under both the Primary Land Use Plan and Alternative Land Use Plan. Project construction would represent a “single-event” diesel fuel demand and would not require ongoing or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023c, p. 27)

#### 4. Construction Trips, VMT, and Construction Worker Fuel Estimates

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul truck commuting to and from the site. The number of workers and vendor trips are presented in Table 4-6 of the Project’s EA report (*Technical Appendix E*). It should be noted that for vendor trips, specifically, CalEEMod only assigns vendor trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for vendor trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity.

With respect to estimated Vehicle Miles Traveled (VMT) for the Project, the construction worker trips (personal vehicles used by workers commuting to the Project from home) would generate an estimated



236,045,940 VMT during the 100 months of construction. Based on CalEEMod methodology, it is assumed that 50% of all construction worker trips are from light-duty-auto vehicles (LDA), 25% are from light-duty-trucks (LDT1<sup>1</sup>), and 25% are from light-duty-trucks (LDT2<sup>2</sup>). Data regarding Project related construction worker trips were based on CalEEMod defaults utilized within the Project's Air Quality Impact Analysis (herein, "AQIA"; EIR *Technical Appendix B1*). (Urban Crossroads, 2023c, p. 29)

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2021 version of the EMFAC developed by CARB. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2021 was run for the LDA, LDT1, and LDT2 vehicle class within the California sub-area for the 2023 through 2031 calendar years. Data from EMFAC2021 is shown in Appendix 4.3 to the Project's EA (*Technical Appendix E*). (Urban Crossroads, 2023c, p. 29)

As shown in Table 4-7 of the Project's EA (*Technical Appendix E*), the estimated fuel consumption resulting from Project construction worker trips is 7,661,264 gallons during full construction of the Project under both the Primary Land Use Plan and Alternative Land Use Plan. It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require ongoing or permanent commitment of fuel resources for this purpose. (Urban Crossroads, 2023c, p. 29)

## 5. Construction Vendor and Hauling Estimates

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) and material hauling trips would generate an estimated 32,757,952 VMT along area roadways under both the Primary Land Use Plan and Alternative Land Use Plan over the duration of construction activity. It is assumed that 50% of all vendor trips would be from medium-heavy duty trucks (MHD) and 50% of all vendor trips would be from heavy-heavy duty trucks (HHD). Hauling trips are assumed to be performed only by HHD trucks. These assumptions are consistent with the CalEEMod defaults utilized within the Project's AQIA (EIR *Technical Appendix B1*). Vehicle fuel efficiencies for MHDs and HHDs were estimated using information generated within EMFAC2021. EMFAC2021 was run for the MHD and HHD vehicle classes within the California sub-area for the 2023 through 2031 calendar years. Data from EMFAC2021 is shown in Appendix 4.3 to the Project's EA (*Technical Appendix E*). Based on Table 4-8 of the Project's EA, it is estimated that 4,252,407 gallons of fuel would be consumed related to construction vendor and hauling trips during full construction of the Project. It should be noted that Project construction vendor trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose. (Urban Crossroads, 2023c, pp. 32-33)

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<sup>1</sup> Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

<sup>2</sup> Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.



## 6. Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2023c, p. 34)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants (TACs). Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2023c, p. 34)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.” In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 35)

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared (see CEQA Guidelines § 15145). (Urban Crossroads, 2023c, p. 35)

In general, construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2023c, p. 35)



### **C. Operational Energy Demands**

Energy consumption in support of or related to Project operations would include transportation fuel demands (fuel consumed by passenger car and truck vehicles accessing the Project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities).

#### **1. Transportation Energy Demands**

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. The VMT per vehicle class can be determined by evaluating the vehicle fleet mix and the total VMT. As with worker and vendors trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2021 developed by CARB. EMFAC2021 was run for the Riverside County area for the 2024 calendar year. Data from EMFAC2021 is shown in Appendix 4.3 to the Project's EA technical report (*Technical Appendix E*). (Urban Crossroads, 2023c, p. 35)

The estimated transportation energy demands are summarized on Table 4.6-6, *Total Project-Generated Traffic Annual Fuel Consumption*. As summarized on Table 4.6-6, the Project would result in 117,730,310 annual VMT under the Primary Land Use Plan (Without MCP) scenario and 116,535,002 annual VMT under the Alternative Land Use Plan (With MCP) scenario. Annual fuel consumption is estimated to be 7,274,564 gallons per year under the Primary Land Use Plan scenario and 7,179,004 gallons per year under the Alternative Land Use Plan scenario. (Urban Crossroads, 2023c, p. 35)

#### **2. On-Site Cargo Handling Equipment Fuel Demands**

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For the proposed Project, on-site modeled operational equipment includes up to thirty 175 horsepower (hp), natural gas-powered cargo handling equipment/port tractor operating 4 hours a day<sup>3</sup> for 365 days of the year under both scenarios. Based on usage factors from EMFAC 2021, it is estimated that on-site cargo handling equipment would consume 139,257 gallons of fuel per year. (Urban Crossroads, 2023c, pp. 36-37)

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<sup>3</sup> Based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB's Technology Assessment: Mobile Cargo Handling Equipment document, a single piece of equipment could operate up to 2 hours per day (Total Average Annual Activity divided by Total Number Pieces of Equipment). As such, the analysis conservatively assumes that the tractor/loader/backhoe would operate up to 4 hours per day.





**Table 4.6-6 Total Project-Generated Traffic Annual Fuel Consumption**

Scenario	Vehicle Type	Average Vehicle Fuel Economy (mpg)	Annual Vehicle Miles Traveled	Estimated Annual Fuel Consumption (gallons)
Without MCP	HHD	7.31	28,286,379	3,868,904
	LDA	38.16	38,065,325	997,583
	LDT1	28.90	2,578,780	89,244
	LDT2	29.24	17,367,083	594,022
	LHD1	20.32	8,946,831	440,256
	LHD2	18.66	2,556,416	136,978
	MCY	42.81	1,659,044	38,753
	MDV	23.80	11,863,020	498,390
	MH	6.00	79,225	13,215
	MHD	10.63	6,287,990	591,524
	OBUS	7.83	10,079	1,287
	SBUS	6.83	23,436	3,433
	UBUS	6.86	6,701	976
	<b>TOTAL (ALL VEHICLES) - WITHOUT MCP</b>			<b>117,730,310</b>
With MCP	HHD	7.31	27,836,966	3,807,435
	LDA	38.16	37,804,009	990,734
	LDT1	28.90	2,561,077	88,631
	LDT2	29.24	17,247,859	589,944
	LHD1	20.32	8,860,399	436,003
	LHD2	18.66	2,531,719	135,654
	MCY	42.81	1,647,655	38,487
	MDV	23.80	11,781,581	494,969
	MH	6.00	81,596	13,610
	MHD	10.63	6,140,720	577,670
	OBUS	7.83	10,381	1,325
	SBUS	6.83	24,137	3,535
	UBUS	6.86	6,902	1,005
	<b>TOTAL (ALL VEHICLES) - WITH MCP</b>			<b>116,535,002</b>

(Urban Crossroads, 2023c, Table 4-9)

### 3. Facility Energy Demands

Project building operations activities would result in the consumption of natural gas and electricity, which would be supplied to the Project by SCE and SoCalGas. Annual natural gas and electricity demands of the Project are summarized in Table 4.6-7, *Project Annual Operational Energy Demand Summary*. As summarized in Table 4.6-7, under the Primary Land Use Plan (Without MCP) scenario, the Project would result in 206,117,594 kBTU/year of natural gas demand and 102,594,513 kWh/year of electricity demand. Under the



Alternative Land Use Plan (With MCP) scenario, the Project would result in 202,930,997 kBTU/yr of natural gas demand and 101,004,082 kWh/year of electricity demand. (Urban Crossroads, 2023c, p. 37)

**Table 4.6-7 Project Annual Operational Energy Demand Summary**

Scenario	Land Use	Natural Gas Demand	Electricity Demand
		(kBTU/year)	(kWh/year)
Without MCP	High-Cube Cold Storage Warehouse	77,795,496	64,296,476
	High-Cube Fulfillment Center Warehouse / High-Cube Warehouse / Warehouse	78,330,620	18,882,339
	Manufacturing	31,568,490	7,033,267
	Industrial Park	17,700,673	11,192,220
	Commercial Retail	722,315	1,190,211
	<b>TOTAL PROJECT ENERGY DEMAND (WITHOUT MCP)</b>	<b>206,117,594</b>	<b>102,594,513</b>
With MCP	High-Cube Cold Storage Warehouse	77,795,496	64,296,476
	High-Cube Fulfillment Center Warehouse / High-Cube Warehouse / Warehouse	77,316,005	18,637,756
	Manufacturing	31,568,490	7,033,267
	Industrial Park	15,501,603	9,801,737
	Commercial Retail	749,403	1,234,846
	<b>TOTAL PROJECT ENERGY DEMAND (WITH MCP)</b>	<b>202,930,997</b>	<b>101,004,082</b>

(Urban Crossroads, 2023c, Table 4-10)

**4. Operational Energy Efficiency/Conservation Measures**

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). (Urban Crossroads, 2023c, p. 37)

Project annual fuel consumption estimates presented previously in Table 4.6-6 represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. (Urban Crossroads, 2023c, p. 37)

Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. (Urban Crossroads, 2023c, p. 38)



**D. Conclusion**

**1. Summary of Construction Energy Demands**

The estimated power cost of on-site electricity usage during the construction of the Project is assumed to be approximately \$3,307,523.28 for the Primary Land Use Plan (Without MCP) scenario and \$3,276,606.84 for the Alternative Land Use Plan (With MCP scenario). Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction, after full Project buildout, is calculated to be approximately 26,377,887 kWh for the Primary Land Use Plan (Without MCP) scenario and 26,131,325 for the Alternative Land Use Plan (With MCP) scenario. (Urban Crossroads, 2023c, p. 38)

Construction equipment used by the Project would result in single event consumption of approximately 962,504 gallons of diesel fuel under both the Primary Land Use Plan and Alternative Land Use Plan. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. (Urban Crossroads, 2023c, p. 38)

CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. BACMs inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 38)

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 7,661,264 gallons of fuel under both the Primary Land Use Plan and Alternative Land Use Plan. Additionally, fuel consumption from construction vendor trips (MHDs and HHDs) and hauling (HHDs) would total approximately 4,252,407 gallons under both scenarios. Diesel fuel would be supplied by regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2021 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements (Urban Crossroads, 2023c, p. 38)

As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, and impacts would therefore be less than significant. (Urban Crossroads, 2023c, p. 38)

**2. Summary of Operational Energy Demands**

**Transportation Energy Demands**

Annual vehicular trips and related VMT generated by the operation of the Project would result in a fuel demand of 7,274,564 gallons of fuel per year for the Primary Land Use Plan (Without MCP) scenario and 7,179,004



gallons of fuel per year for the Alternative Land Use Plan (With MCP) scenario. (Urban Crossroads, 2023c, p. 39)

Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Ed., 2021) and CalEEMod. As such, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other industrial uses. (Urban Crossroads, 2023c, p. 39)

It should be noted that the State strategy for the transportation sector for medium and heavy-duty trucks is focused on making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT reductions and an increase in vehicle efficiency are forecasted to be needed to achieve the overall State emissions reductions goals. (Urban Crossroads, 2023c, p. 39)

Heavy duty trucks involved in goods movements are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy duty trucks are being tested this year and SCAQMD is looking to integrate this new technology into large-scale truck operations. The following State strategies reduce GHG emissions from the medium and heavy-duty trucks: (Urban Crossroads, 2023c, p. 39)

- CARB's Mobile Source Strategy focuses on reducing GHGs through the transition to zero and low emission vehicles and from medium-duty and heavy-duty trucks.
- CARB's Sustainable Freight Action Plan establishes a goal to improve freight efficiency by 25% by 2030, 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.
- CARB's Emissions Reduction Plan for Ports and Goods Movement (Goods Movement Plan) in California focuses on reducing heavy-duty truck-related emissions focus on establishment of emissions standards for trucks, fleet turnover, truck retrofits, and restriction on truck idling (CARB 2006). While the focus of Goods Movement Plan is to reduce criteria air pollutant and air toxic emissions, the strategies to reduce these pollutants would also generally have a beneficial effect in reducing GHG emissions.
- CARB's On-Road Truck and Bus Regulation (2010) requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.



- CARB’s Heavy-Duty (Tractor-Trailer) GHG Regulation requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated GHG emissions.

The proposed Project would implement Project design features that would facilitate the accessibility, parking, and loading of trucks on-site (Urban Crossroads, 2023c, p. 39).

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project would implement sidewalks and trails, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and County requirements, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, and impacts would therefore be less than significant. (Urban Crossroads, 2023c, p. 40)

### **Facility Energy Demands**

Project facility operational energy demands are estimated at: 206,117,594 kBTU/year of natural gas and 102,594,513 kWh/year of electricity under the Primary Land Use Plan (Without MCP) scenario and 202,930,997 kBTU/year of natural gas and 101,004,082 kWh/year of electricity under the Alternative Land Use Plan (With MCP) scenario. Natural gas would be supplied to the Project by SoCalGas, and electricity would be supplied by SCE. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses of similar scale and configuration. (Urban Crossroads, 2023c, p. 40)

The proposed Project would comply with the County of Riverside’s Good Neighbor Policy for Logistics and Warehouse/Distribution uses, which requires the use of electrically powered on-site cargo handling emissions, resulting in a reduction in on-site fuel consumption (Urban Crossroads, 2023c, p. 40).

Additionally, the proposed Project will implement the screening table measures identified in the 2019 County of Riverside CAP Update in order to achieve a minimum of 100 points. Implementation of these measures would result in further building energy demand reductions (Urban Crossroads, 2023c, p. 40).

Lastly, the Project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary (Urban Crossroads, 2023c, p. 40).



### 3. *Significance of Impacts*

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Therefore, Project impacts due to construction- and operational-related energy consumption would be less than significant.

***Threshold b.: Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?***

A summary of the Project's consistency with applicable regulations and requirements is provided below.

#### ***Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)***

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 Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2023c, p. 42)

#### ***Consistency with Transportation Equity Act for the 21<sup>st</sup> Century (TEA-21)***

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 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. (Urban Crossroads, 2023c, p. 42)

#### ***Consistency with 2021 Integrative Energy Policy Report (IEPR)***

Electricity would be provided to the Project site by SCE, and SoCalGas would provide natural gas. SCE's *Clean Power and Electrification Pathway* (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2021 IEPR. Additionally, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR. (Urban Crossroads, 2023c, p. 42)

#### ***Consistency with Energy Action Plan***

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 VMT, and takes advantage of existing



infrastructure systems. The Project therefore supports urban design and planning processes identified under the Energy Action Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2023c, p. 43)

### ***Consistency with California Code Title 24, Part 6, Energy Efficiency Standards***

The 2022 version of Title 24 was adopted by the CEC and will become effective on January 1, 2023. The proposed Project would be required to comply with the Title 24 standards in place at the time plan check submittals are made. Therefore, the Project is would not result in a significant impact on energy resources. The proposed Project would be subject to Title 24 standards. As such, the Project would not conflict with or obstruct implementation of the 2022 Title 24 standards. (Urban Crossroads, 2023c, p. 43)

### ***Consistency with AB 1493***

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. (Urban Crossroads, 2023c, p. 43)

### ***Consistency with Renewable Portfolio Standard (RPS)***

California's Renewable Portfolio Standard is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS. (Urban Crossroads, 2023c, p. 43)

### ***Consistency with SB 350***

The proposed Project would use energy from SCE, which have committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. (Urban Crossroads, 2023c, p. 43)

### ***Consistency with the County of Riverside Climate Action Plan (CAP)***

The Project would be required to comply with the 2022 Title 24 standards. The Project Applicant would be required to install solar panels on future buildings to achieve more than 20% of energy from on-site renewable sources as required by CAP measure R2-CE1, *Clean Energy*. The Project Applicant also would be required to incorporate environmentally sound landscaping into the project, as required by CAP measure R2-L1, *Tree Planting for Shading and Energy Saving*. Additionally, and as documented in EIR Subsection 4.8, *Greenhouse Gas Emissions*, and as summarized previously in Table 4.6-3 and described above in subsection 4.6.4, the Project would be required to achieve a minimum of 100 points pursuant to the CAP Screening Tables (CAP Appendix D). As such, no feature of the Project would conflict with the County of Riverside Climate Action Plan.



### Conclusion

As indicated in the preceding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, impacts would be less than significant.

#### 4.6.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., there are no components of the proposed Project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Although it is possible other cumulative developments could result in the wasteful, inefficient, or unnecessary consumption of energy resources, the Project's projected energy demand during construction and long-term operations would be less-than-cumulatively considerable with mandatory compliance with applicable regulations.

As indicated under the analysis of Threshold b., the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, the Project has no potential to result in cumulatively-considerable impacts due to a conflict with or obstruction of such plans.

#### 4.6.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. Project construction and operations under both the Primary Land Use Plan and Alternative Land Use Plan would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, Project impacts due to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant requiring no mitigation.

Threshold b.: Less-than-Significant Impact. Energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other commercial, business park, and light industrial projects of similar scale and intensity that are operating in California, as the Project would be subject to current regulatory requirements, such as the applicable version of Title 24, which was not in effect when most existing developments were constructed. Moreover, the Project would be subject to compliance with the mitigation measures presented in EIR Subsection 4.3, *Air Quality*, which would further reduce the Project's energy demand, and the Project would be required to comply with the Riverside County CAP Update, as described in EIR Subsection 4.8, *Greenhouse Gas Emissions*. Based on the analysis presented herein, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.





#### 4.6.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within the County of Riverside. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable City regulations and design requirements.

- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Renewable Portfolio Standards (SB 100). Increases 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 (kWh) 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.
- CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*. Grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.

##### ***Mitigation***

Project impacts due to energy consumption would be less than significant; therefore, mitigation measures are not required.



## 4.7 GEOLOGY AND SOILS

This Subsection assesses the existing surface and subsurface geologic conditions and features of the Project site and determines the potential for impacts associated with these features. The analysis in this Subsection is based, in part, on information from the report titled, “Updated Geotechnical Evaluation, Proposed ‘Stoneridge’ Industrial and Mixed-Use Development,” prepared by LGC Geotechnical, Inc. (herein, “LGC”), dated August 18, 2021, and included as EIR *Technical Appendix F* (LGC, 2021).

### 4.7.1 EXISTING CONDITIONS

#### A. Regional Geology

The Project site is regionally located in the Peninsular Ranges geomorphic province which extends from the Los Angeles Basin south to Baja California. The province is characterized by numerous southwest trending mountain ranges and valleys that are geologically controlled by a series of paralleling major active faults. More specifically, the Project site is located in the northern portion of the Perris block, which is bordered to the northeast by the San Jacinto Fault Zone and to the southwest by the Chino/Elsinore Fault Zone. The Peninsular Ranges batholith is composed of Cretaceous aged plutonic rocks mainly of tonalitic composition. Near the Project site, the plutonic rocks are associated with the Lakeview Mountain Pluton which primarily consists of biotite-hornblende tonalite characterized by ubiquitous schlieren and the lack of potassium feldspar. The Project site is situated on the western margin of an alluvial flood plain associated with the San Jacinto River. Most of the alluvial areas west of the San Jacinto River consists of Pleistocene age fluvial deposits similar to those observed at the Project site. These alluvial materials generally form the large area flanking the Perris Valley and the west side of the San Jacinto River Valley. (LGC, 2021, p. 6)

#### B. Local Geology

Based on the Geologic Map of the 7.5-foot Perris Quadrangle, the Project site is underlain by Very Old Fan Deposits of the late Pleistocene. In addition, Lakeview Mountain plutonic bedrock is present along and adjacent to the western boundary of the Project site. The presence of some minor amounts of artificial fill (not mapped) associated with existing “dirt” roadway construction and past agricultural uses likely occur on site. The approximate lateral limits of the geologic units are depicted on the Geotechnical Maps included in the Project’s Geotechnical Evaluation (refer to Sheets 1 through 3 of EIR *Technical Appendix F*). Provided below is a description of the geologic units mapped on site. (LGC, 2021, p. 6)

- **Quaternary Very Old Fan Deposits (Map Symbol - Qvof):** Quaternary Very Old Fan deposits generally flank steep bedrock slopes and consist of reddish brown, well indurated sand deposits. During the subsurface field evaluation conducted by LGC, these deposits were observed to generally consist of brown, gray-brown, and reddish-brown sand, silty sand and clayey sand. The upper approximately 1-foot of the alluvial material was observed to be desiccated and contained rootlets. (LGC, 2021, p. 6)



- **Cretaceous Lakeview Mountain Tonalite (Map Symbol – Klmt):** The Lakeview Mountain Tonalite is described as a medium to coarse grained biotite-hornblende tonalite with an absence of potassium (alkali) feldspar. During the subsurface field evaluation conducted by LGC, these materials were observed to generally be gray to brown, medium to coarse grained rock with abundant hornblende and biotite. The bedrock ranged from moderately to slightly weathered. (LGC, 2021, p. 6)

Both the Quaternary Old Fan deposits and the Cretaceous Lake View Mountain Tonalite were observed to be massive and lacking any significant geologic structure during the subsurface exploration conducted by LGC. (LGC, 2021, p. 7)

### **C. Site Topography**

As previously shown on EIR Figure 2-9, the topography of the Project site is largely characterized by flat lands throughout most of the site, with several large hill forms occurring along the western Project boundary. In general, the topography of the Project site decreases from west to east, with drainage under existing conditions being conveyed to the San Jacinto River. Elevations on site range from 1,425 feet above mean sea level (amsl) in the southeastern corner of the Project site (i.e., within the San Jacinto River) to 1,695 feet amsl along the western Project boundary. Overall topographic relief is approximately 270 feet. (Google Earth, 2018)

### **D. Groundwater**

Groundwater was not encountered during the subsurface field evaluation conducted by LGC to the maximum explored depth of approximately 50 feet below existing ground. Based on nearby available well data, recent high groundwater for Well 337981N1171695W001 south of the Project site was measured at an elevation of approximately 1,357 feet above mean sea level (amsl) in March of 2013. This corresponds to depth of approximately 57 feet below existing grades in the southeastern (lowest) portion of the Project site. (LGC, 2021, p. 7)

Seasonal fluctuations of groundwater elevations should be expected over time. In general, groundwater levels fluctuate with the seasons and local zones of perched groundwater may be present within the near-surface deposits due to local seepage or during rainy seasons. Local perched groundwater conditions or surface seepage may develop once site development is completed and landscape irrigation commences. (LGC, 2021, p. 7)

### **E. Landslides, Debris Flows, and Rock Falls**

A review of readily available geologic resources conducted by LGC and field observations of the surficial conditions by LGC do not indicate the presence of landslides on the Project site or in the immediate vicinity. In general, the Project site consists of relatively flat-lying, very old fan deposits which are not considered susceptible to landslides, seismically-induced landslides, or other mass wasting processes (debris flows, rockfalls, etc.). (LGC, 2021, p. 7)



In general, the cause of debris flows is a combination of heavy rainfall, loose soil, and steep slope conditions. Based on documents reviewed by LGC, debris flows have the potential to occur on slopes that have a gradient steeper than approximately 18 degrees which is approximately equivalent to a 3:1 (horizontal to vertical) slope ratio. Debris flows are most common and have higher flow velocity on slopes with gradients ranging from approximately 2:1 to 1:1. Generally, the steeper the slope, the more prone it is to developing a fast moving, violent debris flow. In addition, debris flows generally begin at drainage heads where there is a concentration of water during heavy rainfall. (LGC, 2021, p. 7)

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Boulder outcrops are present within the Project site along the western boundary. The natural slopes along the western boundary, where outcrops are observed, generally have a slope gradient of 3:1 (horizontal to vertical) or shallower. (LGC, 2021, pp. 7-8)

#### ***F. Seiches***

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an onsite body of water the potential for the Project site to be impacted by seiches is considered low. (LGC, 2021, p. 8)

#### ***G. Subsidence***

Per County GIS, the proposed Project is located within an area considered to be potentially susceptible to subsidence (RCIT, 2020). A specific ground subsidence evaluation was previously performed by Western Technologies, Inc. (1990) due to the observation of well-defined fissures within and nearby the Project site. The observed fissure was located in the eastern central portion of the Project site and trended approximately north-south, near parallel with the San Jacinto River. Previous subsurface evaluations found that the observed fissure extended to a maximum depth of approximately 17 feet below the existing ground surface. Aerial photograph review conducted by LGC indicated that the fissure “daylighted” to the surface relatively rapidly between 1974 to 1976 and has been followed by a slower rate of modification since that time. In addition, it was concluded that the observed fissuring is a result of localized subsidence from the horizontal shrinkage of fine-grained clayey floodplain sediments induced by historic groundwater withdrawal. (LGC, 2021, p. 8)

#### ***H. Faulting and Seismic Hazards***

The Project site is not located within a State of California Earthquake Fault Zone (i.e., Alquist- Priolo Earthquake Fault Act Zone) and no active faults are known to cross the site. A fault is considered “Holocene-active” if evidence of surface rupture in Holocene time (the last approximately 11,000 years) is present. The possibility of damage due to ground rupture is considered low since no active faults are known to cross the Project site. The closest known active fault is the Casa Loma Fault of the San Jacinto Fault Zone located approximately 5 miles northeast of the Project site. (LGC, 2021, p. 11)



Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region, which may affect the Project site, include ground lurching and shallow ground rupture, soil liquefaction, and dynamic settlement. These secondary effects of seismic shaking are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault, and the onsite geology. A discussion of these secondary effects is provided in the following subsections. (LGC, 2021, p. 11)

### **1. Liquefaction and Dynamic Settlement**

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion. Studies indicate that loose, saturated, near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, cohesive soils are not considered susceptible to liquefaction, depending on their plasticity and moisture content. Effects of liquefaction on level ground include settlement, sand boils, and bearing capacity failures below structures. Dynamic settlement of dry sands can occur as the sand particles tend to settle and densify as a result of a seismic event. (LGC, 2021, p. 11)

The Project site is located within a zone with a low to moderate potential for liquefaction according to maps prepared by the County of Riverside. Site soils are not generally susceptible to liquefaction due to a lack of groundwater in the upper 50 feet and generally dense to very dense sandy soils. However, isolated layers may be susceptible to dry sand seismic settlement. (LGC, 2021, p. 7)

Based on the data obtained from the field evaluation conducted by LGC, seismic settlement due to dry sands is estimated to be on the order of about ½-inch or less. Differential settlement may be estimated as half of the total settlement over a horizontal span of 40 feet. Seismic settlement calculations were performed using the program CLiq (GeoLogismiki, 2017) and are provided in Appendix F to the Project's Geotechnical Evaluation (EIR *Technical Appendix F*). (LGC, 2021, pp. 7-8)

### **2. Lateral Spreading**

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the low probability of liquefaction, the potential for lateral spreading at the Project site also is considered low. (LGC, 2021, p. 12)



***I. Settlement and Collapse/Swell Potential***

The underlying very old fan deposits encountered were found by LGC to be medium dense to very dense and are generally not considered susceptible to long-term consolidation settlement. Due to the primarily coarse-grained nature and apparent density of the soils on the Project site, static settlement should occur immediately during increasing grades. In addition to static settlement, recent and previous laboratory testing indicates the presence of potentially collapsible native alluvial soils within the upper approximately 10 feet. Four of the six samples tested for collapse/consolidation experienced hydro-collapse and the resulting two experienced soil swell or expansion. The collapse potential (or hydro-collapse) of the four samples ranged from approximately 0 to 0.9 percent, which is considered to be slightly susceptible to hydro-collapse. (LGC, 2021, p. 13)

***J. Expansion Potential***

Based on the results of laboratory testing, soils on the Project site are anticipated to have a “Very Low” to “Low” expansion potential. (LGC, 2021, p. 14)

***K. Soil Types and Erosion Potential***

EIR Table 2-1 (previously presented) provides a summary of the soils present on the Project site, and identifies the attendant rate of runoff and erosion susceptibility. As shown, approximately 7.9% of the Project site has a “Very Slow” rate of runoff, with no erosion susceptibility identified. Approximately 1.8% of the Project site has a slow rate of runoff and a slight susceptibility to erosion. Approximately 68.1% of the Project site has a slow to medium rate of runoff and a slight to moderate susceptibility to erosion. Approximately 18.2% of the Project site has a medium rate of runoff and a moderate erosion susceptibility, while approximately 3.3% of the Project site has a rapid rate of runoff and a high susceptibility to erosion. Approximately 0.8% of the Project site is not rated by the United States Department of Agriculture (USDA) for rate of runoff or erosion susceptibility. (USDA, 1971, pp. 23-24, 32, 38-40, 47, 54-55, 65, and 67-68; USDA, 2020)

**4.7.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations governing issues related to geology and soils.

***A. Federal Regulations***

***1. Clean Water Act***

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System



(NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020a)

## ***B. State Regulations***

### ***1. Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)***

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose 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. (CA Legislative Info, n.d.)

The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). (CA Legislative Info, n.d.)

### ***2. Seismic Hazards Mapping Act***

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, § 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. (CDC, 2019b)

Staff geologists in the Seismic Hazard Zonation Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. (CDC, 2019b)



The SHMA requires site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. (CDC, 2019b)

### **3. *Natural Hazards Disclosure Act***

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. (CA Legislative Info, n.d.)

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires. (CA Legislative Info, n.d.)

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers. (CA Legislative Info, n.d.)

### **4. *Essential Services Buildings Seismic Safety Act***

In 1986, the California Legislature determined that buildings providing essential services should be capable of providing those services to the public after a disaster. Their intent in this regard was defined in legislation known as the Essential Services Buildings Seismic Safety Act of 1986 and includes requirements that such buildings shall be "...designed and constructed to minimize fire hazards and to resist...the forces generated by earthquakes, gravity, and winds." This enabling legislation can be found in the California Health and Safety Code, Chapter 2, § 16000 through 16022. In addition, the California Building Code defines how the intent of the act is to be implemented in Title 24, Part 1 of the California Building Standards Administrative Code, Chapter 4, Articles 1 through 3. (CAB, n.d.)

### **5. *California Building Standards Code (Title 24)***

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code § 18909). Health and Safety Code (state law) § 18902 gives CCR Title 24 the name California Building Standards Code (CBSC). (CBSC, 2019, p. 1)

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code §§ 18908 and 18938) throughout the State of California.





Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code §§ 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code §§ 17958.7 and 18941.5). (CBSC, 2019, p. 1)

## 6. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 *et seq.*), the policy of the State is as follows:

- 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. (SWRCB, 2014)

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of National Pollutant Discharge Elimination System (NPDES) permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. 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 Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)



The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located in the Santa Ana River Watershed, which is within the purview of Santa Ana Regional Water Quality Control Board (RWQCB). The RWQCB's Santa Ana Region Basin Plan ("Basin Plan"), as most recently updated in June 2019, is the governing water quality plan for the region (RWQCB, 2019).

### **C. Local Regulations**

#### **1. *Riverside County Ordinance No. 457 - Riverside County Building and Fire Codes***

Every three years, Riverside County's Building and Fire Codes are adapted from the California Building Standards Code (CCR Title 24), which includes both building and fire codes. These codes establish site-specific investigation requirements, construction standards and inspection procedures to ensure that development authorized by the County of Riverside does not pose a threat to the health, safety, or welfare of the public. The California Building Standards Code contains minimum baseline standards to guard against unsafe development. This ordinance also adopts, in some cases with modification to a stricter standard, a number of California State's Title 24 codes (fire, building, plumbing, electrical, etc.). The Riverside County Department of Building and Safety provides technical expertise in reviewing and enforcing these codes. (Riverside County, 2015, p. 4.12-25)

#### **2. *Riverside County Ordinance No. 547 - Implementation of the Alquist-Priolo Earthquake Fault Zoning Act***

This ordinance establishes the policies and procedures used by the County of Riverside to implement the A-P Act. Among other things, it requires all projects proposed within an "earthquake fault zone," as shown on the maps prepared by the State Geologist to comply with the provisions of the A-P Act. It establishes regulations for construction, including for grading, slopes and compaction, erosion control, retaining wall design and earthquake fault zone setbacks. (Riverside County, 2015, p. 4.12-25)

#### **3. *Riverside County Ordinance No. 484 - Control of Blowing Dust***

This ordinance establishes requirements for the control of blowing sand within county-designated "Agricultural Dust Control Areas." It defines activities that may contribute to wind erosion, identifies restrictions on activities within these areas, establishes penalties for violation of the ordinance and identifies procedures necessary to obtain a valid permit. (Riverside County, 2015, p. 4.12-25)



### 4.7.3 BASIS FOR DETERMINING SIGNIFICANCE

Section VII of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to geological conditions, and includes the following threshold questions to evaluate the Project's impacts resulting from geologic or soil conditions (OPR, 2018a):

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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? Refer to Division of Mines and Geology Special Publication 42.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- 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, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

- 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;*
- b. *Be subject to seismic-related ground failure, including liquefaction;*
- c. *Be subject to strong seismic ground shaking;*



- d. *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;*
- e. *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;*
- f. *Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard;*
- g. *Change topography or ground surface relief features;*
- h. *Create cut or fill slopes greater than 2:1 or higher than 10 feet;*
- i. *Result in grading that affects or negates subsurface sewage disposal systems;*
- j. *Result in substantial soil erosion or the loss of topsoil;*
- k. *Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property;*
- l. *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;*
- m. *Be impacted by or result in an increase in wind erosion and blow sand, either on or off site.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on geology and soils. It should be noted that impacts to paleontological resources and unique geologic features are addressed separately in EIR Subsection 4.13, *Paleontological Resources*.

**4.7.4 IMPACT ANALYSIS**

***Threshold a.:*** *Would the Project 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?*

***Threshold c.:*** *Would the Project be subject to strong seismic ground shaking?*

The Project site is not located within a State of California Earthquake Fault Zone (i.e., Alquist- Priolo Earthquake Fault Act Zone) and no active faults are known to cross the site. A fault is considered “Holocene-active” if evidence of surface rupture in Holocene time (the last approximately 11,000 years) is present. The possibility of damage due to ground rupture is considered low since no active faults are known to cross the Project site. The closest known active fault is the Casa Loma Fault of the San Jacinto Fault Zone located approximately 5 miles northeast of the Project site. Impacts due to rupture of a known earthquake would therefore be less than significant. (LGC, 2021, p. 11)



The Project site is, however, located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The risk is not considered substantially different than that of other similar properties in the southern California area. The Project would be required to construct all proposed structures in accordance with the California Building Standards Code (CBSC, Title 24) and the Riverside County Building Code. The CBSC and Riverside County Building Code have been designed to preclude significant adverse effects associated with strong seismic ground shaking.

Notwithstanding, the Project as evaluated herein is limited to changes in the land use designations and zoning classifications for the 582.6-acre Project site. Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to strong seismic ground shaking could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies. This is conservatively evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

***Threshold b.: Would the Project be subject to seismic-related ground failure, including liquefaction?***

The Project site is located within a zone with a low to moderate potential for liquefaction according to maps prepared by the County of Riverside. Site soils are not generally susceptible to liquefaction due to a lack of groundwater in the upper 50 feet and generally dense to very dense sandy soils. However, isolated layers may be susceptible to dry sand seismic settlement. (LGC, 2021, p. 7) Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to localized liquefaction hazards could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

***Threshold d.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?***

**Landslide Hazards**

A review of readily available geologic resources conducted by LGC and field observations of the surficial conditions by LGC do not indicate the presence of landslides on the Project site or in the immediate vicinity. In general, the Project site consists of relatively flat-lying, very old fan deposits which are not considered susceptible to landslides, seismically-induced landslides, or other mass wasting processes (debris flows, rockfalls, etc.). (LGC, 2021, p. 7)



In general, the cause of debris flows is a combination of heavy rainfall, loose soil, and steep slope conditions. Based on documents reviewed by LGC, debris flows have the potential to occur on slopes that have a gradient steeper than approximately 18 degrees which is approximately equivalent to a 3:1 (horizontal to vertical) slope ratio. Debris flows are most common and have higher flow velocity on slopes with gradients ranging from approximately 2:1 to 1:1 (horizontal to vertical). Generally, the steeper the slope, the more prone it is to developing a fast moving, violent debris flow. In addition, debris flows generally begin at drainage heads where there is a concentration of water during heavy rainfall. Approximately 2:1 (horizontal to vertical) cut and fill slopes are proposed for the proposed Project. Cut and fill slopes would consist of hard Lakeview Tonalite Bedrock and dense compacted fill soils, respectfully. These slopes are considered surficially stable as long as they are designed and constructed with proper surface drainage and are properly maintained after construction. Therefore, LGC concludes that the potential for the development of a rapid debris flow event on a slope associated with or adjacent to the proposed development is considered very low. Nonetheless, impacts could occur if proposed slopes are not constructed in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, p. 7)

### ***Lateral Spreading***

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Due to the low probability of liquefaction to occur on site, the potential for lateral spreading is also considered low. Nonetheless, impacts could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, p. 12)

### ***Collapse Hazards***

Static settlement of the site would be induced by subjecting the existing grades to design grades (adding fill) and by the proposed structural building loads. The underlying very old fan deposits encountered by LGC were found to be medium dense to very dense and are generally not considered susceptible to long-term consolidation settlement. Due to the primarily coarse-grained nature and apparent density of the site soils, static settlement should occur immediately during increasing grades; therefore, static settlement from increasing grades should not affect the proposed structural improvements. Notwithstanding, impacts due to collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, p. 13)



In addition to static settlement, recent and previous laboratory testing indicates the presence of potentially collapsible native alluvial soils within the upper approximately 10 feet. Four of the six samples tested by LGC for collapse/consolidation experienced hydro-collapse and the resulting two experienced soil swell or expansion. The collapse potential (or hydro-collapse) of the four samples ranged from approximately 0 to 0.9 percent, which is considered to be slightly susceptible to hydro-collapse. Impacts due to hydro-collapse hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, pp. 13-14)

### **Rockfall Hazards**

A rockfall is a fragment of rock, or block of rocks, that detaches from a vertical to sub-vertical cliff or bluff in a downward motion. Boulder outcrops are present within the Project site along the western boundary. The natural slopes along the western boundary, where outcrops were observed by LGC, generally have a slope gradient of 3:1 (horizontal to vertical) or shallower. During grading as proposed by the Project, a majority of the western boundary would be cut in order to produce an approximately 2:1 (vertical to horizontal) slope exposing dense Lakeview Tonalite Bedrock. Due to the shallow slope gradients of the existing slopes and proposed manufactured slopes, the potential for rockfalls to impact the proposed Project is considered low. Notwithstanding, impacts due to rockfall hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, pp. 7-8)

***Threshold e.: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?***

Per Riverside County GIS, the Project site is located within an area considered to be potentially susceptible to subsidence. A specific ground subsidence evaluation was previously performed by Western Technologies, Inc. (1990) due to the observation of well-defined fissures within and nearby the Project site. Based on the report prepared by Western Technologies (1990), the observed fissure was located in the eastern central portion of the Project site and trended approximately north-south, near parallel with the San Jacinto River. Previous subsurface evaluations found that the observed fissure extended to a maximum depth of approximately 17 feet below the existing ground surface. Aerial photograph review indicated that the fissure “daylighted” to the surface relatively rapidly between 1974 to 1976 and has been followed by a slower rate of modification since that time. In addition, it was concluded that the observed fissuring is a result of localized subsidence from the horizontal shrinkage of fine-grained clayey floodplain sediments induced by historic groundwater withdrawal. In general, potential constraints on the proposed Project from the existing fissure may be mitigated utilizing specialized grading techniques, geotextile reinforcement, and requiring post-tension/stiffened building foundations within 25 feet of the existing fissure. (LGC, 2021, p. 8)

Based on Figure No. 1 from the subsidence evaluation report, at its closest the land uses proposed as part of the Project are located approximately 700 feet northwest of the above-described fissure. Therefore, the



observed fissure would not significantly impact development of the Project site. However, there is a potential for additional well-defined fissures to be observed prior to or during grading operations. (LGC, 2021, p. 8) Subsidence on a much larger regional scale is possible if groundwater resources are not managed properly. Mitigation against such a large-scale groundwater drawdown cannot be done by means of typical grading or construction methods within the limits of the proposed Project, but instead “requires regional cooperation among all agencies” and, therefore, is not a site-specific geotechnical consideration. Based on the review conducted by LGC, it appears that the majority of the areas located within the Lakeview Basin are composed of alluvial deposits that are considered potentially susceptible to subsidence (RCIT, 2020). Surveys performed across the Lakeview Basin since 1967 indicate that regional subsidence is most likely continuing at a very slow and decreasing rate (Western, 1990). Thus, based on current conditions, the potential impact of regional subsidence on the proposed development is considered very low. Notwithstanding, impacts due to subsidence hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required. (LGC, 2021, p. 9)

***Threshold f.: Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?***

There are no volcanoes in the Project region; thus, no impacts due to volcanic hazards would occur.

A seiche is an underwater wave that oscillates through a body of water which may be triggered by earthquakes or landslides. In general, seiches are small (on the order of a few inches) and are present in larger lakes as a result of the depth, temperature, and contours of the body of water. Due to the lack of an onsite body of water or other bodies of water within close proximity to the site that have the potential to result in site inundation, the potential for the subject site to be impacted by seiches is considered low. As such, impacts due to seiches would be less than significant. (LGC, 2021, p. 8)

Although portions of the Project site and surrounding areas contain large hill forms, these hill forms largely contain very shallow bedrock and outcroppings. Due to the limited nature of soils on these on- and off-site hill forms, it is unlikely that the Project site would be subject to mudflow hazards. (LGC, 2021) Accordingly, impacts would be less than significant.

***Threshold g.: Would the Project change topography or ground surface relief features?***

***Threshold h.: Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?***

The topography of the Project site is relatively flat throughout most of the site, with several large hill forms occurring on and off site along the western property boundary. The Conceptual Grading Plan included in proposed SP 239A1 and previously depicted on EIR Figure 3-10 generally identifies proposed grades that largely reflect the site’s existing topographic conditions. No grading is proposed along the hill form located within proposed Planning Area 9 of SP 239A1, and no grading of off-site hillsides is proposed. As such, it is anticipated that future development of the Project site would generally maintain the site’s existing topography,





except as necessary for proper site drainage and/or soil remediation as part of Project construction. The Project would not substantially change topography or ground surface relief features, and impacts would be less than significant.

Due to the relatively flat nature of the portions of the Project site proposed for development, the Project generally would not require cut or fill slopes greater than 2:1 or higher than 10 feet. However, there is a potential that portions of the site may require cut or fill slopes greater than 2:1 or higher than 10 feet. If such slopes are proposed, the slopes would be subject to evaluation as part of the geotechnical studies required for future implementing development on site (e.g., tentative tract maps, plot plans, etc.). Notwithstanding, a potentially significant impact due to slopes greater than 2:1 or higher than 10 feet would occur if future implementing projects were to fail to incorporate the recommendations of the future geotechnical evaluations. This is evaluated as a potentially significant impact for which mitigation would be required.

***Threshold i.:*** *Would the Project result in grading that affects or negates subsurface sewage disposal systems?*

***Threshold l.:*** *Would the Project 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?*

Based on a site-specific investigation conducted by Hillman Consulting LLC (“Hillman”), there is no indication of a septic system existing on the Project site (Hillmann, 2019, p. 23). While the Project site was used for agricultural production in the past, there is no evidence that the site ever contained structures that could be associated with subsurface sewage disposal systems. No subsurface sewage disposal systems (septic systems) currently serve the site, and therefore no such systems would be affected or negated by Project grading. As such, no impact would occur.

SP 239A1 includes a Conceptual Sewer Plan (refer to EIR Figure 3-9) that would involve the construction of sewer lines, force mains, and sewer lift stations to convey wastewater generated by the Project to an existing EMWD 27-inch sewer main located within Pico Avenue, south of the Project site. Wastewater generated by the Project would be treated at the existing Perris Valley Regional Water Reclamation Facility (PVRWRF) to the south. The Project does not propose any septic tanks or alternative waste water disposal systems. As such, no impact associated with septic tanks or alternative waste water disposal systems would occur.

***Threshold j.:*** *Would the Project result in substantial soil erosion or the loss of topsoil?*

***Threshold m.:*** *Would the Project be impacted by or result in an increase in wind erosion and blow sand, either on or off site?*

Implementation of the Project has the potential to result in soil erosion. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and long-term operation.



**Construction-Related Impacts**

Proposed grading and construction activities at the Project site would expose underlying soils and disturb surficial soils on the respective properties. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would identify a combination of erosion control and sediment control measure (i.e., Best Management Practices (BMPs)) to reduce or eliminate sediment discharge to surface water from storm water and non-stormwater source discharges during construction.

In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be following that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be tracked out of the site by more than 25 feet. In addition, proposed construction activities would be required to comply with applicable County ordinances (i.e., Ordinance Nos. 457 and 460) to protect and enhance the water quality of the County, which requires the Project Applicant to prepare an erosion control plan to be used during the rainy season. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, and Riverside County Ordinance Nos. 457 and 460, the potential for water and/or wind erosion impacts during Project construction would be reduced to less-than-significant levels.

**Long-Term Operational Impacts**

Following construction, wind and water erosion on the Project site would be minimized, as the disturbed areas would be landscaped or covered with impervious surfaces, and drainage would be controlled through a storm drain system. As discussed in detail in EIR Subsection 4.10, *Hydrology and Water Quality*, the Project is not anticipated to substantially increase the rate or amount of runoff leaving the site, as compared to existing conditions. Future implementing developments (e.g., tentative tract maps, plot plans, etc.) would be required to construct stormwater facilities (such as detention basins) to reduce on-site runoff flows to pre-development conditions. As discussed in EIR Subsection 4.10, construction of detention basins and water quality basins on-site would ensure that post-development rates and amounts of runoff are similar or slightly reduced as compared to those occurring under existing conditions. Accordingly, implementation of the Project would not increase the risk of siltation or erosion in stormwater discharged from the Project site. In addition, Water Quality Management Plans (WQMPs) would be required for future implementing developments within the



Project site, which would identify post-construction measures to ensure on-going protection against erosion. Compliance with the WQMP would be required as a condition of approval for future implementing developments, and long-term maintenance of on-site water quality features also would be required. Based on the foregoing, implementation of the Project would not significantly increase the risk of long-term wind or water erosion on- or off-site, and impacts would be less than significant.

***Threshold k.: Would the Project be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property?***

Based on the results of laboratory testing commissioned by LGC, site soils are anticipated to have a “Very Low” to “Low” expansion potential. However, LGC recommends that the final expansion potential of site soils should be determined at the completion of grading. Results of expansion testing at finish grades would need to be utilized to confirm final foundation design. (LGC, 2021, p. 14) Notwithstanding, impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies. This is evaluated as a potentially significant direct impact of the proposed Project for which mitigation would be required.

#### 4.7.5 CUMULATIVE IMPACT ANALYSIS

With exception of erosion hazards, potential geologic and soils effects are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. That is, thresholds including fault rupture, seismic ground shaking, liquefaction, landslides, expansive soils, and other geologic hazards would involve effects to (and not from) the proposed development, and are specific to on-site conditions. Accordingly, addressing these potential hazards for the proposed development would involve using measures to conform to existing requirements, and/or site-specific design and construction efforts that have no relationship to, or impact on, off-site areas. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no connection to similar potential issues or cumulative effects to or from other properties. Cumulatively-considerable impacts would be less than significant.

As discussed under Thresholds j. and m., during both near-term construction and long-term operation, measures would be incorporated into the Project’s design to ensure that significant erosion hazards do not occur. Other developments within the cumulative study area would be required to comply with similar requirements, such as the need to obtain an NPDES permit and mandatory compliance with the resulting SWPPPs. All projects in the cumulative study area also would be required to demonstrate that measures have been incorporated to ensure that development does not result in substantial increases in the amount or rate of runoff under long-term operating conditions, which could in turn increase soil erosion. Further, all projects in the cumulative study area also would be required to comply with Riverside County Ordinance Nos. 457 and 460, as well as SCAQMD Rule 403, which would preclude water- and wind-related erosion hazards during construction. Therefore, because the Project site would result in less-than-significant erosion impacts, and because other projects within the cumulative study area would be subject to similar requirements to control



erosion hazards during construction and long-term operation, cumulatively-considerable impacts associated with wind and water erosion hazards are evaluated as less than significant.

#### 4.7.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. & c.: Significant Direct Impact. The Project site is not subject to fault hazards, as none occur on site. However, the Project as evaluated herein is limited to changes in the land use designations and zoning classifications for the 582.6-acre Project site. Site-specific geotechnical evaluations would be required for future implementing developments within the Project site (i.e., tentative tract maps, plot plans, etc.). Grading plans would be required for future implementing developments, and proposed grading plans would be required to incorporate the recommendations of the future-required site-specific geotechnical evaluations. However, a significant impact due to strong seismic ground shaking could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies.

Threshold b.: Significant Direct Impact. Site soils are not generally susceptible to liquefaction due to a lack of groundwater in the upper 50 feet and generally dense to very dense sandy soils. However, isolated layers may be susceptible to dry sand seismic settlement. (LGC, 2021, p. 7) A significant impact due to localized liquefaction hazards could occur if future developments failed to incorporate the site-specific recommendations of the future-required geotechnical studies.

Threshold d.: Significant Direct Impact. Impacts due to landslide hazards, lateral spreading, collapse hazards, and rockfall hazards could occur if proposed grading is not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

Threshold e.: Significant Direct Impact. Impacts due to subsidence hazards could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

Threshold f.: Less-than-Significant Impact. The Project site is not subject to volcanic hazards. Due to the lack of an onsite body of water or other bodies of water in the Project vicinity that could subject the site to inundation due to seiches, the potential for the subject site to be impacted by seiches is considered low, and impacts due to seiches would therefore be less than significant. Due to shallow bedrock and the limited nature of soils on the on- and off-site hill forms, it is unlikely that the Project site would be subject to mudflow hazards; thus, impacts due to mudflow hazards would be less than significant.

Thresholds g. and h.: Significant Direct Impact. The Project would not substantially change topography or ground surface relief features, and impacts would be less than significant. However, there is a potential that portions of the site may require cut or fill slopes greater than 2:1 or higher than 10 feet. If such slopes are proposed, the slopes would be subject to evaluation as part of the geotechnical studies required for future implementing development on site (e.g., tentative tract maps, plot plans, etc.). Notwithstanding, a potentially significant impact due to slopes greater than 2:1 or higher than 10 feet would occur if future implementing projects were to fail to incorporate the recommendations of the future geotechnical evaluations.



Thresholds i. and l: No Impact. There are no subsurface sewage disposal systems on site under existing conditions, and the Project does not propose any septic tanks or alternative waste water disposal systems. As such, no impact would occur.

Thresholds j. and m.: Less-than-Significant Impact. The Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities and adhere to a Storm Water Pollution Prevention Plan (SWPPP) as well as SCAQMD Rule 403 and Riverside County Ordinance Nos. 457, and 460. With mandatory compliance to these regulatory requirements, the potential for water and wind erosion impacts during construction would be less than significant. Following development, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, the Project is required by law to implement a WQMP during operation, which would preclude substantial erosion impacts in the long-term.

Threshold k.: Significant Direct Impact. Impacts due to expansive soils could occur if proposed grading activities are not conducted in accordance with the site-specific recommendations of the future-required geotechnical studies.

#### **4.7.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of County Ordinance Nos. 457, 460, and 547. Ordinance No. 457 requires that all projects comply with California Building Codes and the International Building Codes. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public, and includes requirements related to erosion. Ordinance No. 460 sets forth soil erosion control requirements and requires preparation and implementation of a wind erosion control plan. In addition, Ordinance No. 547 requires that cases where a proposed project falls within an earthquake fault zone as shown on the maps prepared by the State Geologist, this Ordinance requires compliance with all of the provisions of the Alquist-Priolo Act and the adopted policies and criteria of Ordinance No. 547.
- The Project is required to comply with the provisions of SCAQMD Rule 403, by addressing blowing dust from the Project's construction activities.



- The Project is required to comply with the provisions of the Project's National Pollution Discharge Elimination System (NPDES) permit, and the Project's Storm Water Pollution Prevention Plan (SWPPP). Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from stormwater and non-stormwater discharges.

### **Mitigation**

MM 4.7-1 Prior to approval of any future implementing developments within the 582.6-acre Project site or off-site improvement areas (e.g., tentative tract maps, plot plans, improvement plans, etc.), updated site-specific geotechnical studies shall be prepared to evaluate grading and site work proposed as part of the future implementing developments. All future implementing projects shall be conditioned to require that the site-specific recommendations of the implementing geotechnical evaluations shall be incorporated into future grading and building permit applications. Future grading or building permits shall not be issued by the County unless the investigations required by Riverside County Ordinance Nos. 457 and 547 have been completed and the site-specific recommendations have been incorporated into the design of grading and/or building permits, as appropriate.

### **4.7.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION**

Thresholds a. & c.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address seismic-related hazards in conformance with the CBSC and the Riverside County Building Code. With implementation of the required mitigation, impacts due to strong seismic ground shaking would be reduced to less-than-significant levels.

Threshold b.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address any localized liquefaction hazards that may be identified in areas subject to grading and development. With implementation of the required mitigation, impacts due to liquefaction hazards would be reduced to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address the potential for landslide hazards. With implementation of the required mitigation, impacts due to landslide hazards would be reduced to less-than-significant levels.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or



building permit applications to address potential subsidence hazards. With implementation of the required mitigation, impacts due to subsidence hazards would be reduced to less-than-significant levels.

Thresholds g. and h.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to ensure that any slopes higher than 10 feet or at a gradient steeper than 2:1 would be grossly stable. With implementation of the required mitigation, impacts associated with unstable slopes would be reduced to less-than-significant levels.

Threshold k.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.7-1 would ensure that appropriate measures are incorporated into future grading and/or building permit applications to address expansive soils on site. With implementation of the required mitigation, impacts associated with expansive soils would be reduced to less-than-significant levels.



## 4.8 GREENHOUSE GAS EMISSIONS

The analysis in this Subsection is based in part on a technical study prepared by Urban Crossroads, Inc. (herein, “Urban Crossroads”), entitled, “Stoneridge Commerce Center Specific Plan Greenhouse Gas Analysis” (herein, “GHGA”), dated May 4, 2023, and included as EIR *Technical Appendix T* (Urban Crossroads, 2023f). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.8.1 EXISTING CONDITIONS

#### A. Introduction to Global Climate Change

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth’s atmosphere, including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years. (Urban Crossroads, 2023f, p. 12)

An individual project like the Project evaluated in herein cannot generate enough GHG emissions to affect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (Urban Crossroads, 2023f, p. 12)

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth’s atmosphere, but prevent radioactive heat from escaping, thus warming the earth’s atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2023f, p. 12)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth’s average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth’s atmosphere is considered to be the cause for the observed increase in the earth’s temperature. (Urban Crossroads, 2023f, p. 12)

#### B. Greenhouse Gases

##### 1. Greenhouse Gases and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and areas discussed below. For the purposes of this analysis,





emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. (Urban Crossroads, 2023f, p. 12)

#### **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 primarily are 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. (Urban Crossroads, 2023f, Table 2-1)

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. 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). (Urban Crossroads, 2023f, Table 2-1)

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. (Urban Crossroads, 2023f, Table 2-1)

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. (Urban Crossroads, 2023f, Table 2-1)

#### **Carbon Dioxide (CO<sub>2</sub>)**

Carbon Dioxide (CO<sub>2</sub>) 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. Prior to the industrial revolution, CO<sub>2</sub> 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 CO<sub>2</sub> in the atmosphere



is projected to increase to a minimum of 540 ppm by the year 2100 as a direct result of anthropogenic sources. (Urban Crossroads, 2023f, Table 2-1)

CO<sub>2</sub> is emitted from natural and man-made sources. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include the burning of coal, oil, natural gas, and wood. CO<sub>2</sub> is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks. (Urban Crossroads, 2023f, Table 2-1)

Outdoor levels of CO<sub>2</sub> are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of CO<sub>2</sub> 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. While current concentrations of CO<sub>2</sub> 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 ppm averaged over 10 hours in a 40-hour work week and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period. (Urban Crossroads, 2023f, Table 2-1)

#### **Methane (CH<sub>4</sub>)**

Methane (CH<sub>4</sub>) is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO<sub>2</sub> and its lifetime in the atmosphere is brief (10-12 years) compared to other GHGs. CH<sub>4</sub> has both natural and anthropogenic sources. It is released as part of animal digestion and 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<sub>4</sub>. Other anthropogenic sources include fossil-fuel combustion and biomass burning. (Urban Crossroads, 2023f, Table 2-1)

CH<sub>4</sub> is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH<sub>4</sub> can cause asphyxiation, loss of consciousness, headache, dizziness, nausea, vomiting, weakness, loss of coordination, and an increased breathing rate. (Urban Crossroads, 2023f, Table 2-1)

#### **Nitrous Oxide (N<sub>2</sub>O)**

Nitrous oxide (N<sub>2</sub>O), also known as laughing gas, is a colorless GHG. Concentrations of N<sub>2</sub>O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). N<sub>2</sub>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), in potato chip bags to keep chips fresh, and in rocket engines and race cars. N<sub>2</sub>O can be transported into the stratosphere, be



deposited on Earth's surface, or be converted to other compounds by chemical reaction. (Urban Crossroads, 2023f, Table 2-1)

N<sub>2</sub>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). (Urban Crossroads, 2023f, Table 2-1)

#### **Chlorofluorocarbons (CFCs)**

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH<sub>4</sub> or ethane (C<sub>2</sub>H<sub>6</sub>) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). 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 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 CFCs will remain in the atmosphere for over 100 years. (Urban Crossroads, 2023f, Table 2-1)

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. (Urban Crossroads, 2023f, Table 2-1)

#### **Hydrofluorocarbons (HFCs)**

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential ("GWP," described below). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF<sub>3</sub>), 1,1,1,2-tetrafluoroethane (CH<sub>2</sub>FCF), and 1,1-difluoroethane (CH<sub>3</sub>CF<sub>2</sub>). Prior to 1990, the only significant emissions were of CHF<sub>3</sub>. CH<sub>2</sub>FCF emissions are increasing due to its use as a refrigerant. HFCs are man-made for applications such as automobile air conditioners and refrigerants. No health effects are known to result from exposure to HFCs. (Urban Crossroads, 2023f, Table 2-1)

#### **Perfluorocarbons (PFCs)**

Perfluorocarbons (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<sub>4</sub>) and hexafluoroethane (C<sub>2</sub>F<sub>6</sub>). The United States Environmental Protection Agency (EPA) estimates that concentrations of CF<sub>4</sub> 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. (Urban Crossroads, 2023f, Table 2-1)



**Sulfur Hexafluoride (SF<sub>6</sub>)**

Sulfur Hexafluoride (SF<sub>6</sub>) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt. SF<sub>6</sub> 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. (Urban Crossroads, 2023f, Table 2-1)

**Nitrogen Trifluoride (NF<sub>3</sub>)**

Nitrogen Trifluoride (NF<sub>3</sub>) is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF<sub>3</sub> has a 100-year GWP of 17,200. NF<sub>3</sub> 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. (Urban Crossroads, 2023f, Table 2-1)

## **2. Potential Global Warming Effects**

The potential health effects related directly to the emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Figure 4.8-1, *Summary of Project Global Warming Impact 2070-2099 (As Compared with 1961-1990)*, presents the potential impacts of global warming. (Urban Crossroads, 2023f, p. 18)

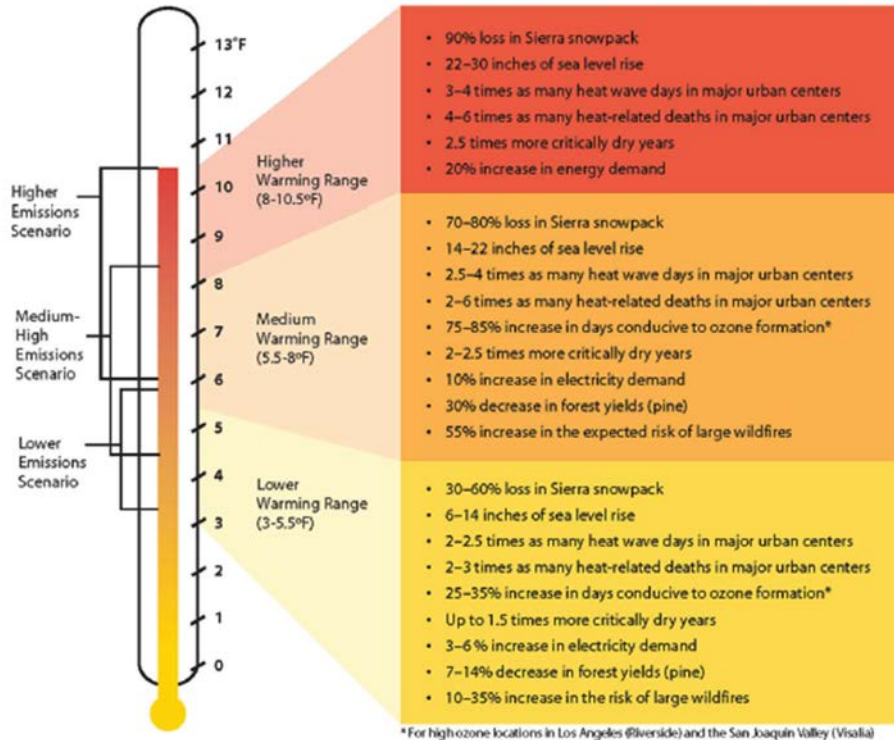
## **3. Global Warming Potential (GWP)**

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO<sub>2</sub> is utilized as the reference gas for GWP, and thus has a GWP of 1. CO<sub>2</sub> equivalent (CO<sub>2</sub>e) is a term used for describing the difference GHGs in a common unit. CO<sub>2</sub>e signifies the amount of CO<sub>2</sub> which would have the equivalent GWP. (Urban Crossroads, 2023f, p. 19)

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 4.8-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.8-1, GWP for the 2nd Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO<sub>2</sub> to 23,900 for SF<sub>6</sub> and GWP for the IPCC's 5th Assessment Report range from 1 for CO<sub>2</sub> to 23,500 for SF<sub>6</sub>. (Urban Crossroads, 2023f, p. 19)



Figure 4.8-1 Summary of Project Global Warming Impact 2070-2099 (As Compared with 1961-1990)



(Urban Crossroads, 2023f, Exhibit 2-A)

Table 4.8-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2 <sup>nd</sup> Assessment Report	5 <sup>th</sup> Assessment Report
CO <sub>2</sub>	See*	1	1
CH <sub>4</sub>	12.4	21	28
N <sub>2</sub> 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 <sub>6</sub>	3,200	23,900	23,500

\*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.

Source: Table 2.14 of the IPCC Fourth Assessment Report, 2007

(Urban Crossroads, 2023f, Table 2-2)



**C. Greenhouse Gas Inventories**

**1. Global**

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2018. Based on the latest available data, the sum of these emissions totaled approximately 28,768,440 gigagram (Gg) CO<sub>2</sub>e as summarized on Table 4.8-2, *Top GHG Producing Countries and the European Union*. (Urban Crossroads, 2023f, p. 19)

**Table 4.8-2 Top GHG Producing Countries and the European Union**

<b>Emitting Countries</b>	<b>GHG Emissions (Gg CO<sub>2</sub>e)</b>
China	12,300,200
United States	6,676,650
European Union (28-member countries)	4,232,274
Russian Federation	2,220,123
India	2,100,850
Japan	1,238,343
<b>Total</b>	<b>28,768,440</b>

(Urban Crossroads, 2023f, Table 2-3)

**2. United States**

As noted in Table 4.8-2, the United States, as a single country, was the number two producer of GHG emissions in 2018 (Urban Crossroads, 2023f, p. 20).

**3. State of California**

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the United States (U.S.) emissions inventory total. The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2021 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2019 GHG emissions period, California emitted an average 418.2 million metric tons of CO<sub>2</sub>e per year (MMTCO<sub>2</sub>e/yr) or 418,200 Gg CO<sub>2</sub>e (6.26% of the total United States GHG emissions). (Urban Crossroads, 2023f, p. 20)

**D. Effects of Climate Change in California**

**1. 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% under the lower warming range to 75 to 85% 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. Based on *Our Changing Climate Assessing the Risks to California* by the California Climate Change Center, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced. (Urban Crossroads, 2023f, p. 20)

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 significant 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. (Urban Crossroads, 2023f, pp. 20-21)

## 2. 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. (Urban Crossroads, 2023f, p. 21)

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%. 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 might be many years with insufficient snow for skiing and snowboarding. (Urban Crossroads, 2023f, p. 21)

The State's 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. (Urban Crossroads, 2023f, p. 21)



### 3. *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% of the water supply needed. Although higher CO<sub>2</sub> 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 ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth. (Urban Crossroads, 2023f, p. 21)

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. (Urban Crossroads, 2023f, p. 21)

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. (Urban Crossroads, 2023f, p. 22)

### 4. *Forest 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%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation. (Urban Crossroads, 2023f, p. 22)

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% 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. (Urban Crossroads, 2023f, p. 22)

### 5. *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. 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 12-14 inches. (Urban Crossroads, 2023f, p. 22)

#### 4.8.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to GHG emissions.

##### A. International Regulations

##### 1. *Kyoto Protocol*

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

On December 21, 2012, the amendment was circulated by the Secretary-General of the United Nations, acting in his capacity as Depositary, to all Parties to the Kyoto Protocol in accordance with Articles 20 and 21 of the Protocol. During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of 5% against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first. (UNFCCC, n.d.)

##### 2. *The Paris Agreement*

The Paris Agreement builds upon the Convention and – for the first time – brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Paris Agreement’s central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius



above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. The Paris Agreement requires all Parties to put forward their best efforts through “nationally determined contributions” (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts. The Paris Agreement entered into force on November 4, 2016, thirty days after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depository. (UNFCCC, n.d.)

On June 1, 2017, President Donald Trump announced he would begin the process of withdrawing the United States from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the United States’ withdrawal from the Agreement was November 4, 2020, at which time the withdrawal became official. On January 20, 2021, President Biden signed an executive order for the United States to rejoin the Paris Agreement, which became official on February 19, 2021.

## ***B. Federal Regulations***

### ***1. Clean Air Act***

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the EPA issued an Endangerment Finding under § 202(a) of the Clean Air Act (CAA), opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them. (EPA, 2020a; DOJ, 2015)

Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address Global Climate Change (GCC) and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]); however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA’s Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. (EPA, 2020a; DOJ, 2015)

## ***C. State Regulations***

### ***1. Title 24 Building Energy Standards***

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative



mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions (2022 Building Energy Efficiency Standards) became effective on January 1, 2023. The 2022 Building Energy Efficiency Standards are 7 percent more efficient than the 2016 Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CEC, 2018)

## **2. California Assembly Bill No. 1493 (AB 1493)**

AB 1493 required the California Air Resources Board (CARB) to adopt the nation’s first GHG emission standards for automobiles. On September 24, 2009, CARB adopted amendments to the “Pavley” regulations that reduced GHG emissions in new passenger vehicles from model year 2009 through 2016. The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. It is expected that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs. CARB has since adopted a new approach to cars and light trucks by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

## **3. Executive Order S-3-05**

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other state agencies. The EO requires the Secretary to report back to the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 goals for GHG emissions reductions included: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80 percent below 1990 levels by 2050. (CA State Library, 2005)



#### 4. California Assembly Bill 32 – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 required California to reduce its GHG emissions to 1990 levels by 2020, which represented a reduction of approximately 15 percent below emissions expected under a “business as usual” scenario (CARB, 2018). Among other items, AB 32 specifically required that CARB prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020 and update the Scoping Plan every five years.

In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions. In May 2014, CARB approved the First Update to the Scoping Plan (Update), which built upon the initial Scoping Plan with new strategies and recommendations. The Update highlighted California’s progress toward meeting the near-term 2020 GHG emission reduction goals, highlighted the latest climate change science and provided direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. In December 2017, CARB adopted the Second Update to the Scoping Plan, which identified the State’s post-2020 reduction strategy. The Second Update reflected the 2030 target of a 40 percent GHG emissions reduction below 1990 levels set by SB 32. The Second Update built upon the Cap- and-Trade Regulation; the Low Carbon Fuel Standard; much cleaner cars, trucks and freight movement; cleaner, renewable energy; and strategies to reduce methane emissions from agricultural and other wastes to reduce GHG emissions. (CARB, 2017)

In December 2022, CARB released the *Final 2022 Scoping Plan Update (2022 Scoping Plan)*, which identifies the State’s strategies to reduce GHG emissions by 85% and achieve carbon neutrality by 2045. The *2022 Scoping Plan* reflects an accelerated target of an 85% reduction in GHG emissions compared to 1990 levels by 2045 (33). This third update relies on key programs in place, including the Cap-and-Trade Regulation and the LCFS, while stressing the need to increase their pace and scale.

In order to meet these targets, the *2022 Scoping Plan* would require contributions from all sectors of the economy and includes an enhanced focus on reducing fossil fuel demand by 94% by 2045 compared to 2022 consumption. Major elements of the *2022 Scoping Plan* framework include:

- Maintaining progress on meeting SB 32 GHG reduction targets of at least 40% below 1990 emissions by 2030.
- Implementation of strategies for reducing California’s dependence on petroleum by providing consumers with clean energy options.
- Integrating equity and protecting California’s most impacted communities.
- Incorporation of natural and working lands to the state’s GHG emissions, as well as their role in achieving carbon neutrality.
- Use of all viable tools to address climate change, including carbon capture and sequestration, as well as direct air capture.



- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH<sub>4</sub> and HCF emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- 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.

In addition to the statewide strategies listed above, the 2022 Scoping Plan 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 previous 2017 Scoping Plan, CARB recommended that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) or less per capita by 2030 and 2 MTCO<sub>2</sub>e or less per capita by 2050. However, because the state is now pursuing carbon neutrality no later than 2045, CARB now recommends that local governments instead focus on developing locally appropriate, plan-level targets that align with the goal of carbon neutrality rather than focusing on a 2050 target. CARB identifies several “priority areas,” including transportation electrification, VMT reduction, and building decarbonization, as these are the GHG reduction opportunities over which local governments have the most authority and the highest GHG reduction potential. (CARB, 2022)

#### **5. California Senate Bill No. 1368 (SB 1368)**

In 2006, the State Legislature adopted Senate Bill (SB) 1368 (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California’s utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand. (CEC, n.d.)

#### **6. Executive Order S-01-07**

Executive Order (EO) S-01-07 is effectively known as the Low Carbon Fuel Standard (LCFS). The Executive Order seeks to reduce the carbon intensity of California’s passenger vehicle fuels by at least 10 percent by 2020. The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO<sub>2</sub>e grams per unit of fuel energy sold. (CA State Library, 2007)



**7. Senate Bill 1078**

Senate Bill (SB) 1078 establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix. (CA Legislative Info, n.d.)

**8. Senate Bill 107**

SB 107 directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010. (CA Legislative Info, n.d.)

**9. Executive Order S-14-08**

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard (RPS) upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020. In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "RPS eligible" energy projects would be needed. Executive Order S-14-08 sought to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issued two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the California Energy Commission (CEC) and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed RPS-eligible renewable energy projects. (CA State Library, 2008)

**10. Senate Bill 97**

Senate Bill 97 (SB 97) was enacted in in 2007 to recognize the need to analyze GHGs as a part of the CEQA process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of GHGs. As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010. Of note, the CEQA Guidelines state that a lead agency has discretion to determine whether to use a quantitative model or methodology, or rely on a qualitative analysis or performance-based standards to evaluate GHGs. (CA Legislative Info, n.d.)

CEQA emphasizes that GHG effects are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See CEQA Guidelines § 15130(f)). CEQ Guidelines § 15064.4(b) provides direction for lead agencies for assessing the significance of impacts of greenhouse gas emissions:



1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a “good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies’ discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.

#### **11. Senate Bill 375**

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB set regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). CARB periodically reviews and updates the targets, as needed. (CARB, n.d.)

Each of California’s MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate “alternative planning strategy” (APS) to meet the targets. (CARB, n.d.)

#### **12. Executive Order B-30-15**

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal



on the way to achieving the GHG reductions goal set by former Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050). (CA State Library, 2015)

### **13. Senate Bill 32**

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050. (CA Legislative Info, n.d.)

### **14. California Climate Crisis Act (AB 1279)**

AB 1279, also known as the California Climate Crisis Act, was signed by the Governor on September 16, 2022. AB 1279 declares that it is the policy of the State to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045; to achieve and maintain net negative greenhouse gas emissions thereafter; and to ensure that by 2045, Statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels. The bill requires the California Air Resources Board (CARB) to work with relevant State agencies to ensure that updates to the CARB Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. AB 1279 also requires CARB to submit an annual report evaluating progress towards these policies. (CA Legislative Info, n.d.)

### **15. Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)**

SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, revised State policy to include interim targets requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035. SB 1020 also requires each State agency to ensure that zero-carbon resources and eligible renewable energy resources supply 100 percent of electricity procured to serve their agency by December 31, 2035. In addition, SB 1020 requires the State Water Project (SWP) to procure eligible renewable energy and zero-carbon resources as necessary to meet the clean energy requirements specified for all State agencies. Finally, SB 1020 requires the California Public Utilities Commission (CPUC) to develop utility affordability metrics for both electricity and gas service. (CA Legislative Info, n.d.)

### **16. Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program (Senate Bill 905)**

SB 905 requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage (CCRUS) Program and adopt regulations for a model unified permit program for the construction and operation of CCRUS





projects. SB 905 is intended to accelerate the deployment of carbon management technologies and ensuring they are deployed in a safe and equitable way. SB 905 requires the CCRUS Program to ensure that carbon dioxide capture, removal, and sequestration projects include specified components including, among others, certain monitoring activities. In addition, SB 905 requires that by January 1, 2025, CARB shall adopt regulations for a unified permit application for the construction and operation of carbon dioxide capture, removal, or sequestration projects to expedite the issuance of permits or other authorizations for the construction and operation of those projects. SB 905 also requires the establishment of a centralized public database to track the deployment of carbon capture, utilization, or storage (CCUS) technologies and carbon dioxide removal (CDR) technologies. (CA Legislative Info, n.d.)

### **17. *Assembly Bill 1757***

AB 1757 directs the California Natural Resources Agency (CNRA) to determine an ambitious range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions for 2030, 2038, and 2045 to support State goals to achieve carbon neutrality and foster climate adaptation and resilience. Additionally, AB 1757 requires these targets to be integrated into the CARB Scoping Plan and other State policies. It also includes provisions to avoid double counting emission reductions, updates the Natural and Working Lands Climate Smart Strategy, develops GHG tracking protocols, and biennially post progress made in achieving the targets on CNRA's internet website. In addition, AB 1757 requires CARB to develop standard methods for State agencies to consistently track greenhouse gas emissions and reductions, carbon sequestration, and, where feasible, additional benefits from natural and working lands over time. (CA Legislative Info, n.d.)

#### **D. *Regional Regulations***

##### **1. *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)***

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 (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG's *2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)*, also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities 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 air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in 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. The Subregional Sustainable Communities Strategies identifies the



Project Site as being located in an area with a “Standard Suburban” land use pattern, which is defined as auto-oriented development with a minimal mix of land uses.

The *Goods Movement Technical Report* of *Connect SoCal* recognizes that the SCAG region is the premier trade gateway for the United States. *Connect SoCal* acknowledges that the SCAG region has witnessed continued growth for warehousing, distribution, cold storage and truck terminal facilities, with a majority of the growth for national and regional distribution facilities occurring in the Inland Empire. Through *Connect SoCal*, SCAG is working on various regional strategies to maintain the SCAG region as an important trade gateway while addressing regional transportation efficiency and environmental sustainability.

### **E. Local Regulations**

#### **1. South Coast Air Quality Management District (SCAQMD)**

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff is convening an ongoing GHG CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group.

The Draft AQMD Staff CEQA GHG Significance Thresholds guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions and was described as a “work in progress” of efforts to date. However, the draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. In December 2008, the SCAQMD adopted an interim 10,000 metric tons of CO<sub>2e</sub> per year (MTCO<sub>2e</sub>/yr) screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, used the following tiered approach to evaluate potential GHG impacts from various uses:

- Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2: Consider whether or not the proposed project is consistent with a locally-adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO<sub>2e</sub>/yr threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential



projects (3,500 MTCO<sub>2</sub>e/yr), commercial projects (1,400 MTCO<sub>2</sub>e/yr), and mixed-use projects (3,000 MTCO<sub>2</sub>e/yr). Under option 2, a single numerical screening threshold of 3,000 MTCO<sub>2</sub>e/yr would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

- Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MTCO<sub>2</sub>e/yr per service population for project level analyses and 6.6 MTCO<sub>2</sub>e/yr per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The SCAQMD has not announced when staff is expecting to present a finalized version of its GHG thresholds to the governing board. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the SoCAB, various utilities such as sanitation and power companies throughout the SoCAB, industry groups, and environmental and professional organizations. These thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provides guidance to CEQA practitioners with regard to determining whether GHG emissions from a proposed land use project are significant.

## **2. *Riverside County Climate Action Plan (CAP)***

The Riverside County Climate Action Plan (CAP), was adopted in December 2015 and most recently updated in November 2019 ("CAP Update"), qualifies as a plan for the reduction of GHG emissions as defined by State CEQA Guidelines Section 15183.5(b). The CAP was designed under the premise that Riverside County, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside 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 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 MTCO<sub>2</sub>e/yr below the Adjusted Business As Usual (ABAU) scenario by 2030 and at least 2,982,948 MTCO<sub>2</sub>e/yr below the ABAU scenario by 2050. 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. The potential for such projects to generate direct or indirect GHG emissions that would result in a significant impact on the environment; or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG would be considered less than significant. (Riverside County, 2019a)

### 3. **Riverside County Board of Supervisors Policy F-3**

The logistics industry is a well-established sector of the Riverside County economy that has contributed to local job growth, fueled by societal growth trends in e-commerce and coupled with our strategic location along a major trade corridor that connects to the Ports of Los Angeles and Long Beach. It is expected that Riverside County will continue to see strong demand for growth in the logistics industry. However, it is also recognized that the construction and operations of logistics and warehouse projects in close proximity to residences or other sensitive land uses may negatively affect the quality of life of those existing communities. The County of Riverside Board of Supervisors Policy F-3, *Good Neighbor Policy for Logistics and Warehouse/Distribution Uses*, provides a framework through which large-scale logistics and warehouse projects, such as that proposed by the Project, can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the County’s Land Use Ordinance, which provides development requirements for said projects, and CEQA. This policy provides a series of development and operational criteria applicable to logistics and warehouse projects that include any building larger than 250,000 square feet in size that are implemented to supplement project-level mitigation measures in order to further reduce impacts related to logistics and warehousing development and operations. Pursuant to Mitigation Measures MM 4.3-7 and MM 4.3-8 in EIR Subsection 4.3, *Air Quality*, all future buildings within the Project site would be subject to applicable provisions of Policy F-3, regardless as to building size. The specific policy provisions germane to Project GHG emissions include the following:

- 2.1 During construction of the warehouse/distribution facility, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards.
- 2.4 Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers’ standards.
- 2.9 Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.
- 4.1 Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the County.



- 4.2 Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.
- 4.3 Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- 4.4 Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- 4.7 Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.
- 4.8 A minimum of 5 percent of employee parking spaces shall be designated for electric or other alternative fueled vehicles.
- 5.5 Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community.

#### 4.8.3 BASIS FOR DETERMINING SIGNIFICANCE

While estimated Project-related GHG emissions can be quantified, the direct impacts of such emissions on GCC and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly or indirectly affect the global climate.

AB 32 states, in part, that “[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would have no potential to result in a direct impact to global warming; rather, Project-related contributions to GCC, if any, only have potential significance on a cumulative basis. Therefore, the analysis below focuses on the Project’s potential to contribute to GCC in a cumulatively-considerable way.

Section VIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to GHGs, and includes the following threshold questions (OPR, 2018a):

- Would the project generate GHGs, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?



The following thresholds are derived directly from Section VIII of Appendix G to the State CEQA Guidelines and the County's Environmental Assessment form, and address typical adverse effects associated with GHG emissions. The proposed Project would have a significant impact on GHG emissions if the Project or any Project-related component would:

- a. *Generate GHGs, either directly or indirectly, that may have a significant impact on the environment;*  
*or*
- b. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*

The above-listed thresholds for GHGs do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." A lead agency may use a "model or methodology" to estimate GHG emissions and has the 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." Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the State CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. As a note, the State CEQA Guidelines were amended in response to SB 97. In



particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per State CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, [and] plans or regulations for the reduction of greenhouse gas emissions.” Put another way, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The significance of the Project’s GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The Riverside County 2019 CAP Update aims to reduce GHG emissions from development projects under County jurisdiction. The CAP Update builds on State and regional policies aimed at reducing GHG emissions consistent with the SB 32 2030 GHG reduction target and Statewide post-2030 reduction goals. The CAP Update identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO<sub>2</sub>e/yr is used to determine if additional analysis is required. Projects that exceed 3,000 MTCO<sub>2</sub>e/yr will be required to quantify and disclose the anticipated GHG emissions then either 1) demonstrate GHG emissions at project buildout year levels of efficiency and include project design features and/or mitigation measures to reduce GHG emissions or 2) garner 100 points through the CAP Update Screening Tables. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) may be determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report, and consequently may be considered consistent with the CAP Update. As such, projects that achieve a total of 100 points or more normally are considered to have a less-than-significant individual and cumulative impact on GHG emissions.

**A. Methodology**

**1. Greenhouse Gas Emissions Modeling**

In May 2022 the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod Version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved



from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.2 of the Project’s GHGA (*Technical Appendix T*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water. (Urban Crossroads, 2023f, p. 48)

**2. Construction and Operational Life-Cycle Analysis Not Required**

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (47). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared. (Urban Crossroads, 2023f, p. 48)

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate (48). Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis. (Urban Crossroads, 2023f, p. 49)

**4.8.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

**Construction Emissions**

Project construction activities would generate CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions. The Project’s Air Quality Impact Analysis (“AQIA”; EIR *Technical Appendix B1*) report contains detailed information regarding Project construction activities. As discussed in the AQIA, construction-related emissions are expected from the following construction activities: site preparation; grading/blasting; building construction; paving; and architectural coating. (Urban Crossroads, 2023f, p. 49)

The anticipated construction durations were previously summarized in EIR Table 3-3, and anticipated construction equipment is summarized in Table 3-2 of the Project’s GHGA (*Technical Appendix T*). The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet and durations. (Urban Crossroads, 2023f, p. 49)

For construction phase Project emissions, GHGs 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 GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the





annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.8-3, *Amortized Annual Construction Emissions*. For purposes of analysis herein, it is assumed that the Project’s construction-related emissions would be similar under the Primary Land Use Plan and Alternative Land Use Plan. (Urban Crossroads, 2023f, p. 50)

**Table 4.8-3 Amortized Annual Construction Emissions**

Year	Emissions (MT/yr)				
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Refrigerants	Total CO <sub>2</sub> e
2023	972.94	0.03	0.05	0.38	988.94
2024	2,713.00	0.09	0.18	1.43	2,771.00
2025	2,784.00	0.09	0.20	1.52	2,846.00
2026	8,629.00	0.17	0.62	11.20	8,830.00
2027	10,867.00	0.21	0.76	13.00	11,112.00
2028	10,700.00	0.19	0.76	11.70	10,943.00
2029	10,472.00	0.17	0.73	10.50	10,706.00
2030	10,273.00	0.17	0.73	9.30	10,506.00
2031	8,753.00	0.14	0.62	7.10	8,947.00
Total GHG Emissions	66,163.94	1.26	4.65	66.13	67,649.94
<b>Amortized Construction Emissions</b>	<b>2,205.46</b>	<b>0.04</b>	<b>0.16</b>	<b>2.20</b>	<b>2,255.00</b>

<sup>A</sup> CalEEMod reports the most common GHGs emitted which include CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. These GHGs are then converted into the CO<sub>2</sub>e by multiplying the individual GHG by the GWP.

(Urban Crossroads, 2023f, Table 3-3)

**□ Operational Emissions**

Operational activities associated with the proposed Project will result in emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O from the following primary sources: area source emissions; energy source emissions; mobile source emissions; on-site cargo handling equipment emissions; Transport Refrigeration Unit (TRU) emissions; water supply, treatment, and distribution; solid waste; and refrigerants. Each is discussed below. (Urban Crossroads, 2023f, p. 51)

**Area Source Emissions**

**Landscape Maintenance Equipment**

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For



purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023f, pp. 51-52)

### **Energy Source Emissions**

#### **Combustion Emissions Associated with Natural Gas and Electricity**

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO<sub>2</sub> and other GHGs directly into the atmosphere. These emissions are considered direct emissions associated with a building; however, the building energy use emissions do not include street lighting. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Natural gas and electricity usage associated with the Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023f, p. 52)

### **Mobile Source Emissions**

The Project related GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) were utilized in the analysis. (Urban Crossroads, 2023f, p. 52)

#### **Approach for Analysis of the Project**

In order to determine emissions from passenger car vehicles from industrial uses and all vehicles from the shopping center use, a trip length of 11.37 miles was used for all trips based on the Project's Vehicle Miles Traveled (VMT) Analysis (EIR *Technical Appendix L1*). For the proposed industrial uses, it is important to note that although the Project's TA (*Technical Appendix L3*) does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1<sup>1</sup> & LDT2<sup>2</sup>), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the fleet mix shown in Table 3-4 of the Project's GHGA (*Technical Appendix T*) was utilized for the industrial uses. The CalEEMod default fleet mix was used for the commercial uses. (Urban Crossroads, 2023f, p. 52)

To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1<sup>3</sup>, LHDT2<sup>4</sup>), 14.2 miles for 3-axle (MHDT) trucks, and 39.9 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages. The trip length function for the industrial uses have been revised to 30.51 miles for both the

<sup>1</sup> Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

<sup>2</sup> Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

<sup>3</sup> Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

<sup>4</sup> Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.



Primary Land Use Plan and Alternative Land Use Plan scenarios, and an assumption of 100% primary trips. Trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided by the SCAQMD recommended truck mix, by axle type. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1 & LHDT2)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. To account for emissions generated by trucks, the fleet mix in Table 3-5 of the Project's GHGA (*Technical Appendix T*) was utilized. (Urban Crossroads, 2023f, p. 53)

### ***On-Site Cargo Handling Equipment Emissions***

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. In accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Uses, it was assumed that all on-site operational equipment would be electric-powered. (Urban Crossroads, 2023f, p. 54)

### ***TRU Emissions***

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. For modeling purposes, 2,208 two-way truck trips have been estimated to include TRUs (e.g., all truck trips that would be associated with up to 2,940,000 s.f. of high-cube cold storage use identified under both the Primary Land Use Plan and Alternative Land Use Plan, consistent with the Project's TA (*EIR Technical Appendix L3*)). TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on EMISSIONS FACTOR MODEL version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of Project level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with Project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operations. (Urban Crossroads, 2023f, p. 54)

### ***Water Supply, Treatment, and Distribution***

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2023f, p. 54)



### ***Solid Waste***

Industrial land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023f, p. 54)

### ***Refrigerants***

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the United States EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. As such, it was conservatively assumed that refrigeration systems installed at the high-cube cold storage warehouse portion of the Project would utilize refrigerants with a GWP of 150. GHG emissions associated with refrigerants were calculated by CalEEMod. (Urban Crossroads, 2023f, p. 55)

### **Emissions Summary**

The estimated Project-related GHG emissions are summarized on Table 4.8-4, Primary Land Use Plan – Project GHG Emissions, and Table 4.8-5, *Alternative Land Use Plan – Project GHG Emissions*, for the Primary Land Use Plan (Without MCP) and Alternative Land Use Plan (With MCP), respectively. Detailed operation model outputs for the Project are presented in Appendix 3.2 to the Project’s GHGA (*Technical Appendix T*). As shown in Table 4.8-4, with implementation of the Primary Land Use Plan the Project would generate approximately 115,953.50 MTCO<sub>2e</sub> per year. As shown in Table 4.8-5, with implementation of the Alternative Land Use Plan the Project would generate approximately 114,610.50 MTCO<sub>2e</sub>/yr. As such, emissions from implementation of the Primary Land Use Plan or Alternative Land Use Plan would exceed the County of Riverside’s numeric threshold of 3,000 MTCO<sub>2e</sub>/yr. Although the Project would be required to achieve 100 points pursuant to the CAP Screening Tables, and in order to provide a conservative analysis of the Project’s impacts due to GHGs, it is concluded that the Project’s cumulatively-considerable impacts due to GHG emissions would be potentially significant prior to mitigation. (Urban Crossroads, 2023f, p. 55)



**Table 4.8-4 Primary Land Use Plan – Project GHG Emissions**

Emission Source	Emissions (MT/yr)				
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	R	Total CO <sub>2</sub> e
Annual construction-related emissions amortized over 30 years	2,205.46	0.04	0.16	2.20	2,255.00
Mobile	68,149.00	1.56	7.68	56.90	70,534.00
Area	173.00	0.01	0.02	0	178.00
Energy	23,073.00	2.50	0.21	0	23,197.00
Water	426.00	11.70	0.28	0	802.00
Waste	783.00	78.30	0	0	2,741.00
Refrigerants	0	0	0	518.00	518.00
TRUs					15,728.50
<b>Total CO<sub>2</sub>e (All Sources)</b>	<b>115,953.50</b>				

(Urban Crossroads, 2023f, Table 3-6)

**Table 4.8-5 Alternative Land Use Plan – Project GHG Emissions**

Emission Source	Emissions (MT/yr)				
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	R	Total CO <sub>2</sub> e
Annual construction-related emissions amortized over 30 years	2,205.46	0.04	0.16	2.20	2,255.00
Mobile	67,261.00	1.55	7.57	56.10	69,610.00
Area	171.00	0.01	0.02	0	176.00
Energy	22,715.00	2.46	0.20	0	22,838.00
Water	420.00	11.50	0.28	0	791.00
Waste	771.00	77.00	0	0	2,696.00
Refrigerants	0	0	0	516.00	516.00
TRUs					15,728.50
<b>Total CO<sub>2</sub>e (All Sources)</b>	<b>114,610.50</b>				

(Urban Crossroads, 2023f, Table 3-7)

***Threshold b.: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

As previously stated, pursuant to § 15604.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project’s consistency with SB 32 and the County’s CAP are discussed below.



**□ Project Consistency with SB 32/2017 Scoping Plan**

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. Table 4.8-6, *Project Consistency with 2017 CARB Scoping Plan*, summarizes the project’s consistency with the 2017 Scoping Plan. As summarized in Table 4.8-6, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. Additionally, any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030.

**Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan**

Action	Responsible Parties	Consistency
<b>Implement SB 350 by 2030</b>		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources.
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. Although this measure is directed towards policymakers, the proposed Project would be designed consistent with CAP measure R2-CE1, which would generate on-site renewable energy of at least 20% of energy demand for commercial, office, industrial or manufacturing development for any proposed buildings that exceed 100,000 s.f. in size.
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. Although this measure is directed towards policymakers, the proposed Project would be designed consistent with CAP measure R2-CE1, which would generate on-site renewable energy of at least 20% of energy demand for commercial, office, industrial or manufacturing development for any proposed buildings that exceed 100,000 s.f. in size.
<b>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</b>		
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	Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
At least 4.2 million zero emission and plugin hybrid light-duty electric vehicles by 2030.		Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
Further increase GHG stringency on all light-duty vehicles beyond existing		Consistent. These are CARB enforced standards; vehicles that access the Project would be required to



**Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan**

Action	Responsible Parties	Consistency
Advanced Clean cars regulations.	Transportation	comply with the standards.
Medium- and Heavy-Duty GHG Phase 2.	(Caltrans), CEC, OPR,	Consistent. These are CARB enforced standards; vehicles that access the Project would be required to comply with the standards.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% 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 <sub>x</sub> standard.	Local Agencies	Not applicable. This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO <sub>x</sub> 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% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
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.”		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
<b>By 2019, adjust performance measures used to select and design transportation facilities</b>		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project	CalSTA, SGC, OPR, CARB, Governor’s Office	Not applicable. Although this is directed towards CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity on-site and in the Project area.



Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan

Action	Responsible Parties	Consistency
selection, etc.).	of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), 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	Not applicable. Although this measure is directed towards policymakers, the proposed Project would comply with AB 341, which sets a statewide policy that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020.  Additionally, the proposed Project would be required to have a recycling program and recycling collection. During construction, the proposed Project Applicant would be required to recycle and reuse construction and demolition waste per County solid waste requirements and regulations.
<b>Implement California Sustainable Freight Action Plan</b>		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	When adopted, 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.
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.		Not applicable. This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	When adopted, this measure would apply to all fuel purchased and used by the Project in the State.
<b>Implement the Short-Lived Climate Pollutant Strategy by 2030</b>		
40% reduction in methane and hydrofluorocarbon emissions below	CARB, CalRecycle,	When adopted, the Project would be required to comply with this measure and reduce SLPS





**Table 4.8-6 Project Consistency with 2017 CARB Scoping Plan**

Action	Responsible Parties	Consistency
2013 levels.	CDFA, SWRCB, Local Air Districts	accordingly.
50% reduction in black carbon emissions below 2013 levels.		Not applicable. This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
<b>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink</b>		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. This measure is not within the purview of this Project.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Not applicable. This measure is not within the purview of this Project.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Not applicable. This measure is not within the purview of this Project.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this Project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not applicable. This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA	Not applicable. This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this Project.



**Project Consistency with SB 32/CARB 2022 Scoping Plan**

The Project would not impede the State’s progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, and the Low Carbon Fuel Standard. As noted below, the Project also would be consistent with the Riverside County CAP (following mitigation). As such, the Project would not be inconsistent with the 2022 Scoping Plan, and impacts would be less than significant.

**Project Consistency with Riverside County CAP Update**

The County of Riverside approved the CAP Update on December 17, 2019. The CAP Update was designed under the premise that the County, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County’s jurisdiction, and that Riverside 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.

In order to evaluate consistency with the CAP, the County provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The County’s CAP currently evaluates and quantifies reductions out to Year 2030. The CAP 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 missions 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.” Thus, compliance with the CAP would serve to meet and support the reduction targets established Senate Bill 32 and the CARB 2022 Scoping Plan.

Pursuant to the CAP Update and associated Screening Tables, projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions below 2008 baseline levels) 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. Absent implementation of Screening Table Measures, the Project could be considered inconsistent with the County CAP. This is a potentially significant impact for which mitigation is required.

The CAP Update also includes measure R2-CE1, which requires on-site renewable energy production. This measure is required for any tentative tract map, plot plan, or conditional use permit that proposes to add more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development. Renewable energy production shall be onsite generation of at least 20 percent (%) of energy demand for commercial, office, industrial or manufacturing development. Future implementing developments within the Project site would be subject to compliance with measure R2-CE1 as a standard condition of approval, and thus the Project would not conflict with CAP Update measure R2-CE1.



#### 4.8.5 CUMULATIVE IMPACT ANALYSIS

As discussed in subsection 4.8.1, there is no evidence at this time that would indicate that the emissions from a project the size of the Project would directly or indirectly affect the global climate. As such, Project impacts due to GHG emissions are inherently cumulative in nature.

As discussed under the analysis of Threshold a., with implementation of the Primary Land Use Plan the Project would generate approximately 115,953.50 MTCO<sub>2</sub>e per year, and with implementation of the Alternative Land Use Plan the Project would generate approximately 114,610.50 MTCO<sub>2</sub>e/yr. As such, emissions from implementation of the Primary Land Use Plan or Alternative Land Use Plan would exceed the County of Riverside's numeric threshold of 3,000 MTCO<sub>2</sub>e/yr. As other cumulative developments similarly have the potential to exceed the CAP Update screening threshold of 3,000 MTCO<sub>2</sub>e/yr, the Project's impacts due to GHG emissions would be cumulatively considerable.

As discussed under the analysis of Threshold b., although the Project would not conflict with the 2017 or 2022 CARB Scoping Plans, the Project has the potential to conflict with the CAP Update in the event the Project fails to achieve a minimum of 100 points per the CAP Update screening tables. As other cumulative developments similarly have the potential to fail to achieve 100 points per the screening tables, the Project's potential impacts due to a conflict with the CAP Update would be cumulatively considerable.

#### 4.8.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Cumulatively-Considerable Impact. The Project would result in approximately 115,953.50 MTCO<sub>2</sub>e/yr under the Primary Land Use Plan and 114,610.50 MTCO<sub>2</sub>e/yr under the Alternative Land Use Plan; thus, the proposed Project would exceed the County's screening threshold of 3,000 MTCO<sub>2</sub>e/year. If the Project were to fail to achieve 100 points pursuant to the CAP Screening Tables, Project-related GHG emissions would have the potential to result in a significant cumulatively-considerable impact on the environment.

Threshold b.: Significant Cumulatively-Considerable Impact. The Project would be consistent with or otherwise would not conflict with the CARB 2017 Scoping Plan and the CARB 2022 Scoping Plan. However, the Project has the potential to conflict with the Riverside County CAP Update if the Project were unable to achieve 100 points pursuant to the CAP Screening Tables. This is evaluated as a cumulatively-considerable impact of the proposed Project.

#### 4.8.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.



The Project would be required to comply with all mandates imposed by the State of California and SCAQMD aimed at the reduction of GHG emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are listed below:

- Global Warming Solutions Act of 2006 (AB32).
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 100). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to achieve a target of 50% renewable resources 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 (kWh) 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.
- Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.

### **Mitigation**

- MM 4.8-1 Prior to approval of implementing development permit applications (i.e., plot plans, conditional use permits, etc.) and prior to building permit issuance, the Project Applicant shall demonstrate that appropriate building construction measures shall apply to achieve a minimum of 100 points per Appendix D to the Riverside County 2019 Climate Action Plan (CAP) Update. The conceptual measures anticipated for the Project are listed in Table ES-2 of the Project's Greenhouse Gas Analysis (GHGA), which is appended to this EIR as *Technical Appendix T*. The conceptual measures may be replaced with other measures as listed in the CAP Screening Tables (Appendix D to the CAP Update), as long as they are replaced at the same time with other measures that in total achieve a minimum of 100 points per Appendix D to the Riverside County CAP Update.
- MM 4.8-2 Pursuant to Riverside County Climate Action Plan Update Measure R2-CE1, prior to issuance of building permits, and in accordance with measure R2-CE1 of the County's Climate Action Plan (CAP) Update, future implementing building permits that involve more than 100,000 gross square feet of commercial, office, industrial, or manufacturing development shall be required to offset the energy demand through renewable energy production. Renewable energy production shall be onsite generation of at least 20% of energy demand for commercial, office, industrial or manufacturing development.



#### 4.8.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. The Riverside County CAP Update (November 2019) qualifies as a “Plan for the Reduction of Greenhouse Gas Emissions,” pursuant to State CEQA Guidelines § 15183.5(b). Pursuant to State CEQA Guidelines §§ 15064(h)(3) and 15130(d), a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. Additionally, and as discussed above in subsection 4.8.2, Tier 2 of the SCAQMD interim thresholds for GHG emissions indicates that if a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions. Implementation of Mitigation Measures MM 4.8-1 and MM 4.8-2 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables, and by requiring the Project to offset energy demands through renewable energy production. Accordingly, with implementation of Mitigation Measure MM 4.8-1, the Project would be fully consistent with the CAP Update and the Project’s cumulatively-considerable impacts due to GHG emissions would be reduced to less-than-significant levels.

Threshold b.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.8-1 would ensure that the proposed Project is fully consistent with the Riverside County CAP Update (November 2019) by requiring the Project Applicant to demonstrate that future implementing building permit applications have incorporated measures to achieve a minimum of 100 points pursuant to the CAP Update Screening Tables. With implementation of Mitigation Measure MM 4.8-1, Project impacts due to a potential conflict with the CAP Update would be reduced to less-than-significant levels.



## 4.9 HAZARDS AND HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a technical study that was prepared to determine the presence or absence of hazardous materials on the Project site under existing conditions. This report, entitled, “Phase I Environmental Site Assessment, Vacant Land, 307-070-003, -004, -005; 307-080-005, -006, -007, -008; 307-090-001, -002, -004, -005, -006; 307-100-001, -003, -004, -005; 307-110-003, -004, -007, -008; 307-220-001, -002; 307-230-019, -020, Perris, California 92571,” was prepared by Hillmann Consulting (herein, “Hillmann”), is dated April 10, 2019, and is included as EIR *Technical Appendix G* (Hillmann, 2019).

### 4.9.1 EXISTING CONDITIONS

#### A. Definition of Toxic Substances and Hazardous Waste

For purposes of this EIR, the term “toxic substance” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include: chemical, biological, flammable, explosive, and radioactive substances.

“Hazardous material” is defined as a substance which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, § 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency [USEPA] as capable of inducing systemic damage to humans or animals).

Certain wastes are called “Listed Wastes” and are found in the California Code of Regulations, Title 22, §§ 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

#### B. Historical Review, Regulatory Review, and Field Reconnaissance

Hillman performed a search of readily available environmental record sources. The search results are summarized below. The search radius for each data base was one mile from the Project site. Environmental Data Resources, Inc. (EDR) conducted a search for sites listed on various federal and state databases within one mile of the Project site. A detailed description of the results of the regulatory and historical records review is provided in the Project’s ESA (*Technical Appendix G*), and is summarized below.



## 1. *Historical Review*

Hillmann has conducted research in order to help identify the likelihood of past uses having led to Recognized Environmental Conditions (RECs) in connection with the Project site. Standard historical sources were sought by Hillmann in an attempt to document the past uses of the Project site as far back as it can be shown that the Project site contained structures; or from the time the Project site was first used for residential, agricultural, commercial, industrial or governmental purposes. (Hillmann, 2019, p. 12)

Hillmann reviewed historic aerial photographs of the Property online at [www.historicaerials.com](http://www.historicaerials.com). Based on this review, Hillmann determined that the Project site was used for agricultural activities as far back as 1938 and as recently as 1985. Agricultural activities on site are thought to have been discontinued on the site in the late 1980s, with no agricultural uses shown in aerial photographs between 1994 and present. Based on the historical aerials, it does not appear that any permanent structures have ever been constructed on site. (Hillmann, 2019, pp. 13-14)

The Property was historically developed for agricultural uses as early as 1938 until at least 1985. This use suggests the historical application of pesticides during this time, which could have accumulated in the shallow soils at that time. The Property remained as vacant land since the late 1980s. The former use of the property as agricultural land may have contributed to accumulated pesticides in the shallow soils and is considered to be a REC in connection with the Project site. (Hillmann, 2019, p. 15)

## 2. *Regulatory Records Review*

Hillmann obtained a regulatory database report, titled EDR Radius Map™ Report, from Environmental Data Resources of Shelton, CT. The report provided a search of standard environmental record sources in general accordance with the requirements of the American Society for Testing for Testing Materials (ASTM) E1527-13. Hillmann has reviewed the regulatory database report, and also has also reviewed the list of unmapped sites (a.k.a. “Orphan List” sites). Table 4.9-1, *Regulatory Database Search Results*, summarizes the results of the regulatory database search. The review of the database search results determined that the Project site is not identified on any of the databases searched by EDR, nor are any adjoining properties identified in regulatory databases. Detailed descriptions of the meaning and significance of the regulatory databases can be found in the regulatory database report in Appendix E to the Project’s Phase I ESA, which is included as EIR *Technical Appendix G*. (Hillmann, 2019, pp. 15-16)

As shown in Table 4.9-1, although the Project site and adjacent properties were not included in any of the regulatory database searches, there are properties within the required search radius that do occur on regulatory databases. These properties are summarized below.

- State/Tribal Hazardous Waste Sites: Six (6) State Hazardous Waste Sites (SHWS) listings were identified within a one-mile radius of the Project site on the EnviroStor database. The closest off-site listing identified as Preissman Ranch Elem/Mid (2100 Rider Street), is located approximately 3.8 miles to the west-northwest and is upgradient relative to the Project site. This is listed as a school investigation by the Department of Toxic Substances Control (DTSC) due to potential pesticide



contamination from previous agricultural uses. The current status is listed as “No Further Action” as of September 26, 2001. Based on the distance and the status, this facility is not considered a REC in connection to the Project site. Based on the distance and/or status, none of the other listings are considered RECs in connection with the Project site. (Hillmann, 2019, p. 17)

**Table 4.9-1 Regulatory Database Search Results**

Regulatory Database	Search Distance	Property Listed?	Adj. Properties Listed?	Total Listings Within Search Distance
Fed. NPL/Proposed NPL	1-mile	No	No	0
Fed. Delisted NPL	½-mile	No	No	0
Fed. SEMS	½-mile	No	No	0
Fed. SEMS-ARCHIVE	½-mile	No	No	0
Fed. RCRA CORRACTS	1-mile	No	No	0
Fed. RCRA TSD	½-mile	No	No	0
Fed. RCRA LQG	Site & Adj.	No	No	
Fed. RCRA SQG	Site & Adj.	No	No	
Fed. RCRA CESQG	Site & Adj.	No	No	
Fed. ENG Control List	Site	No		
Fed. INST Control List	Site	No		
Fed. ERNS	Site	No		
State/Tribal Hazardous Waste Site	1-mile	No	No	6
State/Tribal Landfill/Solid Waste	½-mile	No	No	0
State/Tribal Leaking Storage Tanks	½-mile	No	No	3
State/Tribal Registered Storage Tanks	Site & Adj.	No	No	
State/Tribal Eng. Control List	Site	No		
State/Tribal Inst. Control List	Site	No		
State/Tribal Voluntary Cleanup Sites	½-mile	No	No	0
State/Tribal Brownfields	½-mile	No	No	0
Supplemental Regulatory Databases	Site & Adj.	No	No	

(Hillmann, 2019, p. 16)

- **State/Tribal Leaking Storage Tanks:** Three (3) Leaking Underground Storage Tank (LUST) listings were identified within a ½-mile radius of the Project site. The closest off-site listing is identified as the Tava Development (12th Street), and is located approximately 4,440 feet to the east-southeast and is downgradient relative to the Project site. This site is listed on the LUST database due to impacts to soil with gasoline. The LUST case received regulatory closure on July 27, 1993. Based on the regulatory closure received, this site is not considered a REC in connection with the Project site. Based on the distance and/or status, none of the other listings are considered RECs in connection with the Project site. (Hillmann, 2019, p. 17)

Hillmann also reviewed adjoining and vicinity database sites to identify potential off-site sources of subsurface vapor encroachment. Vicinity database sites pertaining to non-petroleum product releases within 1,760 feet of the Project site in the up-gradient direction, 365 feet of the Property in the cross gradient direction, and 100 feet of the Property in the down gradient direction; and vicinity database sites pertaining to petroleum product





releases within 528 feet of the Property in the up-gradient direction, 165 feet of the Property in the cross gradient direction and 100 feet of the Property in the down gradient direction were reviewed to identify active contamination sites with the potential to affect subsurface vapor conditions at the Project site. The potential for vapor encroachment was considered in assessing whether or not a REC exists in connection with the Property when reviewing applicable sites within those distances. Hillmann did not identify sites with active petroleum or non-petroleum releases within the search criteria specified above that are considered to be RECs due to a risk of vapor encroachment. (Hillmann, 2019, p. 18)

Hillmann also reviewed the regulatory database report for listings on supplemental databases that were searched in addition to the Standard Environmental Record Sources. None of the other supplemental database listings identified by the regulatory database report are considered to be a REC in connection with the Project site. In addition, Hillmann consulted local agencies and available internet sources, and did not identify any RECs in connection with the Project site (Hillmann, 2019, p. 18)

### **3. *Site Reconnaissance***

The site reconnaissance conducted by Hillmann consisted of visual and/or physical observations of the Project site and improvements, adjoining properties as viewed from the Project boundaries, and the surrounding area based on visual observations from adjoining public thoroughfares. The Project site is characterized as undeveloped and overgrown with vegetation. The vicinity is characterized as undeveloped and agricultural land. Hillmann observed a buried water pipeline associated with the Eastern Municipal Water District (EMWD) at the north central portion of the Project site. Hillmann notes that additional buried pipelines may exist in other areas of the Project site. (Hillmann, 2019, p. 20)

The terrain of the Property appeared to be mostly flat with portions of a hill. Hillmann did not observe evidence of standing or pooling liquids on the Property. The Project site is undeveloped and there are no structures present. No obvious indication of past usage on site likely to have involved the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products was observed at the time of the site visit. No indication of past uses of the adjoining properties was noted at the time of the site visit. (Hillmann, 2019, pp. 20-21)

The following provides a summary of the site reconnaissance conducted by Hillmann with respect to specific hazardous substances and petroleum products:

- No drums were observed on the Project site at the time of the site reconnaissance.
- No unidentified containers suspected of containing hazardous substances or petroleum products were observed on the Project site at the time of site reconnaissance.
- No other hazardous substances or petroleum products were observed on the Project site at the time of site reconnaissance.
- No storage tanks for bulk petroleum or hazardous material storage were identified or reported to be present, and are not suspected to be present based on visual observations.



- No electrical or hydraulic equipment suspected of containing PCBs was identified at the Project site.
- No strong, unusual or pungent odors were noted on the Project site at the time of site reconnaissance.
- No standing water or pools of liquid likely to contain hazardous substances or petroleum products were observed at the Project site at the time of site reconnaissance.
- No interior stains or corrosion due to hazardous substance/petroleum products spills/releases were observed on the Project site.
- No floor drains or sump pits were noted at the Project site other than for storm water or sewage management.
- No evidence of exterior pits, ponds or lagoons was identified on the Project site in connection with waste treatment or disposal.
- No stained soil, pavement or stressed vegetation was observed at the Project site.
- Hillmann observed evidence of nuisance trash and debris dumped in various locations throughout the Project site. No evidence of recently deposited fill materials was observed at the Project site at the time of site reconnaissance.
- Storm water runoff generated on-site are discharged into a nearby catch basin or the southeast adjoining stream/creek. No other waste discharges were observed at the Project site.
- No indication of a septic system, well, or railroad spurs was noted on the Project site.

### **C. Airport Hazards**

The Riverside County Airport Land Use Commission (RCALUC) has jurisdiction over development in the Project area due to the proximity of the March Air Reserve Base (MARB), which is located approximately 4.6 miles northwest of the Project site. 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 (ALUC, 2014). A majority of the western, central, and southern portions of the Project site are located within the Airport Influence Area (AIA) for the March Air Reserve Base and are located within ALUCP Compatibility Zone E (RCIT, n.d.). No restrictions are identified by the ALUCP for Compatibility Zone E, other than prohibiting specific types of land uses that can create a hazard to flight (ALUC, 2014). However, proposed developments within the AIA per the MARB require review by the RCALUC.

#### **4.9.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, state, and local environmental laws and related regulations related to hazards and hazardous materials.



**A. Hazardous Materials Regulations and Plans**

**1. Federal Regulations**

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)**

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed. (EPA, 2020b)

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. (EPA, 2020b)

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA). (EPA, 2020b)

**Resource Conservation and Recovery Act (RCRA)**

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. (EPA, 2020c)

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program. (EPA, 2020c)



Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, n.d.)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement. (OSHA, n.d.)

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. (OSHA, n.d.)

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. (OSHA, n.d.)

Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. (EPA, 2019b)

In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states. (EPA, 2019b)



Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. (EPA, 2019c)

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons. (EPA, 2019c)

## 2. *State Regulations*

Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace. (OSHA, n.d.)



Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses. (OSHA, n.d.)

**California Hazardous Waste Control Law**

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA). (CA Legislative Info, n.d.)

**California Code of Regulations (CCR), Titles 22 and 26**

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22.” (DTSC, n.d.; DTSC, 2020)

**3. *Local Regulations***

**Riverside County Ordinance No. 651.5**

Riverside County Ordinance No. 651.1 is intended to implement, within the County of Riverside, the Hazardous Materials Release Response Plans and Inventory Law, Chapter 6.95 of the California Health and Safety Code (HSC), to establish a system for permitting businesses that handle hazardous materials, to enforce



minimum standards respecting such materials, and to designate the County of Riverside, Department of Environmental Health (DEH), as the administering agency (or Certified Unified Program Agency-CUPA) responsible for administering and enforcing Chapter 6.95 HSC. Ordinance No. 651.5 sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the DEH and to the Governor’s Office of Emergency Services. (Riverside County, 2019c)

***B. Airport and Aircraft Hazards Regulations and Plans***

***1. State Regulations***

**State Aeronautics Act**

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics (“Division”), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division’s first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that “protect the public interest in aeronautics and aeronautical progress.” (§ 21002) (CA Legislative Info, n.d.)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature’s intent for a State aviation program. Chapter two explains Caltrans’ role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation. (CA Legislative Info, n.d.)

**California Environmental Quality Act**

The operation of airports and aircraft is the responsibility of the Federal Aviation Administration (FAA), but the requirement to document potential hazards related to airports and air activities when a new project is proposed is contained in CEQA, specifically PRC Section 21096, which states: (CA Legislative Info, 2003)

*“(a) If a lead agency prepares an environmental impact report for a project situated within airport land use compatibility plan boundaries, or, if an airport land use compatibility plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with section 21674.5 of the Public Utilities Code*



*and other documents, shall be utilized as technical resources to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems.*

*(b) A lead agency shall not adopt a negative declaration for a project described in subdivision (a) unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.”*

### 4.9.3 BASIS FOR DETERMINING SIGNIFICANCE

Section IX of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to hazards and hazardous materials, and includes the following threshold questions to evaluate a project’s impacts due to hazards and hazardous materials (OPR, 2018a).

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 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?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- 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?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, are derived from Section IX of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact from hazards and hazardous materials if construction and/or operation of the Project would:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;*
- b. Create a significant hazard to the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*





- c. *Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan;*
- d. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- e. *Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public, or the environment;*
- f. *Result in an inconsistency with an Airport Master Plan;*
- g. *Require review by the Airport Land Use Commission;*
- h. *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; or*
- i. *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.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, which were revised to incorporate the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts due to hazards and hazardous materials. It should be noted that the issue of loss, injury, or death involving wildland fires is addressed separately in EIR Subsection 4.21, *Wildfire*.

**4.9.4 IMPACT ANALYSIS**

***Threshold a.:*** *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

***Threshold b.:*** *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Implementation of the Project would result in the construction and long-term operation of a light industrial and business park development with small areas of commercial retail. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment due to existing site conditions, construction activities, and long-term operation.

***Impact Analysis for Existing Site Conditions***

As indicated above under subsection 4.9.1.B, based on the Phase I ESA prepared by Hillmann (*Technical Appendix G*), and based on a review of historical documents, regulatory records, and site reconnaissance, the Project site is identified as having a potential REC due to the former use of the property as agricultural land,



which may have contributed to accumulated pesticides in the shallow soils. No other RECs were identified in relation to the Project site. Nonetheless, the Project site's potential to contain accumulated pesticides in the shallow soil represents a potentially significant impact of the Project for which mitigation would be required.

### ***Impact Analysis for Temporary Construction-Related Activities***

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be used on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA) and DTSC, as well as the Santa Ana Regional Water Quality Control Board (RWQCB) pertaining to water quality as discussed in Subsection 4.10, *Hydrology and Water Quality*. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. A less-than-significant impact would occur.

### ***Impact Analysis for Long-Term Operation***

The future occupants that would occupy the future buildings on site are not yet known. However, the future building occupant likely will include general warehousing, industrial, manufacturing, assembly, business park, commercial retail, and/or similar uses and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any businesses that occupy the proposed buildings on the Project site and that handle hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would require a permit from the Riverside County Department of Environmental Health (DEH) in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which 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. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is



to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the future buildings on the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. In addition, the Project would be required to comply with Riverside County Ordinance No. 651.5, which establishes specific requirements for the storage of hazardous materials and requirements for reporting and permitting the use, handling, storage, and transportation of hazardous materials.

With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

***Threshold c.: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?***

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would be required to be maintained along public streets that abut the Project site. Furthermore, improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of the Ramona Expressway and Nuevo Road. As part of the County's discretionary review process, Riverside County reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project site and that circulation on the Project site was adequate for emergency vehicles. Additional reviews would be conducted by Riverside County as part of future implementing discretionary applications (i.e., tentative tract maps, plot plans, etc.), as well as part of future grading and building permit applications, in order to ensure adequate emergency ingress and egress are adequately accommodated. Moreover, the Project would construct several major new roadways on site (i.e., Antelope Road and Orange Avenue), which would serve to improve emergency access in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

***Threshold d.: Would the Project emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

There are no existing or proposed schools within 0.25-mile of the Project site. However, the Lakeside Middle School is located approximately 0.38-mile northwest of the northwestern Project boundary, while the Sierra



Vista Elementary School is located approximately 0.50-mile west of the northwestern Project boundary. (Google Earth, 2018) Although these schools are located more than 0.25 mile from the Project site, the Project’s potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes that could adversely affect these schools or associated students has been conducted and is provided below.

As described above under the analysis for Thresholds a. and b., the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with emission, handling, or the routine transport of hazardous substances or materials to-and-from the Project site and impacts would be less than significant.

Although impacts would be less than significant with compliance to applicable federal, State, and local regulations, Mitigation Measure MM 4.9-2 is specified herein to ensure regulatory compliance, which requires the Project Applicant to provide a Hazardous Materials Business Emergency Plan (HMBEP) (if required by law) to the Superintendent’s Office and Facilities Office of the Val Verde Unified School District (VVUSD). Impacts would remain less than significant.

Refer to EIR Subsection 4.3, *Air Quality*, for analysis pertaining to human health risks associated with air pollutant emissions associated with the Project, including risks to the maximally exposed school child located within and further than one-quarter mile from the Project site. As concluded in EIR Subsection 4.3, the Project’s toxic air contaminant emissions (and their associated health risks) would be less than significant.

***Threshold e.: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Based on the results of the Project’s Phase I ESA (*Technical Appendix G*), the Project site is not located on any list of the lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Hillmann, 2019). Accordingly, no impact would occur.

***Threshold f.: Would the Project result in an inconsistency with an Airport Master Plan?***  
***Threshold g.: Would the Project require review by the Airport Land Use Commission?***  
***Threshold h.: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?***

The Project site is not located within the boundaries of any Airport Master Plans, and no impact due to an inconsistency with an Airport Master Plan would occur. As previously indicated, a majority of the western, central, and southern portions of the Project site are located within the Airport Influence Area (AIA) for the March Air Reserve Base (MARB) and are located within ALUCP Compatibility Zone E (RCIT, n.d.). Because



the Project site is partially located within the AIA for the MARB, the Project required review by the Riverside County Airport Land Use Commission (RCALUC). In accordance with the MARB ALUCP, the Riverside County ALUC Director reviewed the Project site for consistency with the ALUCP. Based on the result of the ALUC’s review, the Project was determined to be fully consistent with the March ARB ALUCP. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP.

Moreover, according to the MARB ALUCP, the “Risk Level” for land uses within Compatibility Zone “E” is considered “Low,” and indicates that these areas are within outer or occasionally used portions of flight corridors. Thus, the Project would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.

***Threshold i.: For a project within the vicinity of a private airstrip, or heliport, would the Project result in a safety hazard for people residing or working in the project area?***

There are no private airstrips or heliports within two miles of the Project site, and no such facilities are proposed as part of the Project. The nearest private airport facility is the Perris Valley Airport, which is located approximately 3.5 miles southwest of the Project site. However, according to the Riverside County ALUCP policy document, the Project site is not located within the AIA for the Perris Valley Airport, and also is not identified as being located within any of the Compatibility Zones for the Perris Valley Airport (ALUC, 2010, Map PV-1). Accordingly, the Project would not result in a safety for people residing or working in the Project area associated with private airstrips or heliports, and no impact would occur.

**4.9.5 CUMULATIVE IMPACT ANALYSIS**

Because the issue of hazards and hazardous materials tends to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of the Project site. A one-mile radius is appropriate for most of the thresholds identified herein because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials. With respect to cumulatively-considerable impacts to public airport facilities, the cumulative study area would include the Project site and surroundings, as well as other properties located within the AIA for the MARB.

As discussed under the analysis of Thresholds a. and b., the Project site is identified as having a potential REC due to the former use of the property as agricultural land, which may have contributed to accumulated pesticides in the shallow soils. Although site specific in nature, there is nonetheless a potential that other developments within the cumulative study area also could occur on soils contaminated by past agricultural use. Thus, the Project’s impacts due to potential pesticides that may occur in shallow soils on the Project site represents a cumulatively-considerable impact.

With respect to construction activities, the Project would be subject to compliance with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA and DTSC, as well as the Santa Ana RWQCB pertaining to water quality. Other cumulative developments similarly would be subject to applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials. As such, cumulatively-considerable impacts would be less than significant.



Similarly, under long-term operating conditions, future businesses on site that involve the storage or use of hazardous materials or substances would be subject to applicable federal, State, and local requirements related to hazardous materials. Other businesses within the Project's cumulative study area similarly would be required to comply with applicable federal, State, and local requirements related to hazardous materials. With mandatory regulatory compliance, along with mandatory compliance with Riverside County Ordinance No. 651.5 (or the applicable ordinances of other local agencies), potential hazardous materials impacts associated with long-term operation of the Project are determined to be less-than-cumulatively considerable.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area, and the Project construction activities are not anticipated to adversely affect operations of existing local roadways in the area, including Ramona Expressway and Nuevo Road. Moreover, the Project would construct several major new roadways on site (i.e., Antelope Road and Orange Avenue), which would serve to improve emergency access in the local area. Thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

There are no existing schools within one-quarter mile of the Project site, although the Lakeside Middle School is located approximately 0.38-mile northwest of the northwestern Project boundary, while the Sierra Vista Elementary School is located approximately 0.50-mile west of the northwestern Project boundary. (Google Earth, 2018) It is possible that other businesses could be proposed in the future within close proximity to these schools, and thereby could result in hazardous emissions or hazardous or acutely hazardous materials, substances, or waste. However, the Project and other cumulative developments would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. Although Project impacts would be less than significant with compliance to applicable federal, State, and local regulations, Mitigation Measure MM 4.9-2 is specified herein to ensure regulatory compliance, which requires the Project Applicant to provide a Hazardous Materials Business Emergency Plan (HMBEP) (if required by law) to the Superintendent's Office and Facilities Office of the Val Verde Unified School District (VVUSD). Other cumulative developments likewise would be required to prepare a HMBEP (as required by law). With implementation of the required mitigation (which merely requires compliance with applicable regulations and requirements), hazardous materials impacts to the nearby schools would be less than significant.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code § 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development of contaminated sites listed on regulatory databases.

Based on the result of the ALUC's review, the Project was determined to be fully consistent with the March ARB ALUCP. As such, the Project would result in less-than-significant impacts due to a conflict with the MARB ALUCP. Other cumulative developments within the MARB AIA similarly would require review by the ALUC, and would be subject to the conditions and requirements imposed by the ALUC as part of the required consistency determination. Accordingly, cumulatively-considerable impacts would be less than significant.



There are no private airstrips or heliports within two miles of the Project site, and no such facilities are proposed as part of the Project. As such, cumulatively-considerable safety impacts associated with private airstrips or heliports would not occur.

#### 4.9.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and b.: Significant Direct and Cumulatively-Considerable Impact. The Project site is identified as having a potential REC due to the former use of the property as agricultural land, which may have contributed to accumulated pesticides in the shallow soils. The Project site's potential to contain accumulated pesticides in the shallow soil represents a potentially significant impact of the Project on both a direct and cumulatively-considerable basis. Impacts associated with construction and operation of the Project would be less than significant.

Threshold c.: No Impact. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Additionally, there are no emergency response plans or emergency evacuation plans in effect in the local area. Improvements planned as part of the Project are not anticipated to adversely affect traffic operations in the local area, including along nearby segments of the Ramona Expressway and Nuevo Road. Moreover, the Project would construct several major new roadways on site (i.e., Antelope Road and Orange Avenue), which would serve to improve emergency access in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold d.: Less-than-Significant Impact. The Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within close proximity to two existing schools (Lakeside Middle School and Sierra Vista Elementary School), although both schools are located more than 0.25 mile from the Project site. However, impacts would be less than significant with compliance to applicable federal, State, and local regulations. Although impacts would be less than significant, mitigation has been identified herein to require preparation of a Hazardous Materials Business Emergency Plan (HMBEP) for future implementing uses, if required by law (refer to Mitigation Measure MM 4.9-2).

Threshold e.: No Impact. Based on the results of the Project's Phase I ESA (*Technical Appendix G*), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, no impact would occur.

Thresholds f., g., and h.: Less-than-Significant Impact. The Project would not result in an inconsistency with an Airport Master Plan, and impacts would be less than significant. The ALUC reviewed the Project and found that the Project would not conflict with the March ARB ALUCP. Therefore, impacts would be less than significant. Moreover, according to the MARB ALUCP, the "Risk Level" for land uses within Compatibility Zone "E" is considered "Low," and indicates that these areas are within outer or occasionally used portions of flight corridors. Thus, the Project would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant.



Threshold i.: No Impact. There are no private airstrips or heliports within two miles of the Project site, and no such facilities are proposed as part of the Project. No impact would occur.

#### 4.9.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- All future businesses operating on site would be subject to compliance with Riverside County Ordinance No. 651.1, which sets forth requirements for handling hazardous materials, requires a permit for handling certain types and quantities of hazardous materials, requires businesses to report their hazardous materials inventory, identifies different classifications of hazardous materials handlers, and requires reporting of spills or releases or threatened releases of a hazardous material to the Riverside County Department of Environmental Health (DEH) and to the Governor's Office of Emergency Services.
- The Project shall comply with Title 22, Division 4.5 of the California Code of Regulations, which requires residents and employees to dispose of household hazardous waste, including pesticides, batteries, old paint, solvents, used oil, antifreeze, and other chemicals, at a Household Hazardous Waste Collection Facility.
- The Project shall comply with Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which requires fluorescent lamps, batteries, and mercury thermostats be recycled or taken to a Household Hazardous Waste Collection Facility.

##### *Mitigation*

The following mitigation measure is identified to address potential pesticide contamination in on site soils:

- MM 4.9-1 Prior to issuance of any grading permits, the Project Applicant shall have prepared, and the Riverside County Planning Department shall review and approve, a Phase II Environmental Site Assessment (ESA). The Phase II ESA shall be prepared for all areas proposed for development with commercial retail, business park, and/or light industrial land uses. The purpose of the Phase II ESA is to evaluate the near-surface soils on site for evidence of contamination with pesticides. In the event that the results of the Phase II ESA determine that pesticide levels in site soils are below regulatory limits, then no further action is required. In the event that the Phase II ESA identifies levels of pesticide contamination that exceeds regulatory limits, then the Phase II ESA shall identify appropriate remediation measures, which may include, but may not be limited to, the removal of surficial soils and mixing with other on site soils, or disposal at a facility that is approved to handle contaminated soils. Future grading permits shall be conditioned to implement the attenuation measures identified by the Phase II





ESA, as appropriate. Prior to final grading inspection, the Project Applicant shall provide evidence that the remediation measures identified by the Phase II ESA have been completed as part of site grading activities to the satisfaction of Riverside County.

Although hazardous materials impacts to nearby schools would be less than significant with the Project Applicant's compliance to applicable federal, State, and local regulations addressing hazardous materials, the following mitigation measure is recommended to ensure regulatory compliance.

MM 4.9-2 Prior to the issuance of any new occupancy permit for a use/user within the proposed Project's buildings, and to the extent hazardous materials are planned to exist on-site and a Hazardous Materials Business Emergency Plan (HMBEP) is required by law, the Project Applicant shall provide a copy of its approved Emergency Response Plan to the Superintendent's Office and Facilities Office of the Val Verde Unified School District outlining how the building user(s) will prevent or respond to spills or leaks of hazardous materials related to its facility/facilities and use of the Project site. If so requested, the Project Applicant shall also meet with School District and Fire Department officials to discuss emergency response procedures as contained in the HMBEP for spills or leaks at the Project site in relation to the nearby school facilities. This measure shall be implemented under the supervision of the Riverside County Planning Department, with input from the Val Verde Unified School District Superintendent as appropriate. All meetings shall be documented and documentation shall be provided to the County Planning Department within 30 days of each meeting. Failure to abide by these procedures may be grounds for revocation of any plot plans or other discretionary approvals for specific warehouse uses on the Project site.

#### 4.9.8 SIGNIFICANT OF IMPACTS AFTER MITIGATION

Thresholds a. and b.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.9-1 would ensure that appropriate remedial measures are undertaken as part of future site grading activities to address soils on site that may be contaminated with pesticides that exceed regulatory limits. With implementation of the required mitigation, Project hazardous materials impacts due to existing site conditions would be reduced to less-than-significant levels.



## 4.10 HYDROLOGY AND WATER QUALITY

The following analysis is based on a study entitled “Preliminary Hydrology Analysis, Stoneridge Industrial” prepared by Hunsaker and Associates, Inc. (herein, “Hunsaker”) and dated August 2021. The Preliminary Hydrology Analysis is included in this EIR as *Technical Appendix H1* (Hunsaker, 2021a). Analysis in this Subsection also is based on a Preliminary Water Quality Management Plan (WQMP) titled “Project Specific Water Quality Management Plan,” prepared by Hunsaker and dated August 12, 2021. The WQMP is included in this EIR as *Technical Appendix H2* (Hunsaker, 2021b).

### 4.10.1 EXISTING CONDITIONS

#### A. Regional Hydrology

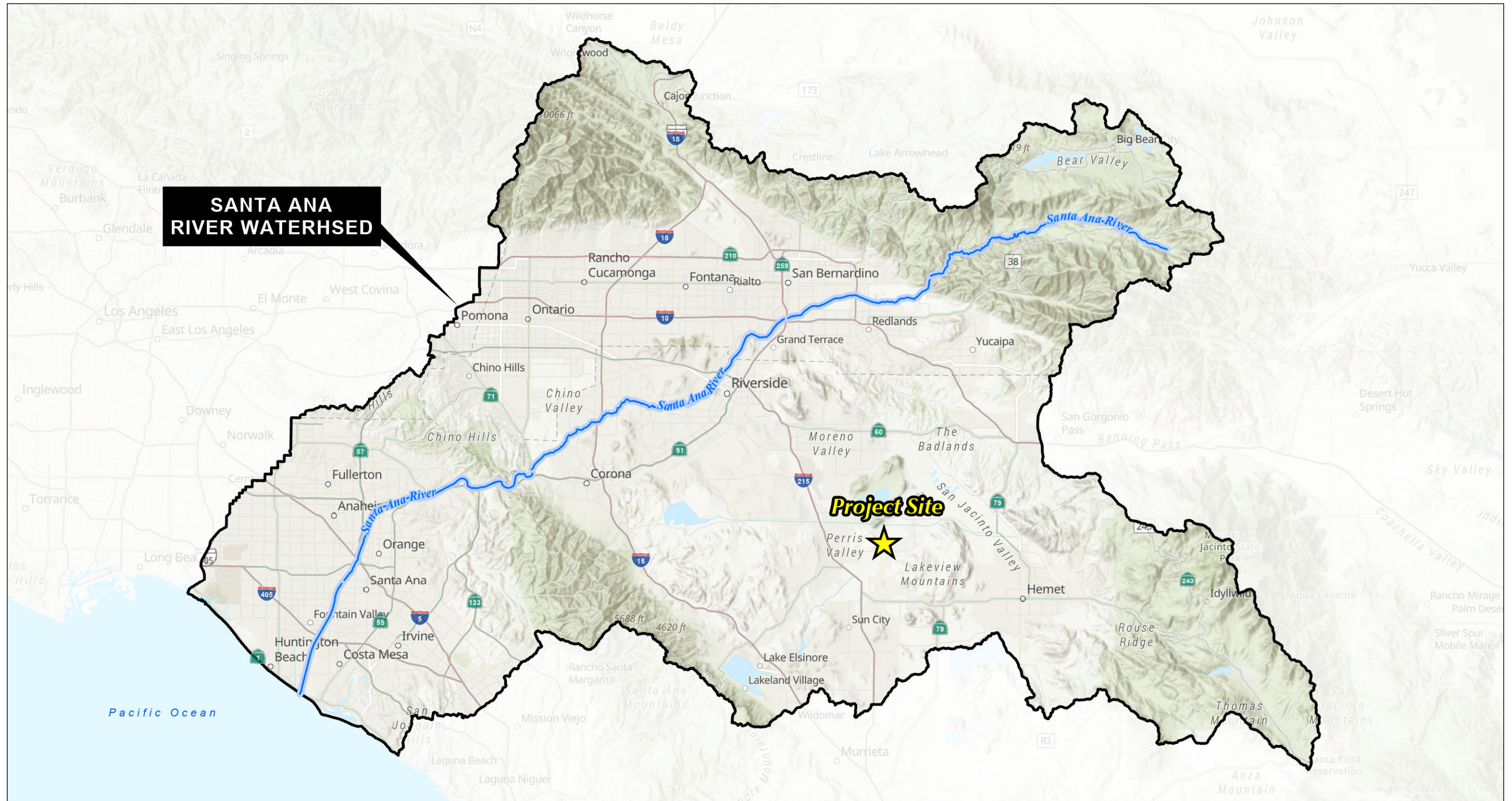
The Project site is located within the Santa Ana River watershed, which drains a 2,840 square-mile area and is the principal surface flow water body within the region. The Santa Ana River flows over 100 miles and drains the largest coastal stream system in Southern California. It discharges into the Pacific Ocean at the City of Huntington Beach. The total stream length of the Santa Ana River and its major tributaries is about 700 miles. (SAWPA, 2019, p. 4-1). The Project site’s location within the Santa Ana River Watershed is depicted on Figure 4.10-1, *Santa Ana River Watershed Map*. The Project site is located within the Lakeview Hydrologic Subunit Area within the Perris Hydrologic Area of the San Jacinto Valley Hydrologic Unit (RWQCB, 2019, p. 4-33).

#### B. Site Hydrology

Under existing conditions, a majority of the Project site is relatively flat, with a large hill form occurring along the western Project site boundary in the southern portion of the site. Runoff on the site and areas tributary to the site generally is conveyed in a west-to-east orientation towards the San Jacinto River, which is located immediately east of the Project site. The topography of the site is typical of the Perris Valley in that it exhibits gently rolling topography with elevations ranging from approximately 1,425 feet to 1,695 feet above mean sea level. (Hunsaker, 2021a)

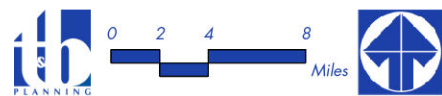
Under existing conditions, and as mapped by Hunsaker, the site includes three main Drainage Management Areas (DMAs) on site (DMAs “A” through “C”), with two off-site drainage basins tributary to the site (DMAs “D” and “E”), as depicted on Figure 4.10-2, *Existing Conditions Hydrology Map*. A description of these DMAs is provided below. (Hunsaker, 2021a, pp. 1-2 through 1-5)

- **Drainage Management Area “A”** encompasses approximately 89.6 acres, inclusive of the northeast portions of the Project site. Flows within DMA “A” are conveyed in a southeasterly direction from Ramona Expressway towards the San Jacinto River. Peak runoff from DMA “A” during 24-hour 100-year storm events is approximately 33.8 cubic feet per second (cfs).

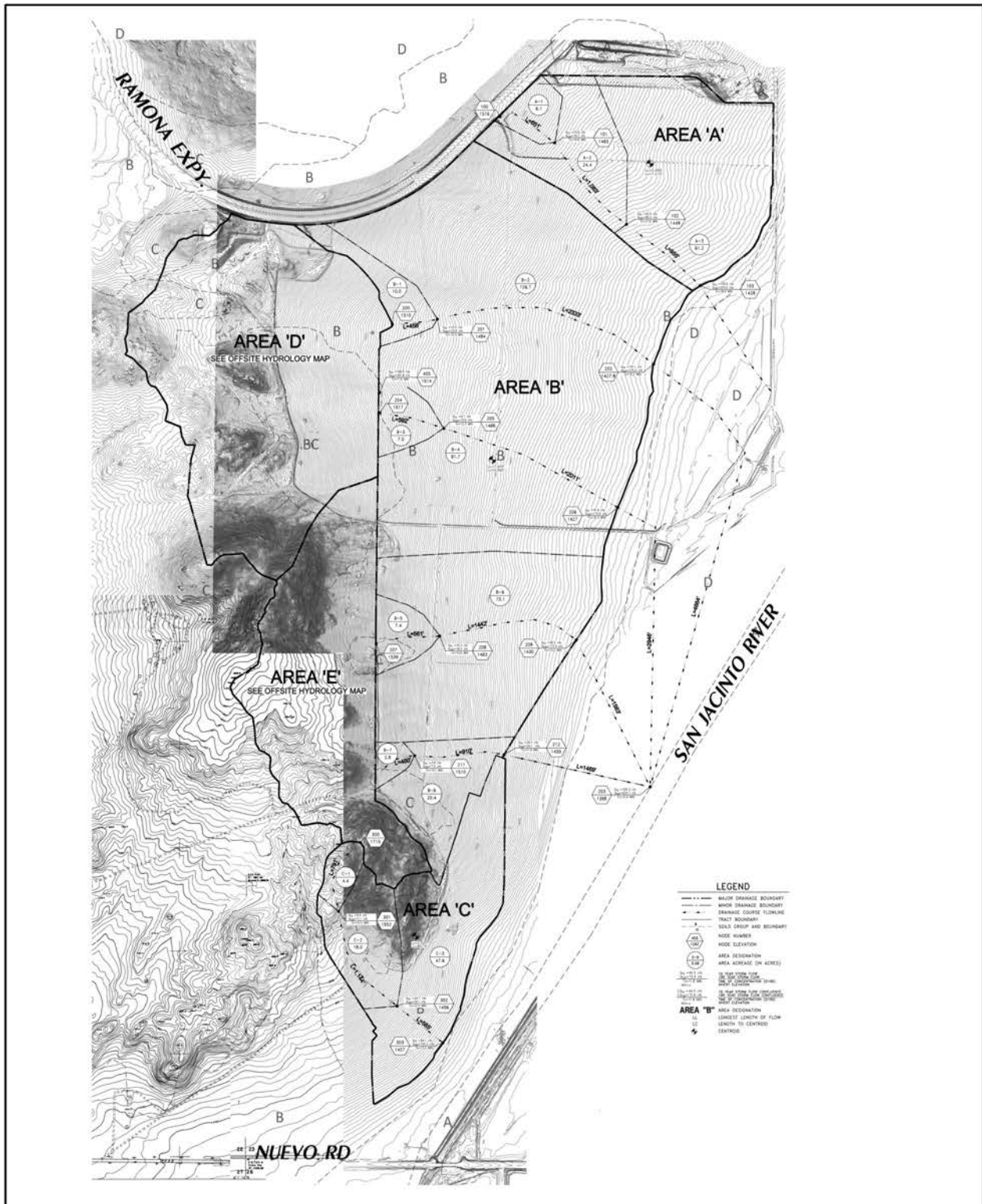


Source(s): ESRI, RCTLMA (2023)

Figure 4.10-1



**Santa Ana River Watershed Map**



Source(s): Hunsaker Engineering (06-29-2020)

Figure 4.10-2



Existing Conditions Hydrology Map



- **Drainage Management Area “B”** encompasses approximately 560.2 acres, including the northern and central portions of the Project site. Runoff within DMA “B” is conveyed in a generally west-to-east orientation from the western site boundary towards the San Jacinto River. Peak runoff from DMA “B” during 24-hour 100-year storm events is approximately 116.5 cfs.
- **Drainage Management Area “C”** encompasses approximately 53.0 acres, including the southern portions of the Project site. Runoff from DMA “C” is conveyed in a generally southeasterly direction towards the San Jacinto River. Peak runoff from DMA “C” during 24-hour 100-year storm events is approximately 27.3 cfs.
- **Drainage Management Area “D”** is located off site and encompasses approximately 143.87 acres. Runoff from DMA “D” is tributary to the northern portions of the Project site. Peak flowrates from DMA “D” are approximately 282.8 cfs.
- **Drainage Management Area “E”** is located off site and encompasses approximately 88.3 acres. Runoff from DMA “E” is tributary to the southern portions of the Project site. Peak flowrates from DMA “E” are approximately 206.8 cfs.

### **C. Flood Hazards**

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Nos. 06065C1435H and 06065C1445H, the eastern portions of the northern portions of the Project site, along with the southeast corner of the Project site, are located in a “Special Flood Hazard Area Subject to Inundation by the 1% Annual Chance Flood.” Specifically, these areas of the Project site, which primarily occur within proposed open space Planning Areas 10 and 11 of proposed SP 239A1, are located within Flood Zone “AE,” which encompasses floodplains where the base flood elevations have been determined. A small portion of proposed Planning Area 4 also occur within Flood Zone “AE.” (FEMA, 2014a; FEMA, 2014b) In addition, the areas on site that are located within mapped FEMA floodplains also are located within a potential dam inundation area associated with failure of the Lake Perris dam (Riverside County, 2019a, LNAP Figure 10)

### **D. Water Quality**

The Project site is located within the jurisdiction of the Santa Ana Basin Regional Water Quality Control Board (RWQCB). The receiving waters of flows from the Project site include the San Jacinto River, Canyon Lake, and Lake Elsinore, as indicated in Table 4.10-1, *Receiving Waters for Storm Water Runoff from the Project Site*. Of these receiving waters, the San Jacinto River is not listed as “impaired” in accordance with the Clean Water Act 303(d) list regulations, Canyon Lake is listed as being impaired by nutrients and pathogens, and Lake Elsinore is impaired by nutrients, organic enrichment/low dissolved oxygen, PCBs, and sediment toxicity. Impairment is typically associated with point and non-point sources of water pollutants including industrial discharge and agricultural operations, respectively. The beneficial uses of the receiving surface waters of the Project site are also summarized in Table 4.10-1. (Hunsaker, 2021b, p. 7)



**Table 4.10-1 Receiving Waters for Storm Water Runoff from the Project Site**

Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
San Jacinto River	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	N/A
Canyon Lake	Nutrients, Pathogens	MUN, AGR, GWR, REC1, REC2, WARM, WILD	N/A
Lake Elsinore	Nutrients, Organic Enrichment/Low Dissolved Oxygen, PCBs, Sediment Toxicity,	REC1, REC2, WARM, WILD	N/A

Notes: MUN = Municipal and Domestic Supply; AGR = Agricultural Supply; GWR = Groundwater Recharge; REC1 = Water Contact Recreation; REC2 = Non-contact Water Recreation; WARM = Warm Freshwater Habitat; and WILD = Wildlife Habitat.

(Hunsaker, 2021b, Table A.1)

**E. Groundwater**

According to Figure 6-2 of the 2020 Urban Water Management Plan (UWMP) prepared by the Eastern Municipal Water District (EMWD), a majority of the flatter portions of the Project site are located within the Lakeview Groundwater Management Zone (GMZ) of the West San Jacinto Groundwater Sustainable Agency (GSA) area, with a small portion of the extreme southern portions of the Project site located within the Perris South GMZ of the West San Jacinto GSA area. As such, development on site is subject to EMWD’s “West San Jacinto Groundwater Basin Groundwater Management Plan.” Under existing conditions, the Project site is vacant and undeveloped, and thus the Project site allows for groundwater infiltration under existing conditions. Depth to groundwater is estimated to be 63 feet below the existing grades in the southeastern (lowest) portion of the Project site. (EMWD, 2021, Figure 6-4; EMWD, 2021; LGC, 2019, p. 7)

**4.10.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations related to hydrology and water quality.

**A. Federal Regulations**

**1. Clean Water Act**

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have



a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020a)

## 2. *Federal Flood Insurance Program*

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards. (FEMA, 2002)

## 3. *Executive Order 11988 – Floodplain Management*

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions: (FEMA, 2020)

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

## B. *State Regulations*

### 1. *Porter-Cologne Water Control Act*

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- 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.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. 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 Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014) The Project site is located within the Santa Ana River Watershed, which is within the purview of the Santa Ana Regional Water Quality Control Board (RWQCB). The Santa Ana River Basin Plan (“Basin Plan”) is the governing water quality plan for the region.

## 2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The





California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, 2004)

Surface water quality is the responsibility of the Regional Water Quality Control Board (RWQCB), water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the 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 the reasonable protection of beneficial uses of water. (CA Legislative Info, 2004)

### 3. *California Toxics Rule (CTR)*

The California Toxics Rule (CTR) fills gap in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the 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. (SWRCB, 2016, pp. 14-15)

### 4. *Watershed Management Initiative (WMI)*

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. (SWRCB, 2017) The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups. (SWRCB, 2017)



## 5. Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability. (DWR, 2020)

### 4.10.3 BASIS FOR DETERMINING SIGNIFICANCE

Section X of Appendix G to the State CEQA Guidelines addresses typical adverse effects to hydrology and water quality, and includes the following threshold questions to evaluate the Project's impacts (OPR, 2018a):

- Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - *Result in substantial erosion or siltation on or off site;*
  - *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; or*
  - *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;*
- In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation; or
- Would the project conflict with or otherwise obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, are derived from Section X of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to hydrology and water quality if construction and/or operation of the Project would:

- a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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 surface;*
- 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; or*
- i. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on hydrology and water quality.

**4.10.4 IMPACT ANALYSIS**

- Threshold a.:*** *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- Threshold b.:*** *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- Threshold i.:*** *Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potable water service to the Project site would be provided by the EMWD, and the Project would not involve direct groundwater extraction via existing or proposed groundwater wells. Additionally, although the Project would result in a substantial increase in impervious surfaces on the site, the total amount of runoff from the site would be similar to existing conditions, and all runoff would be conveyed to downstream facilities where groundwater infiltration would continue to occur (i.e., the San Jacinto River, Canyon Lake, and Lake Elsinore). Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.



The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (“Basin Plan”), as most recently updated in June 2019 (RWQCB, 2019). In addition, a majority of the Project site is located within the Lakeview/Hemet North Groundwater Management Zone (GMZ) of the West San Jacinto Groundwater Management Plan Area, with a small portion of the extreme southern portions of the Project site located within the Perris South GMZ of the West San Jacinto Groundwater Management Plan Area. Thus, the Project is subject to the EMWD’s “Groundwater Management Plan – West San Jacinto Groundwater Basin” (EMWD, 2021). The Project’s consistency with each is discussed below.

### **Santa Ana Region Basin Plan**

The California Porter-Cologne Water Quality Control Act (§ 13000 (“Water Quality”) et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (as most recently updated in June 2019). This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3348. (RWQCB, 2019)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana Watershed and receiving waters for the property’s drainage are the San Jacinto River, Canyon Lake, and Lake Elsinore. Receiving waters listed on the Section 303(d) list include Canyon Lake and Lake Elsinore. Canyon Lake is currently impaired by nutrients and pathogens, while Lake Elsinore currently is impaired by nutrients, organic enrichment/low dissolved oxygen, PCBs, and sediment toxicity. The San Jacinto River currently is not listed as impaired. (Hunsaker, 2021b, p. 7)

Specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project’s potential to conflict with the Santa Ana Region Basin Plan during both construction and long-term operation.

### **Construction-Related Water Quality**

Construction of the proposed Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water



quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the County of Riverside, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Basin Plan. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, runoff associated with Project-related construction activities would not conflict with the Santa Ana Region Basin Plan requirements, and impacts would be less than significant.

#### **Operational Water Quality Impacts**

As noted above, receiving waters for the property's drainage are the San Jacinto River, Canyon Lake, and Lake Elsinore. Canyon Lake/Railroad Canyon Reservoir is currently impaired by nutrients and pathogens, while Lake Elsinore currently is impaired by nutrients, organic enrichment/low dissolved oxygen, PCBs, and sediment toxicity (Hunsaker, 2021b, p. 7). In order to assess the Project's potential for water quality impacts, Project-specific Hydrology and Water Quality Technical Appendices were prepared for the Project and are included as *Technical Appendices H1 and H2*, respectively.

To meet NPDES requirements, the Project's proposed storm drain system would be designed to route first flush runoff (i.e., the initial surface runoff of a rainstorm) to detention basins, landscaped areas, bioretention basins, or bio swales that would be constructed on the Project site. The future required detention basins, landscaped areas, bioretention basins, and/or bio swales would be designed to detain runoff and provide water quality treatment, and would reduce pollutants of concern in runoff leaving the Project site, such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash/debris, and oil/grease (Hunsaker, 2021b, p. 21). However, the required detention basins, bioretention basins, or bio swales, and other water quality features would be identified as part of future implementing development applications (i.e., tentative tract maps, plot plans, etc.), and the specific measures to address potential water quality impacts of the Project cannot be identified without specific development plans for the site. As such, a potentially significant impact could occur if future implementing developments do not include appropriate measures to treat runoff from the Project site for pollutants of concern for receiving waters. This represents a potential conflict with the Santa Ana Region Basin Plan; thus, prior to mitigation, impacts due to a conflict with the Basin Plan would be potentially significant.



### Groundwater Management Plan – West San Jacinto Groundwater Basin

The EMWD adopted the *Groundwater Management Plan – West San Jacinto Groundwater Basin (GMP)* on June 8, 1995, which is intended to manage the West San Jacinto Groundwater Basin (SJGB) in a manner that would supplement EMWD’s water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through MWD. The GMP covers approximately 256-square miles (over 164,200 acres) and has been divided into six (6) groundwater management zones. The Project site mostly is located in the Lakeview/Hemet North Groundwater Management Zone (GMZ) of the West San Jacinto Groundwater Management Plan Area, with a small portion of the extreme southern portions of the Project site located within the Perris South GMZ of the West San Jacinto Groundwater Management Plan Area.

EMWD adopted the GMP in June 1995 in accordance with Assembly Bill 3030 (AB3030), enacted in 1992, which is now codified in the California Water Code Sections 10750 through 10755. The GMP is intended to protect the vested interests of existing groundwater producers while providing a planning framework for new water supply projects for the benefit of groundwater producers and the public. The Management Plan goals include (EMWD, 2021, p. 13):

- Establishment of a Groundwater Basin Manager
- Monitoring of Groundwater Production
- Monitoring of Groundwater Level and Quality
- Development of Well Construction Policies
- Development of a Well Abandonment and Destruction Program
- Monitoring of Well Construction, Abandonment, and Destruction
- Groundwater Quality Protection
- Exchange of Agricultural and Other Non-potable Groundwater Production to Municipal Use
- Maximize Yield Augmentation with Local Resources – Local Runoff and Reclaimed Water
- Maximize Conjunctive Use
- Groundwater Treatment

There are no existing groundwater wells on the Project site, and the Project does not propose to construct any wells on site. As such, the Project would not directly extract groundwater, but would instead obtain potable water from the EMWD, which relies in part on groundwater resources. Accordingly, the Project only would have the potential to conflict with the West San Jacinto GMP if the Project were to obstruct infiltration of runoff into the groundwater basin, or if the Project were to contribute to or exacerbate existing water quality problems within the basin.

As noted above under the discussion of the Project’s consistency with the Santa Ana Region Basin Plan, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities.



The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that construction of the proposed Project does result in polluted runoff that could adversely affect water quality within the SJGB. Additionally, the total amount of runoff from the Project site during construction would not change substantially in relation to existing conditions, thereby continuing to allow for infiltration into the SJGB. Accordingly, during construction the Project would not conflict with the West San Jacinto GMP, and a less-than-significant impact would occur.

Following construction activities, infiltration on the Project site largely would be precluded and would be limited to landscaped areas, as remaining areas of the site would be covered with impervious surfaces (i.e., buildings, drive aisles, etc.). However, under existing conditions all runoff generated on and tributary to the Project site is conveyed directly or indirectly to the San Jacinto River. While a nominal amount of groundwater recharge may occur under existing conditions, the majority of runoff is conveyed to downstream facilities, which ultimately include unlined drainage channels and bodies of water (i.e., Canyon Lake and Lake Elsinore) wherein groundwater recharge occurs. These conditions would not substantially change under the proposed Project. Groundwater recharge would continue to occur downstream, as it does under existing conditions.

With respect to groundwater quality under long-term operations, the Project Applicant would be required to identify measures to reduce pollutants in runoff from the Project site pursuant to the applicable NPDES permit requirements. However, the specific measures that would be incorporated into future developments on site to address water quality cannot be determined without site-specific design, which would not be available until future applications for implementing permits and approvals (i.e., tentative tract maps, plot plans, etc.). Thus, the Project has the potential to contribute polluted runoff, which could adversely affect groundwater quality. This is evaluated as a potentially significant impact prior to mitigation due to a conflict with the West San Jacinto GMP.

***Threshold c.:*** *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?*

***Threshold f.:*** *Would the Project 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?*

As discussed above under the analysis of Thresholds a., b., and i., under long-term operating conditions the Project has the potential to result in substantial additional sources of polluted runoff. This is a significant impact for which mitigation would be required.

Under existing conditions, the Project site is relatively flat, with hill forms occurring along the western site boundary in the southern portions of the Project site. Runoff generally is conveyed in a west-to-east direction and discharges into the San Jacinto River, which is located immediately adjacent to the site’s eastern boundary. As previously shown on EIR Figure 3-7, *Conceptual Drainage and Water Quality Plan*, and EIR Figure 3-10,



*Conceptual Grading Plan*, the site’s topography generally would be maintained with development of the Project site as proposed, although drainage from on-site areas would be diverted to one of three proposed Primary Drainage Basins for detention and water quality treatment prior to flows being discharged to the San Jacinto River.

None of the improvements proposed as part of the Project would directly affect the course of any streams or rivers. While runoff from the Project site would be conveyed to the San Jacinto River, the San Jacinto River is a regional drainage corridor that has been designed to accommodate drainage with buildout of the Project vicinity. As such, the Project would not result in any direct impacts due to the alteration of the course of a stream or river, and impacts would be less than significant.

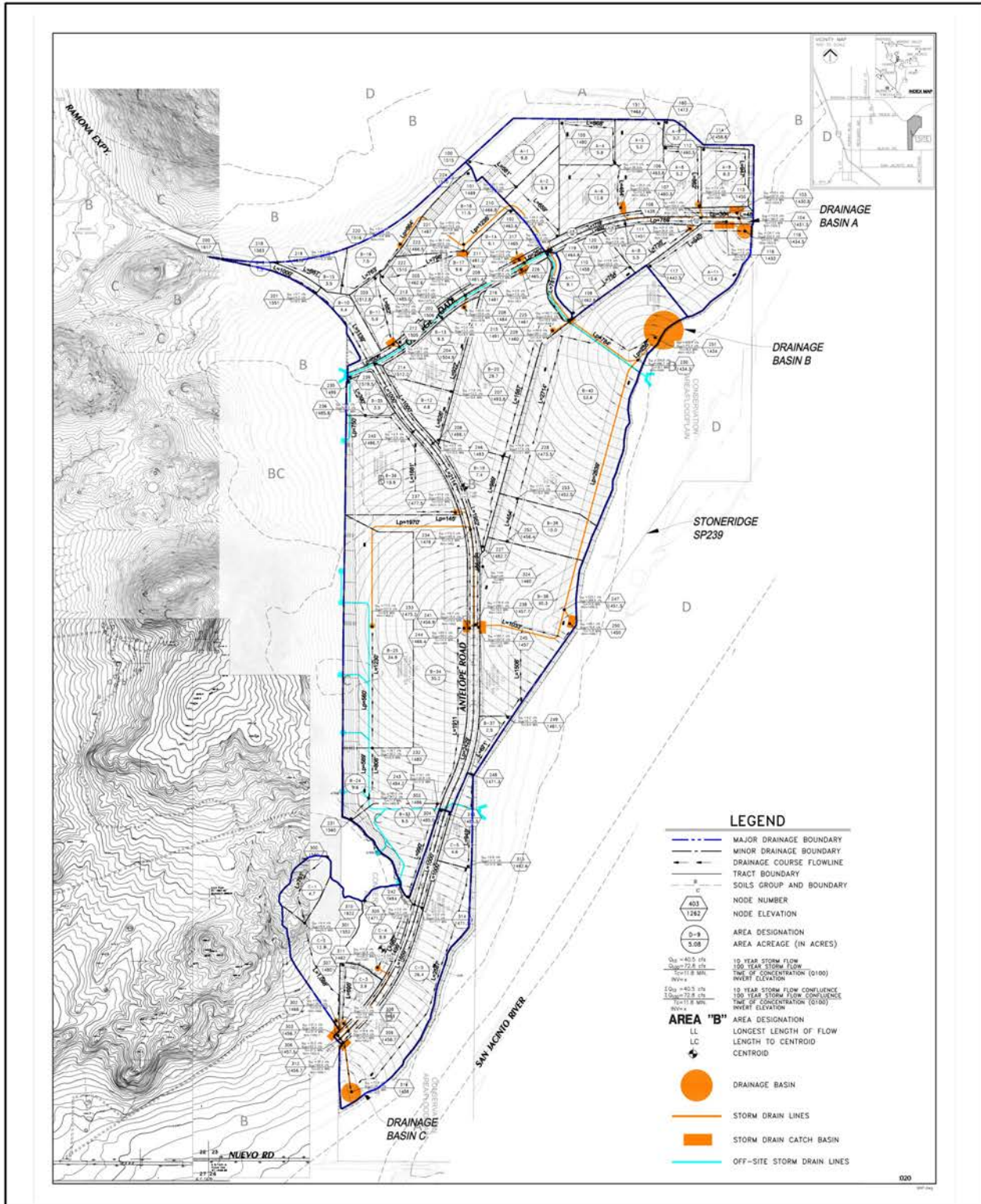
With respect to runoff from the site, runoff would occur within one of three on-site Drainage Management Areas (DMAs), consistent with existing conditions, as shown on Figure 4.10-3, *Proposed Conditions Hydrology Map*. Table 4.10-2, *Drainage Management Area “A” Peak Flow Rates (cfs)*, Table 4.10-3, *Drainage Management Area “B” Peak Flow Rates (cfs)*, and Table 4.10-4, *Drainage Management Area “C” Peak Flow Rates (cfs)*, present a comparison of the existing and proposed peak flow rates for DMAs “A,” “B,” and “C,” respectively, without consideration of the proposed detention and water quality features. As shown in Table 4.10-2, the Project would increase the peak flow rate and volume of storm water run-off within DMA “A,” with the largest peak flow rate increase occurring during the 10-year 1-hour storm event, where the anticipated flow rate would increase by 32.0 cfs, as compared to natural condition. As shown in Table 4.10-3, the Project would increase the peak flow rate and volume of storm water run-off within DMA “B,” with the largest peak flow rate increase occurring during the 100-year 3-hour storm event, where the anticipated flow rate increased by 216.2 cfs, as compared to natural condition. As shown in Table 4.10-4, the Project would increase the peak flow rate and volume of storm water run-off within DMA “C,” with the largest peak flow rate increase occurring during the 10-year 6-hour storm event, where the anticipated flow rate increased by 18.9 cfs, as compared to natural condition. (Hunsaker, 2021a, pp. 1-2 through 1-4)

**Table 4.10-2 Drainage Management Area “A” Peak Flow Rates (cfs)**

	10 YEAR			100 YEAR		
	Existing	Proposed	Mitigation Flowrate	Existing	Proposed	Mitigation Flowrate
<b>1 HOUR</b>	109.7	141.7	<b>32.0</b>	208.6	234.9	<b>26.3</b>
<b>3 HOUR</b>	57.7	82.6	<b>24.9</b>	117.6	132.4	<b>14.8</b>
<b>6 HOUR</b>	45.9	70.7	<b>24.8</b>	104.4	119.6	<b>15.2</b>
<b>24 HOUR</b>	3.3	24.7	<b>21.4</b>	33.8	43.3	<b>9.5</b>

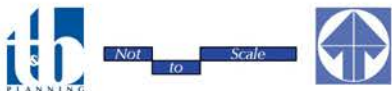
(Hunsaker, 2021a, p. 1-2)





Source(s): Hunsaker Engineering (December 2020)

Figure 4.10-3



Proposed Conditions Hydrology Map



**Table 4.10-3 Drainage Management Area “B” Peak Flow Rates (cfs)**

	10 YEAR			100 YEAR		
	Existing	Proposed	Mitigation Flowrate	Existing	Proposed	Mitigation Flowrate
1 HOUR	206.0	373.4	<b>167.4</b>	426.1	626.9	<b>200.8</b>
3 HOUR	145.3	361.5	<b>216.2</b>	317.0	421.9	<b>104.9</b>
6 HOUR	120.7	230.8	<b>110.1</b>	296.4	392.2	<b>95.8</b>
24 HOUR	17.0	88.6	<b>71.6</b>	116.5	154.9	<b>38.4</b>

(Hunsaker, 2021a, p. 1-3)

**Table 4.10-4 Drainage Management Area “C” Peak Flow Rates (cfs)**

	10 YEAR			100 YEAR		
	Existing	Proposed	Mitigation Flowrate	Existing	Proposed	Mitigation Flowrate
1 HOUR	94.1	105.6	<b>11.5</b>	173.8	174.9	<b>1.1</b>
3 HOUR	48.5	65.6	<b>17.1</b>	94.8	104.6	<b>9.8</b>
6 HOUR	38.8	57.7	<b>18.9</b>	84.1	96.8	<b>12.7</b>
24 HOUR	4.3	19.1	<b>14.8</b>	27.3	33.9	<b>6.6</b>

(Hunsaker, 2021a, p. 1-4)

Although the San Jacinto River improvements in the Project area have been designed to accommodate runoff from future development in the Project area, the anticipated increase in runoff from the Project site represents a substantial increase and could adversely affect the San Jacinto River. Additionally, the increase in runoff has the potential to exceed the capacity of existing and planned drainage infrastructure downstream. This is evaluated as a potentially significant impact, for which mitigation would be required.

***Threshold d.: Would the Project result in substantial erosion or siltation on-site or off-site?***

**A. Construction-Related Erosion Impacts**

As shown on EIR Figure 3-10, the Project has been designed to generally maintain the existing topography of the site, with modifications as necessary to accommodate site development and proposed drainage conditions. Nonetheless, construction of the proposed Project would involve substantial ground disturbance during clearing and grading of the site. In addition, on-site erosion could occur if graded slopes are not stabilized prior to ultimate development or landscaping. The proposed grading activities would generate silt which could



be carried off-site during a heavy rainfall event. Should such an event occur in the absence of any preventative measures to contain silt and other soils on-site, erosion and/or siltation downstream could result.

However, pursuant to requirements of the SWRCB, the Project Applicant would be required to obtain a NPDES permit for construction activities on-site. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction related activities. The SWPPP would specify BMPs to minimize the potential for erosion and siltation to occur and would include specific Project site measures to address the potential for the caving in of temporary excavations. Typical BMPs that are implemented at construction sites to protect water quality include the implementation of straw bale barriers, plastic sheeting/erosion control blankets, and outlet protection measures. With mandatory adherence to the SWPPP requirements, effects associated with construction-related erosion, siltation, water quality, and flooding on downstream water sources and flood control systems would be maintained at a level below significance.

**B. Post-Development Erosion Impacts**

Implementation of the proposed Project would result in the conversion of the site from undeveloped land to that of a master-planned development with light industrial, business park, and commercial retail uses. With development of the Project site, large portions of the Project site would consist of impervious surfaces, with areas of pervious surfaces largely confined to landscaped areas. Thus, the potential for erosion hazards on site would be substantially decreased as compared to existing conditions with buildout of the Project site. However, due to the increase in impervious surfaces on site, runoff from the site following development has the potential to contribute to erosion hazards downstream. As shown above in Table 4.10-2 through Table 4.10-4, with implementation of the Project runoff from the site would substantially increase. Although it is anticipated that future implementing developments on the Project site (e.g., tentative tract maps, plot plans, etc.) would incorporate measures, such as bioretention basins, landscape detention areas, and bioswales, to reduce the rate of runoff from the site, it cannot be assured that these measures would adequately attenuate the rate of runoff from the Project site. Accordingly, prior to mitigation, the Project has the potential to cause or contribute to erosion hazards downstream. This is evaluated as a potentially significant impact for which mitigation would be required.

**Threshold e.: *Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?***

**Threshold g.: *Would the Project impede or redirect flood flows?***

As previously indicated, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Nos. 06065C1435H and 06065C1445H, the eastern portions of the northern portions of the Project site, along with the southeast corner of the Project site, are located in a “Special Flood Hazard Area Subject to Inundation by the 1% Annual Chance Flood.” Specifically, these areas of the Project site are located within Flood Zone “AE,” which encompasses floodplains where the base flood elevations have been determined. (FEMA, 2014a; FEMA, 2014b) In addition, the areas on site that are located within mapped FEMA floodplains also are located within a potential dam inundation area associated with failure of the Lake



Perris dam (Riverside County, 2019a, LNAP Figure 10) A majority of areas on site within identified flood plains and dam inundation areas are proposed to be conserved as natural open space within proposed Planning Areas 10 and 11 of proposed SP 239A1. Areas planned for development with light industrial, business park, and commercial retail land uses largely occur outside of the flood hazard areas and dam inundation zones. However, a small portion of proposed Planning Area 4 of proposed SP 239A1, which is proposed for light industrial uses, occurs within the mapped floodplain. As such, development within Planning Area 4 has the potential to impede or redirect flood flows if future grading activities were to encroach into the floodplain, and this is evaluated as a significant impact for which mitigation would be required.

As shown above in Table 4.10-2 through Table 4.10-4, the Project would increase the peak flow rate and volume of storm water run-off within DMA “A” during the 10-year 1-hour storm event, where the anticipated flow rate would increase by 32.0 cfs, as compared to natural condition. The Project also would increase the peak flow rate and volume of storm water run-off within DMA “B” during the 100-year 3-hour storm event, where the anticipated flow rate increased by 216.2 cfs, as compared to natural condition. Additionally, the Project would increase the peak flow rate and volume of storm water run-off within DMA “C” during the 10-year 6-hour storm event, where the anticipated flow rate increased by 18.9 cfs, as compared to natural condition. (Hunsaker, 2021a, pp. 1-2 through 1-4) As such, runoff from the Project site following development has the potential to contribute to increased flood hazards downstream. This is evaluated as a potentially significant impact for which mitigation would be required.

***Threshold h.: In flood hazard, tsunami, or seiche zones, would the Project risk the release of pollutants due to Project inundation?***

The Project site is located approximately 37 miles northeast of the Pacific Ocean, and as such there is no potential for the Project site to be inundated with tsunamis. According to Figure 10 of the LNAP, the Project site is located within the dam inundation area for Lake Perris. However, the portions of the Project site that are subject to dam inundation largely would be conserved as natural open space within Planning Areas 10 and 11 of proposed SP 239A1. However, a small portion of proposed Planning Area 4 occurs within the dam inundation area for Lake Perris. According to an extensive study conducted by the State Department of Water Resources (DWR) in 2005, there were fears that an earthquake of magnitude 7.5 or larger could breach the dam (Riverside County, 2015, p. 4.11-18). The Perris Dam Modernization Project addresses seismic risks that could impact water deliveries and the safety of surrounding communities. In 2005, DWR began the Perris Dam Modernization Project with the seismic retrofit to the dam embankment. With the completion of the remaining project components in 2023, DWR will achieve its goal of upgrading its infrastructure to protect the water system and enhance public safety. (DWR, n.d.) As such, due to on-going improvements to the Perris Dam that will be completed in 2023, the Project site would not be subject to inundation hazards associated with the failure of the Perris Dam. Because the Project site would not be subject to inundation due to a failure of the Perris Dam, it also can be concluded that the Project site would not be subject to inundation due to seiches within Lake Perris. As such, in the event of a seiche occurring within Lake Perris, future development on site would not be subject to inundation that could risk the release of pollutants. While on-site areas mapped as being within the San Jacinto River floodplain primarily would occur within proposed Planning Areas 10 and 11 of proposed SP 239A1, a small portion of proposed Planning Area 4 of SP 239A1 occurs within the San



Jacinto River floodplain. As such, there is a potential that future development within Planning Area 4 could be subject to inundation during flood events, risking the release of pollutants due to Project site inundation. This is evaluated as a potentially significant impact for which mitigation would be required.

#### **4.10.5 CUMULATIVE IMPACT ANALYSIS**

The cumulative impact analysis considers construction and operation of the proposed Project in conjunction with other development projects in the vicinity of the Project site and resulting from full buildout of the Riverside County General Plan and the general plans of local jurisdictions that are located within the Santa Ana River watershed.

As discussed under the analysis of Thresholds a., b., and i., the Project would result in less-than-significant impacts to surface and groundwater quality during construction because the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Other cumulative developments within the cumulative study area also would be required to comply with the NPDES Municipal Stormwater Permit and would be required to implement BMPs during construction activities to preclude water quality impacts that could impair downstream waters or groundwater. As such, construction-related water quality impacts, as well as impacts due to a conflict with the Basin Plan and the West San Jacinto GMP, would be less-than-cumulatively considerable. With respect to long-term impacts to water quality, the Project does not involve any site-specific development, and as such specific measures that would be required in the future to address water quality are not known at this time. As such, there is a potential that water quality impacts to downstream waters and groundwater could occur in the absence of structural/treatment and non-structure/source control BMPs. Buildout of other developments within the cumulative study area also have the potential to result in adverse water quality impacts during long-term operations, which could contribute to impairments downstream or could adversely affect groundwater quality. Therefore, water quality impacts associated with long-term operation of the Project would be cumulatively-considerable prior to mitigation. Project-related water quality impacts also could result in a conflict with the Basin Plan or the West San Jacinto GMP, resulting in a cumulatively-considerable impact prior to mitigation.

As indicated under the analysis of Thresholds c. and f., the Project would not result in any direct effects to the course of any streams or rivers, and cumulatively-considerable impacts therefore would not occur. However, the Project has the potential to result in a substantial increase in runoff from the Project site as compared to existing conditions, which in turn could adversely affect streams and rivers downstream. Other developments in the cumulative study area also have the potential to increase the rate of runoff, which also could contribute to adverse effects to streams or rivers downstream or could exceed the capacity of existing and planned storm drainage systems. As such, Project impacts would be cumulatively-considerable and mitigation would be required to attenuate the rate of runoff from the Project site following development. The Project also has the potential to result in substantial additional sources of polluted runoff, as discussed above, and impacts would therefore be cumulatively considerable.



As discussed under the analysis of Threshold d., during construction the Project would be subject to compliance with the applicable NPDES permit, which requires the preparation and implementation of a SWPPP to address erosion hazards associated with construction activities. Other cumulative developments similarly would be required to prepare and implement a SWPPP. As such, erosion-related hazards during construction activities would be less-than-cumulatively considerable. However, due to the increase in impervious surfaces on site, runoff from the site following development has the potential to contribute to erosion hazards downstream. Other cumulative developments similarly have the potential to result in an increased rate of runoff, which in turn could contribute to erosion hazards downstream. Thus, the Project's impacts due to erosion under long-term operational conditions would be cumulatively considerable.

A small portion of proposed Planning Area 4 of proposed SP 239A1, which is proposed for light industrial uses, occurs within the mapped floodplain for the San Jacinto River. As such, the Project has the potential to impede or redirect flood flows. As other developments within the cumulative study area also have the potential to impede or redirect flood flows, Project impacts due to flood hazards would be cumulatively considerable. Additionally, with implementation of the Project runoff from the site would substantially increase. Other cumulative developments within the Project's watershed similarly have the potential to result in increased runoff. As such, runoff from the Project site following development has the potential to cumulatively contribute to increased flood hazards downstream. This is evaluated as a cumulatively-considerable impact for which mitigation would be required.

The Project site is not subject to inundation due to tsunamis, and the Project site is unlikely to be affected by seiches that may occur within Lake Perris. Thus, impacts due to inundation from tsunamis and seiches would be less-than-cumulatively considerable. With respect to flood hazards, a small portion of proposed Planning Area 4 of SP 239A1 occurs within the San Jacinto River floodplain. As such, there is a potential that future development within Planning Area 4 could be subject to inundation during flood events, risking the release of pollutants due to Project site inundation. As other developments within the cumulative study area similarly could have the potential for the release of pollutants due to flood hazards, the Project's impacts due to the potential release of pollutants during flood events would be cumulatively considerable.

#### **4.10.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION**

Thresholds a., b., and i.: Significant Direct and Cumulatively-Considerable Impact. The Project would be served potable water by the EMWD, and does not propose any groundwater wells on site; thus, Project impacts to groundwater supplies would be less than significant. Additionally, the total amount of runoff from the site would not change with Project development, and as such Project-related runoff would be conveyed to downstream facilities where groundwater recharge would continue to occur. Additionally, water quality impacts during construction, including potential impacts due to a conflict with the Basin Plan and the West San Jacinto GMP, would be less than significant. However, the specific design of measures to be incorporated in the future to address potential water quality impacts under long-term operational conditions are not known at this time, and would be identified as part of future implementing developments on site (i.e., tentative tract maps, plot plans, etc.). As such, in the absence of any specific measures to address water quality in site runoff, the Project has the potential to adversely affect surface and groundwater quality during long-term operations.



The Project's potential operational-related water quality impacts also could represent a conflict with the Basin Plan and West San Jacinto GMP.

Thresholds c. and f.: Significant Direct and Cumulatively-Considerable Impact. As discussed above under the analysis of Thresholds a., b., and i., under long-term operating conditions the Project has the potential to result in substantial additional sources of polluted runoff. This is a significant impact for which mitigation would be required. The Project would generally maintain the Project site's existing topography, and would not directly affect the course of any streams or rivers. However, it is anticipated that buildout of the Project would result in a substantial increase in peak runoff from the site as compared to existing conditions, in the absence of detention and water quality treatment facilities. As a result, Project-related runoff has the potential to indirectly affect the course of a stream or a river, and also has the potential to exceed the capacity of existing or planned drainage systems. This is evaluated as a significant impact for which mitigation would be required.

Threshold d.: Significant Direct and Cumulatively-Considerable Impact. Due to mandatory compliance with the applicable NPDES permit and associated requirement to prepare and implement a SWPPP during construction, construction-related impacts due to erosion or siltation would be less than significant. However, it is anticipated that buildout of the Project would result in an increase in the peak rate of runoff from the site. Although it is anticipated that future implementing developments on the Project site (e.g., tentative tract maps, plot plans, etc.) would incorporate measures, such as bioretention basins, landscape detention areas, and bioswales, it cannot be assured that these measures would adequately attenuate the rate of runoff from the Project site. Accordingly, prior to mitigation, the Project has the potential to cause or contribute to erosion hazards downstream. This is evaluated as a potentially significant impact for which mitigation would be required.

Thresholds e. and g.: Significant Direct and Cumulatively-Considerable Impact. According to mapping information available from the Federal Emergency Management Agency (FEMA), the portions of the Project site that are proposed for development with light industrial, business park, and commercial retail land uses primarily are located outside of mapped floodplains. However, a small portion of proposed Planning Area 4 of proposed SP 239A1, which is proposed for light industrial uses, occurs within the mapped floodplain. As such, development within Planning Area 4 has the potential to impede or redirect flood flows if future grading activities were to encroach into the floodplain, and this is evaluated as a significant impact for which mitigation would be required. Additionally, with implementation of the Project runoff from the site would substantially increase in the absence of measures such as bioretention basins, landscape detention areas, and bioswales. As such, runoff from the Project site following development has the potential to contribute to increased flood hazards downstream. This is evaluated as a potentially significant impact for which mitigation would be required.

Threshold h.: Significant Direct and Cumulatively-Considerable Impact. The Project site is not subject to inundation due to tsunamis. Although a portion of the areas proposed for development with light industrial uses as part of the Project occur within the mapped inundation area for the Lake Perris dam, the DWR is planning to complete improvements to the dam in 2023, which would attenuate the risk of dam failure. As such, the Project site would not be subject to inundation hazards associated with the failure of the Perris Dam.



Because the Project site would not be subject to inundation due to a failure of the Perris Dam, it also can be concluded that the Project site would not be subject to inundation due to seiches within Lake Perris.

While the portions of the Project site that are located within mapped floodplains and dam inundation areas associated with the Lake Perris dam primarily are proposed to be conserved as open space as part of SP 239A1, a small portion of proposed Planning Area 4 of SP 239A1 occurs within the San Jacinto River floodplain. As such, there is a potential that future development within Planning Area 4 could be subject to inundation during flood events, risking the release of pollutants due to Project site inundation. This is evaluated as a potentially significant impact for which mitigation would be required.

#### 4.10.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA’s definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of the Project’s NPDES permit, and the Project’s SWPPP. Compliance with the NPDES permit and the SWPPP would identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges.

##### *Mitigation*

MM 4.10-1 Prior to approval of any future implementing developments on site (i.e., tentative tract maps, plot plans, etc.), the Project Applicant or implementing developer shall prepare site-specific hydrology studies. The hydrology studies required for implementing developments shall be prepared in accordance with the Riverside County Flood Control and Water Conservation District (RCFCWCD) “Hydrology Manual,” and shall demonstrate that measures have been incorporated, such as bioretention basins, landscape detention areas, and bioswales, to attenuate runoff from the Project site in a manner consistent with RCFCWCD requirements. The future-required hydrology studies also shall demonstrate that runoff from the developed portions of the Project site would not exceed the capacity of existing or planned downstream drainage infrastructure. Measures identified by the hydrology studies shall be depicted on the development plans associated with future development applications (i.e., tentative tract maps, plot plans, etc.), and also shall be depicted on all future construction plans (e.g., grading permits). The hydrology studies for implementing developments shall be reviewed and approved by the RCFCWCD prior to approval of implementing developments within the Project site, and the future implementing developments shall be conditioned to implement the measures identified in the hydrology studies as necessary to attenuate the rate of runoff from the Project site as required by the RCFCWCD.





- MM 4.10-2 Prior to approval of any future implementing developments on site (i.e., tentative tract maps, plot plans, etc.), the Project Applicant shall prepare site-specific Preliminary Water Quality Management Plans (PWQMPs). The implementing Preliminary PWQMPs shall be prepared in accordance with the Santa Ana Regional Water Quality Control Board (RWQCB) requirements as set forth in the RWQCB's "Water Quality Management Plan for the Santa Ana Region of Riverside County," and shall identify appropriate Best Management Practices (BMPs) as necessary to address the Project's identified pollutants of concern. Measures identified by the PWQMPs shall be depicted on the development plans associated with future development applications (i.e., tentative tract maps, plot plans, etc.), and also shall be depicted on all future construction plans (e.g., grading permits). The PWQMPs for implementing developments shall be reviewed and approved by the RCFCWCD prior to approval of implementing developments within the Project site, and the future implementing developments shall be conditioned to implement the measures identified in the WQMPs as necessary to preclude substantial amounts of pollutants in runoff from the Project site.
- MM 4.10-3 Prior to issuance of grading permits that would encroach into areas mapped as subject to flood hazards by the Federal Emergency Management Agency (FEMA), the Project Applicant shall obtain a Conditional Letter of Map Revision (CLOMR) from FEMA to identify measures that will be undertaken to remove the areas proposed for development from the mapped floodplain on site. Prior to final grading inspection for any grading that would encroach into the mapped floodplain, the Project Applicant shall obtain a Letter of Map Revision (LOMR) from FEMA to verify that the Project site has been graded in such a manner as to remove areas planned for development with light industrial uses from areas subject to flooding hazards.

#### 4.10.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Thresholds a., b., and i.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.10-1 and MM 4.10-2 would ensure that hydrology studies and PWQMPs are prepared as part of future implementing developments (i.e., tentative tract maps, plot plans, etc.). The required PWQMPs would ensure that runoff from the Project site does not violate any water quality standards or waste discharge requirements, and that implementing developments do not otherwise substantially degrade surface or groundwater quality. Additionally, the future-required hydrology studies would ensure that runoff from the Project site is properly detained in order to avoid substantial increases in runoff that could cause erosion or flooding hazards downstream. Compliance with the required mitigation also would ensure that future implementing developments do not conflict with the Basin Plan or the West San Jacinto GMP. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Thresholds c. and f.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.10-1 and MM 4.10-2 would ensure that hydrology studies and PWQMPs are prepared as part of future implementing developments (i.e., tentative tract maps, plot plans, etc.). The future-required hydrology studies would be required to demonstrate that measures have been incorporated (e.g., bioswales, bioretention basins, etc.) to reduce the rate of runoff from the developed portions of the property in a manner consistent with RCFCWCD requirements, thereby ensuring runoff from the Project site does not exceed the capacity of



existing or planned drainage systems or adversely affect the course of a stream or river. The required PWQMPs also would ensure that runoff from the Project site is adequately treated for water quality pollutants prior to discharge from the Project site. Implementation of the required mitigation would reduce Project impacts to less-than-significant levels.

Threshold d.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.10-1 and MM 4.10-2 would ensure that hydrology studies and PWQMPs are prepared as part of future implementing developments (i.e., tentative tract maps, plot plans, etc.). Measures would be identified as part of the PWQMPs to reduce siltation within runoff from the Project site. The required hydrology studies would ensure that runoff from the Project site does not substantially increase with Project development, thereby reducing the Project's potential to result in erosion or siltation hazards to downstream areas. Thus, implementation of the required mitigation would ensure that the Project does not result in substantial erosion or siltation on or off site, and impacts would be reduced to less-than-significant levels.

Thresholds e. and g.: Less-than-Significant Impact with Mitigation. Implementation of Mitigation Measures MM 4.10-1 and MM 4.10-2 would ensure that hydrology studies and PWQMPs are prepared as part of future implementing developments (i.e., tentative tract maps, plot plans, etc.). The future-required hydrology studies would be required to demonstrate that measures have been incorporated (e.g., bioswales, bioretention basins, etc.) to reduce the rate of runoff from the developed portions of the property in a manner consistent with RCFCWCD requirements, thereby ensuring runoff from the Project site does not cause or contribute to flood hazards downstream. Implementation of Mitigation Measures MM 4.10-3 requires the Project Applicant to obtain a CLOMR and LOMR from FEMA to remove the portions of the Project site proposed for development with light industrial uses from mapped floodplains occurring on site. As part of the CLOMR and LOMR process, FEMA will evaluate the proposed changes to the floodplain to ensure that the planned improvements do not result in changes to mapped floodplains downstream. With approval of a CLOMR and LOMR, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and would not impede or redirect flood flows in a manner that could adversely affect downstream properties. Impacts would be reduced to less-than-significant levels.

Threshold h.: Less-than-Significant Impact with Mitigation. As noted above, implementation of Mitigation Measure MM 4.10-3 would ensure that the areas of the Project site that are proposed for development with light industrial uses are removed from the mapped floodplains and would ensure that future development is not subject to inundation during flood events. With implementation of the required mitigation, the Project would not risk the release of pollutants due to Project inundation, and impacts would be reduced to less-than-significant levels.



## 4.11 LAND USE AND PLANNING

This Subsection discusses consistency of the proposed Project with applicable land use and planning policies adopted by Riverside County and other governing agencies for the purpose of reducing adverse effects on the physical environment. This Subsection also addresses present and future land uses, zoning, and the physical arrangement of uses on the land. Information used to support the analysis in this Subsection was also obtained in part from the Riverside County General Plan (Riverside County, 2021a), the Riverside County Lakeview/Nuevo Area Plan (LNAP) (Riverside County, 2021b), and the Riverside County GIS database (RCIT, n.d.). Additionally, this Subsection relies in part on a separate analysis of the Project’s consistency with the Riverside County General Plan and LNAP, which is included as *Technical Appendix I* to this EIR. Refer to EIR Subsection 7.0, *References*, for a complete list of reference sources.

### 4.11.1 EXISTING CONDITIONS

#### A. Existing On-Site and Adjacent Land Uses

Under existing conditions, the 582.6-acre Project site consists of undeveloped land that was used for agricultural production as recently as the 1980s. There are no structures on site under existing conditions. A majority of the flatter portions of the Project site are routinely disced for fire abatement purposes, and contain several dirt pathways. In the western portions of the Project site is a portion of a large hill form with generally undisturbed vegetation. Several pedestrian pathways occur at the base of this hillside. The San Jacinto River, a channelized regional drainage facility, traverses the southeast corner of the Project site, while the northeastern portions of the site contain a portion of the San Jacinto River floodplain. (Google Earth, 2018)

To the west of the Project site are numerous large hill forms and undeveloped lands, beyond which are agricultural and rural residential land uses. To the west of the northwestern Project boundary are two existing schools (Lakeside Middle School and Sierra Vista Elementary School), beyond which is an existing master-planned residential community within the City of Perris. To the south of the Project site are undeveloped lands, the San Jacinto River, Ski Land Lake, agricultural uses, and scattered rural residential uses. Nuevo Road is improved along the site’s southern boundary to include one travel lane in each direction. To the east of the Project site are undeveloped lands and the San Jacinto River, beyond which are agricultural uses and scattered rural residential uses. To the north of the Project site are undeveloped lands and the Ramona Expressway, which is improved with one to two lanes in each direction along the site’s frontage. To the north of the Ramona Expressway are undeveloped lands, a large hill form, and the Lake Perris State Recreation Area, which includes Lake Perris. (Google Earth, 2018)

#### B. Existing On-Site and Surrounding Land Use Designations

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan. The Project site is located within the Lakeview/Nuevo Area Plan (LNAP) of the Riverside County General Plan, and is located within the boundaries of the Stoneridge Commerce Center Specific Plan (SP 239). As previously depicted on EIR Figure 2-4, the General Plan and LNAP designations for the site, which reflect the land use designations of the adopted SP 239, include “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High



Density Residential (VHDR),” “Open Space – Recreation (OS-R),” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water (OS-W)” land uses. The CC land use designation is intended to accommodate a combination of small-lot single family residences, multi-family residences, commercial retail, office, business park uses, civic uses, transit facilities, and recreational open space within a unified planned development area. The CR land use designation is intended to accommodate local and regional serving retail and services uses. The MDR land use designation allows for single-family residential development at a density range of 2 to 5 dwelling units per acre (du/ac). The MHDR land use designation allows for single-family attached and detached residences with a density range of 5 to 8 du/ac. The VHDR land use designation is intended to accommodate single-family attached residences and multi-family dwellings at densities between 14-20 du/ac. The OS-R designation is intended to accommodate recreational uses including parks, trails, athletic fields, and golf courses. The OS-C land use designation is intended to provide for the protection of open space for natural hazard protection, cultural preservation, and natural and scenic resource preservation. The OS-CH land use designation applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plan (MSHCP) and in accordance with related Riverside County policies. The OS-W land use designation includes bodies of water and natural or artificial drainage corridors. (Riverside County, 2021b, Table 1)

As also previously depicted on EIR Figure 2-4, lands to the west of the Project site are designated by the General Plan and LNAP for CC, “Rural Residential (RR),” MDR, MHDR, “Agriculture (AG),” OS-R, and OS-C land uses. Lands to the south of the Project site are designated for MDR, “Public Facilities (PF),” OS-W, and OS-CH. Lands to the east of the Project site are designated for MDR, OS-CH, and OS-W. Lands to the north of the Project site are designated for RR, MDR, PF, OS-C, and OS-CH. The RR land use designation allows for single-family residences with a minimum lot size of five acres, along with limited agricultural uses, recreational uses, compatible resource development (not including mineral resources extraction) and associated uses and government uses. The PF land use designation allows for civic uses such as County of Riverside administrative buildings and schools. The AG designation allows for agricultural uses including row crops, groves, nurseries, dairies, poultry farms, processing plants, and other related uses, and also allows single-family uses on minimum 10-acre lot sizes. (Riverside County, 2021b, Table 1)

**C. Existing On-Site and Surrounding Zoning Classifications**

The Riverside County Land Use Ordinance is intended to implement the Riverside County General Plan’s land use plan. Under existing conditions, the 582.6-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of the adopted SP 239. Thus, under existing conditions the Project site is subject to the zoning classifications established by the adopted SP 239, which conform to the General Plan, LNAP, and SP 239 land use designations applied to the site, as described above. (RCIT, n.d.)

Lands to the west of the Project site are zoned SP Zone (SP 246A3), “Rural Residential (R-R),” and “Light Agriculture, 20-acre Minimum Lot Size (A-1-20).” Lands to the south of the Project site are zoned for R-R and “Watercourse, Watershed & Conservation Areas (W-1).” Lands to the east are zoned R-R, “Residential Agricultural, 5-acre Minimum Lot Size (R-A-5).” Lands to the north are zoned for SP Zone, R-A-5, and “Controlled Development Areas (W-2).” (RCIT, n.d.)



***D. Applicable Land Use and Planning Policies***

***1. Riverside County General Plan***

The Riverside County General Plan is a policy document that reflects the County’s vision for the future of Riverside County. The General Plan was comprehensively revised in 2003 and most recently updated in 2019. The General Plan is organized into nine separate elements, including Land Use, Circulation, Multipurpose Open Space, Safety, Noise, Housing, Air Quality, Healthy Communities, and Administration. Each General Plan Element is instrumental to achieving the County’s long-term development goals. Each element contains a series of policies that guide the course of action the County must take to achieve the County’s vision for future development. (Riverside County, 2021a)

In addition, the General Plan divides the County into 19 Area Plans. The purpose of these Area Plans is to provide more detailed land use and policy direction regarding local issues such as land use, circulation, open space, and other topical areas. The Project site is located within the Lakeview/Nuevo Area Plan (LNAP) of the General Plan. The LNAP was most recently updated on April 16, 2019. The following section provides a summary of each General Plan Element, while the LNAP is discussed below in subsection 4.11.1.D.2. (Riverside County, 2021b)

***Land Use Element***

The General Plan Land Use Element functions as a guide to planners, the general public, and decision makers as to the ultimate pattern of development. The Land Use Element designates the general distribution, general location, and extent of land uses, such as housing, business, industry, open space, agriculture, natural resources, recreation, and public/quasi-public uses. These designations are reflected on the General Plan Land Use Map, which categorizes individual parcels of land into five basic categories (“Foundation Components”): Rural, Rural Community, Community Development, Agriculture, and Open Space. As reflected on the General Plan Land Use Map, the Land Use Element provides for a balanced mixture of land uses, including commercial, office, industrial, agriculture, and open space. For each of the various land use designations, the General Plan provides standards for residential density and non-residential intensity, and provides specific policies intended to ensure that product types, densities, and intensities respond to a multitude of market segments. The Land Use Element governs how land is to be utilized; therefore, many of the issues and policies contained in other plan elements are linked in some degree to this element. The Project site is currently located within an adopted Specific Plan that is located within the Community Development Foundation Component. The Project site is designated by the General Plan Land Use Plan for CC, CR, MDR, MHDR, VHDR, OS-R, OS-C, OS-CH, and OS-W land uses. The Project Applicant proposes a mixture of light industrial, business park, and commercial retail land uses; thus, a General Plan Foundation Component Amendment is not required for the proposed Project as the proposed light industrial, business park, and commercial retail land uses also fall under the Community Development Foundation Component. (Riverside County, 2021a, p. LU-1)



### *Circulation Element*

The purpose of the Circulation Element is to provide for the movement of goods and people, including pedestrians, bicycles, transit, train, air, and automobile traffic flows within and through the community. Efficient traffic circulation is important to economic viability and the creation and preservation of a quality living environment (Riverside County, 2021a, p. C-1). The Circulation Element designates future road improvements and extensions; addresses non-motorized transportation alternatives; and identifies funding options. The various roadway improvements and extensions contemplated by the Circulation Element are reflected on the General Plan Circulation Plan. The various roadway classifications depicted on the Circulation Plan correspond to specific roadway cross-sections, which provide specific standards for right-of-way widths, lane configurations, medians, and landscaping requirements. As previously shown on EIR Figure 2-10, *LNAP Circulation Plan*, the Riverside County General Plan and LNAP classifies the Ramona Expressway as an “Expressway (128’ to 220’ ROW),” while Nuevo Road is classified as an “Urban Arterial (152’ ROW).” Additionally, the General Plan and LNAP indicate Orange Avenue is planned to traverse the Project site in an east-west orientation, and classifies Orange Avenue as an “Arterial (128’ ROW)” roadway. The General Plan and LNAP also show Antelope Road traversing the Project site in a north-south orientation between Orange Avenue and Nuevo Road, and classifies this road as a “Major (118’ ROW)” roadway. An unnamed roadway also is planned between Orange Avenue and the Ramona Expressway, and is classified as an “Arterial (128’ ROW)” roadway by the General Plan and LNAP. Additionally, the proposed Mid-County Parkway (MCP) is identified as an “Expressway (128’ to 220’ ROW),” and is identified as part of a Community Environmental Transportation Acceptability Process (CETAP) East-West Corridor. (Riverside County, 2021b, Figure 7)

As previously shown on EIR Figure 2-11, *LNAP Trails and Bikeway System*, the General Plan Circulation Element and LNAP identify numerous planned trails on and adjacent to the Project site. A “Combination Trail (Regional Trail/Class I Bike Path)” is planned to traverse the southern and northeastern portions of the Project site. A “Community Trail” is planned to traverse the central portions of the Project site in a west-east orientation, with this trail continuing in a north-south alignment in the eastern portion of the site up to the northern site boundary, where it would connect to a proposed “Design Guidelines Trail.” The “Design Guidelines Trail” is planned along the southern alignment of the Ramona Expressway, and east along the northern Project boundary where it would connect to off-site portions of the Combination Trail (Regional Trail/Class I Bike Path). A “Regional Trail: Open Space” trail segment also is planned in the western portions of the site, primarily associated with the on-site hill form located in the southern portion of the site along the western Project boundary. (Riverside County, 2021b, Figure 8)

### *Multipurpose Open Space Element*

The Multipurpose Open Space Element addresses forms of open space in the County, including scenic, habitat, and recreation. This element has the purpose of addressing the protection and preservation of natural resources, agriculture, and open space areas; managing mineral resources; preserving and enhancing cultural resources; and providing recreational opportunities for the residents of Riverside County. The Multipurpose Open Space Element also contains figures that detail the locations of water



resources, vegetation communities, parks, forests, recreation areas, mineral resources, and cultural resources within the County. Together with the Multiple Species Habitat Conservation Plan (MSHCP), the Multipurpose Open Space Element seeks to preserve and protect identified open space areas in order to maintain or improve environmental quality. (Riverside County, 2021a, p. OS-1)

### ***Safety Element***

The Safety Element has the primary objective of reducing death, injuries, property damage, and economic and social impact of potential hazards within the County. The Safety Element serves to develop a framework by which safety considerations are introduced into the land use planning process; facilitate the identification and mitigation of hazards for new development; strengthen existing codes, project review, and permitting processes; present policies directed at identifying and reducing hazards in existing development; and strengthen earthquake, flood, inundation, and wildland fire preparedness planning and post-disaster reconstruction policies. Within the Safety Element, policies are presented which pertain to seismic, slope and soil instability; flood and inundation; fire safety; hazardous waste and materials; and disaster preparedness, response, and recovery hazards. (Riverside County, 2021a, pp. S-1 - S-2)

### ***Noise Element***

The purpose of the Noise Element is to identify sources of noise generation in the County and provide policies to ensure development does not expose people to unacceptable noise levels. The establishment of desirable maximum noise levels and implementation of noise regulations are also included as part of the Noise Element. The Noise Element provides a systematic approach to identifying and managing noise problems in the community; quantifies existing and projected noise levels; addresses excessive noise exposure; and directs community planning for regulation of noise. The Noise Element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to the protection of public health and welfare with respect to noise. (Riverside County, 2021a, p. N-3)

### ***Housing Element***

The 2017-2021 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2017, p. H-3)



*Air Quality Element*

The intent of the Air Quality Element is to provide background information on the physical and regulatory environment affecting air quality in the County. This element also identifies goals, policies, and programs that are meant to balance the County’s actions regarding land use, circulation, and other issues potentially affecting air quality. This element works in conjunction with local and regional air quality planning efforts to address ambient air quality standards set forth by the Federal Environmental Protection Agency (EPA) and the California Air Resources Board (CARB). The Air Quality Element sets ambient air quality standards for various air pollutants based on State and federal standards. The Element also contains policies regarding sensitive receptors, mobile and stationary pollution sources, energy efficiency and conservation, jobs and housing, and transportation. (Riverside County, 2021a, pp. AQ-3 - AQ-31)

*Healthy Communities Element*

The Healthy Communities Element provides a framework for translating the General Plan vision for a healthy Riverside County into reality by identifying policies aimed at achieving that vision. The Element addresses areas where public health and planning intersect, including transportation and active living; access to nutritious foods; access to health care; mental health; quality of life; and environmental health. This Element addresses overall health; land uses and community design; transportation system (with an emphasis on non-motorized transportation); arts and culture; social capital; complete communities; parks, trails, and open space; access to healthy foods and nutrition; healthcare and mental healthcare; schools, recreational centers, and daycare centers; and environmental health. (Riverside County, 2021a, pp. HC-1 - HC-12)

*Administration Element*

The Administration Element focuses on the administration of the General Plan, which is the sole responsibility of the County of Riverside, under the authority of the Board of Supervisors. Administration of the General Plan policies includes establishing, maintaining, and applying tools and procedures for interpreting the intent of the General Plan and applying the interpretation to a variety of circumstances. This Element details the vision for Riverside County, General Planning Principles, Countywide Elements and Planning Policies/Area Plan, Appendices of the General Plan, and other administrative topics. (Riverside County, 2021a, pp. AQ-1 - AQ-20)

**2. Lakeview/Nuevo Area Plan (LNAP)**

As noted above, the Project site is located within the Lakeview/Nuevo Area Plan of the Riverside County General Plan. The LNAP guides the evolving character of the area, and uses the County of Riverside General Plan vision to establish policies for development and conservation within the specific area of Riverside County. The LNAP provides a description of the location, physical characteristic, and special features, in addition to a Land Use Plan, policies, and exhibits to better understand the physical, environmental, and regulatory characteristics that comprise the area. Each section of the LNAP addresses critical issues facing the Lakeview/Nuevo community. The LNAP includes sections detailing the features, policy areas, land use, circulation, multipurpose open space, and hazards. (Riverside County, 2021b)





As shown on LNAP Figure 4, *Lakeview/Nuevo Area Plan and Policy Areas*, the Project site is located within the boundaries of adopted SP 239. Additionally, the southeastern corner of the Project site is located within the “San Jacinto River Policy Area,” while a very small portion of the extreme southeast corner of the Project site is located within the “2-4 DU/Acre Policy Area.” The intent of the “San Jacinto River Policy Area” is to reflect the fact that the land use designations may change as a result of implementing the proposed San Jacinto River Channelization Project, which is an ongoing process that had not been finalized when the LNAP was most recently updated in April 2019. The San Jacinto River Channelization Project would reduce the threat of flooding during a 100-year flood event and allow for increased development on adjacent lands. The “2-4 DU/AC Policy Area” is currently within the 100-year floodplain of the San Jacinto River, and its function is to restrict density from the maximum allowed by the Land Use Plan to four dwelling units per acre in order to minimize the impacts of a 100-year flood event on residents and their property. (Riverside County, 2021b, Figure 4 and pp. 20-21)

In addition, LNAP Figure 6, *Lakeview/Nuevo Ara Plan Mt. Palomar Night Time Lighting Policy Area*,” the Project site is located within Zone B of the Mt. Palomar Night Time Lighting Policy Area, indicating that land uses in the Project area are subject to compliance with Riverside County Ordinance No. 655 (Regulating Light Pollution). Additionally, LNAP Figure 9, *Lakeview/Nuevo Area Plan Scenic Highways*, indicates that the Ramona Expressway adjacent to the Project site is classified as a “County Eligible” scenic highway. (Riverside County, 2021b, Figures 6 and 9)

### **3. Riverside County Zoning Ordinance**

The Riverside County Land Use Ordinance is intended to implement the Riverside County General Plan’s Land Use Plan. Under existing conditions, the 582.6-acre Project site is zoned for “Specific Plan Zone (SP Zone),” indicating that the property is within the boundaries of SP 239 and is subject to the zoning classifications established by the adopted SP 239. Refer to subsection 4.11.1 for a more thorough discussion of the site’s existing zoning classifications. (RCIT, n.d.)

### **4. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)**

Riverside County has adopted a Multiple Species Habitat Conservation Plan (MSHCP), which is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP). The MSHCP promotes conservation of species and their associated habitats in Riverside County through implementation of several HCPs that affect lands within the County. The Western Riverside County MSHCP and the Coachella Valley MSHCP are the two dominant plans that impact the largest portions of the county. These plans coordinate multi-jurisdictional habitat-planning and conservation efforts in the region to promote biological and ecological diversity while accommodating the appropriate construction of new development and infrastructure projects. Riverside County catalogs acquisitions and conservation of lands with respect to the HCPs, and periodically updates the General Plan Land Use maps accordingly. (Riverside County, 2015, p. 4.2-27)

The Project site is located within the Western Riverside County MSHCP. As previously shown on EIR Figure 2-6, *MSHCP Cell Groups and Criteria Cells*, the eastern and southern portions of the Project site are located



within MSHCP Criteria Cells. The northeast portion of the Project site is located within Criteria Cell 2442 within Cell Group G of the MSHCP Lakeview/Nuevo Area Plan (LNAP), Criteria Cell 2547 within Cell Group F of the LNAP, and Criteria Cell 2651 within Cell Group E of the LNAP. The southern portions of the Project site are located within Criteria Cell 2762 within Cell Group D of the LNAP. In addition to conservation criteria within areas designated to be included within the MSHCP Reserve System, the MSHCP also identifies a number of additional survey and conservation requirements that apply to the Project area. Refer to EIR Subsection 4.4, *Biological Resources*, for a more thorough discussion of the MSHCP and the Project site's relationship thereto.

#### **5. *Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)***

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres. (Riverside County, 2015, p. 4.8-52)

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat (*Dipodomys stephensi*). Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' Kangaroo Rat HCP on May 6, 1996. To date, more than \$50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50% of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003. (Riverside County, 2015, p. 4.8-52)

Although the Project site is not targeted for conservation as part of the SKR HCP, the Project site is located within the SKR HCP fee area, which requires the payment of fees pursuant to Riverside County Ordinance No. 663.

#### **6. *Southern California Association of Governments (SCAG)***

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 (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops



long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. (SCAG, 2020a)

As an MPO and public agency, SCAG develops transportation and housing strategies that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as “Connect SoCal.” The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The RTP/SCS also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (ARB); these objectives were provided in 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, 2020d) The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The 2020-2045 RTP/SCS includes a Technical Appendix titled “Goods Movement” that is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region’s freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)

## **7. South Coast Air Quality Management District Air Quality Management Plan (SCAQMD AQMP)**

California Health & Safety Code § 40702 et seq., the California Clean Air Act, requires that an Air Quality Management Plan (AQMP) be developed and then updated every three years for air basins with non-attainment status. As discussed in EIR Section 4.3, *Air Quality*, the Project site is located in the South Coast Air Basin (SoCAB). The SoCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SoCAB into conformity with federal and State air quality standards. Air quality within the SoCAB is regulated by the SCAQMD and standards for air quality are documented in the SCAQMD’s 2016 AQMP. Although air quality in the SoCAB has improved over the past several decades, according to the SCAQMD, the SoCAB currently does not meet National Air Quality Standards (NAAQS) attainment status for ozone (O<sub>3</sub>) and particulate matter less than 2.5 microns (PM<sub>2.5</sub>). The



SoCAB's currently is considered non-attainment under the California Ambient Air Quality Standards (CAAQS) due to levels of ozone (O<sub>3</sub>), particulate matter < 2.5 microns (PM<sub>2.5</sub>), and particulate matter < 10 microns (PM<sub>10</sub>). (SCAQMD, 2017b)

The SCAQMD AQMP is a plan for the regional improvement of air quality. Projects such as the proposed Project relate to the air quality planning process through the growth forecasts that were used as inputs into the regional transportation model. If a proposed project is consistent with these growth forecasts, and if all available emissions reduction strategies are implemented as effectively as possible on a project-specific basis, then the project is consistent with the AQMP.

### **8. *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP)***

Within the State of California, Government Code Section 65302.3(a) requires that general plans, specific plans, and amendments must be consistent with the adopted airport land use plans adopted or amended pursuant to Section 21675 of the Public Utilities Code (PUC). The intent behind Comprehensive Land Use Plans for Airports within the County of Riverside is to protect and promote the safety and welfare of residents within the airport vicinity, as well as airport patrons. The land use plans are also intended to ensure the continued operation of the airports. Specifically, these plans seek to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures or activities encroach upon or adversely affect the use of navigable airspace. Implementation of the Comprehensive Land Use Plans promotes compatible urban development within an airport's vicinity and incompatible development is restricted; thus allowing for the continued operation of the airports. (RCALUC, 2004)

The Project site is located within the Airport Influence Area (AIA) of the March Joint Air Reserve Base (MARB) and is therefore subject to review and approval by the Riverside County Airport Land Use Commission (ALUC) for conformance to the Riverside County Airport Land Use Compatibility Plan Policy Document (ALUCP). The airport land use compatibility concerns of the ALUC (and the ALUCP) fall under two broad headings identified in state law: noise and safety. Land use compatibility within Airport Influence Areas is mapped as a series of Compatibility Zones (A thru E), with Compatibility Zone A being the closest to the runways and therefore restricting uses to those associated with airport operations and aeronautical activities, and Zone E being the furthest from airport operations and therefore the least restrictive. A majority of the Project site, except for the northeastern portions of the Project site, are located within the MARB AIA Compatibility Zone E. No restrictions are identified by the ALUCP for Compatibility Zone E, other than prohibiting specific types of land uses that can create a hazard to flight. (ALUC, 2014)

### **9. *Riverside County Good Neighbor Guidelines***

The Riverside County Board of Supervisors has adopted a "Good Neighbor' Policy for Logistics and Warehouse/Distribution Uses" (Good Neighbor Policy). The Good Neighbor Policy provides a framework through which large-scale logistics and warehouse projects can be designed and operated in a way that lessens their impact on surrounding communities and the environment. It is meant to apply Best Management Practices to help minimize potential impacts to sensitive receptors and is intended to be used in conjunction with the



County's Land Use Ordinance, which provides development requirements for said projects, and CEQA. The Good Neighbor Policy does not replace the need for preparation of the appropriate project-specific environmental review and application of any necessary measures that may arise out of that review. The Good Neighbor Policy provides a series of development and operational criteria that can be implemented to supplement project-level mitigation measures, in order to further reduce impacts related to logistics and warehousing development and operations. The policies are organized into specific categories, to address these potential quality of life issues from the initial design process, to construction, and through operations.

#### 4.11.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to land use and planning.

##### A. Federal Regulations

##### 1. *Clean Water Act*

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020a)

##### 2. *Federal Aviation Regulations Part 77*

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for: (FAA, 2020)

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation; and
- Charting of new objects.

Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace. Any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA: (FAA, 2020)



- Any construction or alteration exceeding 200 feet above ground level.
- Any construction or alteration:
  - within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 feet.
  - within 10,000 feet of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 feet.
  - within 5,000 feet of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad, or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location. (FAA, 2020)

Persons failing to comply with the provisions of FAR Part 77 are subject to Civil Penalty under Section 902 of the Federal Aviation Act of 1958, as amended and pursuant to 49 U.S.C. Section 46301(a). (FAA, 2020)

## ***B. State Regulations***

### ***1. Porter-Cologne Water Control Act***

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows: (SWRCB, 2014)

- 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.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management. (SWRCB, 2014)



The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. 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 Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions. (SWRCB, 2014)

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. (SWRCB, 2014)

## **2. California Water Code**

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. (CA Legislative Info, 2004)

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the 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 the reasonable protection of beneficial uses of water. (CA Legislative Info, 2004)

## **3. California Planning and Zoning Law**

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, §§ 65000 - 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and



counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures. (OPR, 2020)

#### **4. Subdivision Map Act**

The Subdivision Map Act (“Map Act”) vests in the cities and counties the power to regulate and control the design and improvement of subdivisions within its boundaries. Each city must adopt an ordinance regulating and controlling subdivisions for which the Map Act requires a tentative and final or parcel map. The authority for a city or county to regulate land use, including subdivisions, flows from the general police power. However, the Map Act sets forth certain mandates that must be followed for subdivision processing. A city can impose conditions on the subdivision process when the Map Act is silent, but it cannot regulate contrary to specific provisions contained in the Map Act. (Curtin, Jr. & Merritt, 2002, p. 1) The Map Act’s primary goals are:

- To encourage orderly community development by providing for the regulation and control of the design and improvement of the subdivision, with a proper consideration of its relation to adjoining areas;
- To ensure that the areas within the subdivision that are dedicated for public purposes will be properly improved by the subdivider so that they will not become an undue burden on the community; and
- To protect the public and individual transferees from fraud and exploitation. (Curtin, Jr. & Merritt, 2002, p. 1)

The Map Act is applied in conjunction with other state land use laws such as the general plan, specific plans, zoning, CEQA, and the Permit Streamlining Act. The Map Act provides for regulation of land divisions by a city or county and is interpreted and enforced by the city or county. (Curtin, Jr. & Merritt, 2002, p. 2)

#### **5. Office of Planning and Research (OPR) General Plan Guidelines**

Each city and county in California must prepare a comprehensive, long term general plan to guide its future. To assist local governments in meeting this responsibility, the Governor’s Office of Planning and Research (OPR) is required to adopt and periodically revise guidelines for the preparation and content of local general plans pursuant to Government Code § 65040.2. The General Plan Guidelines is advisory, not mandatory. Nevertheless, it is the state’s only official document explaining California’s legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice. (OPR, 2017b, p. 1)





## 6. State Aeronautics Act

The State Aeronautics Commission Act of 1947 created the Division of Aeronautics (“Division”), and was later amended by statute to read the State Aeronautics Act (Aeronautics Act) in 1961. As a result of this legislation, the Division’s first priorities are those mandated by the Aeronautics Act, then Caltrans guidance, then Division guidance as expressed through its Policy Element. As directed by the Aeronautics Act, the Division is a steward and advocate of aviation in California. To that end, its efforts are focused on activities that “protect the public interest in aeronautics and aeronautical progress.” (§ 21002) (CA Legislative Info, n.d.)

The Aeronautics Act itself is divided into six chapters, the first five of which have not received significant cleanup legislation since its enabling in 1947. The first chapter begins with general provisions and definitions and explains the Legislature’s intent for a State aviation program. Chapter two explains Caltrans’ role in administering the Division, and explains the role of the California Transportation Commission (CTC). Chapter three includes many of the safety considerations from Federal Aviation Administration (FAA) regulations that help keep airports and the surrounding communities safe and compatible with flight operations. Chapter four deals with airport and heliport permitting, air navigation facilities, noise guidelines, funding, and importantly, the formation and authority of Airport Land Use Commissions (ALUC). Chapter five covers the investigations and hearings on matters covered in the Aeronautics Act. Finally, Chapter six introduces airport planning and specifically introduces the intent of the CASP and how it can be used to support California aviation. (CA Legislative Info, n.d.)

### 4.11.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XI of Appendix G to the State CEQA Guidelines, as updated in December 2018, addresses typical adverse effects on land use and planning, and includes the following threshold questions to evaluate the Project’s impacts on land use and planning (OPR, 2018a):

- Would the project physically divide an established community; or
- Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XI of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the proposed Project would have a significant impact on land use and planning if construction and/or operation of the Project would:

- 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; or*
- b. *Disrupt or divide the physical arrangement of an established community (including a low-income or minority community).*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on land use and planning. It should be noted that the Project’s consistency



with the Western Riverside County MSHCP and the SKR HCP, which are the only habitat conservation plans or natural community conservation plans applicable to the Project site, is evaluated in EIR Subsection 4.4, *Biological Resources*, under the analysis of Threshold a., and the analysis concludes that impacts due to a conflict with the MSHCP and SKR HCP would be less than significant with mitigation. Project consistency with the MSHCP and SKR HCP is not further discussed in this Subsection.

**4.11.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project 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?***

The proposed Project has the potential to conflict with the Riverside County General Plan and LNAP, as well as the SCAG RTP/SCS. Future light industrial development within the Project site will be subject to compliance with the County’s Good Neighbor Policy; thus, the Project has no potential to result in a conflict with the Good Neighbor Policy, and further analysis of Project compliance is not necessary. Additionally, the Project’s consistency with the SCAQMD AQMP is addressed under EIR Subsection 4.3, *Air Quality*. Similarly, the Project’s consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Stephens’ Kangaroo Rat Habitat Conservation Plan (SKR HCP) are addressed in EIR Subsection 4.4, *Biological Resources*. In addition, the Project’s consistency with Riverside County’s Climate Action Plan (CAP) is addressed in EIR Subsection 4.8, *Greenhouse Gas Emissions*. As discussed in Subsection 4.3, the Project would result in significant and unavoidable impacts due to a conflict with the 2016 SCAQMD AQMP, which would result from the Project’s long-term operational emissions of ROGs and NO<sub>x</sub> and because the Project’s proposed land uses are not consistent with the growth forecasts included in the 2016 SCAQMD AQMP. As indicated in EIR Subsections 4.4 and 4.8, the Project would not conflict with the MSHCP, the SKR HCP, or the Riverside County CAP; thus, impacts due to a conflict with the MSHCP, SKR HCP, and CAP would be less than significant. The Project’s consistency with the SCAQMD AQMP, MSHCP, SKR HCP, and the County’s CAP is not further discussed below.

**A. Project Consistency with General Plan and LNAP**

**1. General Plan and LNAP Land Use Consistency**

Under existing conditions, the 582.6-acre Project site is located within the boundaries of the Stoneridge Commerce Center Specific Plan (SP 239). The General Plan and LNAP designate the property for “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space – Recreation (OS-R),” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water” land uses. The Project Applicant proposes a General Plan Amendment (GPA 190008) and the first amendment to Specific Plan No. 239 (SP 239A1) to change the site’s land use designations to instead include “Light Industrial (LI),” “Business Park (BP),” “Commercial Retail (CR),” “Open Space – Conservation (OS-C),” and “Open Space – Conservation Habitat” land uses. With approval of GPA 190008 and SP 239A1, the Project would be fully consistent with the General Plan and LNAP land use designations for the 582.6-acre property. Moreover, impacts associated with the proposed land uses have been evaluated



throughout this EIR. Where significant impacts are identified, mitigation measures are identified to reduce impacts to the maximum feasible extent. Based on the foregoing analysis, the proposed Project would not result in a significant environmental impact due to a conflict with any land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

**2. General Plan and LNAP Policy Consistency**

A General Plan Policies Consistency Analysis was prepared for the proposed Project in order to demonstrate the Project’s consistency with applicable General Plan Policies, and is included as *Technical Appendix I*. For more information regarding the Project’s consistency with specific applicable Riverside County General Plan and LNAP policies, please refer to *Technical Appendix I*. As concluded therein, the Project would not conflict with any of the applicable General Plan and LNAP policies adopted for the purpose of avoiding or reducing significant environmental effects. Accordingly, impacts due to a conflict with applicable General Plan or LNAP policies would be less than significant.

**B. Project Consistency with SCAG's 2020-2045 RTP/SCS**

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as “Connect SoCal.” The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in the RTP/SCS are pertinent to the proposed Project. These goals are meant to provide guidance for considering the proposed Project within the context of regional goals and policies. An analysis of the Project’s consistency with the relevant goals of the RTP/SCS is presented below in Table 4.11-1, *Analysis of Consistency with SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals*. As indicated the Project would not conflict with any of the RTP/SCS goals, and no impact would occur.

**Table 4.11-1 Analysis of Consistency with SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals**

RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
1.	Encourage regional economic prosperity and global competitiveness.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project would support this goal by providing employment-generating land uses (i.e., light industrial, business park, and commercial retail) in a portion of the County that has a low jobs-to-housing ratio.



**Table 4.11-1 Analysis of Consistency with SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals**

RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
2.	Improve mobility, accessibility, reliability, and travel safety for people and goods.	<u>Consistent.</u> EIR Section 4.18, <i>Transportation</i> , evaluates Project-related traffic impacts and specifies mitigation measures to reduce the Project’s impacts to the maximum feasible extent. The Project Applicant would implement local transportation improvements that would improve mobility, accessibility, reliability, and travel safety for people and goods in the local area.
3.	Enhance the preservation, security, and resilience of the regional transportation system.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. As disclosed in EIR Section 4.18, <i>Transportation</i> , there are no components of the proposed Project that would adversely affect the preservation, security, or resilience of the regional transportation system, and the Project Applicant would contribute fees towards regional improvements required in the Project vicinity. Furthermore, SP 239A1 requires roadway and intersection improvements consistent with the County General Plan Circulation Element, LNAP, and the Riverside County Road Standards (Ordinance No. 461).
4.	Increase person and goods movement and travel choices within the transportation system.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would expand facilities for goods movement in the local area, and would construct or contribute fees towards regional transportation improvements. Additionally, the intensity of the proposed Project would facilitate expanded transit service in the local area.
5.	Reduce greenhouse gas emissions and improve air quality.	<u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. The Project would entail development of light industrial, business park, and commercial retail uses in a portion of Riverside County that experiences a relatively low jobs-to-housing ratio; thus, the Project would serve to reduce worker commute times in the local area by providing jobs in close proximity to housing. Additionally, and as discussed in EIR Subsections 4.3, <i>Air Quality</i> , and 4.8, <i>Greenhouse Gas Emissions</i> , the Project would be required to implement mitigation measures to reduce air quality emissions to the maximum feasible extent.
6.	Support healthy and equitable communities.	<u>Consistent.</u> An analysis of the Project’s environmental impacts is provided throughout this EIR, and mitigation measures are specified where warranted. Air quality is addressed in EIR



**Table 4.11-1 Analysis of Consistency with SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals**

RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
		<p>Subsection 4.3, <i>Air Quality</i>, and mitigation measures are specified to reduce the Project’s air quality impacts to the extent feasible. Additionally, the Project would implement trails, sidewalk, and bike lane improvements along public roadway rights-of-way in a manner that is consistent with the County of Riverside General Plan. The Project study area is within the service area of the Riverside Transit Authority (RTA), a public transit agency serving various jurisdictions within Riverside County. The Project would not conflict with any existing or planned RTA routes. Additionally, and as discussed in detail in EIR <i>Technical Appendix I</i>, the Project would be consistent with or otherwise would not conflict with any applicable General Plan policies or requirements, including policies and requirements included in the General Plan’s Healthy Communities Element. Thus, the Project would facilitate the establishment of healthy and equitable communities.</p>
7.	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<p><u>Consistent.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. As indicated in EIR Subsection 4.8, <i>Greenhouse Gas Emissions</i>, the Project would be conditioned to ensure full compliance with the Riverside County Climate Action Plan (CAP), thereby demonstrating that the Project would assist the County in meeting its greenhouse gas (GHG) reduction targets. The Project also would be conditioned to construct and/or contribute fees towards improving the regional transportation network.</p>
8.	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<p><u>Not Applicable.</u> This policy provides guidance to the County to leverage new transportation technologies and data-driven solutions that result in more efficient travel. There are no components of the proposed Project that would preclude the County’s ability to implement this goal.</p>
9.	Encourage development of diverse housing types in areas that are supported by multiple transportation options	<p><u>Not Applicable.</u> This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive transportation planning efforts. The Project does not include any residential uses, and therefore has no potential to conflict with this goal.</p>



**Table 4.11-1 Analysis of Consistency with SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Goals**

RTP/SCS GOAL	GOAL STATEMENT	PROJECT CONSISTENCY DISCUSSION
10.	Promote conservation of natural and agricultural lands and restoration of habitats	<u>No conflict identified.</u> As part of the Project, a total of 99.0 acres of the Project site would be conserved as natural open space. As indicated in EIR Subsection 4.4, <i>Biological Resources</i> , the only sensitive vegetation communities that occur on site under existing conditions is Southern Riparian Scrub. The Project would result in impacts to 0.31 acre of Southern Riparian Scrub; however, impacts would be reduced to less-than-significant levels with implementation of EIR Mitigation Measure MM 4.4-1. Additionally, the Project site is designated by the Riverside County General Plan for future development with urban land uses, and therefore the Project site is not suitable for conservation as agricultural land.

(SCAG, 2020d)

**C. Land Use Compatibility**

The Project as evaluated herein would provide for the future development of the 582.6-acre Project site with a mixture of light industrial, business park, and commercial retail land uses. Under existing conditions, the Project site is surrounded by a mixture of undeveloped lands/open space and agricultural uses, with scattered low-density residential developments to the southeast and southwest, medium-density residential uses within the City of Perris to the west of the site, and two existing schools to the west (Avalon Elementary School and Lakeside Middle School). The Riverside County General Plan and LNAP designate areas east and south of the Project site for Medium Density Residential (MDR), Open Space Conservation Habitat (OS-CH), Open Space – Water (OS-W), Public Facilities (PF), and Rural Community – Low Density Residential (RC-LDR) land uses, while areas north of the site are designated for Open Space – Conservation (OS-C), MDR, PF, Rural Residential (RR), and OS-CH land uses. Areas to the west of the Project site are planned for a mixture of residential, commercial retail, schools, and open space areas pursuant to the McCanna Hills Specific Plan (SP 246). As such, the Project has the potential to result in significant environmental impacts due to the proximity of the Project’s proposed light industrial and business park uses to planned residential and school uses.

Impacts associated with the Project’s potential land use compatibility with surrounding uses have been evaluated throughout this EIR under the appropriate subject headings. For example, EIR Subsection 4.3, *Air Quality*, includes an assessment of potential localized air quality impacts that could result from Project implementation, including cancer and non-cancer risks associated with diesel-powered truck trips that would be generated by the Project. As concluded in EIR Subsection 4.3, the Project’s localized air quality impacts affecting surrounding sensitive receptors, including residential and school uses, would be less than significant. EIR subsection 4.9, *Hazards and Hazardous Materials*, includes an analysis of potential hazardous materials impacts that could affect surrounding land uses, and demonstrates that with mandatory regulatory compliance and implementation of mitigation measures, impacts associated with hazards and hazardous materials would be reduced to less-than-significant levels. EIR Subsection 4.13, *Noise*, includes an assessment of potential



noise impacts associated with the Project, including noise from construction, site operations, and Project-related traffic, and concludes that with mitigation, Project impacts would be less than significant, although Project-related traffic noise could be significant and unavoidable if affected landowners do not allow for the construction of a noise wall along Ramona Expressway south of Rider Street. However, this is true of virtually any development of the large currently vacant/undeveloped Project site, regardless of the proposed use, and therefore is not indicative of land use inconsistency. There are no environmental effects to surrounding existing or planned land uses that have not already been evaluated throughout this Program EIR, and where necessary mitigation measures have been imposed on the Project to reduce potential impacts to the extent feasible.

Furthermore, the Project would be subject to compliance with the County's "Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses (Good Neighbor Policy). The Good Neighbor Policy includes a number of requirements intended to reduce impacts associated with logistics and warehouse/distribution uses on surrounding land uses, particularly residential land uses. The Good Neighbor Policy applies to any logistics and warehouse project that include any building larger than 250,000 square feet (s.f.) in size. Although the precise configuration and size of proposed buildings would be determined in the future as part of future implementing discretionary actions (e.g., tentative parcel maps, plot plans, conditional use permits, etc.), it is expected that a majority of buildings to be constructed on site would exceed 250,000 s.f. in size and thus would be subject to the Good Neighbor Policy requirements. These requirements include, but are not limited to, the following:

- An air quality study, health risk assessment, noise impact analysis, and construction traffic control plan shall be prepared;
- During construction, all heavy-duty haul trucks accessing the site shall have CARB-approved 2010 engines or newer approved CARB engine standards;
- During construction, all excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be CARB Tier 3 Certified engines or better;
- During construction, the maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day;
- During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts;
- Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet away from the property line of sensitive receptors, measured from the dock building door (this distance may be reduced the site design include berms or other similar features to appropriately shield and buffer the sensitive receptors);
- Warehouse/distribution facilities shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors;
- Driveways shall be placed, to the maximum extent practicable, on streets that do not have fronting sensitive receptors adjacent to the Project site;
- Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced at no less than 50 feet on center;



- Dock doors shall be located where they are not readily visible from sensitive receptors or major roads, or must be screened from public view through a combination of landscaping, berms, walls, or other similar features;
- To the extent possible, establish separate entry and exit points within a warehouse/distribution facility for trucks and vehicles to minimize vehicle/truck conflicts;
- Facility operators shall maintain records of their fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks (“MHDT”) and Heavy-Heavy Duty Trucks (“HHD”) accessing the site use year CARB 2010 or newer engines;
- Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks;
- Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and avoid traveling through local residential communities;
- Facility operators shall require their drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets;
- If a public address (PA) system is being used in conjunction with a warehouse/distribution facility operation, the PA system shall be oriented away from sensitive receptors and the volume set at a level not readily audible past the property line;
- Facility Operation shall comply with the exterior noise decibel levels as required by Ord. 847 (Noise Ordinance), which includes a maximum exterior decibel level of 55 dba (between 7:00 a.m. and 10:00 p.m.) and 45 dba (between 10:00 p.m. and 7:00 a.m.) as measured on adjacent occupied residences, or as modified by the most current version of Ordinance No. 847; and
- The applicant for any new facility may be required to provide a supplemental funding contribution, which would be applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures.

With mandatory compliance with the County’s Good Neighbor Guidelines, in addition to implementation of the measures described above to address other environmental issues (e.g., air quality, etc.), the Project’s potential impacts due to land use compatibility would remain less than significant.

***Threshold b.: Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?***

Under existing conditions, the Project site is undeveloped and contains no public thoroughfares, aside from the Ramona Expressway and Nuevo Road, which are partially improved along site’s northern and southern boundaries, respectively. Additionally, while the hill form and open space in the western portions of the site include informal trails, these trails occur on private property and are not publicly-accessible. Although residential uses occur in the area, the Project site is not situated in a location that could physically divide any of these existing communities. Future development on site would include public roadways and trails, which would improve local access in the area and provide linkages to existing roads and infrastructure. As such, the Project would not disrupt or divide the physical arrangement of an established community, and impacts would be less than significant.





#### 4.11.5 CUMULATIVE IMPACT ANALYSIS

As indicated under the analysis of Threshold a., with approval of the Project's GPA, the proposed Project would not conflict with any of the policies included in the General Plan or LNAP, and would not conflict with the SCAG 2020-2045 RTP/SCS. Other developments within the western Riverside County region similarly would be required to demonstrate compliance with applicable general plan and RTP/SCS policies. Thus, the Project's impacts due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less-than-cumulatively considerable.

As indicated under the analysis of Threshold b., the Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community). As such, cumulatively-considerable impacts would not occur.

#### 4.11.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project would not conflict with the General Plan, LNAP, the SCAG 2020-2045 RTP/SCS, or any other land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Additionally, there are no impacts due to land use incompatibility that have not already been evaluated and mitigated to the maximum feasible extent in relevant sections of this EIR; therefore, and with exception of the significant and unavoidable impacts to surrounding land uses identified in the relevant sections of this EIR (which are not land use impacts), Project impacts due to land use incompatibility would be less than significant.

Threshold b.: Less-than-Significant Impact. The Project would not disrupt or divide the physical arrangement of an established community (including a low-income or minority community), and impacts would be less than significant.

#### 4.11.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

Impacts to land use and planning would be less than significant; therefore, mitigation measures are not required.



## 4.12 MINERAL RESOURCES

This subsection describes the potential mineral resources that are located on the Project site and in the vicinity and evaluates the potential effects that the Project may have on these resources. The following analysis is based on information obtained in the County’s General Plan (Riverside County, 2021a), the “Updated Geotechnical Evaluation, Proposed ‘Stoneridge’ Industrial and Mixed-Use Development,” prepared by LGC Geotechnical, Inc. (herein, “LGC”), dated September 12, 2019, and included as EIR *Technical Appendix F* (LGC, 2019), and the “Phase I Environmental Site Assessment” for the Project site prepared by Hillmann Consulting (herein, “Hillmann”), dated April 10, 2019, and included as EIR *Technical Appendix G* (Hillman, 2019).

### 4.12.1 EXISTING CONDITIONS

As detailed in the Geotechnical Report prepared for the Project site, the Project site encompasses 582.6 acres of undeveloped land. The Project site is generally situated along the eastern flank of some relatively small hills associated with plutonic rocks of the Peninsular Ranges geomorphic province. Historical records indicate that the Project site was utilized as agricultural land from approximately 1938 until at least 1985. Since the late 1980s, the Project site has remained vacant (LGC, 2019, p. 15). Additionally, a historical record search performed by Hillmann did not indicate evidence of any quarrying or mining activities on the Project site (Hillman, 2019, p. 12-15).

### 4.12.2 APPLICABLE ENVIRONMENTAL REGULATIONS

The following is a brief description of the applicable environmental laws and related regulations related to mineral resources.

#### A. State Regulations

##### 1. Surface Mining and Reclamation Act of 1975

The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, §§ 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the State’s mineral resources. Public Resources Code § 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations. (CDC, 2019c)

SMARA, Chapter 9, Division 2 of the Public Resources Code, requires the State Mining and Geology Board to adopt State policy for the reclamation of mined lands and the conservation of mineral resources. These policies are prepared in accordance with the Administrative Procedures Act, (Government Code) and are found in California Code of Regulations, Title 14, Division 2, Chapter 8, Subchapter 1. (CDC, 2019c)

SMARA also requires the State geologist to classify areas identified by the California Office of Planning and Research into Mineral Resource Zones. The primary purpose of mineral land classification is to assure that mineral potential and its significance is recognized and considered before land use decisions that preclude mining are made. These classifications are based on geological factors without regard to existing land use and



ownership. The SMARA requires the State Geologist to classify land according to the presence, absence, or likely occurrence of significant mineral deposits in certain areas of the State subject to urban expansion or land uses incompatible with mining. The State classification system is broken out into four general zones, as shown below in Table 4.12-1, *Mineral Resources Zones*.

**Table 4.12-1 Mineral Resources Zones**

<b>Zone</b>	<b>Significance</b>
MRZ-1	Areas where geologic information indicates no significant mineral deposits are present
MRZ-2	Areas that contain identified mineral resources
MRZ-3	Areas of undetermined mineral resource significance
MRZ-4	Areas of unknown mineral resource potential

(Riverside County, 2021a, Table 4.12-1)

As indicated on Figure 4.14.2 of the Riverside County Draft EIR, the entire Project site is mapped within “Mineral Resource Zone 3 (MRZ-3; Significance of mineral deposits undetermined)” (Riverside County, 2021a, Fig. 4.14.2). Accordingly, the Project site does not contain any areas of known mineral resources.

**4.12.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section XII of Appendix G to the State CEQA Guidelines addresses typical adverse effects to mineral resources, and includes the following threshold questions to evaluate the Project’s impacts on mineral resources (OPR, 2018a):

- *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- *Would the Project result in the loss of availability of a locally-important mineral resource recover site delineated on a local general plan, specific plan, or other land use plan.*

Significance thresholds as implemented by Riverside County are set forth in Riverside County’s Environmental Assessment Checklist form, which are derived from Section XI of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact on mineral resources if construction and/or operation of the Project would:

- 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. *Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine; or*



- d. Expose people or property to hazards from proposed, existing or abandoned quarries or mines.

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on mineral resources.

**4.12.4 IMPACT ANALYSIS**

***Threshold 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?***

According to the California Department of Conservation (CDC), the Project site is classified as Mineral Resources Zone (MRZ) 3, which includes “areas containing mineral deposits the significance of which cannot be evaluated from available data” (CDC, 1984). Therefore, the Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

***Threshold 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?***

The Project site is not designated as a mineral resource recovery site by the County’s General Plan, LNAP, or the adopted SP 239, and there are no other land use plans that identify the site for containing mineral resources. Accordingly, the Project would not 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, and no impact would occur.

***Threshold c: Be an incompatible land use located adjacent to a State classified or designated area or existing surface mine?***

As mapped by the CDC, there are no areas surrounding the Project site that contain known mineral resources. No lands in the Project vicinity are classified or designated by the State as containing mineral resource deposits, and there are no known surface mines in the Project vicinity. Accordingly, the Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

***Threshold d: Expose people or property to hazards from proposed, existing or abandoned quarries or mines?***

Historical records indicate that no quarrying or mining activities ever occurred on the Project site, and there is no evidence of any proposed, existing, or abandoned quarries in the surrounding area (Hillman, 2019, p. 15). Accordingly, the Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.



#### 4.12.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects within the western Riverside County region. This cumulative study area was selected because western Riverside County encompasses large areas that include geologic conditions similar to those that occur on the Project site, and because this study area encompasses a large portion of the local market for the production and consumption of mineral resources.

As mapped by the CDC, the Project site is classified as MRZ-3 and contains no known mineral resource deposits. As such, the Project has no potential to result in cumulatively-considerable impacts due to the loss of availability of a known mineral resource that would be of value to the region or residents of the State. No cumulatively-considerable impacts would occur.

Riverside County's General Plan, LNAP, and the adopted SP 239 do not designate the Project site or surrounding areas as a mineral resource recovery site, and there are no other land use plans that identify the site or surrounding areas for containing mineral resources. As such, the Project has no potential to result in cumulatively-considerable impacts due to 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 cumulatively-considerable impacts would occur.

There are no lands in the Project vicinity that include State classified or designated areas for mineral resources, and there are no existing surface mines in the Project vicinity. As such, no cumulatively-considerable impacts to State classified or designated areas or existing surface mines would occur.

There are no known proposed, existing, or abandoned quarries or mines in the Project vicinity. As such, the Project has no potential to expose people or property to hazards from proposed, existing or abandoned quarries or mines, and no cumulatively-considerable impacts would occur.

#### 4.12.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: No Impact. The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, with implementation of the proposed Project there would be no impact to known mineral resources.

Threshold b.: No Impact. The Project would not 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, and no impact would occur.

Threshold c.: No Impact. The Project would not be an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and no impact would occur.

Threshold d.: No Impact. The Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines, and no impact would occur.



#### **4.12.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

No impact to mineral resources would occur with implementation of the proposed Project; thus, mitigation measures are not required.



## 4.13 NOISE

This Subsection addresses the environmental issue of noise. The information in this Subsection is based in part on a technical report prepared by Urban Crossroads, Inc. (Urban Crossroads), entitled, “Stoneridge Commerce Center Specific Plan Noise and Vibration Analysis” (herein, “NIA”), dated June 12, 2023, and included as *Technical Appendix J* to this EIR (Urban Crossroads, 2023d). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.13.1 NOISE FUNDAMENTALS

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Figure 4.13-1, *Typical Noise Levels*, presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below. (Urban Crossroads, 2023d, p. 7)

#### A. Range of Noise

Since the range of intensities that 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 roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time. (Urban Crossroads, 2023d, pp. 7-8)

#### B. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most used metric is the equivalent level (Leq). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the “average” noise levels within the environment. (Urban Crossroads, 2023d, p. 8)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of



**Figure 4.13-1 Typical Noise Levels**

<b>COMMON OUTDOOR ACTIVITIES</b>	<b>COMMON INDOOR ACTIVITIES</b>	<b>A - WEIGHTED SOUND LEVEL dBA</b>	<b>SUBJECTIVE LOUDNESS</b>	<b>EFFECTS OF NOISE</b>
THRESHOLD OF PAIN		140	<b>INTOLERABLE OR DEAFENING</b>	<b>HEARING LOSS</b>
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100		
GAS LAWN MOWER AT 1m (3 ft)		90	<b>VERY NOISY</b>	<b>SPEECH INTERFERENCE</b>
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	<b>LOUD</b>	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	<b>MODERATE</b>	<b>SLEEP DISTURBANCE</b>
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	<b>FAINT</b>	<b>NO EFFECT</b>
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10		
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0	<b>VERY FAINT</b>	

(Urban Crossroads, 2023d, Exhibit 2-A)

a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when noise can become more intrusive. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The County of Riverside relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources. (Urban Crossroads, 2023d, p. 8)

**C. Sound Propagation**

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors. (Urban Crossroads, 2023d, p. 8)

**1. Geometric Spreading**

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates





outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2023d, p. 8)

## **2. *Ground Absorption***

The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 ft. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, 2023d, pp. 8-9)

## **3. *Atmospheric Effects***

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects. (Urban Crossroads, 2023d, p. 9)

## **4. *Shielding***

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure. (Urban Crossroads, 2023d, p. 9)

## **D. *Noise Control***

Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements. (Urban Crossroads, 2023d, p. 9)



**E. Noise Barrier Attenuation**

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however, do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source. (Urban Crossroads, 2023d, p. 9)

**F. Land Use Compatibility with Noise**

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (Urban Crossroads, 2023d, p. 10)

**G. Community Response to Noise**

Approximately sixteen percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. Twenty to thirty percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. (Urban Crossroads, 2023d, p. 10)

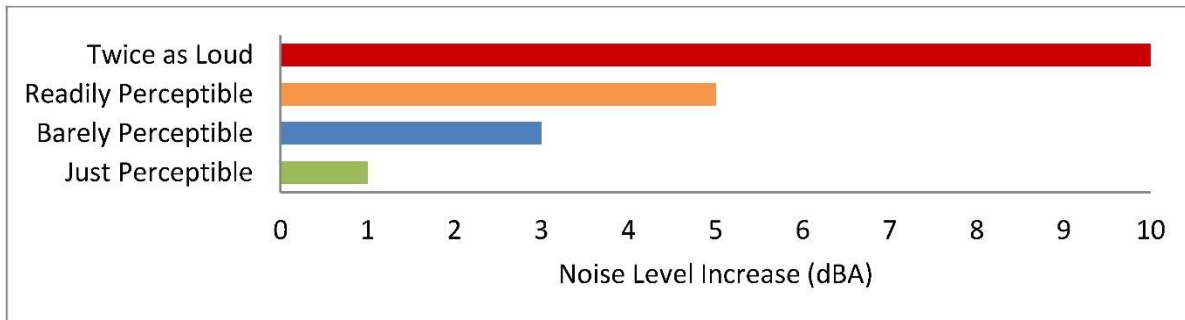
Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing. According to research originally published in the *Noise Effects Handbook* published by the United States Environmental Protection Agency (EPA) (1981), the percentage of high annoyance ranges from approximately 0 percent at 45 dB or less, 10 percent are highly annoyed around 60 dB, and increases rapidly to approximately 70 percent being highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels as shown on Figure 4.13-2, *Noise Level Increase Perception*. A change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible. (Urban Crossroads, 2023d, p. 10)

**H. Vibration**

Per the Federal Transit Administration (FTA) Transit Noise Impact and Vibration Impact Assessment Manual, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery,



Figure 4.13-2 Noise Level Increase Perception



(Urban Crossroads, 2023d, Exhibit 2-B)

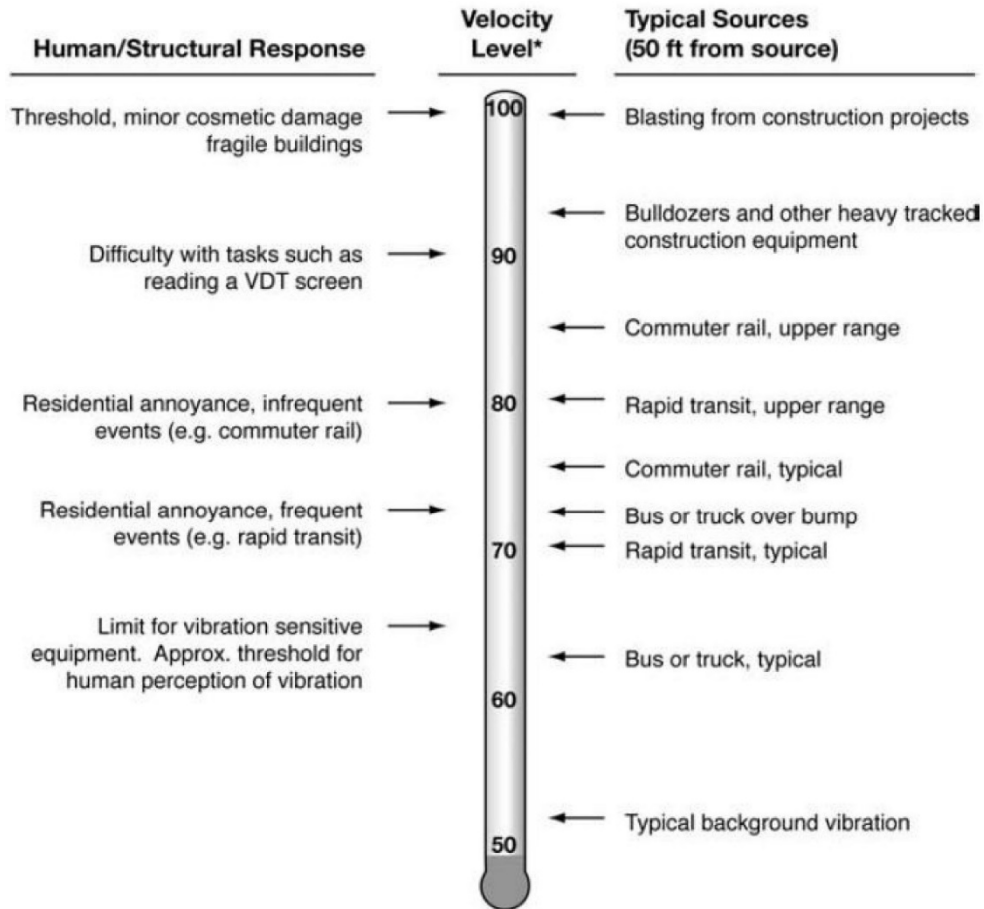
traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. (Urban Crossroads, 2023d, p. 11)

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The peak-particle-velocity (PPV) is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities. (Urban Crossroads, 2023d, p. 11)

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Figure 4.13-3, *Typical Levels of Ground-Borne Vibration*, illustrates common vibration sources and the human and structural response to ground-borne vibration. (Urban Crossroads, 2023d, p. 11)



Figure 4.13-3 Typical Levels of Ground-Borne Vibration



\* RMS Vibration Velocity Level in VdB relative to 10<sup>-6</sup> inches/second

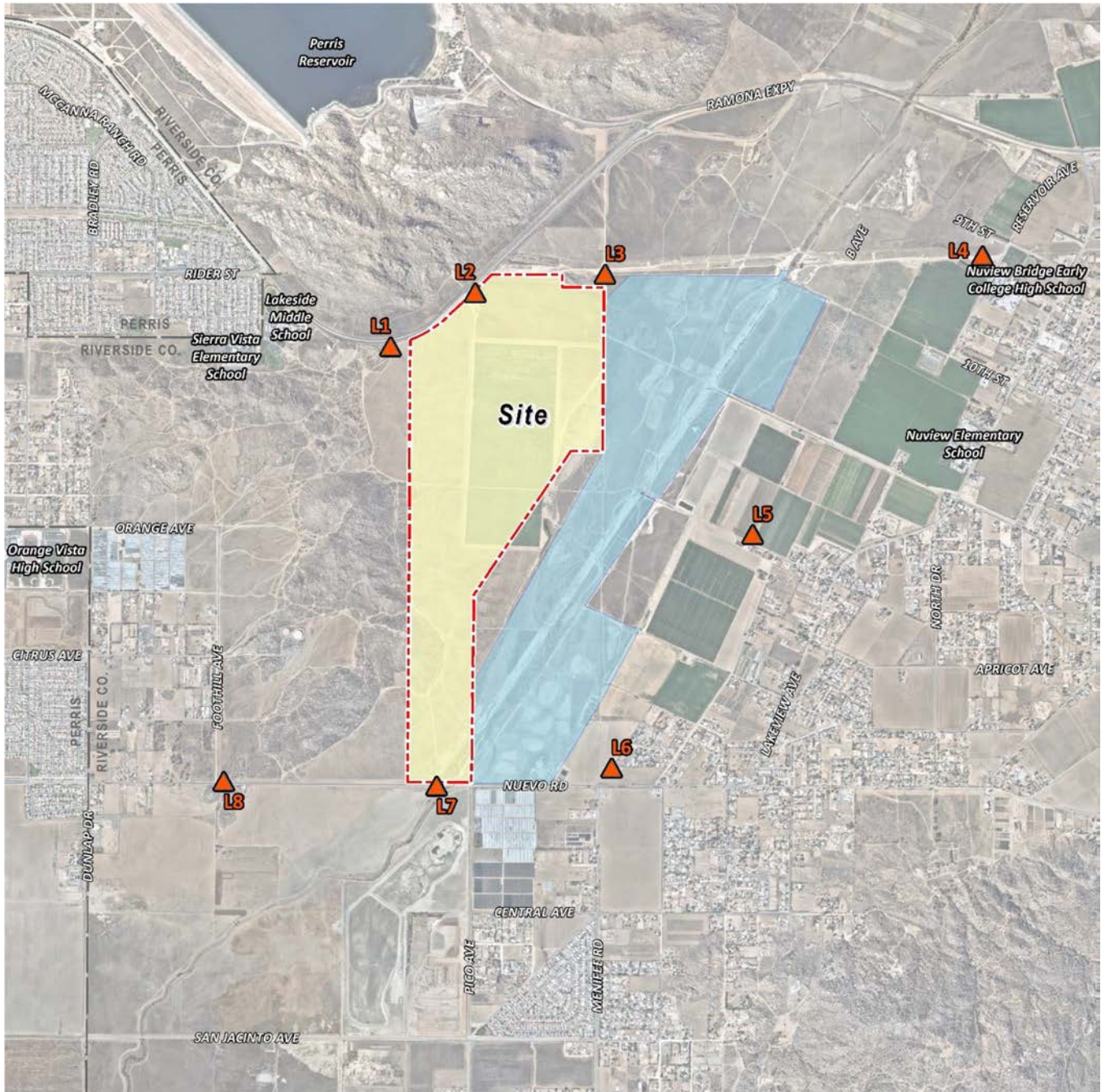
Source: Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. (Urban Crossroads, 2023d, Exhibit 2-C)

### 4.13.2 EXISTING CONDITIONS

To assess the existing noise level environment, 24-hour noise level measurements were taken at eight locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Figure 4.13-4, *Noise Measurement Locations*, provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Thursday, November 3rd, 2022. Appendix 5.1 of the Project’s NIA (*Technical Appendix J*) includes study area photos. (Urban Crossroads, 2023d, p. 27)



Figure 4.13-4 Noise Measurement Locations



**LEGEND:**

- Site Boundary
- Riverpark Mitigation Bank Parcels
- ▲ Measurement Locations

(Urban Crossroads, 2023d, Exhibit 5-A)



**A. Measurement Procedure and Criteria**

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the equivalent daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2023d, p. 27)

**B. Noise Measurement Locations**

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent every part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources. Further, FTA guidance states that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.* (Urban Crossroads, 2023d, p. 27)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels. (Urban Crossroads, 2023d, pp. 27-28)

**C. Noise Measurement Results**

The noise measurements presented below focus on the equivalent or the energy average hourly sound levels (Leq). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. Figure 4.13-4 (previously presented) depicts the noise measurement locations, while Table 4.13-1, *Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. Table 4.13-1 provides the equivalent noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise



levels observed during these time periods expressed as a single number. Appendix 5.2 to the Project’s NIA (*Technical Appendix J*) provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L<sub>2</sub>, L<sub>5</sub>, L<sub>8</sub>, L<sub>25</sub>, L<sub>50</sub>, L<sub>90</sub>, L<sub>95</sub>, and L<sub>99</sub> percentile noise levels observed during the daytime and nighttime periods. (Urban Crossroads, 2023d, p. 28)

**Table 4.13-1 Ambient Noise Level Measurements**

Location <sup>1</sup>	Description	Energy Average Noise Level (dBA L <sub>eq</sub> ) <sup>2</sup>		CNEL
		Daytime	Nighttime	
L1	Located west of the Project site near Lakeside Middle School located at 27720 Walnut St.	57.9	50.9	59.4
L2	Located near the northwest corner of the project site, south of Ramona Expressway.	64.5	62.7	69.6
L3	Located on northeast of the project site south of Ramona Expressway.	56.2	47.5	56.8
L4	Located northeast of the project site near the Nuview Bridge Early College High School.	55.4	44.9	56.4
L5	Located East of the project site near the residence located at 29520 11th Street.	48.9	43.7	51.5
L6	Located South of the project site near the residence at 29219 Alva Road.	67.2	64.7	71.8
L7	Located South of the project site and north of Nuevo Road.	68.7	65.6	72.9
L8	Located west of the project site north of Nuevo Road.	72.6	69.7	76.9

1. See Figure 4.13-4 for the noise level measurement locations.
2. Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 to the Project’s NIA (*Technical Appendix J*).  
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.  
(Urban Crossroads, 2023d, Table 5-1)

**4.13.3 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations related to noise.

**A. Federal Regulations**

**1. Noise Control Act of 1972**

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective



coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA, 2020i)

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control. (EPA, 2020i)

## **2. Federal Transit Administration**

The Federal Transit Administration (FTA) has published a Noise and Vibration Impact Assessment (NVIA), which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents. In the interest of promoting quality and uniformity in assessments, the manual is used by project sponsors and consultants in performing noise and vibration analyses for inclusion in environmental documents. The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact. (FTA, 2006, p. 1-1)

The NVIA also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of root mean square (rms) velocity levels in decibels and the criteria for acceptable ground-borne noise are expressed in terms of A-weighted sound levels. As shown in Table 4.13-2, *Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use. (FTA, 2006, pp. 8-3 and 8-4)

## **3. Federal Aviation Administration**

The Federal Aviation Administration (FAA) regulates the maximum noise level that an individual civil aircraft can emit through requiring aircraft to meet certain noise certification standards. These standards designate changes in maximum noise level requirements by "stage" designation. The standard requires that the aircraft meet or fall below designated noise levels. For civil jet aircraft, there are four stages identified, with Stage 1 being the loudest and Stage 4 being the quietest. For helicopters, two different stages exist, Stage 1 and Stage 2. As with civil jet aircraft, Stage 2 is quieter than Stage 1. In addition, the FAA is currently working to adopt the latest international standards for helicopters, which will be called Stage 3 and will be quieter than Stage 2. (FAA, 2020b)

The FAA has undertaken a phase out of older, noisier civil aircraft, resulting in some stages of aircraft no longer being in the fleet. Currently within the contiguous US, civil jet aircraft over 75,000 pounds maximum take-off weight must meet Stage 3 and Stage 4 to fly. In addition, aircraft at or under 75,000 pounds maximum take-off weight must meet Stage 2, 3, or 4 to operate within the U.S. In addition, by December 31, 2015, all civil jet aircraft, regardless of weight must meet Stage 3 or Stage 4 to fly within the contiguous U.S. Both Stage 1 and Stage 2 helicopters are allowed to fly within the U.S. (FAA, 2020b)





**Table 4.13-2 Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment**

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events <sup>1</sup>	Occasional Events <sup>2</sup>	Infrequent Events <sup>3</sup>	Frequent Events <sup>1</sup>	Occasional Events <sup>2</sup>	Infrequent Events <sup>3</sup>
<b>Category 1:</b> Buildings where vibration would interfere with interior operations.	65 VdB <sup>4</sup>	65 VdB <sup>4</sup>	65 VdB <sup>4</sup>	N/A <sup>4</sup>	N/A <sup>4</sup>	N/A <sup>4</sup>
<b>Category 2:</b> Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
<b>Category 3:</b> Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

**Notes:**

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.

(FTA, 2006, Table 8-1)

The U.S. noise standards are defined in the Code of Federal Regulations (CFR) Title 14 Part 36 – *Noise Standards: Aircraft Type and Airworthiness Certification* (14 CFR Part 36). The FAA publishes certificated noise levels in the advisory circular, *Noise Levels for U.S. Certificated and Foreign Aircraft*. This advisory circular provides noise level data for aircraft certificated under 14 CFR Part 36 and categorizes aircraft into their appropriate "stages." Any aircraft that is certified for airworthiness in the U.S. needs to also comply with noise standard requirements to receive a noise certification. The purpose of the noise certification process is to ensure that the latest available safe and airworthy noise reduction technology is incorporated into aircraft design and enables the noise reductions offered by those technologies to be reflected in reductions of noise experienced by communities. As noise reduction technology matures, the FAA works with the international community to determine if a new stringent noise standard is needed. If so, the international community through the International Civil Aviation Organization (ICAO) embarks on a comprehensive analysis to determine what that new standard will be. (FAA, 2016)



The current FAA noise standards applicable to new type certifications of jet and large turboprop aircraft is Stage 4. It is equivalent to the ICAO Annex 16, Volume 1 Chapter 4 standards. Recently, the international community has established and approved a more stringent standard within the ICAO Annex 16, Volume 1 Chapter 14, which became effective July 14, 2014. The FAA adopted this standard and promulgated the rule for Stage 5 effective for new type certificates after December 31, 2017 and December 31, 2020, depending on the weight of the aircraft. The Final Rule for Stage 5 was published in the Federal Register on October 4, 2017. (FAA, 2016)

For helicopters, the FAA has noise standards for a Stage 3 helicopter that became effective on May 5, 2014. These more stringent standards apply to new type helicopters and are consistent with ICAO Annex 16, Volume 1 Chapter 8 and Chapter 11. (FAA, 2016)

The FAA Modernization and Reform Act of 2012, in Section 513, had a prohibition on operating certain aircraft weighing 75,000 pounds or less not complying with Stage 3 noise levels, and on July 2, 2013, the FAA published a Final Rule in the Federal Register for the *Adoption of Statutory Prohibition the Operation of Jets Weighing 75,000 Pounds or Less That Are Not Stage 3 Noise Compliant*. In 1990, Congress passed the Aviation Noise and Capacity Act, which required that by the year 2000 all jet and large turboprop aircraft at civilian airports be Stage 3. (FAA, 2016)

#### **4. Federal Highway Administration**

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 CFR 772 *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design. (FHWA, 2017)

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in Title 23 of the United States Code of Federal Regulations Part 772. The regulations require the following during the planning and design of a highway project:

- Identification of traffic noise impacts;
- Examination of potential mitigation measures;
- The incorporation of reasonable and feasible noise mitigation measures into the highway project; and
- Coordination with local officials to provide helpful information on compatible land use planning and control. (FHWA, 2017)



The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway. (FHWA, 2017)

## **5. Construction-Related Hearing Conservation**

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels. (OSHA, 2002) This analysis does not evaluate the noise exposure of construction workers within the Project site based on CEQA requirements, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

### ***B. State Regulations***

#### **1. Building Standards Code**

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL. (BSC, n.d.)

#### **2. California Noise Insulation Standards**

The California Noise Insulation Standards (CCR Title 25 Section 1092) establish uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 25 specifies that interior noise levels attributable to exterior sources shall not exceed 45 dBA Ldn/CNEL (i.e., the same levels that the EPA recommends for residential interiors) in any habitable room of a new dwelling. An acoustical study must be prepared for proposed multiple unit residential and hotel/motel structures where outdoor Ldn/CNEL is 60 dBA or greater. The study must demonstrate that the design of the building would reduce interior noise to 45 dBA Ldn/CNEL or lower. Because noise levels can increase over time in developing areas, Title 25 also specifies that dwellings



are to be designed so that interior noise levels will meet this standard for at least ten years from the time of building permit application. (MLA, n.d.)

### **3. OPR General Plan Guidelines**

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor’s Office of Planning and Research (OPR), provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. Local governments must “analyze and quantify” noise levels and the extent of noise exposure through actual measurement or the use of noise modeling. Technical data relating to mobile and point sources must be collected and synthesized into a set of noise control policies and programs that “minimizes the exposure of community residents to excessive noise.” Noise level contours must be mapped and the conclusions of the element used as a basis for land use decisions. The element must include implementation measures and possible solutions to existing and foreseeable noise problems. Furthermore, the policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements. The noise element directly correlates to the Land Use, Circulation, and Housing Elements. The Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. The noise levels from existing land uses, including mining, agricultural, and industrial activities, must be closely analyzed to ensure compatibility, especially where residential and other sensitive receptors have encroached into areas previously occupied by these uses. (OPR, 2017a, pp. 131-132)

#### **C. Local Regulations**

##### **1. Riverside County General Plan**

The Riverside County General Plan Noise Element was adopted to control and abate environmental noise, and to protect the citizens of Riverside County from excessive exposure to noise. The Noise Element specifies the maximum allowable exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Noise Element identifies several polices to minimize the impacts of excessive noise levels throughout the community and establishes noise level requirements for all land uses. To protect Riverside County residents from excessive noise, the Noise Element contains the following policies related to the Project:

- 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 shall be used.*
- N 1.2 Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise producing, such as transportation corridors or within the projected noise contours of any adjacent airports.*
- 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
- Residential Uses
- Libraries
- Passive Recreation Uses
- Places of Worship

*N 1.4 Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys.*

*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.*

*N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels:*

- a. 45 dBA 9-minute  $L_{eq}$  between 10:00 p.m. and 7:00 a.m.;*
- b. 65 dBA 9-minute  $L_{eq}$  between 7:00 a.m. and 10:00 p.m.*

*N 13.1 Minimize the impacts of construction noise on adjacent uses within acceptable standards.*

*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.*

*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 this 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.*

*N 14.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.*

*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.*



To ensure noise-sensitive land uses are protected from high levels of noise (N 1.1), Table N-1 of the Noise Element identifies guidelines to evaluate proposed developments based on exterior and interior noise level limits for land uses and requires a noise analysis to determine needed mitigation measures if necessary. The Noise Element identifies residential use as a noise-sensitive land use (N 1.3) and discourages new development in areas with transportation related levels of 65 dBA CNEL or greater existing ambient noise levels. To prevent and mitigate noise impacts for its residents (N 1.5), County of Riverside requires exterior noise attenuation measures for sensitive land use exposed to transportation related noise levels higher than 65 dBA CNEL. In addition, the County of Riverside had adopted an interior noise level limit of 45 dBA CNEL. (Urban Crossroads, 2023d, p. 14)

Policy N 4.1 of the Noise Element sets a stationary-source exterior noise limit to not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. To prevent high levels of construction noise from impacting noise-sensitive land uses, policies N 13.1 through 13.3 identify construction noise mitigation requirements for new development located near existing noise-sensitive land uses. Policy 16.3 establishes the vibration perception threshold for rail-related vibration levels, which typically is used in the County as a threshold for determining potential vibration impacts due to construction activities. (Urban Crossroads, 2023d, pp. 14-15)

### ***Land Use Compatibility***

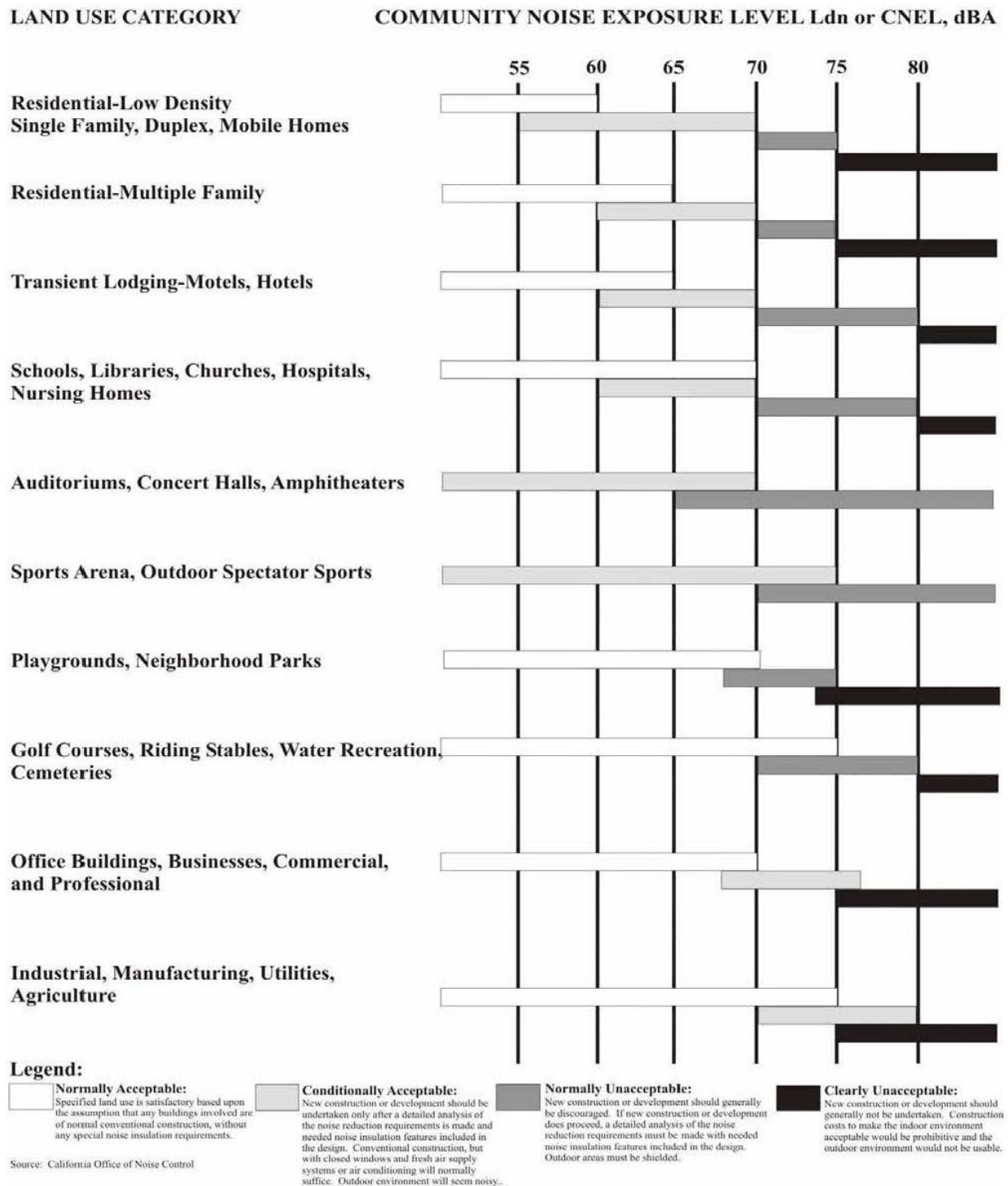
The noise criteria identified in the County of Riverside Noise Element (Table N-1) are guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Figure 4.13-5, *Land Use Compatibility for Community Noise Exposure*, provides the County with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Land Use Compatibility for Community Noise Exposure matrix describes categories of compatibility and not specific noise standards. Residential land uses are considered normally acceptable with unmitigated exterior noise levels of less than 60 dBA CNEL. For conditionally acceptable exterior noise levels, approaching 70 dBA CNEL for residential land uses, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. (Urban Crossroads, 2023d, p. 15)

### ***Riverside County Exterior Stationary Source Noise Standards***

The County of Riverside has set stationary-source hourly average Leq exterior noise limits to control loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, truck movements, and drive-through speakerphone activity associated with the development of the proposed Project. 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 following worst-case noise levels. Policy N 4.1 of the County of Riverside General Plan Noise



**Figure 4.13-5 Land Use Compatibility for Community Noise Exposure**



(Urban Crossroads, 2023d, Exhibit 3-A)



Element sets a stationary-source average Leq exterior noise limit not to be exceeded for a cumulative period of more than ten minutes in any hour of 65 dBA Leq for daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m. (Urban Crossroads, 2023d, p. 15)

## **2. Riverside County Ordinance No. 847 (Regulating Noise)**

### **Construction Noise Standards**

To control noise impacts associated with the construction of the proposed Project, the County of Riverside has established limits to the hours of construction activities. Section 2i of Riverside County Ordinance No. 847 (Regulating Noise) indicates that noise associated with any private construction activity located within one-quarter of a mile from an inhabited dwelling is considered exempt between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September, and 7:00 a.m. and 6:00 p.m. during the months of October through May. However, neither the County's General Plan nor County Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes. (Urban Crossroads, 2023d, pp. 18-19)

### **Operational Noise Standards**

To analyze noise impacts originating from a designated fixed location or private property such as the proposed Project, stationary-source (operational) noise such as the expected loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, truck movements, and drive-through speakerphone activity are typically evaluated against standards established under a jurisdiction's Municipal Code. Riverside County Ordinance No. 847 (Regulating Noise) identifies lower, more restrictive exterior noise level standards, which for the purpose of analysis are used to evaluate potential Project-related operational noise level limits instead of the higher General Plan exterior noise level standards previously identified. The County of Riverside County Code identifies residential exterior noise level limits of 55 dBA Leq during the daytime hours of 7:00 a.m. to 10:00 p.m., and 45 dBA Leq during the noise-sensitive nighttime hours of 10:00 p.m. to 7:00 a.m., commercial exterior noise level limits of 65 dBA Leq during the daytime hours, and 55 dBA Leq during the noise-sensitive nighttime hours, and public facility exterior noise level limits of 65 dBA Leq during the daytime hours, and 45 dBA Leq during the noise-sensitive nighttime hours. (Urban Crossroads, 2023d, p. 18)

Based on several discussions with the County of Riverside Department of Environmental Health (DEH), Office of Industrial Hygiene (OIH), it is important to recognize that the County of Riverside County Code noise level standards, incorrectly identify maximum noise level (Lmax) standards that should instead reflect the average Leq noise levels. Moreover, the County of Riverside DEH OIH's April 15th, 2015, *Requirements for Determining and Mitigating Non-Transportation Noise Source Impacts to Residential Properties*, also identifies operational (stationary source) noise level limits using the Leq metric, consistent with the direction of the County of Riverside General Plan guidelines and standards provided in the Noise Element. Therefore, the analysis herein was conducted consistent with direction of the County of Riverside DEH OIH guidelines and standards using the average Leq noise level metric for stationary-source (operational) noise level evaluation. (Urban Crossroads, 2023d, p. 18)





### 3. City of Perris General Plan

#### **Noise Compatibility**

The City of Perris has adopted a Noise Element of the General to evaluate the acceptability of the transportation related noise level impacts. Like the County of Rivers, the City of Perris Land Use/Noise Compatibility are based on the Governor’s Office of Planning and Research (OPR) and are used as guidelines to assess the long-term traffic noise impacts on land use. According to the City’s Land Use/Noise Compatibility Guidelines (as shown on General Plan Exhibit N-1), which is presented on Figure 4.13-6, *City of Perris Land Use/Noise Compatibility Guidelines*, noise-sensitive land uses such as single-family residences are normally acceptable with exterior noise levels below 60 dBA CNEL and conditionally acceptable with noise levels below 65 dBA CNEL. Commercial uses are normally acceptable with exterior noise levels below 65 dBA CNEL and conditionally acceptable with noise levels below 75 dBA CNEL. Industrial uses are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL, and conditionally acceptable with exterior noise levels between 70 to 80 dBA CNEL. (Urban Crossroads, 2023d, pp. 15-16)

#### **Construction Noise Standards**

The City of Perris Municipal Code, Section 7.34.060, identifies the City’s construction noise standards and limits construction activities to the hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (except for Columbus Day and Washington’s birthday). The City of Perris Municipal Code, Section 7.34.060, establishes a noise level standard of 80 dBA Lmax for construction noise affecting residential zones within the City of Perris. While the City of Perris has adopted the noise level standard of 80 dBA Lmax, this analysis relies on the FTA construction noise level of 80 dBA Leq since Leq considers the overall noise exposure and accounts for both high and low levels of noise during that period providing a more balanced representation of the construction noise exposure. (Urban Crossroads, 2023d, p. 19)

#### **4.13.4 BASIS FOR DETERMINING SIGNIFICANCE**

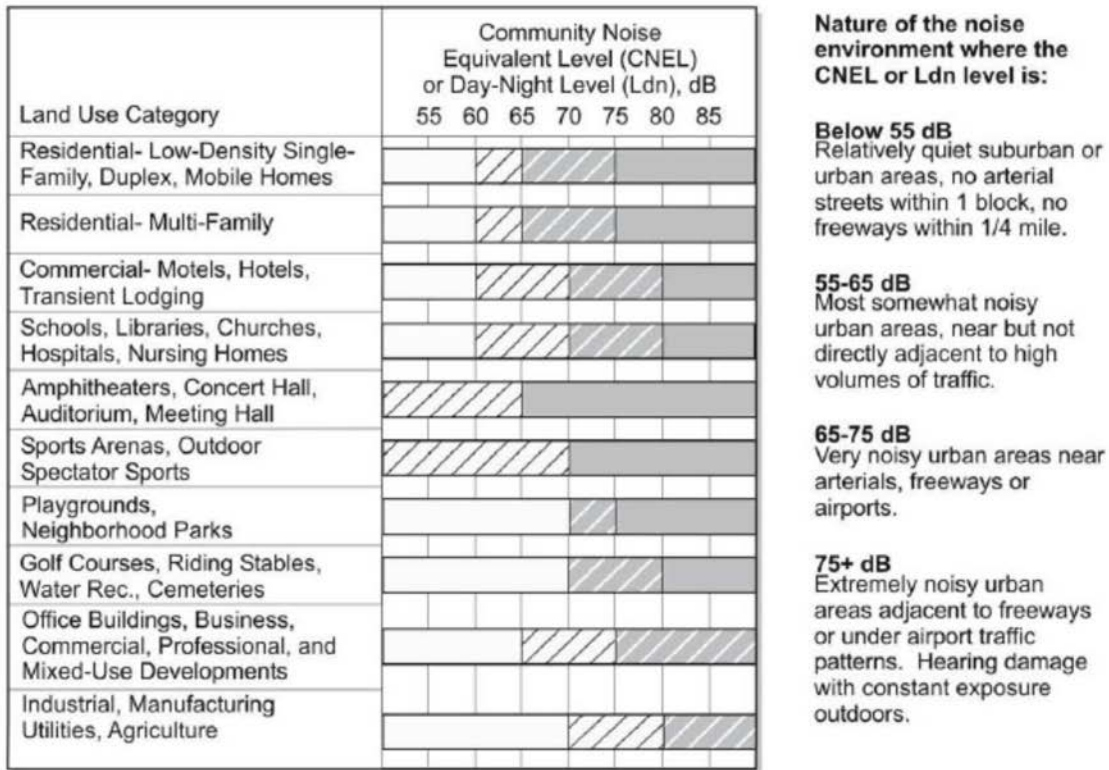
##### **A. Significance Thresholds**

Section XIII of Appendix G to the CEQA Guidelines addresses typical adverse effects to noise, and includes the following threshold questions to evaluate a project’s impacts on noise:

- Would the project result in the 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 or noise ordinance, or applicable standards of other agencies?
- Would the project result in the generation of excessive ground-borne vibration or noise levels?
- For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?



Figure 4.13-6 City of Perris Land Use/Noise Compatibility Guidelines



**Nature of the noise environment where the CNEL or Ldn level is:**

**Below 55 dB**  
Relatively quiet suburban or urban areas, no arterial streets within 1 block, no freeways within 1/4 mile.

**55-65 dB**  
Most somewhat noisy urban areas, near but not directly adjacent to high volumes of traffic.

**65-75 dB**  
Very noisy urban areas near arterials, freeways or airports.

**75+ dB**  
Extremely noisy urban areas adjacent to freeways or under airport traffic patterns. Hearing damage with constant exposure outdoors.

<b>Normally Acceptable</b> Specific land use is satisfactory, based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements	<b>Conditionally Acceptable</b> New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.	<b>Normally Unacceptable</b> New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in design.	<b>Clearly Unacceptable</b> New construction or development should generally not be undertaken.
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The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of the 24-hour noise environment. They represent the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. In order to account for the greater sensitivity of people to noise at night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m. and a 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes only the 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equivalent for typical urban noise environments.

(Urban Crossroads, 2023d, Exhibit 3-B)



Additionally, the following thresholds are derived from Riverside County’s Environmental Assessment Checklist and are used to evaluate the significance of the proposed Project’s impacts due to noise. Thus, for purposes of analysis herein, significant impacts to noise would occur if the Project or any Project-related component would:

- a. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels;*
- b. *For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels;*
- c. *Result in the 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; or*
- d. *Generate excessive ground-borne vibration or ground-borne noise levels.*

**B. Construction-Related Noise and Vibration Limits**

**1. General Construction Noise Level Limits**

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise (such as Riverside County Ordinance No. 847). They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA Leq. (Urban Crossroads, 2023d, p. 19)

**2. Construction-Related Blasting Noise Limits**

Blasting contractors are required to obtain blasting permit(s) from the State and to notify Riverside County Sheriff’s Department within 24 hours prior to the planned blasting events. Air overpressure regulations are identified by the U.S. Bureau of Mines and the ISEE’s Blasters’ Handbook. To analyze blasting impacts originating from the construction of the Project, vibration-generating rock blasting activities are appropriately evaluated against standards established under a City’s Municipal Code, if such standards exist. However, the County of Riverside does not identify specific blasting noise or vibration level limits. Therefore, the analysis herein relies on the following criteria to assess potential temporary construction-related impacts at adjacent receiver locations. Based on Table 26.17, *Typical Air Overpressure Damage Criteria*, of the Blasters’ Handbook, an air overpressure of 133 dB (linear, unweighted) is identified as a perception-based criteria level for blasting. As such, to present a conservative approach, the Project blasting-related vibration and airblast



levels are based on the 133 dB (linear, unweighted) criteria for airblasts identified by the ISEE and U.S. Bureau of Mines. (Urban Crossroads, 2023d, p. 20)

### 3. ***Construction-Related Vibration Limits***

#### **General Construction Vibration Limits**

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. To analyze vibration impacts originating from the operation and construction of the proposed Project, vibration-generating activities are appropriately evaluated against standards established under the Municipal Code, if such standards exist. However, the County of Riverside does not identify specific construction vibration level limits. Therefore, for analysis purposes, the Caltrans *Transportation and Construction Vibration Guidance Manual*, Table 19, *Guideline Vibration Damage Potential Threshold Criteria*, are used herein to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise sensitive buildings adjacent to the Project site can best be described as “older residential structures” with a maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec). (Urban Crossroads, 2023d, pp. 19-20)

#### **Blasting Vibration Limits**

The Caltrans *Transportation and Construction Vibration Guidance Manual*, Table 19, *Guideline Vibration Damage Potential Threshold Criteria*, are used herein to assess potential temporary construction-related building damage impacts at adjacent receiver locations. Caltrans guidance identifies a maximum acceptable transient peak-particle-velocity (PPV) vibration threshold of 0.5 inches per second (in/sec). Therefore, the 0.5 PPV (in/sec) vibration threshold is used to evaluate the potential blasting-related vibration levels at the nearby structures. (Urban Crossroads, 2023d, p. 20)

### C. **Operational Noise Level Increases**

Noise level increases resulting from the Project are evaluated at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders a noise impact significant. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person’s subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted – the so-called ambient environment. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. (Urban Crossroads, 2023d, p. 23)

Sensitive receivers are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Other receivers include office and industrial



buildings, which are not considered as sensitive as single-family homes, but are still protected by the County of Riverside land use compatibility standards. (Urban Crossroads, 2023d, p. 23)

### 1. **Noise-Sensitive Receivers**

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (Leq). (Urban Crossroads, 2023d, p. 23)

The approach used in this analysis recognizes that there is no single noise increase that renders a noise impact significant. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the without project noise levels are below 60 dBA. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. (Urban Crossroads, 2023d, p. 24)

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. (Urban Crossroads, 2023d, p. 24)

### 2. **Non-Noise-Sensitive Receivers**

The County of Riverside General Plan Noise Element, Table N-1, *Land Use Compatibility for Community Noise Exposure*, was used to establish the satisfactory noise levels of significance for all the non-noise-sensitive land uses in the Project study area. This includes the non-noise sensitive land uses within the City of Perris even though the City of Perris does not consider noise increases to non-noise-sensitive uses to be significant. As previously shown on Figure 4.13-5, the normally acceptable exterior noise level for non-noise-sensitive land use is 70 dBA CNEL. Noise levels greater than 70 dBA CNEL are considered conditionally acceptable per the Land Use Compatibility for Community Noise Exposure. (Urban Crossroads, 2023d, p. 24)



To determine if Project-related traffic noise level increases are significant at off-site non-noise-sensitive land uses, a barely perceptible 3 dBA criteria is used. When the without Project noise levels are greater than the normally acceptable 70 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the County of Riverside General Plan Noise Element, Table N-1, *Land Use Compatibility for Community Noise Exposure*, normally acceptable 70 dBA CNEL exterior noise level criteria. (Urban Crossroads, 2023d, p. 24)

**D. Summary of Significance Criteria**

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4.13-3, *Significance Criteria Summary*, shows the significance criteria summary matrix that includes the allowable criteria used to identify potentially significant incremental noise level increases. (Urban Crossroads, 2023d, p. 26)

**4.13.5 METHODOLOGY FOR CALCULATING PROJECT-RELATED NOISE IMPACTS**

**A. Sensitive Receiver Locations**

To assess the potential for long-term stationary operational and short-term construction noise impacts, the following sensitive receiver locations, as shown on Figure 4.13-7, *Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. The selection of receiver locations is based on FHWA guidelines and is consistent with additional guidance provided by Caltrans and the FTA. (Urban Crossroads, 2023d, p. 55)

Other sensitive land uses in the Project study area including land uses within the City of Perris that are located at greater distances than those identified herein would experience lower noise levels than those presented herein due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location. To describe the potential off-site Project noise levels, 23 receiver locations in the vicinity of the Project site were identified. This includes FUT-1 to FUT-8 representing potential future noise sensitive residential land uses and biological habitat locations BIO-1 to BIO-5 describing the Riverpark Mitigation Bank Parcels east of the Project site. The nearest noise-sensitive residential receiver is located approximately 2,483 feet southeast of the Project site at 22125



**Table 4.13-3 Significance Criteria Summary**

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive <sup>1</sup>	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive <sup>2</sup>	If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	Exterior Noise Level Standards <sup>3</sup>	55 dBA L <sub>eq</sub>	45 dBA L <sub>eq</sub>
		If ambient is < 60 dBA Leq <sup>1</sup>	≥ 5 dBA L <sub>eq</sub> Project increase	
		If ambient is 60 - 65 dBA Leq <sup>1</sup>	≥ 3 dBA L <sub>eq</sub> Project increase	
		If ambient is > 65 dBA Leq <sup>1</sup>	≥ 1.5 dBA L <sub>eq</sub> Project increase	
Construction	Noise-Sensitive	Noise Level Threshold <sup>4</sup>	80 dBA L <sub>eq</sub>	70 dBA L <sub>eq</sub>
		Vibration Level Threshold <sup>5</sup>	0.3 PPV (in/sec)	
Blasting	Noise-Sensitive	Airblast Threshold <sup>6</sup>	133 dB	n/a
		Vibration Level Threshold <sup>5</sup>	0.5 PPV (in/sec)	n/a

1. FICON, 1992.

2. County of Riverside General Plan Noise Element, Table N-1.

3. County of Riverside General Plan Municipal Code, Section 9.52.040.

4. Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

5. Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19

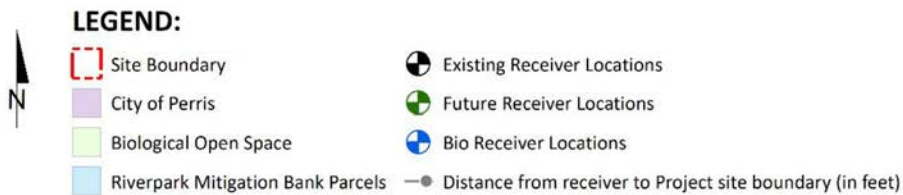
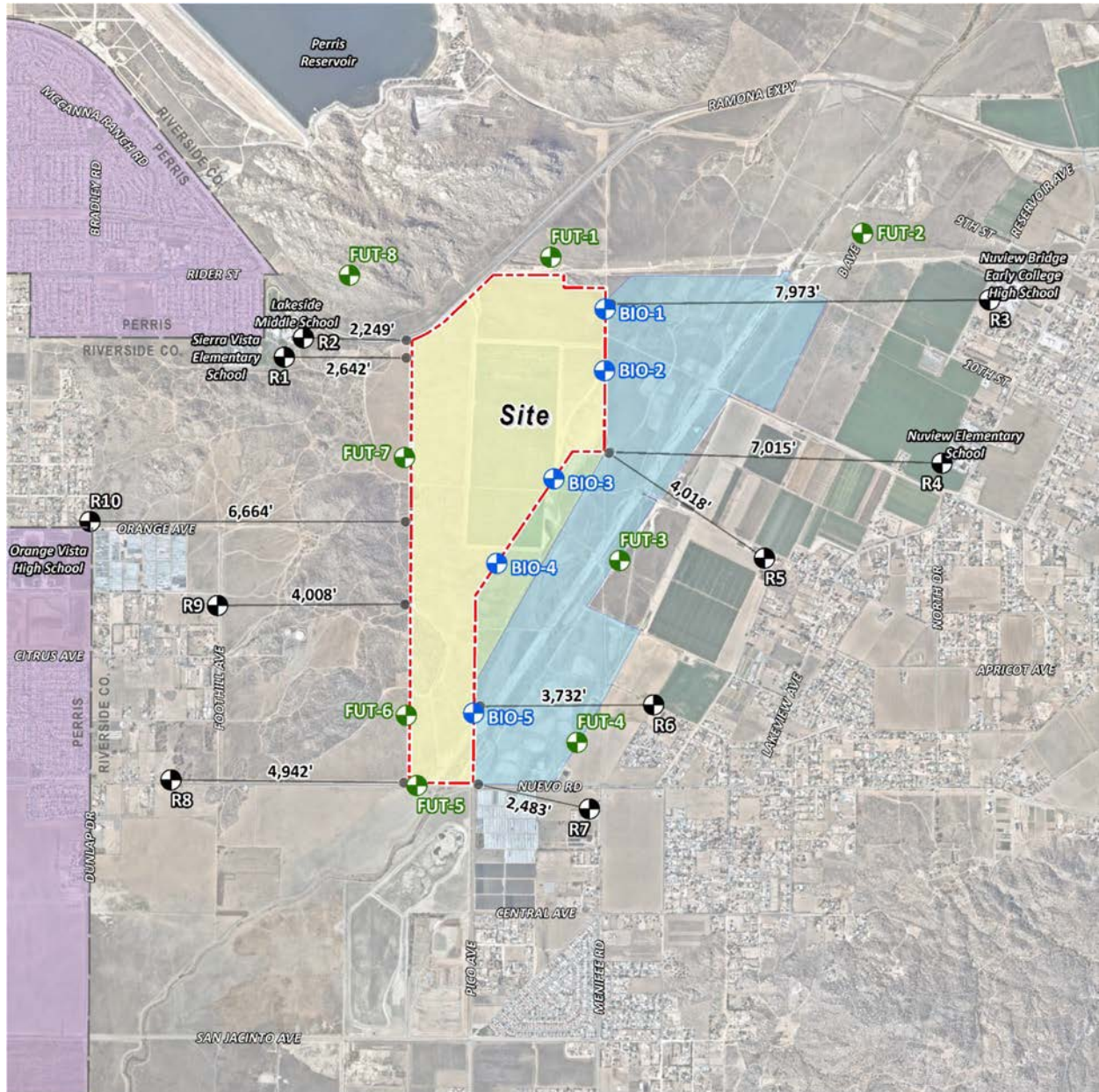
6. ISEE's Blasters' Handbook, Table 26.17 Typical Air Overpressure Damage Criteria, and U.S. Bureau of Mines standards.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2023d, Table 4-1)



Figure 4.13-7 Receiver Locations



(Urban Crossroads, 2023d, Exhibit 8-A)





Menifee Road. All the nearest noise sensitive receivers are in the unincorporated area within the County of Riverside. None of the nearest noise sensitive residential receivers are in the City of Perris. (Urban Crossroads, 2023d, p. 55)

- R1: Location R1 represents Sierra Vista Elementary School, approximately 2,780 feet west of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R2: Location R2 represents Lakeside Middle School, approximately 2,540 feet west of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R3: Location R3 represents Nuview Bridge Early College High School, approximately 7,973 feet east of the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- R4: Location R4 represents Nuview Elementary School, approximately 7,015 feet east of the Project site. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- R5: Location R5 represents the existing residence at 28900 Reservoir Avenue, approximately 4,018 feet east of the Project site. Receptor R5 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- R6: Location R6 represents the existing residence at 28240 Green Valley Road, approximately 3,732 feet east of the Project site. Receptor R6 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.
- R7: Location R7 represents the existing residence at 22125 Menifee Road, approximately 2,483 feet southeast of the Project site. Receptor R7 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.
- R8: Location R8 represents the existing residence at 27304 Nuevo Road, approximately 4,942 feet west of the Project site. Receptor R8 is placed in the private outdoor living areas (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L8, to describe the existing ambient noise environment.
- R9: Location R9 represents the existing residence at 21361 Foothill Avenue, approximately 4,008 feet west of the Project site. Since there are no private outdoor living areas facing the Project site, R9 is placed at the building façade facing the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.



- R10: Location R10 represents Orange Vista High School, approximately 6,664 feet west of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- FUT-1: Location FUT-1 represents the potential future noise sensitive medium density residential land use located north of the Project site.
- FUT-2: Location FUT-2 represents the potential future noise sensitive medium-high density residential land use located northeast of the Project site.
- FUT-3: Location FUT-3 represents the potential future noise sensitive medium density residential land use located east of the Project site.
- FUT-4: Location FUT-4 represents the potential future noise sensitive medium density residential land use located east of the Project site.
- FUT-5: Location FUT-5 represents the potential future noise sensitive medium density residential land use located south of the Project site.
- FUT-6: Location FUT-6 represents the potential future noise sensitive medium density residential land use located west of the Project site within the McCanna Hills Specific Plan.
- FUT-7: Location FUT-7 represents the potential future noise sensitive medium density residential land use located west of the Project site within the McCanna Hills Specific Plan.
- FUT-8: Location FUT-8 represents the potential future noise sensitive medium density residential land use located northwest of the Project site.
- BIO-1: Location BIO-1 represents the limits of construction east of the Project site.
- BIO-2: Location BIO-2 represents the limits of construction east of the Project site.
- BIO-3: Location BIO-3 represents the boundary of the Riverpark Mitigation Bank Parcels approximately 649 feet southeast of the Project limits of construction.
- BIO-4: Location BIO-4 represents the boundary of the Riverpark Mitigation Bank Parcels approximately 836 feet southeast of the Project limits of construction.
- BIO-5: Location BIO-5 represents the limits of construction east of the Project site.

**B. Construction Noise and Vibration Methodology**

**1. Construction Noise Methodology**

As previously noted, because the County of Riverside has not established a numeric maximum acceptable construction source noise levels at potentially affected receivers for CEQA analysis purposes, a numerical construction threshold based on the FTA Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts. The FTA considers a daytime exterior construction noise level of 80 dBA Leq and a nighttime exterior construction noise level of 70 dBA Leq as a reasonable threshold for noise-



sensitive residential land use. These noise level limits also are consistent with the City of Perris Municipal Code, Section 7.34.060.

To describe construction noise activities, this construction noise analysis was prepared using reference construction equipment noise levels from the FHWA published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database, provides a comprehensive list of the noise generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. (Urban Crossroads, 2023d, pp. 75-76)

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. Consistent with FTA guidance for general construction noise assessment, Table 4.13-4, *Construction Reference Noise Levels*, presents the combined construction reference noise levels for the loudest construction equipment, assuming they operate at the same time. (Urban Crossroads, 2023d, p. 76)

## **2. Nighttime Concrete Pour Reference Noise Level Measurements**

Nighttime concrete pouring activities likely would occur as a part of Project building construction activities. To estimate the noise levels due to nighttime concrete pouring activities, sample reference noise level measurements were taken during a nighttime concrete pour at a construction site. Urban Crossroads collected short-term nighttime concrete pour reference noise level measurements during the noise-sensitive nighttime hours between 1:00 a.m. to 2:00 a.m. at 27334 San Bernardino Avenue in the City of Redlands. The reference noise levels describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. To describe the nighttime concrete pour noise levels associated with the construction of the proposed Project, this analysis relies on reference sound pressure level of 67.7 dBA Leq at 50 feet representing a sound power level of 100.3 dBA Lw. While the Project noise levels would depend on the actual duration of activities and specific equipment fleet in use at the time of construction, the reference sound power level of 100.3 dBA Lw is used to describe the expected Project nighttime concrete pour noise activities. (Urban Crossroads, 2023d, p. 82)

## **3. Construction Vibration Methodology**

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.13-5, *Vibration Source Levels for Construction Equipment*. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage, as more fully described in subsection 10.7 of the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2023d, p. 83)



**Table 4.13-4 Construction Reference Noise Levels**

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA Leq) <sup>1</sup>	Combined Noise Level (dBA Leq) <sup>2</sup>	Combined Sound Power Level (PWL) <sup>3</sup>
Site Preparation	Crawler Tractors	78	80	112
	Hauling Trucks	72		
	Rubber Tired Dozers	75		
Grading	Graders	81	83	115
	Excavators	77		
	Compactors	76		
Building Construction	Cranes	73	81	113
	Tractors	80		
	Welders	70		
Paving	Pavers	74	83	115
	Paving Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77	109
	Air Compressors	74		
	Generator Sets	70		

1. FHWA Roadway Construction Noise Model (RCNM).
2. Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
3. Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the CadnaA noise model at the reference distance to the noise source.

(Urban Crossroads, 2023d, Table 10-1)

**Table 4.13-5 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
Vibratory Roller	0.210

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual  
(Urban Crossroads, 2023d, Table 10-5)

#### **4. Construction-Related Blasting Methodology**

Project construction is expected to require blasting to remove non-rippable materials at the site proposed for construction of the two off-site water towers as shown on Figure 4.13-8, *Off-Site Construction Blasting*



*Location.* When a blast is detonated, only a portion of the energy is consumed in breaking up and moving the rock. The remaining energy is dissipated in the form of seismic waves expanding rapidly outward from the blast, either through the ground (as vibration) or through the air (as air overpressure or airblast). While a blaster can quite easily design blasts to stay well below any vibration or air overpressure levels that could cause damage, it is virtually impossible to design blasts that are not perceptible by people in the vicinity.

### **C. Operational Noise Methodology**

Following is a summary of the methodology used to evaluate Project-related operational noise impacts. Refer to Section 9 of the Project's NIA (*Technical Appendix J*) for a complete discussion of the methodology and modeling inputs and assumptions.

#### **1. Reference Noise Levels**

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. The reference noise level measurements shown on Table 4.13-6, *Operational Reference Noise Level Measurements*, were used to estimate the Project operational noise impacts. It is important to note that the projected noise levels assume the worst-case noise environment with the loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, truck movements, and drive-through speakerphone activity all operating at the same time. These sources of noise activity likely would vary throughout the day. (Urban Crossroads, 2023d, p. 59)

#### **Measurement Procedures**

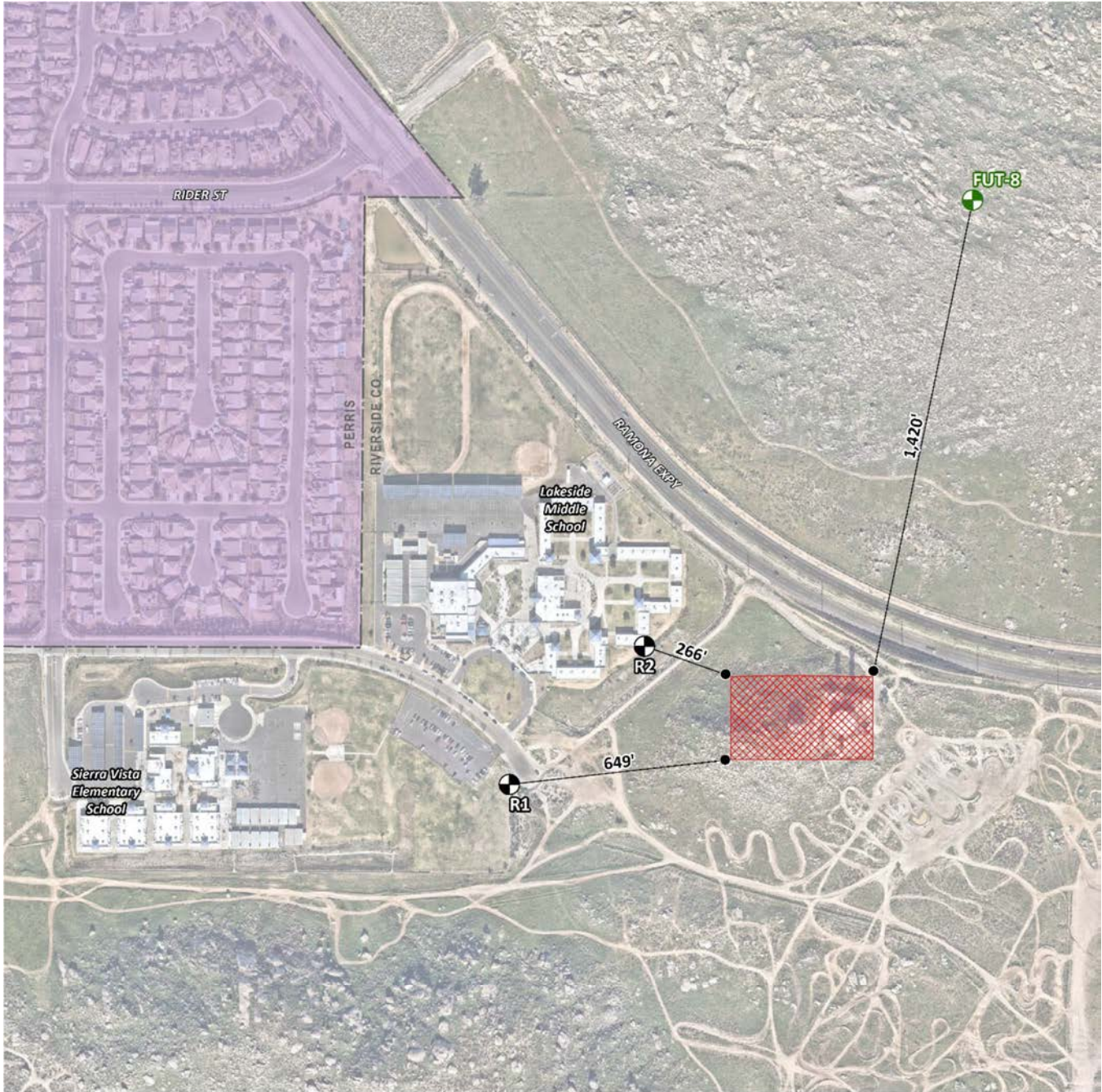
The reference noise level measurements presented in the analysis were collected using a Larson Davis LxT Type 1 precision sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (Urban Crossroads, 2023d, pp. 59-60)

#### **Loading Dock Activity**

The reference loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Project. This includes truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking including a combination of tractor trailer semi-trucks, two-axle delivery trucks, and background operation activities. Since the noise levels generated by cold storage loading dock activity can be slightly higher due to the use of refrigerated trucks or reefers. The reference noise level measurement was taken in the center of the loading dock activity area and represents multiple concurrent noise sources resulting in a combined noise level of 65.7 dBA Leq at a uniform distance of 50 feet. Specifically, the



Figure 4.13-8 Off-Site Construction Blasting Location



**LEGEND:**

- Blasting Area
- Existing Receiver Locations
- Future Receiver Locations
- City of Perris
- Distance from receiver to blasting activity (in feet)

(Urban Crossroads, 2023d, Exhibit 10-C)



**Table 4.13-6 Operational Reference Noise Level Measurements**

Noise Source <sup>1</sup>	Noise Source Height (Feet)	Min./Hour <sup>2</sup>		Reference Noise Level (dBA Leq) @ 50 Feet	Sound Power Level (dBA) <sup>3</sup>
		Day	Night		
Loading Dock Activity	8'	60	60	65.7	111.5
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Trash Enclosure Activity	5'	60	30	57.3	89.0
Parking Lot Vehicle Movements	5'	60	60	52.6	81.1
Truck Movements	8'	60	60	59.8	93.2
Drive-Through Speakerphone Activity	3'	60	60	50.0	84.0
Park Activities	5'	60'	0'	51.8	83.5

<sup>1</sup> As measured by Urban Crossroads, Inc.

<sup>2</sup> Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

<sup>3</sup> Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

(Urban Crossroads, 2023d, Table 9-1)

reference noise level measurement represents one truck located approximately 30 feet from the noise level meter with another truck passing by to park roughly 20 feet away, both with their engines idling. Throughout the reference noise level measurement, a separate docked and running reefer truck was located approximately 50 feet east of the measurement location. Additional background noise sources included truck pass-by noise, truck drivers talking to each other next to docked trucks, and air brake release noise when trucks parked. (Urban Crossroads, 2023d, p. 62)

**Roof-Top Air Conditioning Units**

The noise level measurements describe a single mechanical roof-top air conditioning unit. The reference noise level represents a Lennox SCA120 series 10-ton model packaged air conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 57.2 dBA Leq. Based on the typical operating conditions observed over a four-day measurement period, the roof-top air conditioning units are estimated to operate for and average 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F. For purposes of analysis, the air conditioning units are expected to be located on the roof of the Project buildings. (Urban Crossroads, 2023d, pp. 62-63)

**Trash Enclosure Activity**

To describe the noise levels associated with a trash enclosure activity, Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster



movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the Project Site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA Leq for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the Project’s proposed buildings. (Urban Crossroads, 2023d, p. 63)

**Parking Lot Vehicle Movements**

To describe the on-site parking lot activity, a long-term reference noise level measurement was collected for twenty-nine hours in the center of activity within the staff parking lot of an Amazon warehouse distribution center. At 50 feet from the center of activity, the parking lot produced a reference noise level of 52.6 dBA Leq. Parking activities are expected to take place during the full hour (60 minutes) throughout the daytime and evening hours. The parking lot noise levels are mainly due cars pulling in and out of parking spaces in combination with car doors opening and closing. (Urban Crossroads, 2023d, p. 63)

**Truck Movements**

The truck movements reference noise level measurement was collected over a period of 1 hour and 28 minutes and represent multiple heavy trucks entering and exiting the outdoor loading dock area producing a reference noise level of 59.8 dBA Leq at 50 feet. The noise sources included at this measurement location account for trucks entering and existing the Project driveways and maneuvering in and out of the outdoor loading dock activity area. (Urban Crossroads, 2023d, p. 63)

**Drive-Through Speakerphone Activities**

To describe the potential noise level impacts associated with the planned drive-thru speakerphones, this analysis relies on the drive-through intercom system manufactured by HME. This type of system is commonly used by the quick service restaurant (QSR) industry for drive-thru communications. The HME SPP2 speaker post intercom system produces a maximum noise level of 84 dBA at one foot from the speaker post. The system may also be equipped with an automatic volume control that can automatically reduce the sound levels as the ambient noise level decreases. The reference speakerphone noise level describes continuous drive-through operations and does not include any periods of inactivity. (Urban Crossroads, 2023d, p. 63)

**2. *CadnaA Noise Prediction Model***

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. (Urban Crossroads, 2023d, p. 64)

Using the ISO 9613-2 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613-2 protocol, the CadnaA noise prediction model relies on the reference sound power level (L<sub>w</sub>) to





describe individual noise sources. While sound pressure levels (e.g., Leq) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (Lw) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. (Urban Crossroads, 2023d, p. 64)

The operational noise level calculations provided herein account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the CadnaA noise analysis to account for mixed ground representing a combination of hard and soft surfaces. Appendix 9.1 to the Project's NIA (*Technical Appendix J*) includes the detailed noise model inputs used to estimate the Project operational noise levels presented in this section. (Urban Crossroads, 2023d, p. 64)

#### **D. Off-Site Traffic Modeling Methodology**

##### **1. FHWA Traffic Noise Prediction Model**

The expected roadway noise level increases from vehicular traffic were calculated by Urban Crossroads, Inc. using a computer program that replicates the FHWA Traffic Noise Prediction Model- FHWA-RD-77-108. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels. Adjustments are then made to the REMEL to account for: the roadway classification (e.g., collector, secondary, major or arterial), the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total average daily traffic (Average Daily Traffic [ADT]), the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total ADT which flows each hour throughout a 24-hour period. Research conducted by Caltrans has shown that the use of soft site conditions is appropriate for the application of the FHWA traffic noise prediction model used in this analysis. (Urban Crossroads, 2023d, p. 31)

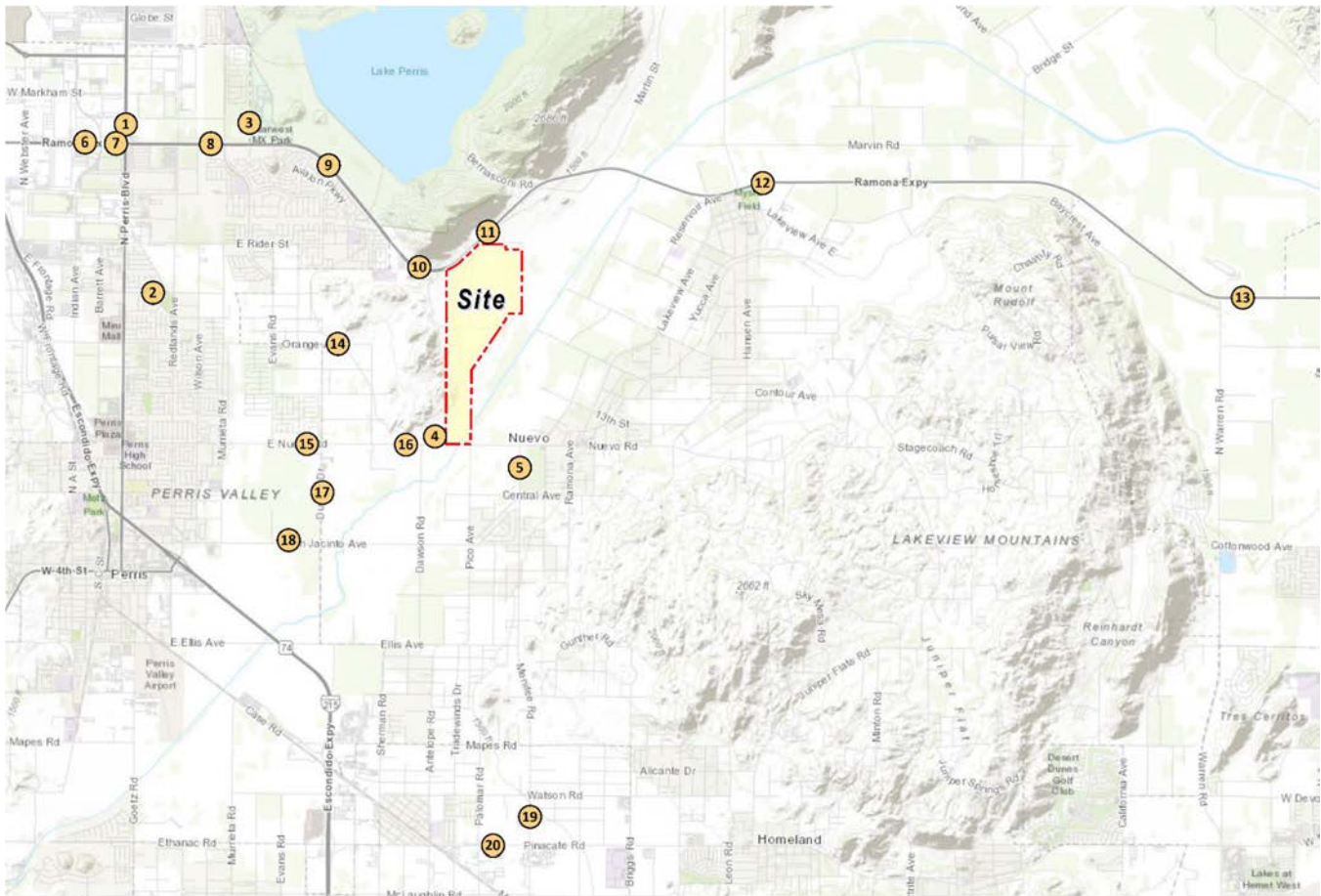
##### **2. Off-Site Traffic Noise Prediction Model Inputs**

The off-site study area roadway segments are shown on Figure 4.13-9, *Off-Site Study Area Roadway Segments*. Table 6-1 of the Project's NIA (*Technical Appendix J*) presents the roadway parameters used to assess the Project's off-site transportation noise impacts. Table 6-1 of the Project's NIA identifies the 16 off-site study area roadway segments shown on Figure 4.13-9, the distance from the centerline to adjacent land use based on the functional roadway classifications per the County of Riverside General Plan Circulation Element, and the vehicle speeds. The ADT volumes used in the Project's NIA are based on the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*) for the following traffic scenarios. (Urban Crossroads, 2023d, p. 31)

- Existing (E)
- Existing with Project (EP)



**Figure 4.13-9 Off-Site Study Area Roadway Segments**



(Urban Crossroads, 2023d, Exhibit 6-A)

- Existing plus Ambient Growth plus Cumulative (EAC) without Project Conditions
- Existing plus Ambient Growth plus Cumulative (EAPC) with Project without MCP Conditions (Primary Land Use Plan)
- Horizon Year (2040) Without Project (Without MCP)
- Horizon Year (2040) With Project (Project Buildout Without MCP)
- Horizon Year (2040) Without Project (With MCP)
- Horizon Year (2040) With Project (Project Buildout With MCP)

**3. Alternative Truck Routes**

As previously discussed in EIR subsection 3.6.2.B.2, a total of six (6) different alternative truck routes have been considered, as shown on EIR Figure 3-12. The alternative truck routes have been identified in order to evaluate alternatives to the use of Ramona Expressway for westbound truck traffic in order to determine if any of the alternative truck routes would reduce the Project’s potential impacts to sensitive receptors along the



identified truck routes. Only three of the Alternative Truck Routes were determined to be feasible: Alternative Truck Routes 1, 2, and 6, as described below. Refer to EIR subsection 3.6.2.B.2 for a discussion of why the remaining three Alternative Truck Routes were determined to be infeasible.

- Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 2: Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Eastbound trucks would continue to be routed along Ramona Expressway to the east.
- Alternative Truck Route 6: Alternative Truck Route 6 reflects the truck route previously evaluated in the DEIR for the Alternative Land Use Plan. Under near-term conditions and prior to full buildout of the Mid-County Parkway (MCP), truck traffic would utilize one of the alternative truck routes described above (i.e., Alternative Truck Routes 1 or 2). Once the MCP is constructed and operational, all westbound trucks would be routed west along the MCP to the west to access the I-215. Under this alternative, and following completion of the MCP, all eastbound truck traffic would be routed along the MCP to the east.

#### **4. Off-Site Traffic Volumes**

The ADT volumes vary for each roadway segment based on the existing traffic volumes and the combination of project traffic distributions. Tables 6-2 to 6-7 of the Project's NIA (*Technical Appendix J*) present a summary of the study area roadway segment average daily traffic volumes. The analysis relies on a comparative evaluation of the off-site traffic noise impacts at the boundary of the right-of-way of the receiving adjacent land use, without and with project ADT traffic volumes from the Project traffic analysis. (Urban Crossroads, 2023d, p. 33)

To quantify the off-site noise levels, the Project related truck trips were added to the heavy truck category in the FHWA noise prediction model. The addition of the Project related truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. Table 6-8 of the Project's NIA (*Technical Appendix J*) provides the time of day (daytime, evening, and nighttime) vehicle splits. The daily Project truck trip-ends were assigned to the individual off-site study area roadway segments based on the Project truck trip distribution percentages documented in the Stoneridge Commerce Center Specific Plan Traffic Analysis. Using the Project truck trips in combination with the Project trip distribution, Urban Crossroads, Inc. calculated the number of additional Project truck trips and vehicle mix percentages for each of the study area roadway segments. Table 6-9 of the Project's NIA shows the traffic flow by vehicle type (vehicle mix) used for all without Project traffic scenarios. (Urban Crossroads, 2023d, p. 33)



Due to the added Project truck trips, the increase in Project traffic volumes and the distributions of trucks on the study area road segments, the percentage of autos, medium trucks and heavy trucks will vary for each of the Alternative Truck Routes evaluated herein. This explains why the existing and future traffic volumes and vehicle mixes vary between seemingly identical study area roadway segments. (Urban Crossroads, 2023d, p. 41)

#### 4.13.6 IMPACT ANALYSIS

***Threshold 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?*

***Threshold 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?*

The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area; thus, no direct impact would occur.

There are no public or private airports located within two miles of the Project site. The nearest public airport is the March Air Reserve Base which is approximately 4.6 miles northwest of the Project site, while the nearest private airport to the Project site is the Perris Valley Airport which is located approximately 3.5 miles southwest of the Project site (Google Earth, 2021).

The March Air Reserve Base Inland Port (MARB) 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 (RCALUC, 2014). According to Riverside County GIS, a majority of the western, central, and southern portions of the Project site are located within the Airport Influence Area (AIA) for the March Air Reserve Base, with an Airport Compatibility Zone designation of “Zone E.” According to Table MA-1 of the ALUCP, lands within Compatibility Zone E are located “[b]eyond the 55-CNEL contour.” As such, future workers on the Project site would be exposed to noise levels less than 55 dBA CNEL, which is considered “Normally Acceptable” for the proposed light industrial, business park, and commercial retail land uses. As such, the Project would not expose future workers to excessive noise associated with public airports, and impacts would be less than significant. (RCALUC, 2014 Map MA-1 and Table MA-1; RCIT, n.d.).

According to Map PV-3 of the ALUCP prepared for the Perris Valley Airport, the 55 dBA CNEL contour for the Perris Valley Airport does not extend north of East 4<sup>th</sup> Street within the City of Perris or east of I-215, and the Project site is located more than two miles from the 55 dBA CNEL for this facility. As noted above, noise levels below 55 dBA CNEL are considered “Normally Acceptable” for the proposed light industrial, business park, and commercial retail land uses. As such, the Project would not expose future workers to excessive noise associated with private airports, and impacts would be less than significant. (RCALUC, 2010, Map PV-3; Google Earth, 2021)



***Threshold c.: Would the Project result in the 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?***

The Project has the potential to result in the generation of substantial noise levels associated with construction activities, site operations, and Project-related traffic. Each is discussed below.

**A. Construction Noise Impacts**

The following is an analysis of potential impacts resulting from the short-term construction activities associated with the development of the Project. Figure 4.13-10, *On-Site Construction Noise Source Locations*, shows the on-site construction noise source activity including the off-site improvements in relation to the nearest sensitive receiver locations previously described in subsection 4.13.5.A. As previously noted, a numerical construction threshold based on FTA Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA Leq. Construction trips would occur throughout the construction period and would be associated with the delivery of building materials, supplies, and concrete to the Project Site. The construction trips would consist mostly of individual worker vehicles. However, it is expected that the individual worker vehicle construction noise source activities will be overshadowed by the construction noise source activities outlined below. (Urban Crossroads, 2023d, p. 73)

**1. Construction Noise Levels**

The FTA *Transit Noise and Vibration Impact Assessment Manual* recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities are expected to occur in the following stages: site preparation, grading, building construction, paving, and architectural coating. (Urban Crossroads, 2023d, pp. 73-74)

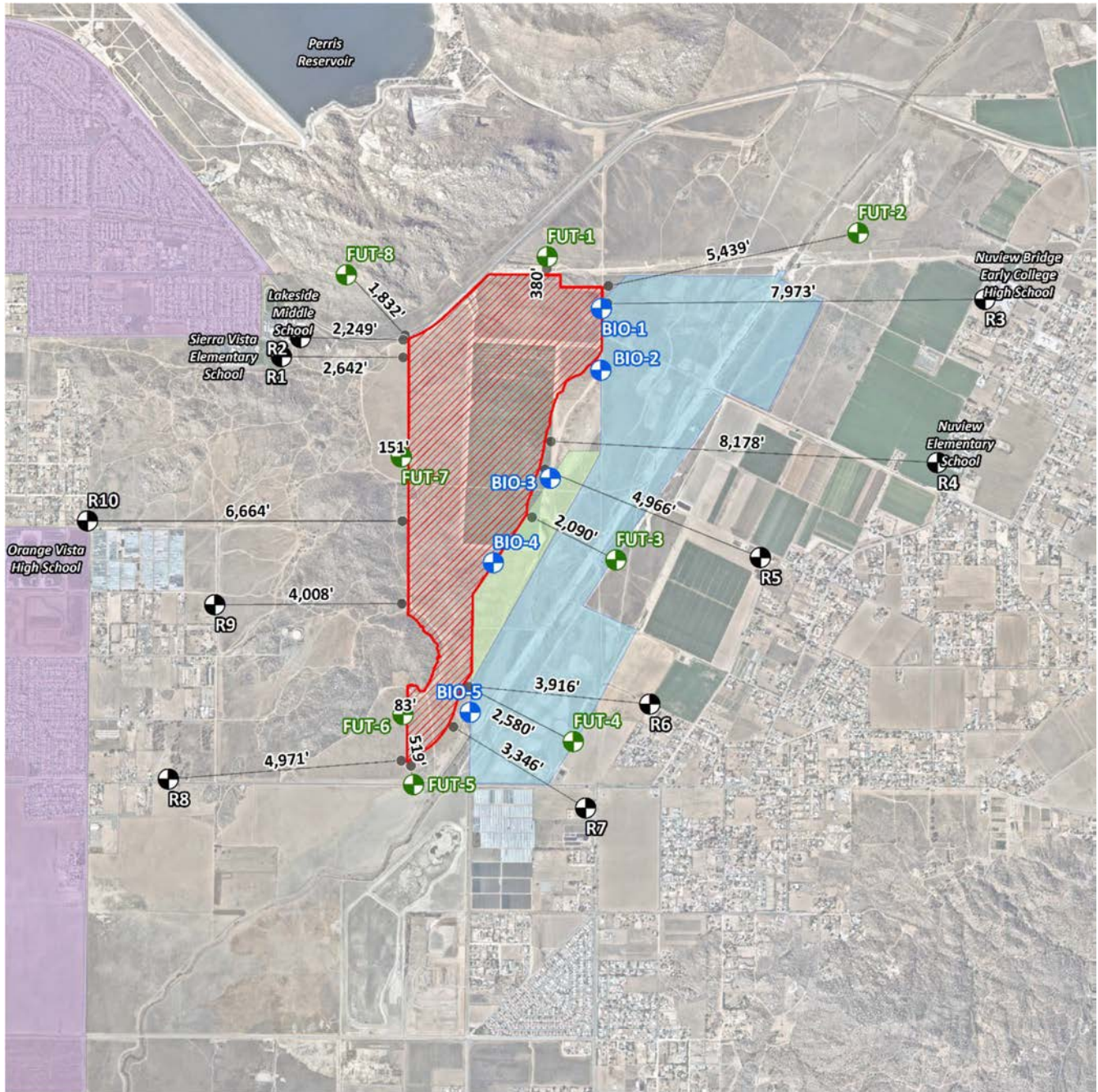
Using the reference construction equipment noise levels previously shown in Table 4.13-4 and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. As shown on Table 4.13-7, *On-Site Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 30.3 to 48.6 dBA Leq at the nearest existing noise sensitive receiver locations (R1 to R10). Appendix 10.1 to the Project’s NIA (*Technical Appendix J*) includes the detailed CadnaA construction noise model inputs. (Urban Crossroads, 2023d, p. 71)

**2. On-Site Construction Noise Level Compliance**

To evaluate whether the Project would generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level of 80 dBA Leq is used as a reasonable threshold



Figure 4.13-10 On-Site Construction Noise Source Locations



**LEGEND:**



- On-Site Limits of Disturbance
- City of Perris
- Riverpark Mitigation Bank Parcels
- Biological Open Space
- Existing Receiver Locations
- Bio Receiver Locations
- Future Receiver Locations
- Distance from receiver to construction activity (in feet)

(Urban Crossroads, 2023d, Exhibit 10-A)



**Table 4.13-7 On-Site Construction Equipment Noise Level Summary**

Receiver Location <sup>1</sup>	Construction Noise Levels (dBA Leq)					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels <sup>2</sup>
R1	44.7	47.7	45.7	47.7	41.7	47.7
R2	45.6	48.6	46.6	48.6	42.6	48.6
R3	33.3	36.3	34.3	36.3	30.3	36.3
R4	35.2	38.2	36.2	38.2	32.2	38.2
R5	40.5	43.5	41.5	43.5	37.5	43.5
R6	42.1	45.1	43.1	45.1	39.1	45.1
R7	43.4	46.4	44.4	46.4	40.4	46.4
R8	38.9	41.9	39.9	41.9	35.9	41.9
R9	41.8	44.8	42.8	44.8	38.8	44.8
R10	37.2	40.2	38.2	40.2	34.2	40.2
FUT-1	49.7	52.7	50.7	52.7	46.7	52.7
FUT-2	36.8	39.8	37.8	39.8	33.8	39.8
FUT-3	45.6	48.6	46.6	48.6	42.6	48.6
FUT-4	45.7	48.7	46.7	48.7	42.7	48.7
FUT-5	58.3	61.3	59.3	61.3	55.3	61.3
FUT-6	53.3	56.3	54.3	56.3	50.3	56.3
FUT-7	57.4	60.4	58.4	60.4	54.4	60.4
FUT-8	45.9	48.9	46.9	48.9	42.9	48.9
BIO-1	62.1	65.1	63.1	65.1	59.1	65.1
BIO-2	53.4	56.4	54.4	56.4	50.4	56.4
BIO-3	53.6	56.6	54.6	56.6	50.6	56.6
BIO-4	52.5	55.5	53.5	55.5	49.5	55.5
BIO-5	58.7	61.7	59.7	61.7	55.7	61.7

1. Construction noise source and receiver locations are shown on Figure 4.13-10.
2. Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 to the Project’s NIA (*Technical Appendix J*).  
(Urban Crossroads, 2023d, Table 10-2)

to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest existing noise sensitive receiver locations (R1 to R10) would not be exposed to Project construction-related noise levels exceeding the reasonable daytime 80 dBA Leq significance threshold during Project construction activities as shown on Table 4.13-8, *On-Site Construction Noise Level Compliance*. Potential construction noise level impacts associated with receiver locations FUT-1 to FUT-8 and BIO-1 to BIO-5 are provided for informational purposes only; however, the analysis also shows that these receptor locations would not be exposed to noise levels exceeding 80 dBA Leq. Therefore, the noise impacts due to Project construction noise



would be less than significant at all the existing and future noise sensitive receiver locations. (Urban Crossroads, 2023d, p. 77)

### **3. Off-Site Roadway and Utility Improvements Construction Noise Analysis**

As part of Project construction activities, there would be grading, trenching, and paving for off-site improvements associated with roadway construction and utility installation for the Project as shown on Figure 4.13-11, *Off-Site Construction Noise Source Locations*. This includes the installation of the proposed offsite water line adjacent to the Lakeside Middle School and residential land uses located north of Walnut Street. The loudest phase of construction associated with off-site roadway and utility improvements likely would be during grading/excavation activities, which would generate similar noise levels compared to the grading/excavation phase of the proposed Project's on-site construction activities previously outlined on Table 4.13-4. (Urban Crossroads, 2023d, p. 78)

To assess the off-site construction noise analysis from the installation of the proposed offsite water line, three off-site receivers (OFF1, OFF2 and OFF3) were identified at locations adjacent to the Lakeside Middle School, Sierra Vista Elementary School, and the nearest residential land uses located north of Walnut Street, as shown on Figure 4.13-12, *Off-Site Construction Receiver Locations*. The off-site construction noise analysis includes the existing 5-foot-high noise barriers and the substantial existing topographical features that places the residential homes in the noise shadow zone approximately 27 feet below Walnut Street. The existing topography also places the nearest noise sensitive Sierra Vista Elementary School approximately 27 above Walnut Street. Receiver OFF1 representing the Lakeside Middle school is effectively located at grade with Walnut Street. (Urban Crossroads, 2023d, p. 80)

Table 4.13-9, *Off-Site Construction Noise Analysis*, shows that the unmitigated off-site construction noise levels at receiver locations OFF1, OFF2, and OFF3 would range from 56.0 to 64.1 dBA Leq. The unmitigated off-site receivers would not be exposed to noise levels exceeding the reasonable daytime 80 dBA Leq significance threshold during off-site Project construction activities. Therefore, the noise impacts due to off-site Project construction noise are considered less than significant and no construction noise mitigation is required due to the off-site Project construction activities. Appendix 10.2 to the Project's NIA (*Technical Appendix J*) includes the CadnaA off-site construction noise calculations. Although impacts would be less than significant, the off-site construction activities would be subject to the construction noise measures identified as part of Mitigation Measure MM 4.13-3, which would serve to further reduce noise levels during off-site utility and roadway improvements. (Urban Crossroads, 2023d, pp. 80-81)

### **4. Nighttime Concrete Pour Analysis**

Nighttime concrete pouring activities would occur as a part of Project building construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building pad area. Since the nighttime concrete pours would take place outside the permitted by Section 2i of Riverside County Ordinance No. 847, the Project Applicant would be required to obtain authorization for nighttime work from





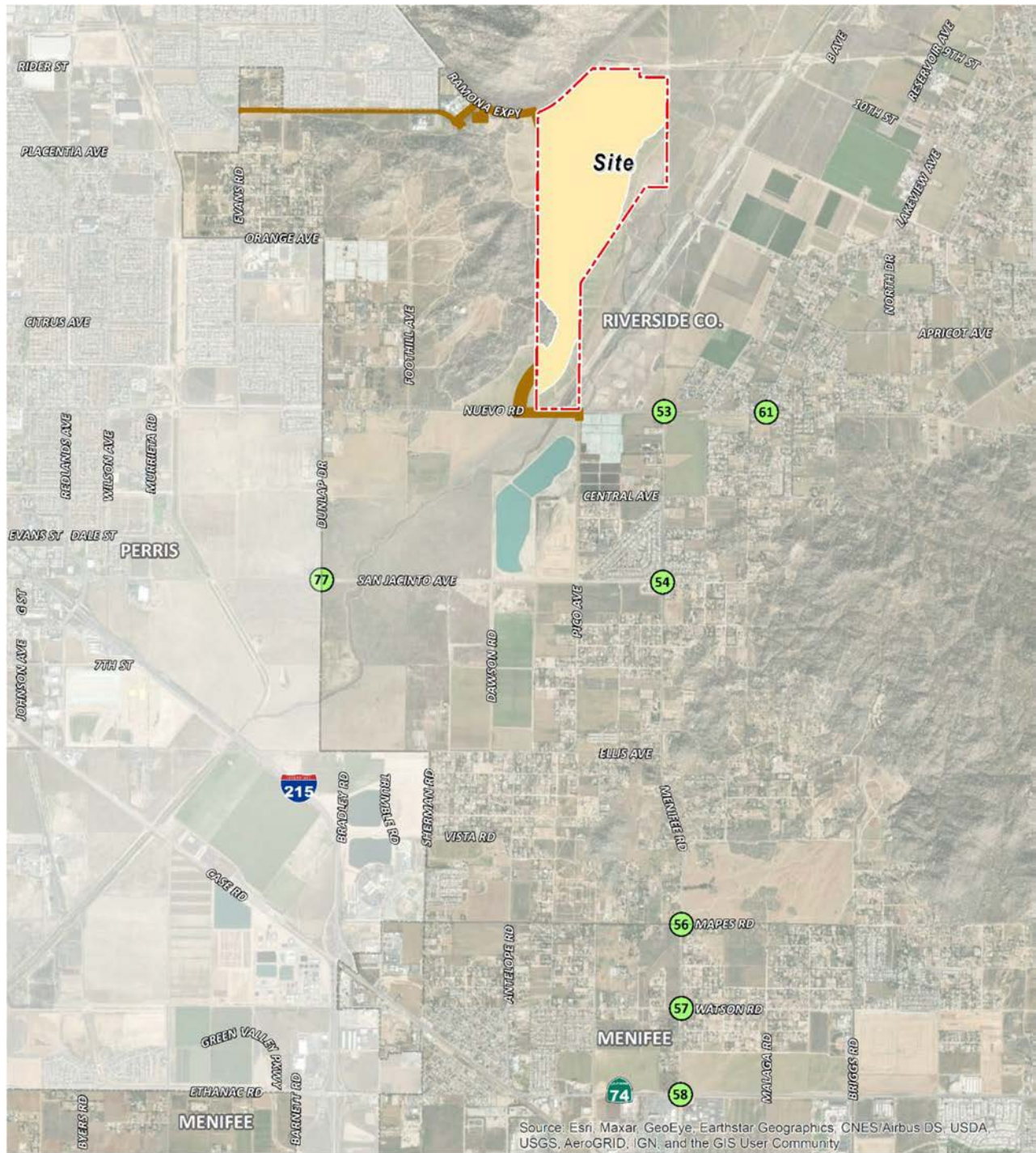
**Table 4.13-8 On-Site Construction Noise Level Compliance**

Receiver Location <sup>1</sup>	Construction Noise Levels (dBA L <sub>eq</sub> )		
	Highest Construction Noise Levels <sup>2</sup>	Threshold <sup>3</sup>	Threshold Exceeded? <sup>4</sup>
R1	47.7	80	No
R2	48.6	80	No
R3	36.3	80	No
R4	38.2	80	No
R5	43.5	80	No
R6	45.1	80	No
R7	46.4	80	No
R8	41.9	80	No
R9	44.8	80	No
R10	40.2	80	No
FUT-1	52.7	.5	.5
FUT-2	39.8	.5	.5
FUT-3	48.6	.5	.5
FUT-4	48.7	.5	.5
FUT-5	61.3	.5	.5
FUT-6	56.3	.5	.5
FUT-7	60.4	.5	.5
FUT-8	48.9	.5	.5
BIO-1	65.1	.5	.5
BIO-2	56.4	.5	.5
BIO-3	56.6	.5	.5
BIO-4	55.5	.5	.5
BIO-5	61.7	.5	.5

1. Construction noise source and receiver locations are shown on Figure 4.13-10.
2. Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 4.13-7.
3. Construction noise level thresholds as shown on Table 4.13-3.
4. Do the estimated Project construction noise levels exceed the construction noise level threshold?
5. Project construction noise levels provided for informational purposes.  
(Urban Crossroads, 2023d, Table 10-3)



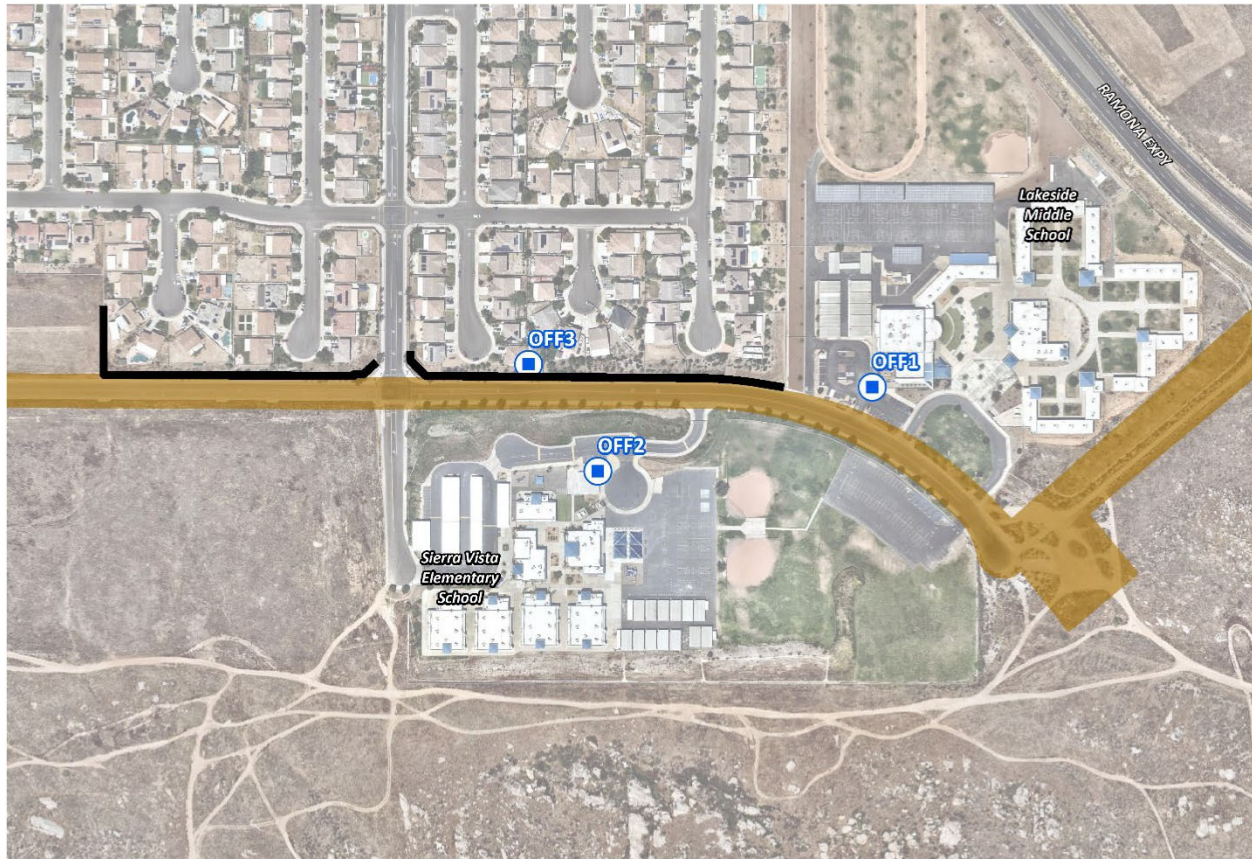
Figure 4.13-11 Off-Site Construction Noise Source Locations



(Urban Crossroads, 2023d, Exhibit 10-B)



Figure 4.13-12 Off-Site Construction Receiver Locations



- LEGEND:**
- N
  - Off-Site Receiver Location
  - Off-Site Limits of Disturbance
  - Existing 5-Foot High Barrier
  - On-Site Limits of Disturbance
  - Off-Site Intersection Improvement Location

(Urban Crossroads, 2023d, Exhibit 10-C)



**Table 4.13-9 Off-Site Construction Noise Analysis**

Off-Site Receiver Location <sup>1</sup>	Off-Site Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels <sup>2</sup>	Threshold <sup>3</sup>	Threshold Exceeded? <sup>4</sup>
OFF1	64.1	80	No
OFF2	57.2	80	No
OFF3	56.0	80	No

1. Off-site construction receiver locations are shown on Figure 4.13-12.
2. Based on the highest construction noise source level as shown on Table 4.13-7. Calculations included in Appendix 10.2 to the Project’s NIA (*Technical Appendix J*).
3. Construction noise level thresholds as shown on Table 4.13-3.
4. Do the estimated Project construction noise levels exceed the construction noise level threshold?
5. Project construction noise levels provided for informational purposes.  
(Urban Crossroads, 2023d, Table 10-4)

the County of Riverside. Any nighttime construction noise activities are evaluated against the FTA nighttime exterior construction noise level threshold of 70 dBA Leq for noise sensitive residential land use. (Urban Crossroads, 2023d, p. 82)

As shown on Table 4.13-10, *Nighttime Concrete Pour Noise Level Compliance*, the noise levels associated with the nighttime concrete pour activities are estimated to range from 26.4 to 35.8 dBA Leq at the existing noise sensitive receiver locations. The analysis shows that the unmitigated nighttime concrete pour activities would not exceed the FTA 70 dBA Leq nighttime residential noise level threshold at all the nearest noise sensitive receiver locations. Potential nighttime concrete pour construction noise level impacts associated with receiver locations FUT-1 to FUT-8 and BIO-1 to BIO-5 are provided for informational purposes only; however, the analysis shows that none of the future receptors or sensitive biological areas would not be exposed to nighttime noise levels exceeding the 70 dBA Leq nighttime residential noise level threshold. Therefore, the noise impacts due to Project construction nighttime concrete pour noise activity would be less than significant at all receiver locations with prior authorization for nighttime work from the County of Riverside. Appendix 10.3 to the Project’s NIA (*Technical Appendix J*) includes the CadnaA nighttime concrete pour noise model inputs. (Urban Crossroads, 2023d, p. 82)

**5. Blasting-Related Noise Impacts**

Off-site Project construction blasting will be limited to the two off-site water towers as shown on Figure 4.13-13, *Off-Site Construction Blasting Location*. The blasting is needed to remove the non-rippable materials at the water towers located off-site and southeast of the Lakeside Middle School. A blasting contractor would be required to complete all blasting-related activities in compliance with applicable regulations of the Riverside County Sheriff’s Department, the U.S. Bureau of Mines, the California Division of Occupational Safety and Health (Cal-OHSA), the Department of Homeland Security, and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). As required by law a licensed blasting contractor would be responsible for performing and supervising all blasting activities, including the following: (Urban Crossroads, 2023d, p. 86)



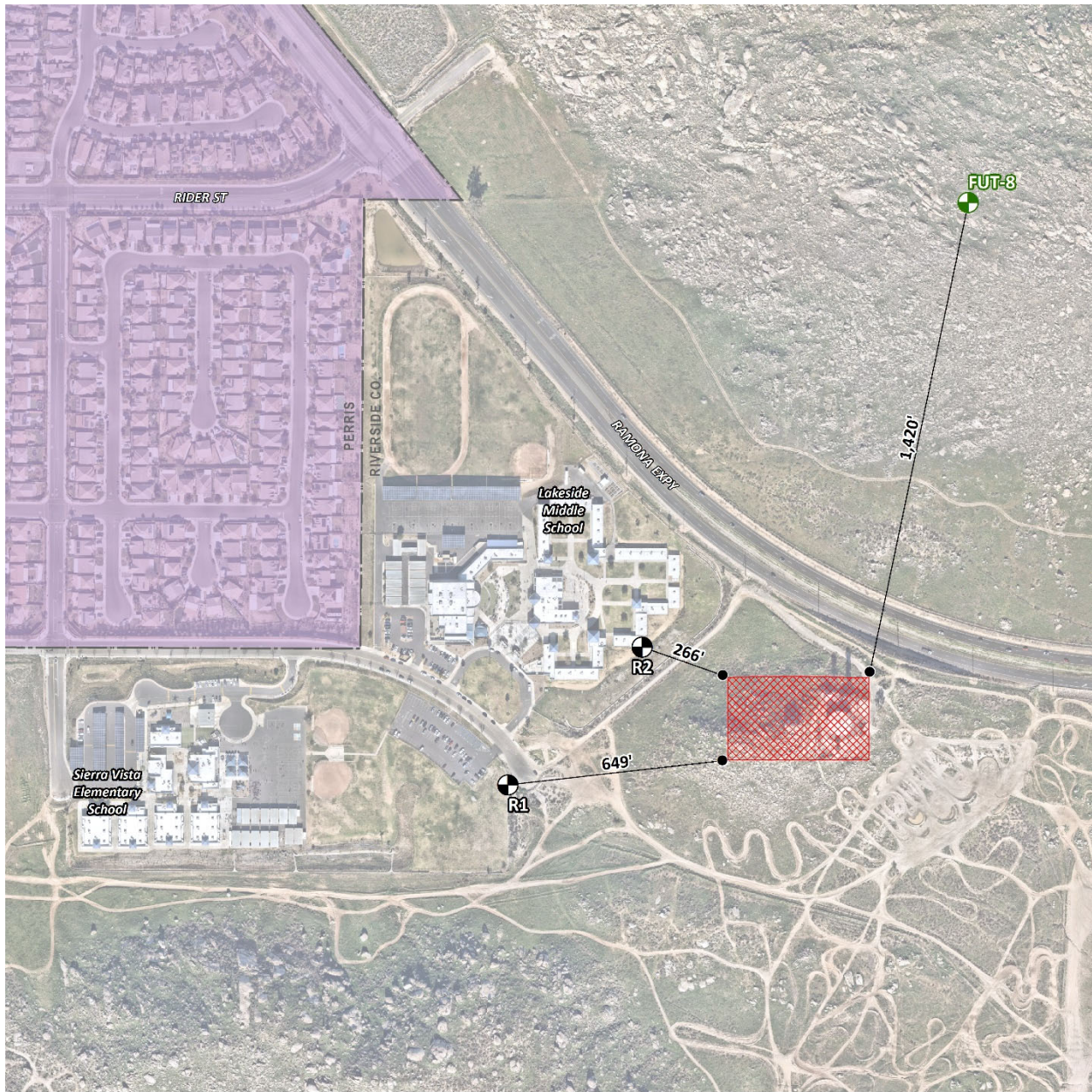
Table 4.13-10 Nighttime Concrete Pour Noise Level Compliance

Receiver Location <sup>1</sup>	Concrete Pour Construction Noise Levels (dBA L <sub>eq</sub> )		
	Exterior Noise Levels <sup>2</sup>	Threshold <sup>3</sup>	Threshold Exceeded? <sup>4</sup>
R1	35.3	70	No
R2	35.8	70	No
R3	26.4	70	No
R4	27.7	70	No
R5	32.3	70	No
R6	33.5	70	No
R7	32.9	70	No
R8	29.3	70	No
R9	32.9	70	No
R10	28.7	70	No
FUT-1	47.4	.5	.5
FUT-2	30.1	.5	.5
FUT-3	37.5	.5	.5
FUT-4	35.6	.5	.5
FUT-5	39.1	.5	.5
FUT-6	48.8	.5	.5
FUT-7	45.3	.5	.5
FUT-8	36.6	.5	.5
BIO-1	52.2	.5	.5
BIO-2	45.3	.5	.5
BIO-3	42.6	.5	.5
BIO-4	48.6	.5	.5
BIO-5	44.3	.5	.5

1. Construction noise source and receiver locations are shown on Figure 4.13-10.
2. Nighttime Concrete Pour noise model inputs are included in Appendix 10.2 to the Project’s NIA (*Technical Appendix J*).
3. Construction noise level thresholds as shown on Table 4.13-3.
4. Do the estimated Project construction noise levels exceed the construction noise level threshold?
5. Project construction noise levels provided for informational purposes.  
(Urban Crossroads, 2023d, Table 10-4)



Figure 4.13-13 Off-Site Construction Blasting Location



**LEGEND:**



- Blasting Area
- Existing Receiver Locations
- Future Receiver Locations
- City of Perris
- Distance from receiver to blasting activity (in feet)

(Urban Crossroads, 2023d, Exhibit 10-D)



- Drill pattern design;
- Pre-blast inspection;
- Loading of explosives;
- Pre-blast notifications and warning signaling;
- Blasting safety procedures;
- Blasting site security;
- Post-blast inspections and re-entry procedures; and
- Blast log and history.

Explosives used for blasting usually consist of a primer, secondary explosive, and an initiator. The blasting contractor would most likely use a high explosive Ammonia Gelatin as a primer for each shot and ammonium nitrate mixed with fuel oil (ANFO) as the primary blasting agent. Non-electric blasting caps are typically used to initiate the blasting agent. The charges are time delayed by at least 8-milliseconds. Delays between charges are used to decouple changes and reduce vibration. Pattern blasting is a common technique used in blasting for construction. This method is used when rock materials occur over a wide area. Pattern blasting involves drilling holes in a pre-designed pattern. The depth and spacing of holes is controlled to provide the maximum fracture with the minimum amount of ground shaking. (Urban Crossroads, 2023d, p. 86)

Blasting patterns typically consist of drill holes between two and five inches in diameter. The depth of the drill holes would be determined by the blasting contractor and is specific to each application. Blasting patterns on construction sites typically range from three feet by three feet to 12 feet by 12 feet. The Blasting Engineer would control blasting-induced vibration and noise. General control measures include: (Urban Crossroads, 2023d, p. 88)

- Stemming shall be of uniform size in order to ensure consistency between individual shots;
- The weight of explosives used per delay shall be determined by adherence to the Scaled Distance Equation;
- Independent delays shall be used for each blast hole to control vibration; and
- Blasting shall not take place when wind velocity equals or exceeds 15 miles per hour. A licensed blasting contractor will determine wind speed through the use of a recording anemometer located a minimum of ten feet above ground level.

In addition, ground vibrations and air overpressure shall be monitored during each blast for compliance with the limits by the U.S. Bureau of Mines. Following each blast, seismographs shall be checked to ensure that the blasting has not exceeded relevant standards. The relevant standards are as follows:

- Pursuant to 30 CFR Ch. VII, §816.67(b)(1)(i) of U.S. Bureau of Mines publication RI8485, airblasts shall not exceed 133 dB at the location of any dwelling, public building, school, church, or community or institutional building outside the permit area.



- Pursuant to 30 CFR Ch. VII, §816.67(d)(2)(i) of U.S. Bureau of Mines publication RI8508, the maximum ground vibration shall not exceed the limits in said section at the location of any dwelling, public building, school, church, or community or institutional building outside the permit area.

To evaluate the potential noise levels from blasting activities during Project construction, the FHWA RCNM reference noise level of 94 dBA Lmax is used at a reference distance of 50 feet. Each blast represents a point-source of noise which attenuates at a rate of 6 dB for each doubling of distance from the source. The Lakeside Middle School represents the closest building structure to the off-site water tower blasting area represented by Receiver R2 located approximately 266 feet to the south. With the distance attenuation from the nearest blasting activities, the unmitigated noise levels at nearby receiver locations would range from 64.2 to 69.3 dBA Lmax, as shown in Table 4.13-11, *Blasting Construction Noise Levels*. However, since the type of blasting techniques planned within the Project site were unknown at the time of analysis, the noise levels presented at the nearby sensitive receiver locations represent the worst-case conditions based on the RCNM reference noise level. (Urban Crossroads, 2023d, p. 88)

**Table 4.13-11 Blasting Construction Noise Levels**

Receiver Location <sup>1</sup>	Distance to Construction Activity (Feet)	Construction Noise Level (dBA Lmax) <sup>2</sup>
R1	266'	65.4
R2	649'	69.3
FUT-8	1,420'	64.2

1. Off-site construction blasting, and receiver locations are shown on Exhibit 10-D.
2. Based on FHWA Roadway Construction Noise Model reference noise level of 94 dBA Lmax. CadnaA noise model calculations are included in Appendix 10.4 to the Project’s NIA (*Technical Appendix J*). (Urban Crossroads, 2023d, Table 10-9)

The County of Riverside General Plan and ordinances do not identify specific construction noise level limits for blasting activities. Therefore, the OSMRE and CFR lowest maximum Airblast Limit (30 CFR 816.67(b)) of 129 dBA Lmax at nearby sensitive uses is used as a significance threshold. While some blasting noise may be noticeable by nearby noise sensitive receivers, the single-event, temporary noise levels generated by the blast would not exceed the OSMRE and the CFR standards for airblasts. Therefore, the noise levels due to blasting activities would result in a less-than-significant noise impact. Appendix 10.4 to the Project’s NIA (*Technical Appendix J*) includes the CadnaA blasting noise model inputs. (Urban Crossroads, 2023d, pp. 88-89)

**B. Operational Noise Impacts**

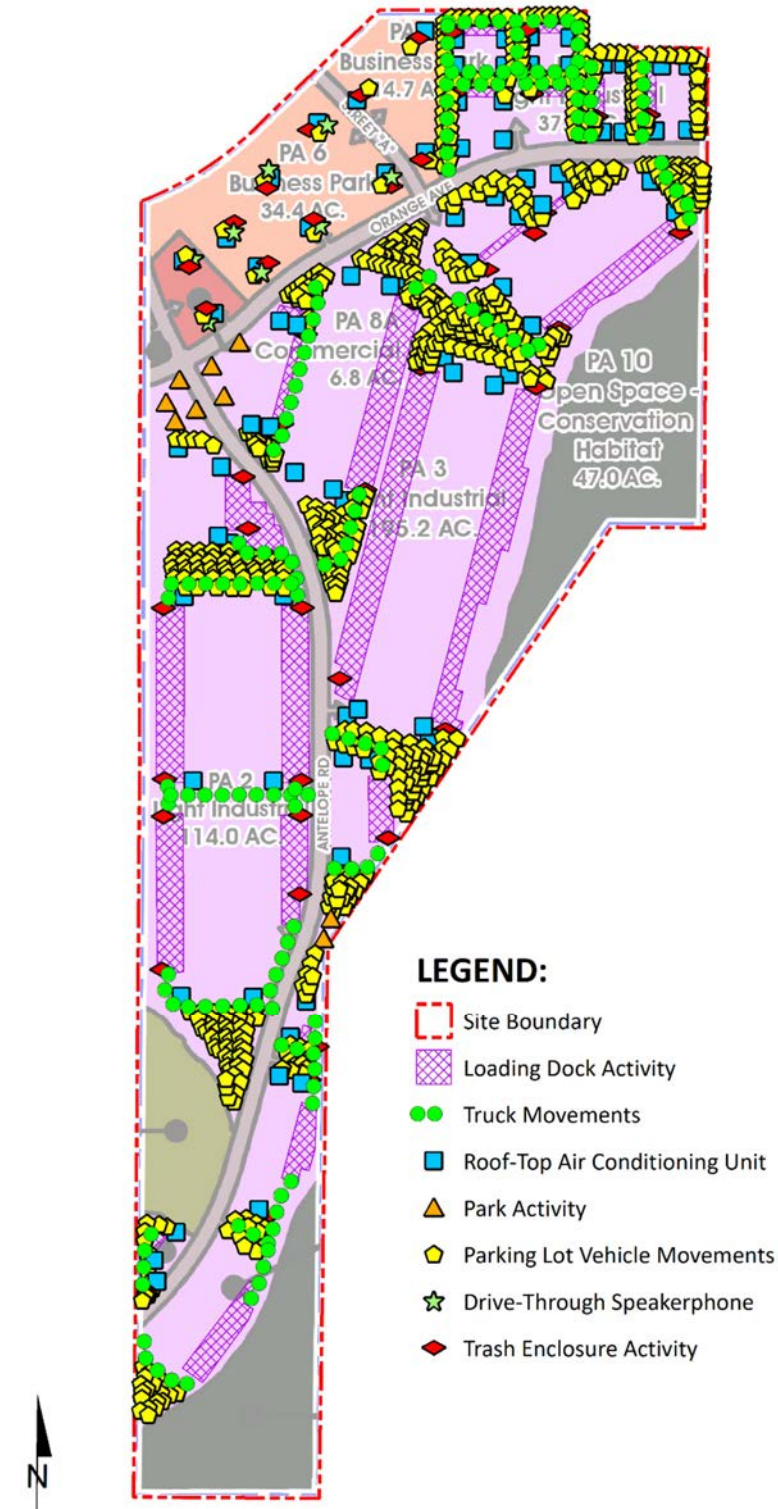
**1. Operational Noise Levels**

Figure 4.13-14, *Operational Noise Source Locations*, identifies the noise source locations used to assess the operational noise levels, which includes over 885 individual noise sources to conservatively describe the





Figure 4.13-14 Operational Noise Source Locations



(Urban Crossroads, 2023d, Exhibit 9-A)



potential worst-case noise environment. This includes a combination of noise sources such as loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, truck movements, and drive-through speakerphone activity. Therefore, no screen walls or noise barriers were included in the following operational noise analysis. In addition, while the actual location and configuration of the loading docks cannot be reasonably known at this level of analysis, the operational noise analysis includes multiple loading docks within each industrial planning area. (Urban Crossroads, 2023d, p. 59)

Using the reference noise levels to represent the proposed Project operations that include loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, truck movements, and drive-through speakerphone activity, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations as shown on Table 4.13-12, *Daytime Project Operational Noise Levels (Existing Receptor Locations)*, Table 4.13-13, *Daytime Project Operational Noise Levels (Biology and Future Receptor Locations)*, Table 4.13-14, *Nighttime Project Operational Noise Levels (Existing Receptor Locations)*, and Table 4.13-15, *Nighttime Project Operational Noise Levels (Biology and Future Receptor Locations)*. (Urban Crossroads, 2023d, p. 64)

Table 4.13-12 and Table 4.13-13 show the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 35.1 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.7 to 62.1 dBA Leq at the nearby habitat (BIO) locations. Table 4.13-14 and Table 4.13-15 show the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 35.0 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.6 to 62.1 dBA Leq at the nearby habitat (BIO) locations. The differences between the daytime and nighttime noise levels are largely related to the estimated duration of noise activity as outlined in Table 4.13-6 and Appendix 9.1 to the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2023d, p. 67)

## 2. Project Operational Noise Level Compliance

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the County of Riverside exterior noise level standards at the existing nearby noise-sensitive receiver locations. Table 4.13-16, *Operational Noise Level Compliance*, shows the operational noise levels associated with the proposed Project would not exceed the County of Riverside daytime and nighttime exterior noise level standards at the existing nearby noise-sensitive receiver locations. Therefore, the operational noise impacts are considered less than significant at the nearby existing noise-sensitive receiver locations. The analysis also shows that nearby biological receptors would not be exposed to excessive noise levels. However, future residential receptor FUT-1 would be exposed to noise levels of 58.4 dBA Leq during the daytime hours and 58.4 dBA Leq during the nighttime hours, which would exceed the identified significance criteria of 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours. In addition, future residential receptors FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8 would be exposed



**Table 4.13-12 Daytime Project Operational Noise Levels (Existing Receptor Locations)**

Noise Source <sup>1</sup>	Operational Noise Levels by Receiver Location (dBA Leq)									
	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10
Loading Dock Activity	41.2	42.2	34.8	35.7	41.0	43.5	43.0	36.7	39.9	35.1
Roof-Top Air Conditioning Units	27.4	28.2	17.3	18.4	22.9	23.2	21.8	19.5	23.5	19.9
Trash Enclosure Activity	24.7	25.6	12.9	14.0	18.9	20.6	19.6	15.4	20.2	16.5
Parking Lot Vehicle Movements	26.7	27.4	18.0	19.3	24.4	25.5	23.9	20.9	24.6	20.8
Truck Movements	24.3	24.7	16.1	18.0	24.0	26.4	26.4	21.5	24.7	20.1
Drive-Through Speakerphone Activity	15.0	16.2	0.0	0.0	2.1	0.1	0.0	1.0	6.7	4.7
Park Activities	17.4	18.1	0.0	0.9	6.6	9.3	7.5	4.4	10.3	7.8
<b>Total (All Noise Sources)</b>	<b>41.7</b>	<b>42.7</b>	<b>35.1</b>	<b>36.0</b>	<b>41.3</b>	<b>43.7</b>	<b>43.2</b>	<b>37.0</b>	<b>40.3</b>	<b>35.6</b>

See Figure 4.13-14 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix J*).  
(Urban Crossroads, 2023d, Table 9-2)

**Table 4.13-13 Daytime Project Operational Noise Levels (Biology and Future Receptor Locations)**

Noise Source <sup>1</sup>	Operational Noise Levels by Receiver Location (dBA Leq)												
	FUT-1	FUT-2	FUT-3	FUT-4	FUT-5	FUT-6	FUT-7	FUT-8	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5
Loading Dock Activity	58.3	38.4	47.2	45.9	48.5	55.5	46.2	45.4	40.4	54.6	53.0	61.7	54.6
Roof-Top Air Conditioning Units	37.4	21.2	27.7	24.4	24.8	36.4	33.9	29.2	36.8	34.5	31.8	33.7	29.8
Trash Enclosure Activity	33.8	16.5	24.6	22.6	17.4	22.5	32.7	27.5	21.0	34.0	29.0	46.2	30.7
Parking Lot Vehicle Movements	38.8	21.6	29.9	26.5	33.0	43.8	39.1	28.6	48.8	36.1	32.2	42.3	33.9
Truck Movements	37.7	19.1	29.7	29.2	33.8	44.6	36.2	26.0	34.0	34.7	29.7	49.8	40.4
Drive-Through Speakerphone Activity	15.7	0.0	5.3	0.0	0.0	1.6	18.3	17.8	0.0	9.7	8.8	5.1	1.6
Park Activities	10.1	1.3	13.3	10.7	4.9	13.4	24.8	17.5	0.0	9.0	14.5	26.4	14.4
<b>Total (All Noise Sources)</b>	<b>58.4</b>	<b>38.6</b>	<b>47.4</b>	<b>46.1</b>	<b>48.8</b>	<b>56.2</b>	<b>47.7</b>	<b>45.7</b>	<b>49.7</b>	<b>54.8</b>	<b>53.1</b>	<b>62.1</b>	<b>54.8</b>

See Figure 4.13-14 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix J*).  
(Urban Crossroads, 2023d, Table 9-2)



**Table 4.13-14 Nighttime Project Operational Noise Levels (Existing Receptor Locations)**

Noise Source <sup>1</sup>	Operational Noise Levels by Receiver Location (dBA Leq)									
	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10
Loading Dock Activity	41.2	42.2	34.8	35.7	41.0	43.5	43.0	36.7	39.9	35.1
Roof-Top Air Conditioning Units	25.0	25.8	14.9	16.0	20.5	20.8	19.4	17.1	21.1	17.4
Trash Enclosure Activity	24.7	25.6	12.9	14.0	18.9	20.6	19.6	15.4	20.2	16.5
Parking Lot Vehicle Movements	26.7	27.4	18.0	19.3	24.4	25.5	23.9	20.9	24.6	20.8
Truck Movements	24.3	24.7	16.1	18.0	24.0	26.4	26.4	21.5	24.7	20.1
Drive-Through Speakerphone Activity	15.0	16.2	0.0	0.0	2.1	0.1	0.0	1.0	6.7	4.7
Park Activities	17.4	18.1	0.0	0.9	6.6	9.3	7.5	4.4	10.3	7.8
<b>Total (All Noise Sources)</b>	<b>41.6</b>	<b>42.6</b>	<b>35.0</b>	<b>35.9</b>	<b>41.2</b>	<b>43.7</b>	<b>43.2</b>	<b>37.0</b>	<b>40.3</b>	<b>35.5</b>

See Figure 4.13-14 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix J*).  
(Urban Crossroads, 2023d, Table 9-3)

**Table 4.13-15 Nighttime Project Operational Noise Levels (Biology and Future Receptor Locations)**

Noise Source <sup>1</sup>	Operational Noise Levels by Receiver Location (dBA Leq)												
	FUT-1	FUT-2	FUT-3	FUT-4	FUT-5	FUT-6	FUT-7	FUT-8	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5
Loading Dock Activity	58.3	38.4	47.2	45.9	48.5	55.5	46.2	45.4	40.4	54.6	53.0	61.7	54.6
Roof-Top Air Conditioning Units	35.0	18.8	25.3	22.0	22.4	34.0	31.5	26.8	34.4	32.1	29.4	31.3	27.4
Trash Enclosure Activity	33.8	16.5	24.6	22.6	17.4	22.5	32.7	27.5	21.0	34.0	29.0	46.2	30.7
Parking Lot Vehicle Movements	38.8	21.6	29.9	26.5	33.0	43.8	39.1	28.6	48.8	36.1	32.2	42.3	33.9
Truck Movements	37.7	19.1	29.7	29.2	33.8	44.6	36.2	26.0	34.0	34.7	29.7	49.8	40.4
Drive-Through Speakerphone Activity	15.7	0.0	5.3	0.0	0.0	1.6	18.3	17.8	0.0	9.7	8.8	5.1	1.6
Park Activities	10.1	1.3	13.3	10.7	4.9	13.4	24.8	17.5	0.0	9.0	14.5	26.4	14.4
<b>Total (All Noise Sources)</b>	<b>58.4</b>	<b>38.6</b>	<b>47.4</b>	<b>46.1</b>	<b>48.8</b>	<b>56.1</b>	<b>47.6</b>	<b>45.7</b>	<b>49.6</b>	<b>54.8</b>	<b>53.1</b>	<b>62.1</b>	<b>54.8</b>

See Figure 4.13-14 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's NIA (*Technical Appendix J*).  
(Urban Crossroads, 2023d, Table 9-3)



Table 4.13-16 Operational Noise Level Compliance

Receiver Location <sup>1</sup>	Project Operational Noise Levels (dBA Leq) <sup>2</sup>		Noise Level Standards (dBA Leq) <sup>3</sup>		Noise Level Standards Exceeded? <sup>4</sup>	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	41.7	41.6	55	45	No	No
R2	42.7	42.6	55	45	No	No
R3	35.1	35.0	55	45	No	No
R4	36.0	35.9	55	45	No	No
R5	41.3	41.2	55	45	No	No
R6	43.7	43.7	55	45	No	No
R7	43.2	43.2	55	45	No	No
R8	37.0	37.0	55	45	No	No
R9	40.3	40.3	55	45	No	No
R10	35.6	35.5	55	45	No	No
FUT-1	58.4	58.4	.5	.5	.5	.5
FUT-2	38.6	38.6	.5	.5	.5	.5
FUT-3	47.4	47.4	.5	.5	.5	.5
FUT-4	46.1	46.1	.5	.5	.5	.5
FUT-5	48.8	48.8	.5	.5	.5	.5
FUT-6	56.2	56.1	.5	.5	.5	.5
FUT-7	47.7	47.6	.5	.5	.5	.5
FUT-8	45.7	45.7	.5	.5	.5	.5
BIO-1	49.7	49.6	.5	.5	.5	.5
BIO-2	54.8	54.8	.5	.5	.5	.5
BIO-3	53.1	53.1	.5	.5	.5	.5
BIO-4	62.1	62.1	.5	.5	.5	.5
BIO-5	54.8	54.8	.5	.5	.5	.5

1. See Figure 4.13-7 for the receiver locations.
  2. Proposed Project operational noise levels as shown on Table 4.13-12 through Table 4.13-15.
  3. Exterior noise level standards, as shown on Table 4.13-3.
  4. Do the estimated Project operational noise source activities exceed the noise level standards?
  5. Project operational noise levels provided for informational purposes.
- "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.  
(Urban Crossroads, 2023d, Table 9-4)

to nighttime noise levels exceeding the County’s threshold of significance of 45 dBA Leq. Accordingly, Project operational noise impacts to future residential receptors FUT-1, FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8 represents a potentially significant impact prior to mitigation. (Urban Crossroads, 2023d, p. 67)



### 3. ***Project Operational Noise Level Increases***

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the equation described in Subsection 9.6 of the Project's NIA (*Technical Appendix J*). The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. (Urban Crossroads, 2023d, p. 69)

Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented on Table 4.13-17, *Daytime Project Operational Noise Level Increases*, and Table 4.13-18, *Nighttime Project Operational Noise Level Increases*, respectively. As indicated on Table 4.13-17, the Project would generate a daytime operational noise level increases ranging from 0.0 to 0.7 dBA Leq at the nearest receiver locations. Table 4.13-18 shows that the Project would generate a nighttime operational noise level increases ranging from 0.0 to 2.0 dBA Leq at the nearest receiver locations. Project-related operational noise level increases would not exceed the operational noise level increase significance criteria presented in Table 4.13-3, and, therefore, the increases at the sensitive receiver locations under long-term Project operations would be less than significant. (Urban Crossroads, 2023d, p. 69)

#### ***C. Off-Site Transportation Noise Impacts***

The off-site traffic noise impacts are evaluated based on noise level increases resulting from the Project. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. To assess the off-site transportation CNEL noise level impacts associated with development of the proposed Project, noise contours were developed for each of the three different feasible Alternative Truck Routes (Alternative Truck Routes 1, 2, and 6) based on the Project's TA (EIR *Technical Appendix L3*). Refer to EIR subsection 3.6.2.B for a description of Alternative Truck Routes 1, 2, and 6. Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. (Urban Crossroads, 2023d, p. 43)

Noise contours were used to assess the Project's incremental 24-hour dBA CNEL traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic. The noise contours shown on Tables 7-1 to 7-6 of the Project's NIA (*Technical Appendix J*) represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA CNEL 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. Appendix 7.1 to the Project's NIA includes the traffic noise level contours worksheets for each traffic condition. (Urban Crossroads, 2023d, p. 43)



**Table 4.13-17 Daytime Project Operational Noise Level Increases**

Receiver Location <sup>1</sup>	Total Project Operational Noise Level <sup>2</sup>	Measurement Location <sup>3</sup>	Reference Ambient Noise Levels <sup>4</sup>	Combined Project and Ambient <sup>5</sup>	Project Increase <sup>6</sup>	Increase Criteria <sup>7</sup>	Increase Criteria Exceeded?
R1	41.7	L1	57.9	58.0	0.1	5.0	No
R2	42.7	L1	57.9	58.0	0.1	5.0	No
R3	35.1	L4	55.4	55.4	0.0	5.0	No
R4	36.0	L5	48.9	49.1	0.2	5.0	No
R5	41.3	L5	48.9	49.6	0.7	5.0	No
R6	43.7	L6	67.2	67.2	0.0	1.5	No
R7	43.2	L6	67.2	67.2	0.0	1.5	No
R8	37.0	L8	72.6	72.6	0.0	1.5	No
R9	40.3	L1	57.9	58.0	0.1	5.0	No
R10	35.6	L1	57.9	57.9	0.0	5.0	No

1. See Figure 4.13-7 for the receiver locations.
2. Total Project daytime operational noise levels as shown on Table 4.13-12.
3. Reference noise level measurement locations as shown on Figure 4.13-4.
4. Observed daytime ambient noise levels as shown on Figure 4.13-1.
5. Represents the combined ambient conditions plus the Project activities.
6. The noise level increase expected with the addition of the proposed Project activities.
7. Significance increase criteria as shown on Table 4.13-3.  
(Urban Crossroads, 2023d, Table 9-5)

**Table 4.13-18 Nighttime Project Operational Noise Level Increases**

Receiver Location <sup>1</sup>	Total Project Operational Noise Level <sup>2</sup>	Measurement Location <sup>3</sup>	Reference Ambient Noise Levels <sup>4</sup>	Combined Project and Ambient <sup>5</sup>	Project Increase <sup>6</sup>	Increase Criteria <sup>7</sup>	Increase Criteria Exceeded?
R1	41.6	L1	50.9	51.4	0.5	5.0	No
R2	42.6	L1	50.9	51.5	0.6	5.0	No
R3	35.0	L4	44.9	45.3	0.4	5.0	No
R4	35.9	L5	43.7	44.4	0.7	5.0	No
R5	41.2	L5	43.7	45.7	2.0	5.0	No
R6	43.7	L6	64.7	64.7	0.0	5.0	No
R7	43.2	L6	64.7	64.7	0.0	5.0	No
R8	37.0	L8	69.7	69.7	0.0	1.5	No
R9	40.3	L1	50.9	51.3	0.4	5.0	No
R10	35.5	L1	50.9	51.0	0.1	5.0	No

1. See Figure 4.13-7 for the receiver locations.
2. Total Project nighttime operational noise levels as shown on Table 4.13-14.
3. Reference noise level measurement locations as shown on Figure 4.13-4.
4. Observed nighttime ambient noise levels as shown on Figure 4.13-1.
5. Represents the combined ambient conditions plus the Project activities.
6. The noise level increase expected with the addition of the proposed Project activities.
7. Significance increase criteria as shown on Table 4.13-3.  
(Urban Crossroads, 2023d, Table 9-5)



## 2. Alternative Truck Route 1 Traffic Noise Level Increases

Table 4.13-19, *Alternative Truck Route 1 Off-Site Traffic Noise Analysis*, presents a summary of the Alternative Truck Route 1 off-site traffic CNEL noise level increases for each of the without and with Project conditions. Table 4.13-19 shows that the Project off-site traffic noise level increases would range from 0.0 to 10.5 dBA CNEL under EP conditions<sup>1</sup>, 0.0 to 9.7 dBA CNEL for EAC for the Primary Land Use Plan (without MCP) conditions, and 0.0 to 6.8 dBA CNEL for the Primary Land Use Plan under HY 2040 conditions. This incremental noise level increase would exceed the applicable significance thresholds under the with Project scenario for the following four study area roadway segments: (Urban Crossroads, 2023d, p. 43)

- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Therefore, the Project’s contribution to off-site traffic noise along the above-listed roadway segments would result in a potentially significant off-site traffic noise impact under all study scenarios except for EP conditions with implementation of the Primary Land Use Plan (Urban Crossroads, 2023d, p. 43).

## 3. Alternative Truck Route 2 Traffic Noise Level Increases

Table 4.13-20, *Alternative Truck Route 2 Off-Site Traffic Noise Analysis*, presents a summary of the Alternative Truck Route 2 off-site traffic CNEL noise level increases for each of the without and with Project conditions. Table 4.13-20 shows that the Project off-site traffic noise level increases would range from 0.0 to 7.4 dBA CNEL under EP conditions<sup>1</sup>, 0.0 to 6.3 dBA CNEL for EAC for the Primary Land Use Plan (without MCP conditions), and 0.0 to 4.9 dBA CNEL for the Primary Land Use Plan (without MCP) under HY 2040 conditions. This incremental noise level increase would exceed the applicable significance thresholds under the with Project scenario for the following three study area roadway segments: (Urban Crossroads, 2023d, p. 50)

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<sup>1</sup> It should be noted that EP conditions are provided for information purposes only, as the scenario where Project traffic is added to existing (2022) traffic conditions would not actually occur.





Table 4.13-19 Alternative Truck Route 1 Off-Site Traffic Noise Analysis

ID	Road	Segment	Receiving Land Use <sup>1</sup>	CNEL at Receiving Land Use (dBA) <sup>2</sup>									Incremental Noise Level Increase Threshold <sup>3</sup>	
				Existing			EAC (2030)			HY (2040) Without MCP			Limit	Exceeded?
				No Project	With Project	Project Increment	No Project	With Project	Project Increment	No Project	With Project	Project Increment		
1	Perris Bl.	n/o Ramona Exwy.	Sensitive	73.7	73.8	0.1	74.9	74.9	0.0	75.6	75.7	0.1	1.5	No
2	Placentia Av.	e/o Perris Bl.	Non-Sensitive	64.9	64.9	0.0	68.2	68.2	0.0	68.8	69.4	0.6	n/a	No
3	Evans Rd.	n/o Ramona Exwy.	Sensitive	62.6	63.8	1.2	68.8	69.1	0.3	69.4	69.7	0.3	3.0	No
4	Antelope Rd.	n/o Nuevo Rd.	Non-Sensitive	-	-	-	72.2	77.9	5.7	75.4	79.0	3.6	3.0	Yes
5	Menifee Rd.	s/o Nuevo Rd.	Sensitive	69.6	69.9	0.3	75.5	75.5	0.0	76.3	76.4	0.1	1.5	No
6	Ramona Exwy.	w/o Indian Av.	Non-Sensitive	74.1	74.4	0.3	79.1	79.1	0.0	79.9	79.9	0.0	3.0	No
7	Ramona Exwy.	w/o Perris Bl.	Sensitive	74.1	74.4	0.3	78.9	79.0	0.1	79.8	79.8	0.0	1.5	No
8	Ramona Exwy.	w/o Evans Rd.	Sensitive	74.3	74.6	0.3	78.8	79.0	0.2	79.9	80.0	0.1	1.5	No
9	Ramona Exwy.	w/o Bradley Rd.	Sensitive	72.3	72.9	0.6	78.2	78.4	0.2	78.8	78.9	0.1	1.5	No
10	Ramona Exwy.	s/o Rider St.	Sensitive	73.1	73.7	0.6	79.0	79.2	0.2	80.0	80.1	0.1	1.5	No
11	Ramona Exwy.	e/o Street A	Sensitive	72.1	72.4	0.3	78.7	78.8	0.1	79.5	79.5	0.0	1.5	No
12	Ramona Exwy.	e/o Davis Rd.	Non-Sensitive	72.6	72.9	0.3	78.9	79.0	0.1	79.6	79.7	0.1	3.0	No
13	Ramona Exwy.	e/o Warren Rd.	Non-Sensitive	73.1	73.3	0.2	77.0	77.1	0.1	77.7	77.8	0.1	3.0	No
14	Orange Av.	e/o Dunlap Dr.	Non-Sensitive	-	-	-	-	-	-	65.8	68.0	2.2	3.0	No
15	Nuevo Rd.	w/o Dunlap Dr.	Sensitive	69.9	70.7	0.8	76.9	77.1	0.2	78.0	78.1	0.1	1.5	No
16	Nuevo Rd.	w/o Antelope Rd.	Sensitive	70.4	77.3	6.9	78.4	80.5	2.1	79.7	81.3	1.6	1.5	Yes
17	Dunlap Dr.	n/o San Jacinto Av.	Sensitive	66.7	77.2	10.5	67.6	77.3	9.7	71.0	77.8	6.8	1.5	Yes
18	San Jacinto Av.	w/o Dunlap Dr.	Sensitive	70.4	77.7	7.3	71.6	77.9	6.3	73.5	78.4	4.9	1.5	Yes
19	Menifee Rd.	n/o Ethanac Rd.	Sensitive	68.9	69.0	0.1	76.0	76.1	0.1	76.7	76.8	0.1	1.5	No
20	Ethanac Rd.	w/o Menifee Rd.	Sensitive	72.4	72.4	0.0	73.3	73.3	0.0	73.9	74.0	0.1	1.5	No

1. Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2. The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3. Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-3)?

"n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023d, Table 7-1)



Table 4.13-20 Alternative Truck Route 2 Off-Site Traffic Noise Analysis

ID	Road	Segment	Receiving Land Use <sup>1</sup>	CNEL at Receiving Land Use (dBA) <sup>2</sup>									Incremental Noise Level Increase Threshold <sup>3</sup>	
				Existing			EAC (2030)			HY (2040) Without MCP			Limit	Exceeded?
				No Project	With Project	Project Increment	No Project	With Project	Project Increment	No Project	With Project	Project Increment		
1	Perris Bl.	n/o Ramona Exwy.	Sensitive	73.7	73.8	0.1	74.9	74.9	0.0	75.6	75.7	0.1	1.5	No
2	Placentia Av.	e/o Perris Bl.	Non-Sensitive	64.9	64.9	0.0	68.2	68.2	0.0	68.8	69.4	0.6	n/a	No
3	Evans Rd.	n/o Ramona Exwy.	Sensitive	62.6	63.8	1.2	68.8	69.1	0.3	69.4	69.7	0.3	3.0	No
4	Antelope Rd.	n/o Nuevo Rd.	Non-Sensitive	-	-	-	72.2	77.9	5.7	75.4	79.0	3.6	3.0	Yes
5	Menifee Rd.	s/o Nuevo Rd.	Sensitive	69.6	77.0	7.4	75.5	78.8	3.3	76.3	79.2	2.9	1.5	Yes
6	Ramona Exwy.	w/o Indian Av.	Non-Sensitive	74.1	74.4	0.3	79.1	79.1	0.0	79.9	79.9	0.0	3.0	No
7	Ramona Exwy.	w/o Perris Bl.	Sensitive	74.1	74.4	0.3	78.9	79.0	0.1	79.8	79.8	0.0	1.5	No
8	Ramona Exwy.	w/o Evans Rd.	Sensitive	74.3	74.6	0.3	78.8	79.0	0.2	79.9	80.0	0.1	1.5	No
9	Ramona Exwy.	w/o Bradley Rd.	Sensitive	72.3	72.9	0.6	78.2	78.4	0.2	78.8	78.9	0.1	1.5	No
10	Ramona Exwy.	s/o Rider St.	Sensitive	73.1	73.7	0.6	79.0	79.2	0.2	80.0	80.1	0.1	1.5	No
11	Ramona Exwy.	e/o Street A	Sensitive	72.1	72.4	0.3	78.7	78.8	0.1	79.5	79.5	0.0	1.5	No
12	Ramona Exwy.	e/o Davis Rd.	Non-Sensitive	72.6	72.9	0.3	78.9	79.0	0.1	79.6	79.7	0.1	3.0	No
13	Ramona Exwy.	e/o Warren Rd.	Non-Sensitive	73.1	73.3	0.2	77.0	77.1	0.1	77.7	77.8	0.1	3.0	No
14	Orange Av.	e/o Dunlap Dr.	Non-Sensitive	-	-	-	-	-	-	65.8	68.0	2.2	3.0	No
15	Nuevo Rd.	w/o Dunlap Dr.	Sensitive	69.9	70.7	0.8	76.9	77.1	0.2	78.0	78.1	0.1	1.5	No
16	Nuevo Rd.	w/o Antelope Rd.	Sensitive	70.4	71.2	0.8	78.4	78.6	0.2	79.7	79.7	0.0	1.5	No
17	Dunlap Dr.	n/o San Jacinto Av.	Sensitive	66.7	66.7	0.0	67.6	67.6	0.0	71.0	71.0	0.0	1.5	No
18	San Jacinto Av.	w/o Dunlap Dr.	Sensitive	70.4	77.7	7.3	71.6	77.9	6.3	73.5	78.4	4.9	1.5	Yes
19	Menifee Rd.	n/o Ethanac Rd.	Sensitive	68.9	69.0	0.1	76.0	76.1	0.1	76.7	76.8	0.1	1.5	No
20	Ethanac Rd.	w/o Menifee Rd.	Sensitive	72.4	72.4	0.0	73.3	73.3	0.0	73.9	74.0	0.1	1.5	No

1. Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2. The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3. Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-3)?

"n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023d, Table 7-2)



- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Therefore, the Project’s contribution to off-site traffic noise along the above-listed roadway segments would result in a potentially significant off-site traffic noise impact except for EP conditions (Urban Crossroads, 2023d, p. 43).

**4. Alternative Truck Route 6 Traffic Noise Level Increases**

Because the MCP is a regional transportation improvement that is not anticipated to be constructed and operational under near-term conditions, the analysis of Alternative Truck Route 6 focuses on the horizon year condition, as it is anticipated that under near-term (EAC) conditions all Project-related truck traffic would be routed to either Alternative Truck Route 1 or Alternative Truck Route 2. Table 4.13-21, *Alternative Truck Route 6 Off-Site Traffic Noise Analysis*, presents a summary of the Alternative Truck Route 6 off-site traffic CNEL noise level increases for HY conditions. As shown, with implementation of the Alternative Land Use Plan (with MCP), the Project off-site traffic noise level increases would range from 0.0 to 1.1 dBA CNEL under HY conditions. Based on the significance criteria for off-site traffic noise presented in Table 4.13-3, land uses adjacent to the study area roadway segments would experience less-than-significant noise level impacts due to the Alternative 6 unmitigated Project-related traffic noise levels. Thus, with implementation of Alternative Truck Route 6, all Project traffic-related noise impacts would be less than significant. (Urban Crossroads, 2023d, p. 51)

***Threshold d.: Would the Project result in the generation of excessive ground-borne vibration or ground-borne noise levels?***

The Project has the potential to result in excessive ground-borne vibration or ground-borne noise levels during both construction and long-term operation. Each is discussed below.

**A. Construction-Related Vibration Impacts**

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.13-5. Based on the representative vibration levels presented



**Table 4.13-21 Alternative Truck Route 6 Off-Site Traffic Noise Analysis**

ID	Road	Segment	Receiving Land Use <sup>1</sup>	CNEL at Receiving Land Use (dBA) <sup>2</sup>												Incremental Noise Level Increase Threshold <sup>3</sup>	
				Existing			EAC (2030) Without MCP			HY (2040) Without MCP			HY (2040) With MCP			Limit	Exceeded?
				No Project	With Project	Project Increment	No Project	With Project	Project Increment	No Project	With Project	Project Increment	No Project	With Project	Project Increment		
1	Perris Bl.	n/o Ramona Exwy.	Sensitive	73.7	73.8	0.1	74.9	74.9	0.0	75.6	75.7	0.1	75.6	75.6	0.0	1.5	No
2	Placentia Av.	e/o Perris Bl.	Non-Sensitive	64.9	64.9	0.0	68.2	68.2	0.0	68.8	69.4	0.6	72.0	72.0	0.0	n/a	No
3	Evans Rd.	n/o Ramona Exwy.	Sensitive	62.6	63.8	1.2	68.8	69.1	0.3	69.4	69.7	0.3	72.8	72.9	0.1	3.0	No
4	Antelope Rd.	n/o Nuevo Rd.	Non-Sensitive	-	-	-	72.2	73.0	0.8	75.4	75.7	0.3	71.7	72.1	0.4	3.0	No
5	Menifee Rd.	s/o Nuevo Rd.	Sensitive	69.6	69.9	0.3	75.5	75.5	0.0	76.3	76.4	0.1	74.9	75.0	0.1	1.5	No
6	Ramona Exwy.	w/o Indian Av.	Non-Sensitive	74.1	74.4	0.3	79.1	79.1	0.0	79.9	79.9	0.0	75.6	75.6	0.0	3.0	No
7	Ramona Exwy.	w/o Perris Bl.	Sensitive	74.1	74.4	0.3	78.9	79.0	0.1	79.8	79.8	0.0	78.3	78.3	0.0	1.5	No
8	Ramona Exwy.	w/o Evans Rd.	Sensitive	74.3	74.6	0.3	78.8	79.0	0.2	79.9	80.0	0.1	77.5	77.5	0.0	1.5	No
9	Ramona Exwy.	w/o Bradley Rd.	Sensitive	72.3	72.9	0.6	78.2	78.4	0.2	78.8	78.9	0.1	77.7	77.7	0.0	1.5	No
10	Ramona Exwy.	s/o Rider St.	Sensitive	73.1	73.7	0.6	79.0	79.2	0.2	80.0	80.1	0.1	77.9	78.0	0.1	1.5	No
11	Ramona Exwy.	e/o Street A	Sensitive	72.1	72.4	0.3	78.7	78.8	0.1	79.5	79.5	0.0	77.7	77.8	0.1	1.5	No
12	Ramona Exwy.	e/o Davis Rd.	Non-Sensitive	72.6	72.9	0.3	78.9	79.0	0.1	79.6	79.7	0.1	75.9	76.0	0.1	3.0	No
13	Ramona Exwy.	e/o Warren Rd.	Non-Sensitive	73.1	73.3	0.2	77.0	77.1	0.1	77.7	77.8	0.1	74.8	74.9	0.1	3.0	No
14	Orange Av.	e/o Dunlap Dr.	Non-Sensitive	-	-	-	-	-	-	65.8	68.0	2.2	65.8	66.9	1.1	3.0	No
15	Nuevo Rd.	w/o Dunlap Dr.	Sensitive	69.9	70.7	0.8	76.9	77.1	0.2	78.0	78.1	0.1	74.9	75.0	0.1	1.5	No
16	Nuevo Rd.	w/o Antelope Rd.	Sensitive	70.4	71.2	0.8	78.4	78.6	0.2	79.7	79.7	0.0	76.2	76.3	0.1	1.5	No
17	Dunlap Dr.	n/o San Jacinto Av.	Sensitive	66.7	66.7	0.0	67.6	67.6	0.0	71.0	71.0	0.0	64.6	64.7	0.1	1.5	No
18	San Jacinto Av.	w/o Dunlap Dr.	Sensitive	70.4	70.4	0.0	71.6	71.6	0.0	73.5	73.5	0.0	73.8	73.8	0.0	1.5	No
19	Menifee Rd.	n/o Ethanac Rd.	Sensitive	68.9	69.0	0.1	76.0	76.1	0.1	76.7	76.8	0.1	76.3	76.3	0.0	1.5	No
20	Ethanac Rd.	w/o Menifee Rd.	Sensitive	72.4	72.4	0.0	73.3	73.3	0.0	73.9	74.0	0.1	76.5	76.5	0.0	1.5	No

1. Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2. The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3. Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.13-3)?

"n/a" Per the County of Riverside General Plan Noise Element Table N-1, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact when the ambient non-noise sensitive noise level is greater than the normally acceptable 70 dBA CNEL land use compatibility criteria.

(Urban Crossroads, 2023d, Table 7-6)



for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the following vibration assessment methods defined by the FTA. To describe the vibration impacts the FTA provides an equation as described in Subsection 10.7 of the Project's NIA (*Technical Appendix J*). (Urban Crossroads, 2023d, p. 83)

### 1. **On-Site Construction Vibration Analysis**

Table 4.13-22, *On-Site Construction Vibration Levels*, presents the expected Project related vibration levels at the existing nearby receiver locations. At distances ranging from 2,249 to 8,178 feet from Project construction activities, construction vibration velocity levels are estimated at 0.000 in/sec PPV at the nearest existing noise sensitive receiver locations, and would be below 0.035 PPV at all of the future sensitive residential receptor locations. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all of the noise receiver locations. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Therefore, the Project-related vibration impacts would be less than significant during typical construction activities at the Project site at all existing and future nearby sensitive receptor locations. (Urban Crossroads, 2023d, p. 84)

### 2. **Off-Site Roadway and Utility Improvements Vibration Analysis**

To support the Project development, there would be grading, trenching, and paving for off-site improvements associated with roadway construction and utility installation for the Project previously shown on Figure 4.13-11. This includes the installation of the proposed offsite water line adjacent to the Lakeside Middle School and residential land uses located along Walnut Street, with the nearest residential building structures located over 25 feet from the off-site improvements along Walnut Street. Table 4.13-23, *Off-Site Project Construction Vibration Levels*, presents the estimated Project related vibration levels at distances ranging from 25 to 200 feet. As shown on Table 4.13-23, at distances ranging from 25 to 200 feet, the construction vibration velocity levels are estimated to range from 0.009 to 0.210 in/sec PPV. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the off-site roadway and utility construction vibration levels would fall below the building damage thresholds. Therefore, the Project-related vibration impacts would be less than significant during Project-related off-site roadway and utility improvements. (Urban Crossroads, 2023d, p. 80)

### 3. **Blasting-Related Vibration Impacts**

Blasting operations can have unacceptable noise and vibration impacts if not conducted correctly. Excessive levels of structural vibration due to ground vibration from blasting can cause substantial damage to structures. A blasting contractor would be required to complete all blasting-related activities in compliance with applicable regulations of the Riverside County Sheriff's Department, the U.S. Bureau of Mines, the California Division of Occupational Safety and Health (Cal-OHSA), the Department of Homeland Security, and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), which have many requirements for the safe handling, use, and storage of explosives and recommend various measures and controls, including, but not



**Table 4.13-22 On-Site Construction Vibration Levels**

Location <sup>1</sup>	Distance to Const. Activity (Feet) <sup>2</sup>	Typical Construction Vibration Levels PPV (in/sec) <sup>3</sup>						Thresholds PPV (in/sec) <sup>4</sup>	Thresholds Exceeded? <sup>5</sup>
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	2,642'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R2	2,249'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R3	7,973'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R4	8,178'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R5	4,966'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R6	3,916'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R7	3,346'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R8	4,971'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R9	4,008'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
R10	6,664'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
FUT-1	380'	0.000	0.001	0.001	0.002	0.004	0.004	0.3	No
FUT-2	5,439'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
FUT-3	2,090'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
FUT-4	2,580'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No
FUT-5	519'	0.000	0.000	0.001	0.001	0.002	0.002	0.3	No
FUT-6	83'	0.000	0.006	0.013	0.015	0.035	0.035	0.3	No
FUT-7	151'	0.000	0.002	0.005	0.006	0.014	0.014	0.3	No
FUT-8	1,832'	0.000	0.000	0.000	0.000	0.000	0.000	0.3	No

1. Construction noise source and receiver locations are shown on Figure 4.13-10.
2. Distance from receiver building facade to Project construction boundary (Project site boundary).
3. Based on the Vibration Source Levels of Construction Equipment (Table 4.13-5).
4. Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
5. Does the peak vibration exceed the acceptable vibration thresholds?

"PPV" = Peak Particle Velocity  
(Urban Crossroads, 2023d, Table 10-6)

**Table 4.13-23 Off-Site Project Construction Vibration Levels**

Distance to Const. Activity (Feet) <sup>2</sup>	Typical Construction Vibration Levels PPV (in/sec) <sup>3</sup>						Thresholds PPV (in/sec) <sup>4</sup>	Thresholds Exceeded? <sup>5</sup>
	Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
25'	0.003	0.035	0.076	0.089	0.210	0.210	0.3	No
50'	0.001	0.012	0.027	0.031	0.074	0.074	0.3	No
100'	0.000	0.004	0.010	0.011	0.026	0.026	0.3	No
200'	0.000	0.002	0.003	0.004	0.009	0.009	0.3	No

1. Construction noise source and receiver locations are shown on Figure 4.13-10.
2. Distance from receiver building facade to Project construction boundary (Project site boundary).
3. Based on the Vibration Source Levels of Construction Equipment (Table 4.13-5).
4. Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
5. Does the peak vibration exceed the acceptable vibration thresholds?

"PPV" = Peak Particle Velocity  
(Urban Crossroads, 2023d, Table 10-7)



limited to monitoring and reporting of each blast to verify no damage has occurred at nearby structures, notifications to surrounding neighbors, limitations on the amounts and times blast may occur. (Urban Crossroads, 2023d, p. 89)

Detonating as little as 25 pounds of explosives may be perceived up to 500 feet from a charge. Therefore, without vibration controls and measures, blasting could exceed thresholds at the areas near existing residential homes surrounding the water tank site, shown on Figure 4.13-8. Therefore, prior to mitigation, Project-related blasting vibration impacts associated with blasting activities at the off-site water tank site would be significant requiring mitigation.

### **B. Operational-Related Vibration Impacts**

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible ground-borne vibration beyond the Project site. Caltrans has issued a publication entitled, “Transportation and Construction Vibration Guidance Manual,” dated April 2020 (Caltrans, 2020). As noted by Caltrans:

*“Because vehicles traveling on highway are supported on flexible suspension systems and pneumatic tires, these vehicles are not an efficient source of ground vibration. They can, however, impart vibration into the ground when they roll over pavement that is not smooth. Continuous traffic traveling on a smooth highway creates a fairly continuous but relatively low level of vibration. Where discontinuities exist in the pavement, heavy truck passages can be the primary source of localized, intermittent vibration peaks. These peaks typically last no more than a few seconds and often for only a fraction of a second. Because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks.”* (Caltrans, 2020, p. 10)

All trucks generated by the Project would travel along County roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes). As such, and based on guidance from Caltrans, the Project’s operational traffic-related vibration impacts would be less-than-significant.

### **4.13.7 CUMULATIVE IMPACT ANALYSIS**

The cumulative study area for the issue of noise includes the Project vicinity as well as areas adjacent to roadways evaluated by the Project’s TA (*Technical Appendix L3*). Areas outside of the cumulative study area are too far away to be adversely impacted by noise and ground-borne vibration generated as a result of the proposed Project.

#### **A. Thresholds a. and b.**

As indicated under the analysis of Thresholds a. and b., the Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area. Additionally, the Project site is located outside of the 55 dBA noise contour for the MARB and Perris Valley Airport, and therefore has no potential to result in the exposure of future Project employees to excessive airport-related noise. Cumulatively-considerable impacts would not occur.



**B. Threshold c.**

**1. Construction Noise**

**Typical Construction Noise**

As previously indicated in Table 4.13-7, Project-related noise during on-site construction activities would not expose any existing, future, or biological receptors to noise levels exceeding the FTA threshold of significance of 80 dBA CNEL. Although it is possible that other cumulative developments could be under construction at the same time as the proposed Project, based on the noise levels presented in Table 4.13-7, Project construction-related noise, even when combined with noise from cumulative developments, does not have the potential to result in cumulative noise levels exceeding 80 dBA Leq. Accordingly, Project impacts due to on-site construction-related noise would be less than significant on a cumulatively-considerable basis.

**Noise Impacts from Off-Site Roadway and Utility Improvements**

As previously indicated in Table 4.13-9, the unmitigated off-site construction noise levels at receiver locations OFF1, OFF2, and OFF3 would range from 56.0 to 64.1 dBA Leq, which would be well below the reasonable daytime 80 dBA Leq significance threshold during off-site Project construction activities. Although the Project's off-site roadway and utility improvements are unlikely to occur simultaneous with construction activities from cumulative developments, given the Project's relatively low noise levels in relation to the identified 80 dBA Leq threshold of significance, it is not likely that the Project's off-site roadway and utility improvements would overlap with noise from cumulative developments such that the resulting noise levels would exceed 80 dBA Leq. Accordingly, cumulatively-considerable impacts would be less than significant.

**Nighttime Concrete Pour Analysis**

As previously shown in Table 4.13-10, the nighttime concrete pour activities are estimated to range from 26.4 to 35.8 dBA Leq at the existing noise sensitive receiver locations, which is well below the FTA 70 dBA Leq nighttime residential noise level threshold. Thus, even if noise from Project nighttime concrete pour activities were to be combined with noise from other cumulative developments, the Project's noise levels would not exceed 70 dBA Leq and would not result in a significant noise impact. Accordingly, Project-related noise during nighttime concrete pouring activities would be less than significant on a cumulatively-considerable basis.

**Blasting-Related Noise Impacts**

As previously indicated in Table 4.13-11, Project blasting-related noise levels at the nearest sensitive receptors would not exceed 69.3 dBA Lmax, which is well below the airblast threshold of 133 dBA. Although the Project's blasting-related noise has the potential to result in significant direct impacts if appropriate measures are not undertaken to reduce peak noise levels, blasting activities represent a single-source event, and it is highly unlikely that Project-related blasting noise would combine with blasting noise from other cumulative developments. As such, Project-related blasting noise impacts would be less than significant on a cumulatively-considerable basis.





## 2. Operational Noise Impacts

### On-Site Operational Noise Impacts

Table 4.13-12 and Table 4.13-13 show the Project operational noise levels during the daytime at the off-site receiver locations are expected to range from 35.1 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.7 to 62.1 dBA Leq at the nearby habitat (BIO) locations. Table 4.13-14 and Table 4.13-15 show the Project operational noise levels during the nighttime hours at the off-site receiver locations are expected to range from 35.0 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.6 to 62.1 dBA Leq at the nearby habitat (BIO) locations. Areas immediately to the east of the Project site are unlikely to be developed in the future, as these areas include the Riverpark Mitigation Bank, which is a mitigation bank containing sensitive biological habitats and resources. However, lands along Nuevo Road to the southeast of the Project site and within the McCanna Hills Specific Plan to the west are planned for long-term development with Commercial Retail land uses. Although Project-related operational noise would not affect any existing sensitive receptors, noise from cumulative developments has the potential to result in cumulatively-considerable noise increases at FUT-1, FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8. Thus, prior to mitigation, the Project's operational-related noise impacts would be cumulatively considerable at receptor location FUT-1 during daytime hours, and would be cumulatively considerable at receptor locations FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8 during nighttime hours.

### Off-Site Transportation Noise Impacts

#### **Alternative Truck Route 1 Traffic Noise Level Increases**

As previously indicated in Table 4.13-19, implementation of Alternative Truck Route 1 would result in cumulatively-considerable impacts to the following roadway segments with implementation of the Primary Land Use Plan and/or Alternative Land Use Plan. Accordingly, Project traffic-related noise impacts affecting nearby sensitive receptors along the following roadway segments would be cumulatively considerable prior to mitigation under EAC (2030) and HY (2040) conditions with implementation of Alternative Truck Route 1:

- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.



- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

### ***Alternative Truck Route 2 Traffic Noise Level Increases***

As previously indicated in Table 4.13-20, implementation of Alternative Truck Route 2 would result in cumulatively-considerable impacts to the following roadway segments with implementation of the Primary Land Use Plan and/or Alternative Land Use Plan. Accordingly, Project traffic-related noise impacts affecting nearby sensitive receptors along the following roadway segments would be cumulatively considerable prior to mitigation under EAC (2030) and HY (2040) conditions with implementation of Alternative Truck Route 2:

- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

### ***Alternative Truck Route 6 Traffic Noise Level Increases***

As previously indicated in Table 4.13-20, implementation of Alternative Truck Route 6 would result in less-than-significant noise increases along all study area roadway segments under all study scenarios. Specifically, Project traffic-related noise increases would range from 0.0 to 1.1 dBA CNEL for the Alternative Land Use Plan (with MCP) under HY conditions. Because the HY 2040 conditions account for cumulative traffic volumes, and because the Project noise increases would be below the identified thresholds of significance along all study area roadway segments, cumulatively-considerable impacts due to Project-related traffic with implementation of Alternative Route 6 would be less than significant.

## ***C. Threshold d.***

### ***1. On-Site Construction Vibration***

As previously indicated in Table 4.13-22, at distances ranging from 2,249 to 8,178 feet from Project construction activities, construction vibration velocity levels are estimated at 0.000 in/sec PPV at the nearest existing noise sensitive receiver locations, and would be below 0.035 PPV at all of the future sensitive residential receptor locations. The Project-related vibration levels at nearby sensitive receptors would be far below the identified threshold of significance of 0.3 PPV (in/sec). Thus, even if vibration levels from Project construction activities were to be combined with vibration levels from cumulative developments that may be under simultaneous construction, the Project has no potential to result in cumulatively-considerable impacts



associated with on-site construction-related vibration. Cumulatively-considerable vibration impacts would therefore be less than significant.

## 2. *Off-Site Roadway and Utility Improvements Vibration*

As previously shown on Table 4.13-23, at distances ranging from 25 to 200 feet, the construction vibration velocity levels are estimated to range from 0.009 to 0.210 in/sec PPV during construction of off-site utilities within Walnut Street, which is well below the identified threshold of significance of 0.3 PPV (in/sec). The majority of lands along the north side of this segment of Walnut Street already are built out with residential uses, although lands along the southern edge of Walnut Street are currently undeveloped but are planned for development with residential uses by the Riverside County General Plan. Although there is a remote potential that the Project's off-site roadway and utility improvements within Walnut Street would occur at the same time as development along the south side of Walnut Street, because the utility line installation would be of very short-term duration and because the Project-related vibration velocity levels would be well below 0.3 PPV, cumulatively-considerable noise impacts during construction of the off-site utility lines would be less than significant on a cumulatively-considerable basis.

## 3. *Blasting-Related Vibration Impacts*

Although the analysis of Threshold d. shows that vibration-related impacts associated with Project blasting activities would be potentially significant prior to mitigation, blasting activities consist of a single-event source of vibration and each blasting event would be of very short in duration. The nearest cumulative development occurs immediately west of the Serra Vista Elementary School (cumulative development RC1 on EIR Figure 4.0-1), along the opposite side of the school from the Project's off-site blasting activities, and vibration levels decrease rapidly with distance from the source. Thus, it is highly unlikely that other sources of vibration from cumulative developments, when combined with Project-related blasting vibration levels, would expose nearby sensitive receptors to vibration levels exceeding the identified threshold of significance of 0.04 in/sec PPV. Notwithstanding, and in an effort to provide a conservative evaluation of the Project's impacts, because the Project has the potential to result in significant impacts due to blasting-related vibration levels, there is a remote potential that other cumulative sources of vibration could occur in the local area and contribute to vibration levels at the sensitive receptors nearest to the Project site. Accordingly, Project impacts due to blasting-related vibration during construction would be cumulatively considerable prior to mitigation.

### 4.13.8 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and b.: Less-than-Significant Impact. The Project does not include an airport-related component, and the Project has no potential to contribute to or cause increased airport-related noise in the local area. Additionally, the Project site is located outside of the 55 dBA noise contour for the MARB and Perris Valley Airport, and therefore has no potential to result in the exposure of future Project employees to excessive airport-related noise. Airport-related noise impacts would therefore be less than significant.

Threshold c.: Significant Direct and Cumulatively-Considerable Impact. The construction noise analysis shows that the nearest existing noise sensitive receiver locations (R1 to R10) would not be exposed to Project construction-related noise levels exceeding the reasonable daytime 80 dBA Leq significance threshold during



Project construction activities as shown on Table 4.13-8. Potential construction noise level impacts associated with receiver locations FUT-1 to FUT-8 and BIO-1 to BIO-5 are provided for informational purposes only; however, the analysis also shows that these receptor locations would not be exposed to noise levels exceeding 80 dBA Leq. Therefore, the noise impacts due to Project construction noise would be less than significant at all the existing and future noise sensitive receiver locations.

Table 4.13-9 shows that the unmitigated off-site construction noise levels at receiver locations OFF1, OFF2, and OFF3 would range from 56.0 to 64.1 dBA Leq. The unmitigated off-site receivers would not be exposed to noise levels exceeding the reasonable daytime 80 dBA Leq significance threshold during off-site Project construction activities. Therefore, the noise impacts due to off-site Project construction noise are considered less than significant and no construction noise mitigation is required due to the off-site Project construction activities.

As shown on Table 4.13-10, the noise levels associated with the nighttime concrete pour activities are estimated to range from 26.4 to 35.8 dBA Leq at the existing noise sensitive receiver locations, which is below the identified threshold of significance of 70 dBA Leq for nighttime hours. Potential nighttime concrete pour construction noise level impacts associated with receiver locations FUT-1 to FUT-8 and BIO-1 to BIO-5 are provided for informational purposes only; however, the analysis shows that none of the future receptors or sensitive biological areas would not be exposed to nighttime noise levels exceeding the 70 dBA Leq nighttime residential noise level threshold. Accordingly, Project noise impacts during nighttime concrete pour activities would be less than significant.

During blasting activities, the nearest sensitive receptor would be exposed to blasting-related noise levels up to 69.3 dBA Lmax, which would not exceed the OSMRE and CFR lowest maximum Airblast Limit (30 CFR 816.67(b)) of 129 dBA Lmax; thus, noise from Project-related blasting activities would be less than significant. Accordingly, Project construction-related noise impacts would be less than significant.

As previously shown in Table 4.13-12 through Table 4.13-15, the Project's daytime hourly noise levels at the off-site receiver locations are expected to range from 35.1 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.7 to 62.1 dBA Leq at the nearby habitat (BIO) locations, while the Project's nighttime hourly noise levels at the off-site receiver locations are expected to range from 35.0 to 43.7 dBA Leq at the existing noise sensitive receiver locations, 38.6 to 58.4 dBA Leq at the potential future noise sensitive receiver (FUT) locations, and 49.6 to 62.1 dBA Leq at the nearby habitat (BIO) locations. While the Project's operational noise levels would not expose any existing sensitive receptors to noise levels exceeding the identified thresholds of significance of 55 dBA Leq during the daytime and 45 dBA Leq during the nighttime, future residential receptor FUT-1 would be exposed to daytime noise levels of 58.4 dBA Leq during the daytime hours and 58.4 dBA Leq during the nighttime hours, which would exceed the identified significance criteria of 55 dBA Leq during daytime hours and 45 dBA Leq during nighttime hours. In addition, future residential receptors FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8 would be exposed to nighttime noise levels exceeding the County's threshold of significance of 45 dBA Leq. Accordingly, Project operational noise impacts to future residential receptors



FUT-1, FUT-3, FUT-4, FUT-5, FUT-6, FUT-7, and FUT-8 represents a potentially significant impact prior to mitigation.

Implementation of Alternative Truck Route 1 (Primary Land Use Plan, without the MCP) would result in significant traffic-related noise impacts to the following roadway segments under each of the identified study scenarios; thus, Project impacts to the following roadway segments would represent significant impacts requiring mitigation with implementation of Alternative Truck Route 1:

- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Implementation of Alternative Truck Route 2 (Primary Land Use Plan, without the MCP) would result in significant traffic-related noise impacts to the following roadway segments under each of the identified study scenarios; thus, Project impacts to the following roadway segments would represent significant impacts requiring mitigation with implementation of Alternative Truck Route 2:

- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

With implementation of Alternative Truck Route 6 (Alternative Land Use Plan, with the MCP), Project traffic-related noise increases would be below the significance criteria presented in Table 4.13-3. Thus, with implementation of Alternative Truck Route 6, all Project traffic-related noise impacts would be less than significant.



Threshold d.: Significant Direct and Cumulatively-Considerable Impact. As shown in Table 4.13-22, construction vibration velocity levels are estimated at 0.000 in/sec PPV at the nearest existing noise sensitive receiver locations, and would be below 0.035 PPV at all of the future sensitive residential receptor locations. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all of the noise receiver locations. Additionally, Table 4.13-23 shows that the off-site roadway and utility construction vibration levels would fall below the building damage thresholds. Without vibration controls and measures, blasting activities associated with the off-site water tank construction could exceed thresholds at the areas near existing residential homes surrounding the water tank site, as shown on Figure 4.13-8. Therefore, prior to mitigation, Project-related blasting vibration impacts would be significant requiring mitigation.

#### 4.13.9 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- All construction activities and haul truck deliveries shall adhere to Section 2.i of Riverside County Ordinance No. 847, which prohibits construction activities that make loud noise from occurring between 6:00 p.m. and 6:00 a.m. during the months of June through September, and between 6:00 p.m. and 7:00 a.m. during the months of October through May, and on Sundays and federal holidays. Exceptions to these time restrictions may be granted pursuant to Section 7 of Ordinance No. 847 (e.g., if needed to accommodate nighttime concrete pouring activities).
- All future implementing developments shall comply with Riverside County Board of Supervisors Policy F-3, "*Good Neighbor*" Policy for Logistics and Warehouse/Distribution Uses. Applicable measures related to noise, include, but are not necessarily limited to, the following:
  - Provision 1.3: A "Noise Impact Analysis" shall be prepared for use during the land use entitlement review process to evaluate potential impacts to the neighboring properties. The analysis shall include construction and operations-related noise impacts, including stationary and off-site increases to ambient noise levels. This analysis shall be required for all future implementing developments within the Project site.
  - Provision 2.5: Construction contractors shall locate or park all stationary construction equipment so that the emitted noise is directed away from sensitive receptors nearest the project site, to the extent practicable.
  - Provision 3.1: Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design include berms or other similar features to appropriately shield and buffer the



sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.

- Provision 3.6: On-site speed bumps shall not be allowed except at security/entry gates. Truck loading bays and drive aisles shall be designed to minimize truck noise.
- Provision 3.7: Dock doors shall be located where they are not readily visible from sensitive receptors or major roads. If it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented. A combination of landscaping, berms, walls, and similar features shall be considered.
- Provision 3.8: An additional “wing-wall” shall be installed perpendicular to the loading dock areas to further attenuate noise related to truck activities and also address aesthetics by screening the loading area when adjacent to sensitive receptors.
- Provision 3.12: Facility construction shall comply with the hours of operation and exterior noise decibel levels as required by Riverside County Ordinance No. 847 (“Noise Ordinance”).
- Provision 4.10: If a public address (PA) system is being used in conjunction with a warehouse/distribution facility operations, the PA system shall be oriented away from sensitive receptors and the volume set at a level not readily audible past the property line.
- Provision 4.11: Facility Operation shall comply with the exterior noise decibel levels as required by Ord. 847 (Noise Ordinance), which includes a maximum exterior decibel level of 55 dba (between 7:00 a.m. and 10:00 p.m.) and 45 dba (between 10:00 p.m. and 7:00 a.m.) as measured on adjacent occupied residences, or as modified by the most current version of Ordinance No. 847.

### **Mitigation**

- MM 4.13-1 Prior to approval of any plot plans or conditional use permits for proposed light industrial, business park, or commercial retail uses within Planning Areas 1, 2, 3, 4, 5, 6, 7, 8A, or 8B of Specific Plan No. 239, Amendment No. 1, the Project Applicant shall prepare and Riverside County shall review and approve a site-specific noise impact analysis. The analysis shall evaluate the proposed plot plan or conditional use permits application materials to determine whether future operations on-site would expose nearby planned sensitive receptors (i.e., residential units), including sensitive receptors within the McCanna Hills Specific Plan or in areas designated for residential uses by the General Plan to the east or south of the Project site, to noise levels exceeding the County's residential standard of 55 dBA Leq during daytime hours (i.e., between 7:00 a.m. and 10:00 p.m.) and 45 dBA Leq during nighttime hours (i.e., between 10:00 p.m. and 7:00 a.m.). If significant operational-related noise impacts are anticipated, the County shall ensure that the noise impact analysis identifies noise attenuation measures that may be necessary to reduce operational-related noise impacts affecting off-site existing or future residential uses to below the County's residential standard during both daytime and nighttime hours. Noise attenuation measures may include, but are not necessarily limited to, the incorporation of screen walls or other barriers (such as berms). No implementing plot plans or conditional use permits may be approved unless it can be demonstrated to the



satisfaction of the County that operational noise impacts affecting nearby existing or future sensitive receptors following the implementation of mitigation measures would be reduced to below the County's thresholds of significance of 55 dBA Leq during daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA Leq during nighttime hours (10:00 p.m. to 7:00 a.m.). Prior to issuance of building permits, the Riverside County Building and Safety Department shall ensure that any required noise attenuation measures have been incorporated into the building plans, and shall verify that the noise attenuation measures have been implemented prior to final building inspection.

MM 4.13-2 Prior to approval of any grading permits that require blasting activities and a blasting permit, the Project Applicant shall prepare and submit for County review and approval of a Blasting Noise and Vibration Monitoring and Abatement Plan ("Noise and Vibration Abatement Plan"). The required Noise and Vibration Abatement Plan shall include the name and qualifications of the person(s) responsible for monitoring and reporting blast vibrations. In addition, the Noise and Vibration Abatement Plan shall require a minimum of three seismographs for monitoring peak ground vibration and air-overpressure. The Noise and Vibration Abatement Plan also shall require that equipment and its use shall conform fully to the standards developed by the Vibration Section of the International Society of Explosive Engineers (ISEE). For all blasts, the Noise and Vibration Abatement Plan shall require monitoring of ground motion and air-overpressure at the nearest residential properties or other structure of concern. The Noise and Vibration Abatement Plan also shall specify a minimum trigger level for monitoring of 0.05 in/s for ground motion and 120 dB for air-overpressure. Additionally, the Noise and Vibration Abatement Plan shall require regular reporting of blasting and measurements to Riverside County, and shall include a copy of the instrument/software-generated blast monitoring report at each instrument location that includes measured peak particle velocity in inches per second, peak air-overpressure in linear-scale decibels, and vibration and air-overpressure event plots, with date and time of event recording. In addition, the Noise and Vibration Abatement Plan shall include the following requirements:

- Prior to commencement of any blasting, a pre-blast survey of the conditions of all existing property and aboveground utilities located within 300 feet of any potential blasting areas shall be conducted. The pre-blast survey shall include a photographic record of all visible and accessible structures, facilities, utilities, or other improvements. The survey shall document the interior and exterior conditions of all residential property and associated structures located within 500 feet of blasting areas. If property owners refuse surveys, provide copies of certified-mail letters documenting attempts to provide the survey by a third-party professional survey company. The required surveys shall include a description of the interior and exterior condition of the various structures examined. Descriptions shall include the locations of any cracks, damage, or other existing defects and shall include information needed to identify and describe the defect, if any, and to evaluate the construction operations on the defect. Survey records shall include photos of all cracks and other damaged, weathered, or otherwise deteriorated structural conditions. If necessary, macro lenses and flash illumination shall be used to ensure defects are shown clearly in the





photographs. Photos shall contain an accurate date stamp. No blasting shall occur prior to completion of surveys of surrounding residential properties. Surveys also shall be repeated at facilities or properties where damage concerns have been expressed by individual residents, property owners, or other concerned parties. Details of any observed changes to surveyed structures and documenting photos shall be reported and submitted to Riverside County.

- Blasting only shall be allowed Monday through Friday only between the hours of 8:00 a.m. and 5:00 p.m.
- No blasting shall occur closer than 100 feet from residential structures. In the event that non-rippable materials are encountered within 100 feet from any residential structure, alternative methods shall be employed to reduce blasting-related noise and vibration impacts. Alternative rock blasting within 100 feet of residential homes may include methods such as the drilling of holes in the largest area of rock, inserting expansive grout or small charges into each whole to fragment the rock into smaller pieces, and then crushing the pieces for transport or other use.
- No more than a total of 2,000 pounds of explosive shall be detonated each day, excluding detonators.
- All blasts located within 500 feet of any structures or above ground utilities shall be covered with woven steel cable or steel-cable and rubber-tire blasting mats with a minimum weight of 30 pounds per square foot. Woven polypropylene or similar weed-barrier fabric, covered with at least 6 inches of soil or sand shall be placed over blast areas to protect initiators before mats are placed. Mats shall be overlapped at least 3 feet and shall completely cover the blast area and extend at least three feet beyond the blast area in all directions. If any flyrock or blasted material is thrown more than 10 feet or half the distance to the nearest structure, whichever is less, blasting shall be suspended until the County's has approved a revised blasting plan showing revisions to assure adequate ground movement control.
- Before blasts are covered, all loose soils above the blast shall be removed where feasible. Remaining ground located within 20 feet of the blast shall be thoroughly wetted with water to suppress airborne dust. Sand or soils placed over weed-barrier fabric shall be similarly wetted before placing blast mats.
- If specified vibration limits are exceeded, blasting operations shall cease immediately and a revised blasting plan shall be submitted to the County. Blasting shall not resume until a revised blasting plan has been reviewed and the Contractor has expressed in writing the conditions that will be applied to further blasting work.

Project grading and blasting contractors shall be required to ensure compliance with the Noise and Vibration Abatement Plan requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The requirements of the Noise and Vibration Abatement Plan also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all



monitoring reports to ensure compliance with the Noise and Vibration Abatement Plan, and shall have the authority to stop all blasting activities on site if it is determined that blasting activities are not being conducted in conformance with Noise and Vibration Abatement Plan and/or the above-listed requirements.

MM 4.13-3 To minimize the potential construction noise impacts from the off-site roadway and utility Improvements, the Project shall implement the following construction noise abatement measures. Project grading and blasting contractors shall be required to ensure compliance with these requirements and shall permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The following requirements also shall be specified in bid documents issued to prospective construction contractors. Riverside County shall review all monitoring reports to ensure compliance.

- a. All construction activities shall comply with Riverside County Ordinance No. 847 Regulating Noise Section 2i (Code Section 9.52.020[I]), limiting construction activities to the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September, and 7:00 a.m. and 6:00 p.m., during the months of October through May. (13) Any construction activity within the City of Perris shall comply with the Municipal Code, Section 7.34.060, limiting construction activities to the hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (with the exception of Columbus Day and Washington's birthday).
- b. Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards).
- c. All stationary construction equipment shall be placed in such a manner so that the emitted noise is directed away from any sensitive receivers.
- d. Construction equipment staging areas shall be located the greatest distance between the staging area and the nearest sensitive receivers.
- e. The construction contractor shall limit equipment and material deliveries to the same hours specified for construction equipment outlined above.
- f. Electrically powered air compressors and similar power tools shall be used, when feasible, in place of diesel equipment.
- g. No music or electronically reinforced speech from construction workers shall be allowed.

#### 4.13.10 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold c.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Although construction-related noise impacts would be less than significant during off-site construction of roadway and utility improvements, implementation of Mitigation Measure MM 4.13-3 would ensure that appropriate best management practice measures are implemented to reduce Project construction-related noise levels at the nearest sensitive receptors to the maximum feasible extent. Accordingly, implementation of Mitigation



Measure MM 4.13-3 would further ensure the Project-related noise impacts during the off-site roadway and utility construction improvements would be less than significant.

Implementation of Mitigation Measure MM 4.13-1 would ensure that site-specific noise impact analyses are prepared in conjunction with future plot plans for light industrial, business park, and commercial retail uses within SP 239A1 Planning Areas 1, 2, 3, 4, 5, 6, 8A, or 8B. The required noise impact analyses would evaluate site-specific development components based on the plot plan or conditional use permit application materials, and would identify measures, such as screen walls or other barriers (such as berms), to preclude significant operational-related noise impacts affecting existing or planned residential uses within the adjacent McCanna Hills Specific Plan or on lands located east, north, and south of the Project site and that are designated by the County's General Plan for residential development. With implementation of the required mitigation, Project impacts due to operational noise increases affecting residential sensitive receptors would be reduced to less-than-significant levels.

Feasible mitigation measures are not available to reduce the Project's significant traffic-related noise impacts that would occur with implementation of Alternative Truck Routes 1 and 2. For example, rubberized asphalt was considered to reduce traffic noise levels at the noise source, and Caltrans research has shown that rubberized asphalt can provide noise attenuation of approximately 4 dBA for automobile traffic noise levels. Traffic noise is generated primarily by the interaction of the tires and pavement, the engine, and exhaust systems. For automobiles noise, as much as 75 to 90-percent of traffic noise is generated by the interaction of the tires and pavement, especially when traveling at higher and constant speeds. According to research conducted by Caltrans and the Canadian Ministry of Transportation and Highways, a 4 dBA reduction in tire/pavement noise is attainable using rubberized asphalt under typical operating conditions. However, the effectiveness of reducing traffic noise levels is higher on roadways with low percentages of heavy trucks, since the heavy truck engine and exhaust noise is not affected by rubberized alternative pavement due to the truck engine and exhaust stack height above the pavement itself. Per Caltrans guidance, a truck stack height is modeled using a height of 11.5 feet above the road. With the primary off-site traffic noise source consisting of heavy trucks with a stack height of 11.5 feet off the ground, the tire/pavement noise reduction benefits associated rubberized asphalt primarily would be limited to autos. While the off-site Project-related traffic noise level increases would theoretically be reduced with the 4 dBA reduction provided by rubberized asphalt, the reduction would not provide reliable benefits for the noise levels generated by heavy truck traffic. This is, as previously stated, due to the noise source height difference between automobiles and trucks. While rubberized asphalt could provide some nominal noise reduction, rubberized asphalt is only effective for in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce primary truck-related noise sources (e.g., truck engine noise and exhaust stack noise). Since the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not a feasible mitigation measure for the Project's traffic-related noise impacts. (Urban Crossroads, 2023d, pp. 51-52)

In addition, off-site noise barriers were considered as a potential measure to reduce the Project's traffic-related noise impacts with implementation of Alternative Truck Routes 1 and 2. While noise barriers are commonly used to reduce the potential traffic noise levels from nearby transportation noise source activities, they are typically developed in coordination with new noise sensitive residential development or as part of a roadway



widening project. Off-site noise barriers are estimated to provide a readily perceptible 5 dBA reduction which, according to the FHWA, is simple to attain when blocking the line-of-sight from the noise source to the receiver. Caltrans guidance in the Highway Design Manual, Section 1102.3, indicates that for design purposes, the noise barrier should intercept the line of sight from the exhaust stack of a truck to the receptor, and an 11.5-foot-high truck stack height is assumed to represent the truck engine and exhaust noise source. Therefore, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance. It would not be practical to construct 11.5 foot-high barriers at off-site locations along the Study Area roadways. Additionally, arguably such barriers would block views from area land uses and would result in aesthetic and visual impacts affecting passersby that would off-set any noise attenuation benefits that may result from such walls. According to FHWA guidance, outdoor living areas are generally limited to outdoor living areas of frequent human use (e.g., backyards of single-family homes). Therefore, front and side yards of residences adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Lastly, the Applicant cannot autonomously unilaterally construct off-site walls or other features at properties owned or controlled by others. As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project, because such barriers are not feasible mitigation for the Project's traffic-related impacts. (Urban Crossroads, 2023d, pp. 52-53)

Accordingly, because mitigation is not available to reduce Project-related traffic noise impacts, the Project's off-site traffic-related noise level increases at adjacent land uses would remain significant and unavoidable prior to construction of the MCP and implementation of Alternative Truck Route 6. The Project's significant and unavoidable traffic-related impacts with implementation of Alternative Truck Routes 1 and 2 include the following:

- Alternative Truck Route 1
  - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Alternative Truck Route 2



- Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Threshold d.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.13-2 would ensure that all future blasting activities occur on site in conformance with a County-approved blasting Noise and Vibration Abatement Plan. The mitigation would ensure that any potentially affected structures or utilities would be subject to inspections prior to commencement of any blasting activities, and additional surveys would be required where damage concerns have been expressed by individual residents, property owners, or other concerned parties. The provisions of the Noise and Vibration Abatement Plan also would impose restrictions on blasting activities within 100 feet and within 500 feet of residential structures, and would require monitoring of vibration levels during blasting. In the event that blasting activities exceed the specified vibration limit of 0.05 in/s for ground motion and 120 dB for air-overpressure, then all blasting activities would cease until a revised blasting plan is prepared and approved by Riverside County. Implementation of Mitigation Measure MM 4.13-2 would ensure that vibration-related impacts during construction-related blasting activities do not adversely affect any existing structures, and would reduce blasting-related vibration impacts to less-than-significant levels.



## 4.14 PALEONTOLOGICAL RESOURCES

The analysis in this Subsection is based in part on a Project-specific Paleontological Resources Monitoring and Mitigation Program (PRMMP) report prepared ECORP Consulting, Inc. (herein, “ECORP”), dated July 31, 2019, and appended to this EIR as *Technical Appendix K* (ECORP, 2019b). The analysis provided herein also is based in part on a Project-specific Updated Geotechnical Evaluation prepared by LGC Geotechnical, Inc., dated August 18, 2021, and appended to this EIR as *Technical Appendix F* (LGC, 2021).

### 4.14.1 EXISTING CONDITIONS

#### A. Geological Setting

##### 1. *Regional Geology*

The Project site is located in the Peninsular Range Geomorphic Province of California. This province encompasses western Riverside County. The Project sits near the eastern margin of the Perris Block, which is bounded on the east by the San Jacinto Fault. Crystalline rocks in Moreno Valley include late Jurassic and Cretaceous granitic rocks of the southern California Batholith. These resistant rocks weather to form gray- or tan-colored, boulder covered, conical buttes and hills. (ECORP, 2019b, p. 2)

##### 2. *Local Geology*

Based on the Geologic Map of the 7.5-foot Perris Quadrangle, the Project site is underlain by Very Old Fan Deposits of the late Pleistocene. In addition, Lakeview Mountain plutonic bedrock is present along and adjacent to the western boundary of the Project site. The presence of some minor amounts of artificial fill (not mapped) associated with existing “dirt” roadway construction and past agricultural uses likely occur on site. The approximate lateral limits of the geologic units are depicted on the Geotechnical Maps included in the Project’s Geotechnical Evaluation (refer to Sheets 1 through 3 of EIR *Technical Appendix F*) prepared by LGC Geotechnical, Inc. (herein, “LGC”). Provided below is a description of the geologic units mapped on site. (LGC, 2021, p. 6)

- **Quaternary Very Old Fan Deposits (Map Symbol - Qvof):** Quaternary Very Old Fan deposits generally flank steep bedrock slopes and consist of reddish brown, well indurated sand deposits. During the subsurface field evaluation conducted by LGC, these deposits were observed to generally consist of brown, gray brown, and reddish-brown sand, silty sand and clayey sand. The upper approximately 1-foot of the alluvial material was observed to be desiccated and contained rootlets. (LGC, 2021, p. 6)
- **Cretaceous Lakeview Mountain Tonalite (Map Symbol – Klmt):** The Lakeview Mountain Tonalite is described as a medium to coarse grained biotite-hornblende tonalite with an absence of potassium (alkali) feldspar. During the subsurface field evaluation conducted by LGC, these materials were observed to generally be gray to brown, medium to coarse grained rock with abundant hornblende and biotite. The bedrock ranged from moderately to slightly weathered. (LGC, 2021, p. 6)



Multiple sites within seven miles of the Project have produced Pleistocene mammals and other fossils. In addition, an extensive late Pleistocene biota was recovered from excavations at Diamond Valley Reservoir in Hemet. (ECORP, 2019b, p. 2)

## ***B. Paleontological Resources***

### ***1. Records Search***

ECORP requested a paleontological records search from the Natural History Museum of Los Angeles County (LACM). The report stated that the museum does not have any fossil localities within one (1) mile of the Project boundaries. The LACM has a record of horse fossil (*Equus*) approximately 10 miles south of the Project site at Railroad Canyon Reservoir. Based on a review of this site it was concluded that shallow excavations in both the coarse older Quaternary Alluvium and the finer-grained younger Quaternary Alluvium found at the surface in the eastern portions of the proposed Project area probably would not contain any near-surface significant vertebrate fossils. Deeper excavations in the latter areas that extend down into the older and perhaps finer-grained sedimentary deposits, however, may well encounter significant fossil vertebrate remains. (ECORP, 2019b, p. 3)

### ***2. Literature Review***

Geologic units mapped on site as part of the Project's site-specific updated geotechnical evaluation (EIR *Technical Appendix F*) include Quaternary Very Old Fan Deposits (Qvof) and Cretaceous Lakeview Mountain Tonalite (Klmt). The updated geotechnical evaluation reports that the upper 4 to 12 inches of the Qvof showed rootlets due to agricultural disturbances and uses. No geologic structure was observed in either deposit; the deposits were described as massive. The deepest deposits of Qvof were on the east side of the Project site. One of the test pits did produce caliche (pedogenic calcium carbonate) at a depth of 1.75 to 7.5 feet, and toward the western edge of the Qvof. Caliche can be an indicator of the presence of Pleistocene fossil soils (paleosols).

There are numerous fossil specimens from Diamond Valley Lake, located about 10 miles from the Project site to the southeast. The biota from these localities include spruce trees, mammoths, mastodons, ground sloths, dire wolves, short-faced bears, sabre-toothed cats, large and small horses, large and small camels, and bison.

Recent discoveries in Riverside and other counties in southern California have revealed that paleosols produce vertebrate fossils in some places. There are no published fossils from paleosols in the Perris area, but Pleistocene paleosols have been observed less than 4 miles west and two miles northwest of the Project site in Perris, and also have been observed at Grand Terrace and Moreno Valley.

### ***3. Paleontological Sensitivity***

Riverside County has been inventoried for geologic formations known to potentially contain paleontological resources. Lands with high, low, or undetermined potential for finding paleontological resources are mapped on Figure OS-8 (Paleontological Sensitivity Resources Map) of the County's General Plan as well as the County's GIS system. The paleontological sensitivity map is used in the environmental assessment of development proposals and the determination of required impact mitigation. (Riverside County, 2019a, p. OS-51)



Areas mapped on General Plan Figure OS-8 with a “Low” potential for containing paleontological resources include lands for which previous field surveys and documentation demonstrate as having a low potential for containing significant paleontological resources subject to adverse impacts. The mapping of low potential was determined based on actual documentation and was not generalized to cover all areas of a particular rock unit on a geologic map. (Riverside County, 2015, p. 4.9-11)

General Plan Figure OS-8 also identifies areas within the County with a “High” potential for containing paleontological resources. Sedimentary rock units with high potential for containing significant non-renewable paleontological resources include rock units in which vertebrate or significant invertebrate fossils have been found or determined likely to be present. These units include, but are not limited to, sedimentary formations which contain significant nonrenewable paleontological resources anywhere within their geographical extent and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. High sensitivity includes not only the potential for yielding abundant vertebrate fossils, but also for production of a few significant fossils that may provide new and significant data. High sensitivity areas are mapped by the General Plan as either “High A” or “High B,” according to the following criteria: (Riverside County, 2015, p. 4.9-11)

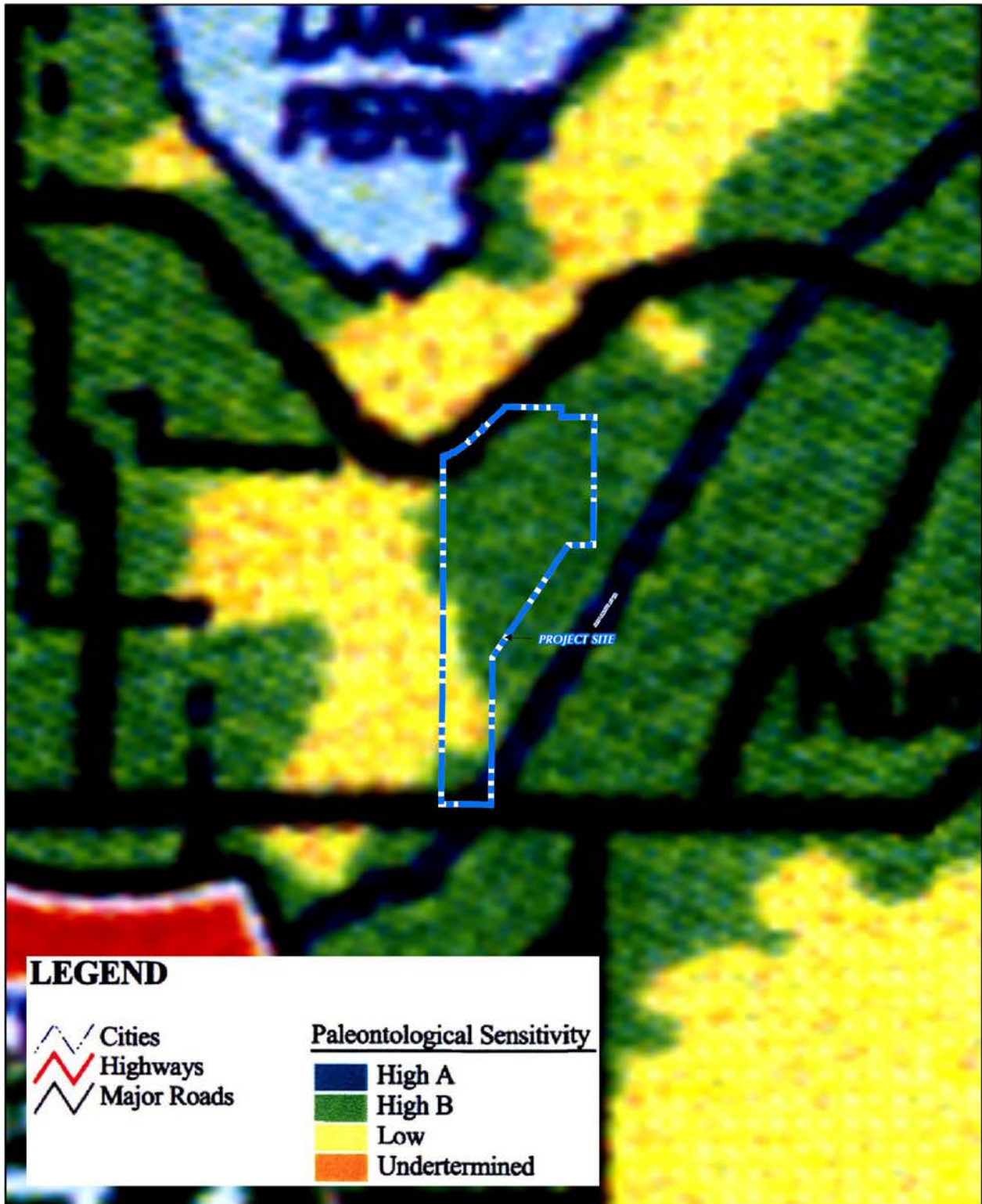
- **High Sensitivity A (Ha):** High A is based on geologic formations or mapped rock units that are known to contain or have the correct age and depositional conditions to contain significant paleontological resources. These include rocks of Silurian or Devonian age and younger that have potential to contain remains of fossil fish, and Mesozoic and Cenozoic rocks that contain fossilized body elements and trace fossils such as tracks, nests, and eggs. (Riverside County, 2015, p. 4.9-11)
- **High Sensitivity B (Hb):** High B is a sensitivity equivalent to High A, but is based on the occurrence of fossils at a specified depth below the surface. This category indicates fossils that are likely to be encountered at or below 4 feet of depth and may be impacted during construction activities. (Riverside County, 2015, p. 4.9-11)

As depicted on Figure 4.14-1, *Paleontological Sensitivity Map*, 453.6 acres of the 582.6-acre Project site are mapped as having a “High B (Hb)” sensitivity for containing paleontological resources, while 129.0 acres within the southern and northern areas of the Project site are mapped as having a “Low” sensitivity for containing paleontological resources. (Riverside County, 2019a, Figure OS-8)

#### 4.14.2 APPLICABLE REGULATORY REQUIREMENTS

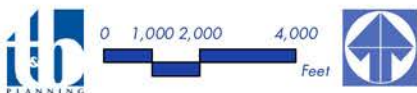
The following is a brief description of the federal, State, and local environmental laws and related regulations related to paleontological resources.





Source(s): RCIP (2002)

Figure 4.14-1



**Paleontological Sensitivity Map**



**A. Federal Regulations**

**1. *Paleontological Resources Preservation Act***

The Paleontological Resources Preservation Act (PRPA) was signed into law on March 30, 2009 (Public Law 111-11, Title VI, Subtitle D; 16 U.S.C. §§ 470aaa - 470aaa-11). PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to implement comprehensive paleontological resource management programs. Section 6310 of PRPA specifically states, "As soon as practical after the date of enactment of this Act, the Secretary shall issue such regulations as are appropriate to carry out this subtitle, providing opportunities for public notice and comment." (NPS, n.d.)

**B. State Regulations**

**1. *California Administrative Code, Title 14, Section 4308***

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value." (CDPR, 2020)

**2. *California Public Resources Code***

Public Resources Code § 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." Public Resources Code § 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." (FindLaw, 2020a)

**C. Local Regulations**

**1. *Riverside County Planning Department Procedures***

In order to ensure the review and protection of paleontological resources for projects subject to CEQA and not otherwise categorically exempt, the Riverside County Geologist performs an initial review of the County of Riverside's database and mapped information for the subject site. When existing information indicates that a site proposed for development has high paleontological sensitivity, a paleontological resource impact mitigation program (PRIMP) is required for the project. The PRIMP shall specify the steps to be taken to mitigate impacts to paleontological resources. If the site warrants protection, then an "Environmental Constraint" is placed on the approved map for the project, stating that: (Riverside County, 2015, pp. 4.9-26 and -27)

"This site, as delineated on this [Environmental Constraint Sheet] map and as indicated in the county's General Plan, has been mapped as having a high potential for containing significant nonrenewable



fossil material. The proposed project’s potential to impact paleontological resources has been determined to be possible. Therefore, mitigation of this potential impact in the form of monitoring of all site earth-moving activities and collection/curation of all significant fossils unearthed is required unless proven unnecessary through comprehensive literature research and site inspection.”

When existing information indicates that a site proposed for development has low paleontological sensitivity, no direct mitigation is required unless a fossil is encountered during site 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 documents the extent and potential significance of the paleontological resources on the site and establishes appropriate mitigation measures for further site development. (Riverside County, 2015, p. 4.9-27)

When existing information indicates that a site proposed for development has undetermined paleontological sensitivity, a report is filed with the Riverside County Geologist documenting the extent and potential significance of the paleontological resources on site and identifying mitigation measures for the fossil and for impacts to significant paleontological resources. (Riverside County, 2015, p. 4.9-27)

**4.14.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section VII of Appendix G to the State CEQA Guidelines addresses typical adverse effects paleontological resources, and includes the following threshold question to evaluate the Project’s impacts to paleontological resources (OPR, 2018a):

- Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, as modified based on the 2018 updates to Section VII of Appendix G to the State CEQA Guidelines (listed above), and indicate significant impacts would occur if the Project or any Project-related component would:

- a. *Directly or indirectly destroy a unique paleontological resources, site, or unique geologic feature.*

The significance threshold set forth in Riverside County’s Environmental Assessment Checklist, as modified by the 2018 updates to the State CEQA Guidelines, was used to evaluate the significance of the proposed Project’s impacts on paleontological resources.

**4.14.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project directly or indirectly destroy a unique paleontological resources, site, or unique geologic feature?***

There are no unique geologic features on site. Although there is an existing hill form that partially occurs along the western Project boundary in the southern portions of the site, this hill form does not exhibit any unique geologic features. Furthermore, a majority of the on-site portions of this hill form would be preserved



in open space planning areas, as proposed by SP 239A1. As such, no impacts to unique geologic features would occur with Project implementation.

Based on the paleontological records search and historical document review conducted by ECORP, the geologic mapping shows some Pleistocene sediments at the surface, Pleistocene fossil soils have been found in several nearby areas, and Pleistocene vertebrate fossils have been found in the vicinity. Furthermore, Riverside County General Plan Figure OS-8 indicates that a majority of the Project site has a “High B” potential for containing paleontological resources. As such, implementation of the Project has the potential to result in direct and indirect impacts to unique paleontological resources. This is evaluated as a significant impact for which mitigation would be required.

#### 4.14.5 CUMULATIVE IMPACT ANALYSIS

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the vicinity of the Project site, including buildout of the Riverside County General Plan Land Use Plan and the general plans of cities throughout western Riverside County. This cumulative study area was selected for analysis because it encompasses a region in which geological conditions, and thus paleontological sensitivity, are similar to what occurs in the immediate vicinity of the Project site.

As indicated under the analysis of Threshold a., the Project site is mapped as containing geological formations that have a “High B” sensitivity for containing paleontological resources, and the Project has the potential to directly impact unique paleontological resources that may be present on the Project site. Additionally, Pleistocene fossil soils have been found in several nearby areas, and Pleistocene vertebrate fossils have been found in the vicinity. Other developments within the region occurring on soils/geologic units with a “high” potential for containing paleontological resources also have the potential to impact subsurface unique paleontological resources during grading and excavation. Therefore, the Project’s potential impacts to paleontological resources on site would be cumulatively considerable.

#### 4.14.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. The Project would not impact any known paleontological resources or unique geological features. However, the Project site is underlain by soils and geologic units with a “High B” potential for containing unique paleontological resources. Thus, there is a potential for impacts to paleontological resources that during Project grading and excavation. This is evaluated as a significant impact on both a direct and cumulatively-considerable basis.

#### 4.14.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Mitigation*

MM 4.14-1 Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by the County to create and implement a Project-specific plan for monitoring site grading/earthmoving activities (Project paleontologist). The Project



paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the County Geologist for approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standards and Society of Vertebrate Paleontology standards, are as follows:

- Prior to issuance of grading permits, a qualified vertebrate paleontologist (“Project Paleontologist”) shall review the Project grading plans and geotechnical report data, with particular regard to location and depth of earth moving and the rock unit(s) being encountered. The review is for the purpose of assessing potential for fossil remains being encountered by earth moving. If previously undisturbed strata with potential for containing fossil remains will be encountered by earth moving, the following measures shall be implemented.
  - Museum Storage Agreement. The Western Science Center (WSC), Natural History Museum of Los Angeles County (LACM), San Diego Natural History Museum (SDNHM), San Bernardino County Museum (SBCM), or Riverside Municipal Museum (RMM) shall be the designated museum repository for any vertebrate, invertebrate, and plant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered from the site as a result of the PRIMP. Prior to any earth moving at the Project site, the paleontologist shall develop a formal agreement with the museum regarding final disposition and permanent storage and maintenance of the fossil collection and associated data. The agreement shall cover, but not necessarily be limited to, museum requirements regarding: 1) level of treatment of the collection; 2) storage and maintenance fees, if any; 3) purchase of specimen storage cabinets and drawers, as well as specimen trays, vials, specimen data cards, and other curatorial supplies, if required.
  - Discovery Clause/Treatment Plan. As part of the PRIMP, the Project Paleontologist shall develop a discovery clause/treatment plan (DC/TP) to allow for the additional tasks (recovery, geologic mapping, fossiliferous rock sample processing, specimen preparation, identification, curation, cataloguing, data entry, specimen storage, and maintenance by museum) and manpower required to treat a large or productive fossil occurrence that cannot be treated without diverting the monitor from routine monitoring. The DC/TP shall also include approved procedures and lines of communication to be followed by specific individuals if fossil remains are uncovered by earth moving, particularly when a paleontologic monitor is not present at the site. Names and telephone numbers of contact personnel shall be included in the lines of communication. The preparation of the required PRIMPs for future grading permits would ensure compliance with these requirements.



- Pre-Construction Meeting. The Project Paleontologist or field supervisor, as well as a paleontologic construction monitor, shall attend a preconstruction meeting to explain the PRIMP to construction contractor and the developer's construction workers. The presentation shall summarize mitigation procedures to be employed by PRIMP personnel and shall detail procedures and lines of communication to be followed by specific Project personnel when fossil remains are found at the site.

The Project Paleontologist or field supervisor shall inform the construction contractor and the developer's construction workers of the following items:

- 1) Routine mitigation measures (primarily monitoring and test screening) to be employed by a monitor during earth moving.
- 2) The potential for fossil remains being uncovered by earth moving in particular areas of the site and the need to implement specific actions and additional mitigation measures when a fossil occurrence is uncovered by earth moving.
- 3) Functions and responsibilities of the monitor when fossil remains are uncovered by earth moving and can be recovered without diverting the monitor from monitoring (temporarily divert earth moving around fossil site until remains evaluated, recovered, and earth moving allowed to proceed through site by monitor; if approved by construction contractor, enlist assistance of earth-moving equipment and operator to expedite recovery of remains, obviate need for additional personnel, and reduce any potential construction delay).
- 4) Functions and responsibilities of the monitor when a fossil occurrence is uncovered by earth moving and is sufficiently large or productive that it cannot be recovered without diverting the monitor from monitoring.
  - 4a) Flag the site.
  - 4b) Advise construction contractor to avoid fossil site until further notice.
  - 4c) Call the Project Paleontologist or field supervisor to site.
- 5) Functions and responsibilities of the Project Paleontologist or field supervisor when notified by the monitor that a large or productive fossil occurrence has been uncovered by earth moving and cannot be recovered without diverting the monitor from monitoring. Evaluate occurrence to determine if recovery is warranted.
  - 5a) If recovery is warranted, notify construction contractor and the Project developer of necessity for implementing additional mitigation measures specified in DC/TP initiating increased level of monitoring, if not already in effect, in immediate vicinity of fossil site and assigning additional personnel to PRIMP.



- 5b) Within 24 hours, mobilize recovery crew to recover occurrence; supervise recovery of occurrence and its transport to laboratory facility or to location elsewhere at site approved by construction contractor for initial/field processing of a fossiliferous rock sample or to laboratory facility for preparation of a fossil specimen.
- 5c) If warranted and approved by construction contractor, enlist assistance of the earth-moving equipment and operator to expedite recovery of occurrence.
- 5d) To obviate need for additional personnel and reduce any potential construction delay, after recovery of occurrence, have construction contractor allow earth moving to proceed through fossil site.
- 5e) Notify Project developer of recovery (or of decision not to recover fossil occurrence, if appropriate) and of authorization for earth moving to proceed through fossil site.
- 6) Responsibilities of the construction contractor and earth-moving equipment operators if fossil remains are uncovered by earth moving, particularly if a monitor is not present at the site when the remains are encountered.
  - 6a) Avoid disturbance of fossil site by earth moving.
  - 6b) Notify monitor, the Project Paleontologist or the field supervisor and Project developer of the fossil occurrence.
  - 6c) Avoidance of fossil site by earth-moving activities.
  - 6d) Assist with equipment and operator to expedite recovery of occurrence.

If warranted, the Project Paleontologist or field supervisor and a monitor shall give a similar presentation to the earth-moving equipment operators at one of their earliest safety meetings. The operators shall be instructed on recognizing fossil remains in the field, informed of their responsibilities if they observe fossil remains when the monitor is not present at the site (avoid disturbance of occurrence by earth moving; have construction contractor call monitor to fossil site; expedite recovery of occurrence, if requested), and advised that unauthorized collecting of fossil remains is illegal.

- Monitoring Earth Moving. Earth moving shall be monitored by a paleontologic monitor only in those areas of the site where earth moving will disturb soils greater than 5 feet deep (monitoring will not be conducted in areas in which soils will be buried, but not disturbed). Monitoring shall not be implemented until earth moving has reached a depth of 5 feet below current grade. Monitoring shall consist of visually inspecting freshly exposed rock and debris for larger fossil remains and periodically dry test screening a small (25 pound) sample of rock and debris with a 20-mesh box screen for smaller vertebrate fossil remains. Monitoring shall be conducted on a full-



time basis. However, if too few or no fossil remains are uncovered by earth moving in areas underlain by a particular rock unit, monitoring can be reduced, generally, to half or quarter time or suspended once 50% of earth moving in the area underlain by the rock unit has been completed. Alternatively, if sufficient fossil remains are uncovered by earth moving, monitoring may be increased in areas underlain by the fossil-bearing rock unit, at least in the immediate vicinity of the fossil site.

o Large-Specimen Evaluation and Recovery Option.

- 1) If a large fossil specimen is found as a result of monitoring earth moving and the specimen can be recovered without significantly diverting the monitor from monitoring, earth moving shall be temporarily diverted around the fossil site and the specimen shall be evaluated, and, if warranted, excavated, covered with a protective plaster-impregnated burlap jacket, if required, and recovered.

If necessary, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen and obviate the need for additional personnel, and the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen. A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site.

At the end of the day the monitor or (following his next site inspection) the field supervisor shall transport the fossil remains and associated data to a laboratory facility for further treatment. If appropriate, samples of fossil wood will be submitted for carbon-14 dating analysis.

- 2) If a fossil specimen is found and is sufficiently large that it cannot be recovered without significantly diverting the monitor from monitoring, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site, the construction contractor shall be advised to avoid the site until further notice, and the Project Paleontologist or field supervisor shall be called to the site. The grading contractor will notify the Project developer and Project Paleontologist of the occurrence and of the avoidance of the site. The Project Paleontologist or field supervisor in turn shall evaluate the specimen to determine if recovery is warranted.
  - 2a) If specimen recovery is not warranted, no further action will be taken to preserve the fossil site or remains, and the construction contractor will be allowed to have earth moving proceed through the site immediately.





- 2b) If specimen recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP, initiating full-time monitoring, if not already in effect, at least in the immediate vicinity of the site in areas underlain by the fossil-bearing rock unit, and assigning additional personnel to the PRIMP. Within 24 hours a recovery crew shall be mobilized to recover the specimen. The size of the crew shall reflect the size of the specimen and the need to recover the specimen as quickly as possible.

The specimen shall be excavated with hand tools, covered with a protective plaster-impregnated burlap jacket, and recovered. If necessary and approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite recovery of the specimen, reduce any potential construction delay, and obviate the need for additional personnel. The construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the specimen.

A temporary field number shall be assigned to the specimen; the field number, a preliminary field identification, and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member shall transport the fossil specimen and associated site data to a laboratory facility for further treatment.

- Small-Specimen Sample Evaluation, Recovery, and Processing. If a sufficient number of smaller vertebrate fossil remains are found at one (1) site as a result of test screening by the paleontological monitor, the fossil site shall be flagged with colored survey ribbon to temporarily divert earth moving around the site. The construction contractor shall be advised to avoid the site until further notice, and if requested by the monitor to expedite recovery of a fossiliferous rock sample reduce any potential construction delay and obviate the need for additional personnel, the construction contractor shall have earth-moving equipment and an operator acquire a rock sample from the fossil site and transport the sample, if possible, to a nearby temporary location at the site approved by the construction contractor.

If a sample is recovered, the construction contractor shall be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample. The Project Paleontologist or field supervisor shall be called to the fossil/storage site to determine if the fossil site/sample is sufficiently productive to warrant recovery of a large sample of fossiliferous rock to process for additional small remains.



- 1) If the site/sample is determined too unproductive or the remains too poorly preserved or insufficiently diagnostic, no further action will be taken to preserve the fossil site/sample or remains, and the construction contractor will be allowed to have earth moving proceed through the fossil/storage site immediately.
- 2) If sample recovery is warranted, the Project Paleontologist or field supervisor shall notify the construction contractor and Project developer of the necessity for implementing additional mitigation measures specified in the DC/TP and assigning additional personnel to the PRIMP.
  - 2a) Within 24 hours, a recovery crew shall be mobilized to recover the sample. The size of the crew shall reflect the need to recover the sample as quickly as possible. The field supervisor shall record the size and supervise recovery of the sample. Up to 3 tons of fossiliferous rock shall be recovered. The sample shall be excavated with hand tools for recovery. If necessary and if approved by the construction contractor, earth-moving equipment and an operator shall be enlisted to expedite transportation of the sample to the processing facility site, obviate the need for additional personnel, and reduce any potential construction delay and the construction contractor will be allowed to have earth moving proceed through the fossil site immediately after recovery of the sample.
  - 2b) A temporary field number shall be assigned to the sample; the field number and pertinent specimen (field number, identification by taxon and element) and geologic (particularly stratigraphic level within rock unit) and geographic site data (location, elevation) recorded in the monitor's daily monitoring log; and the field number recorded and the fossil site location plotted on a map of the site. The field supervisor and, if necessary, a crew member will transport the sample to a location elsewhere at the site approved by the construction contractor or to an offsite location for initial/field processing (wet screening) of the sample. The total weight of all samples from each fossil-bearing rock unit at the site shall not exceed 3 tons.
  - 2c) If warranted, the field supervisor shall setup a field processing facility for wet screening the sample at a site location approved by the construction contractor. Wet screening shall consist of sieving rock through a 20- (and/or finer) mesh box screen immersed in a tub of water to remove the smaller (clay and silt) particles from the larger (sand and rock) particles and small fossil remains, and could result in a reduction in sample weight/volume in excess of 90%. If necessary, rock shall be soaked in an environmentally safe dispersant (citrus oil) prior to screening to improve the separation of the clay particles from the rest of the sample during screening. The monitor shall conduct wet screening if screening can be accomplished without diverting the monitor from monitoring. If it is not possible to have the monitor perform



the wet screening, a field technician shall be assigned to the task. Following the next site inspection, the field supervisor will transport the concentrate (larger particles and small fossil remains) generated by initial processing to a laboratory facility for final/laboratory processing.

2d) If the fossil remains in the concentrate are sufficiently fossilized (dense), an environmentally safe heavy liquid (sodium polytungstate), if appropriate, shall be used by the senior vertebrate paleontologist to separate the remains from the remaining sand and rock particles. When added to a beaker filled with heavy liquid, the concentrate will separate, the particles floating to the surface, and the remains sinking to the bottom, from where they are retrieved. This technique can result in a further sample weight/volume reduction in excess of 90% (less than 1% of original sample size). The final concentrate shall be examined under a microscope and fossil specimens recovered from any remaining sand and rock particles. If the fossil bone in the original concentrate is not sufficiently dense for use of the heavy-liquid separation technique, the entire sample of concentrate shall be sorted under a microscope for fossil remains. Recovered fossil remains shall then be treated as outlined herein.

2e) During the final processing of a sample, the senior vertebrate paleontologist shall continually evaluate the results of field and laboratory processing. If the sample is insufficiently productive or the fossil remains, too poorly preserved, the senior vertebrate paleontologist shall have the option of discontinuing further laboratory processing of the sample, having field processing of the remainder of the sample suspended, and disposing of the remainder of the sample and unprocessed concentrate. Similarly, processing shall be discontinued if, after preliminary identification of some specimens, the remains are determined insufficiently diagnostic or diverse taxonomically, or the species represented are the same as those in another sample from the fossil-bearing rock unit. If appropriate, small splits from one or more samples shall be submitted for palynological analysis.

- Fossil Treatment. Final treatment of all fossil specimens recovered from the site as a result of the PRIMP shall be conducted at a laboratory facility. Larger vertebrate fossil specimens shall be removed from their protective jackets, prepared to the point of identification using hand tools, and hardened or stabilized with a penetrating solution by a preparator. All recovered fossil specimens shall be identified to the lowest taxonomic level possible by knowledgeable vertebrate and invertebrate paleontologists and, if required, other knowledgeable paleontologists (i.e., paleobotanists, micropaleontologists, palynologists). The specimens shall then be curated (assigned and labeled with museum specimen data and corresponding site numbers, placed in specimen trays and, if appropriate, vials with completed specimen data cards), catalogued (specimen and site numbers and specimen data and corresponding geologic



and geographic site data, respectively, archived [entered into appropriate catalogs and computerized databases]), and accessioned into the museum fossil collection, where they will be permanently stored, maintained, and, along with associated data, made available for future study by qualified investigators. With the possible exception of those tasks (curation, cataloging) that might be conducted by museum staff, all treatment of the fossil specimens shall be conducted by a laboratory technician. Fossil specimen preparation, identification, curation, and cataloging are now required before a fossil collection will be accepted by most museum repositories, including the WSC, LACM, SDNHM, SBCM, and RMM. Moreover, the scientific importance of a fossil specimen cannot be evaluated until the specimen has been identified to the lowest taxonomic level possible, and specimen identification often is not possible without prior preparation.

- Final Report. A final technical report of findings shall be prepared by the Project Paleontologist and shall describe the site's stratigraphy, summarize field and laboratory methods employed during the PRIMP, include a taxonomic list and an inventory of catalogued fossil specimens recovered as a result of the PRIMP, evaluate the scientific importance of the specimens, and discuss the relationship of the fossil assemblage from any newly recorded fossil site at the project site to relevant fossil assemblages from fossil sites in other areas. The report shall be submitted to the contractor and County Geologist. Submission of the final report will signify completion of the PRIMP and will ensure Project compliance with Public Resources Code Section 21081.6 (mitigation monitoring, reporting, and compliance).

All reports shall be signed by the Project paleontologist and all other professionals responsible for the report's content (e.g. Project Geologist), as appropriate. One original signed copy of the report(s) shall be submitted to the County Geologist along with a copy of this condition and the grading plan for appropriate case processing and tracking. These documents should not be submitted to the Project Planner, Plan Check staff, Land Use Counter or any other County office. In addition, the Project Applicant shall submit proof of hiring (i.e. copy of executed contract, retainer agreement, etc.) a Project paleontologist for the in-grading implementation of the PRIMP.

#### 4.14.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measure MM 4.14-1 would ensure that a PRIMP is prepared prior to issuance of any grading permits that have the potential to affect subsurface paleontological resources. Implementation of a PRIMP would ensure that paleontological resources, if uncovered during site grading activities, are appropriately treated, and would reduce the Project's direct and cumulatively-considerable impacts to paleontological resources to less-than-significant levels.



## 4.15 POPULATION AND HOUSING

The following analysis discloses existing population and housing data from Riverside County and assesses the potential for impacts on population and housing associated with implementation of the Project. The analysis in this Subsection is based on information contained in the Riverside County General Plan (Riverside County, 2021a) and addresses population and housing projections and requirements from the Southern California Association of Governments (SCAG). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.15.1 EXISTING CONDITIONS

Under existing conditions, the 582.6-acre Project site is vacant and undeveloped. A majority of the flatter portions of the Project site were previously subject to agricultural activity, and are routinely disced for fire abatement purposes.

As indicated in Section 2.0 of this EIR, the Project site is located within the Lakeview/Nuevo Area Plan (LNAP) of the Riverside County General Plan. The Project site also is located within the boundaries of the Stoneridge Commerce Center Specific Plan (SP 239). Though the entire Project site is vacant and undeveloped, the General Plan and LNAP designate the property for “Community Center (CC),” “Commercial Retail (CR),” “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Open Space – Recreation (OS-R),” “Open Space – Conservation (OS-C),” “Open Space – Conservation Habitat (OS-CH),” and “Open Space – Water” land uses. The adopted SP 239 allows for up to 718 “Medium Residential (2-5 du/ac)” dwelling units on 185.0 acres; 903 “Medium-High Residential (5-8 du/ac)” dwelling units on 185.0 acres; 446 “Very High Residential (14-20 du/ac)” dwelling units on 30.0 acres; “Commercial” uses on 75.0 acres, which also allows for up to 169 dwelling units in Planning Area 1; “Parks” on 33.7 acres; “Open Space – Natural” on 20.8 acres; “Open Space – Recreational” on 8.6 acres; three planning areas designated for “Schools” on 27.0 acres; and 40.3 acres of major circulation facilities

#### A. Population Projections

The Project site is located within unincorporated Riverside County, immediately east of the City of Perris. According to SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”; also referred to as “Connect SoCal”), and as shown in Table 4.15-1, *SCAG Region Projected 2000-2045 Growth Forecast*, in 2000 the SCAG region had a population of approximately 16,574,000 persons. The population within the County is expected to increase to 22,504,000 persons by 2045, reflecting a 35.7% increase in population over the 45-year period. While the annual rate of household growth has steadily tracked upward since its low of 0.2 percent in 2010, household growth in the SCAG region remains much flatter than before the Great Recession (0.6 percent from 2017-2019). After losing over 700,000 jobs between 2007 and 2010, the region has experienced tremendous job growth between 2010 and 2019, reaching nearly 8.7 million jobs and cresting the previous high of 8.1 million reached in 2007. (SCAG, 2020d, Demographics and Growth Forecast Technical Appendix)



**Table 4.15-1 SCAG Region Projected 2000-2045 Growth Forecast**

	2000	2010	2016	2045
Population	16,574,000	18,076,000	18,832,000	22,504,000

(SCAG, 2020d, Demographics and Growth Forecast Technical Appendix, Table 3)

**4.15.2 APPLICABLE ENVIRONMENTAL REGULATIONS**

The following is a brief description of the federal, State, and local environmental laws and related regulations governing environmental topics related to population and housing.

**A. Federal Plans, Policies, and Regulations**

**1. *Fair Housing Act***

The federal Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally-assisted housing. (HUD, n.d.)

**2. *U.S. Census Bureau***

The U.S. Census Bureau is the leading source of statistical information about the nation’s people. Population statistics come from decennial censuses, which count the entire U.S. population every ten years, along with several other surveys. The American Community Survey (ACS) is an ongoing annual survey intended to help communities decide where to target services and resources. Demographic surveys measure income, poverty, education, health insurance coverage, housing quality, crime victimization, computer usage, and many other subjects. Economic surveys are conducted monthly, quarterly, and yearly, and cover selected sectors of the nation’s economy. (USCB, n.d.)

**B. State and Regional Plans, Policies, and Regulations**

**1. *State Housing Law***

The State law regulating residential occupancies is entitled the “State Housing Law” and is found in Division 13, Part 1.5 of the California Health and Safety Code (HSC), Sections 17910 to 17998.3 Regulations implementing the State Housing Law mandate statewide residential building standards for new construction, which are found in the California Code of Regulations, Title 24, also referred to as the California Green Building Standards Code (CalGreen). (CA Legislative Info, n.d.)

**2. *Southern California Association of Governments (SCAG)***

SCAG determines regional housing needs and the share of the regional needs to be addressed by Riverside County and its constituent cities. SCAG is a Joint Powers Agency and is the designated Council of Governments (COG), Regional Transportation Planning Agency (RTPA), and Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial counties. SCAG’s Regional Comprehensive Plan and Guide (RCPG) and Regional Housing



Needs Assessment (RHNA) are tools for coordinating regional planning and housing development strategies in southern California. (SCAG, 2020a)

**3. *Regional Housing Needs Assessment (RHNA)***

State Housing Law (California Government Code Article 10.6, Sections 65580-65590) mandates that local governments, through Councils of Governments (COGs), identify existing and future housing needs in a Regional Housing Needs Assessment (RHNA). The RHNA provides recommendations and guidelines to identify housing needs within counties and cities. The County of Riverside addresses its RHNA allocation through its General Plan Housing Element. The RHNA prepared by SCAG projects the County’s share of regional housing need for 2021-2029 as 40,647 homes, as summarized in Table 4.15-2, *SCAG 6th Cycle Regional Housing Needs Allocation – Unincorporated County*. (SCAG, 2020c; SCAG, 2021; Riverside County, 2021, Table H-1)

**Table 4.15-2 SCAG 6<sup>th</sup> Cycle Regional Housing Needs Allocation – Unincorporated County**

<b>Income Category</b>	<b>Allocation</b>
Extremely Low	5,185
Very Low	5,185
Low	6,627
Moderate	7,347
Above Moderate	16,302
<b>Total</b>	<b>40,647</b>

(SCAG, 2021; Riverside County, 2021, Table H-1)

**C. Local Plans, Policies, and Regulations**

**1. *Riverside County General Plan Housing Element***

The 2021-2029 Housing Element identifies and establishes County policies intended to fulfill the housing needs of existing and future residents in Riverside County. It establishes policies that guide County decision-making and set forth an action plan to implement its housing goals for the 6<sup>th</sup> Cycle Housing Element update through 2029. The Housing Element includes a review of previous housing goals, an assessment of the effectiveness of those goals, and an assessment of housing needs. Additionally, the Housing Element includes an inventory of resources and constraints related to meeting housing needs in the County; an analysis of affordable housing developments and programs intended to preserve such housing; community goals for the maintenance, preservation, improvement and development of housing; and a program which sets forth a five-year schedule of actions that the County is undertaking or intends to undertake in implementing the polices set forth in the Housing Element. (Riverside County, 2021, pp. H-1 and H-2)

**2. *SCAG Regional Transportation Plan/Sustainable Communities Strategy***

SCAG is a joint-powers authority (JPA) under California State law, established as an association of local governments and agencies that convene as a forum to address regional issues. On September 3, 2020, SCAG’s Regional Council adopted Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). The RTP/SCS is intended to create a plan for defining and solving regional problems including



housing, traffic, water, air quality, and other regional challenges. The RTP/SCS builds upon the elements of existing local general plans and provides a blueprint for where and how the Southern California area will grow. (SCAG, 2020d)

**4.15.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section XIV of Appendix G to the State CEQA Guidelines addresses typical adverse effects due to population and housing, and includes the following threshold questions to evaluate the Project’s impacts due to population and housing (OPR, 2018a):

- *Induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through the extension of infrastructure); or*
- *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, are derived from Section XIV of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to population and housing if construction and/or operation of the Project would:

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere;*
- Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County’s median income; or*
- 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).*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on population and housing.

**4.15.4 IMPACT ANALYSIS**

***Threshold a: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

Under existing conditions, the Project site consists of undeveloped land with no dwelling units or structures located on the Project site. Accordingly, the Project would have no potential to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing else-where. No impacts would occur.





***Threshold b: Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?***

Under existing conditions, the Project site is designated for urban development by adopted SP 239, although SP 239 designates the site for a mixture of residential uses with some areas of commercial retail land uses. The Project proposes to amend the land use designations as applied to the Project site to instead provide for a mixture of light industrial, business park, and commercial retail land uses. Although the Project would result in an increase in employment within this portion of Riverside County by between 8,950 and 9,162 jobs (for the Alternative Land Use Plan and Primary Land Use Plan, respectively), Riverside County currently suffers from a poor jobs-housing ratio, wherein there are not enough jobs within the County to prevent the need for County residents to travel outside the region for employment (Riverside County, 2021a, p. LU-26). Thus, with the reduction in the number of planned dwelling units planned on site and a substantial increase in employment opportunities, the Project would assist the County in improving its jobs-housing balance. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Moreover, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan or the general plans of cities within the County, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

***Threshold c: Would the Project 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)?***

Under existing conditions, the Project site is designated for future development as a master-planned residential community that would include commercial retail land uses. The Project Applicant proposes to amend the land use designations for the 582.6-acre Project site to provide for a mixture of light industrial, business park, and commercial retail land uses. Although the Project would result in a change in planned land uses, the Project site already is targeted for urban development under existing conditions. Thus, the Project would not result in substantial unplanned population growth in the area. Moreover, Riverside County currently suffers from a poor jobs-housing ratio. The Project would replace planned residential uses on site with light industrial, business park, and commercial retail land uses, and would result in the generation of between 8,950 and 9,162 jobs (for the Alternative Land Use Plan and Primary Land Use Plan, respectively). Thus, the Project would serve to improve the County's jobs-housing ratio, which in turn would reduce the need for County residents to commute outside of the County for employment. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Thus, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.



#### **4.15.5 CUMULATIVE IMPACT ANALYSIS**

For purposes of analysis, the cumulative study area for the issue of population and housing encompasses western Riverside County as well as the various cities within western Riverside County. This study area is appropriate because growth in the region is largely controlled by the Riverside County General Plan and the general plans of the various cities within the County.

The Project site does not contain any existing residential units on site under existing conditions. As such, the Project would not result in the displacement of existing residents or housing, and cumulatively-considerable impacts would not occur.

The Project would result in the generation of between 8,950 and 9,162 jobs (for the Alternative Land Use Plan and Primary Land Use Plan, respectively) at full buildout. Although the Project would result in an increase in the number of employment opportunities, the County currently exhibits a low jobs-to-housing ratio. Implementation of the proposed Project is anticipated to help improve the jobs-to-housing ratio, thereby reducing the need for County residents to travel outside of the region for employment. Although the Project may result in an incremental increase in the demand for housing, including housing for lower-income households, it is expected that such an increase could be accommodated by existing housing within the County, or by housing that is already planned for as part of the County's General Plan and the general plans of local cities within the County. Furthermore, the Riverside County General Plan designates areas of the County in which lower-income housing can be accommodated to meet the County's RHNA obligations, and does not rely on residential development on the Project site in order to meet its RHNA obligations. Other cumulative developments within the region would either result in the establishment of new housing units, including those affordable to lower-income households, or would result in the creation of new employment opportunities that would serve to assist the County in improving its jobs-to-housing balance. As such, the Project's contribution to cumulatively-considerable impacts due to the creation of demand for additional housing, including affordable housing, would be less than significant.

Under existing conditions, the Project site is designated by the General Plan, LNAP, and SP 239 for urban development. Although the Project Applicant proposes to amend the land use designations for the 582.6-acre Project site to provide for a mixture of light industrial, business park, and commercial retail land uses, the employment opportunities generated by the Project are expected to largely be filled by existing County residents, and thus would not create a substantial new demand for housing within the County. The Project would serve to improve the County's jobs-housing ratio, which in turn would reduce the need for County residents to commute outside of the County for employment. Furthermore, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed to serve the proposed Project, and would not contribute to or indirectly induce growth in the local area. As such, the Project would not induce substantial unplanned population growth in the area, and impacts would therefore be less-than-cumulatively considerable.



#### 4.15.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: No Impact. The Project site does not contain any existing residences or housing, and the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Threshold b: Less-than-Significant Impact. The employment-generating land uses proposed as part of the Project (i.e., light industrial, business park, and commercial retail land uses) would replace the site's existing residential and commercial land use designations, and would result in between 8,950 and 9,162 jobs (for the Alternative Land Use Plan and Primary Land Use Plan, respectively) at full buildout. However, it is anticipated that any future employees generated by the Project could be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. Impacts would be less than significant.

Threshold c: Less-than-Significant Impact. Because the Project site is designated for development with urban uses by the General Plan, LNAP, and SP 239, and because the Project would accommodate employment opportunities in a portion of Riverside County that has a relatively low ratio of jobs to housing, the Project would not directly induce substantial unplanned population growth in the area, and impacts would be less than significant. The Project also would not indirectly induce substantial unplanned population growth due to infrastructure improvements, as all proposed infrastructure improvements would be sized to serve only the proposed Project; thus, indirect population growth impacts would be less than significant.

#### 4.15.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

No significant environmental impacts related to population and housing would occur as a result of the proposed Project. Thus, no mitigation measures are required.



## 4.16 PUBLIC SERVICES

This Subsection provides information on existing public services and service levels for fire protection, police protection, schools, libraries, and public health facilities, and evaluates impacts to the environment that may result from the demand the Project may have on such services.

### 4.16.1 EXISTING CONDITIONS

#### A. Fire Protection/Emergency Medical Services

Fire protection services for the Project site are provided by the Riverside County Fire Department (RCFD). The RCFD provides a full range of fire services within the County and contracting cities. The level of service provided is dependent on response times, travel distance, and staffing workload levels established in the Riverside County Fire Protection and Emergency Medical Aid Plan. The Fire Protection Master Plan contains four fire response categories that are used to determine the response times/travel distances for primary and secondary fire stations. The response categories are based on the amount of community build-out presumed in the Master Fire Plan. The Fire Department assumes in any given region that three or more fire engines respond to any reported fire.

The fire station that would serve the Project is Station 3 (Nuview), which is located approximately 1.5 miles east of the Project site. The Project site also could be served by Station 90 ((North Perris City), which is located approximately 2.8 miles west of the Project site, or Station 1 (Perris), located approximately 3.6 miles southwest of the Project site. All of the fire stations that could serve the Project site are staffed full-time, 24 hours per day, 7 days per week with a minimum three-person crew, including paramedics, operating a “Type 1” structural firefighting apparatus. (Google Earth, 2021)

#### B. Sheriff Services

The Riverside County Sheriff’s Department provides community policing for the Project area. The Sheriff Station serving the Project area is the Perris Station, located at 137 North Perris Boulevard in Perris, CA, 92570, approximately 3.3 miles southwest of the Project site (Google Earth, 2021). In addition to community policing, other services provided by the Sheriff’s Department include, but are not limited to, operating of the emergency 911 system, operating correctional facilities, performing traffic control, and providing crime prevention education. Also, the Sheriff’s Department coordinates with volunteer groups such as Neighborhood Watch Programs and the Community Oriented and Policing Problem Solving (COPPS) Program and the Community Oriented Policing (COP) Program. COPPS shifts the focus of police work from a solely reactive mode by supplementing traditional law enforcement methods with proactive problem-solving approaches that involve the community as well as the police.

Unincorporated Riverside County has set a minimum standard of 1.0 deputy per 1,000 residents. This standard was adopted as part of the “Commitment to Public Safety and Citizens’ Option for Public Safety,” by the Board of Supervisors on September 17, 1996. The Sheriff’s Department has indicated that their desired staffing level is 1.2 deputies per 1,000 residents, while Mitigation Measure 4.15.C of EIR No. 441, which was prepared for the County’s 2003 General Plan, establishes a standard of 1.5 sworn peace officers per 1,000 population.



**C. Schools**

The northern portions of the Project site are located within the Val Verde Unified School District (VVUSD), while the southern portions of the Project site are located within the Nuvew Union School District (NUSD) and the Perris Union High School District (PUHSD). The nearest schools to the Project site include the Sierra Vista Elementary School, located 0.5 mile west of the Project site; the Lakeside Middle School, located 0.4 mile west of the Project site; and the Perris High School, located 3.0 miles west of the Project site. As of the 2017/2018 school year, the VVUSD had a total capacity of 22,016 students, including 11,482 elementary school students, 3,094 middle school students, and 7,440 high school students, and in the 2022-2023 school year the VVUSD had a total enrollment of 19,379 students (VVUSD, 2018; DoE, 2023a). As of October 2022, the NUSD had a total capacity for 1,173 students, including 884 elementary school students (grades K-5) and 289 middle school students (grades 6-8), and had a total enrollment of 1,499 students (NUSD, 2023, Tables 8 and 9). In the 2022-2023 school year, the PUHSD had a total enrollment of 11,731 students, although total capacity data for the PUHSD is not publicly available (DoE, 2023b).

**D. Libraries**

The Project site is located within the Riverside County Public Library System (RCPLS) service area. The County of Riverside operates a system of 35 libraries and two book mobiles (one serving Coachella Valley and one serving western Riverside County) to serve unincorporated populations. In addition, the Riverside County Library System operates an automated network that currently deploys over 350 computer/terminal workstations in the library branches of the Riverside County Library System, Riverside Public Library, Moreno Valley Library, Murrieta Public Library, Murrieta Valley High School and College of the Desert. The network can also be accessed by Riverside County residents via the Internet. The library system manages the library catalog of the 1.3 million items in the library system and the annual checkout of over 3.5 million books, audios, and videos. For 2010, the Riverside County Library System reported a total of 681,117 ‘registered borrowers’ utilizing County library services. (Riverside County, 2015a, pp. 4.17-65 and 4.17-66)

The Riverside County library system does not maintain a specific numerical factor to analyze the needs created by new development. However, the American Library Association suggests that an appropriate service criterion would be availability of convenient library facilities and book reserves at a rate of 0.5 square foot of library space and 2.5 volumes per capita. The County’s ability to support the needs of future growth is dependent upon its ability to secure sites for, construct and stock new libraries on a timely basis. As of 2015, there was no specific funding mechanism for expansion of library facilities. Based on 2010 reported registered borrowers (681,117) and current square footage of library facilities available (333,884), as of 2015 facilities provided approximately 0.49 square feet of space per registered borrower (not the Riverside County population as a whole). (Riverside County, 2015a, p. 4.17-66)

**E. Health Services**

Public health services in Riverside County are provided by the County Department of Public Health. However, most health services are provided by the private sector. The nearest medical facilities to the Project site are the Riverside County Regional Medical Center, located at 26520 Cactus Avenue in Moreno Valley, or



approximately 5.7 miles north of the Project site; and the Menifee Valley Medical Center, located at 28400 McCall Blvd in the City of Menifee, or approximately 5.7 miles south of the Project site.

#### 4.16.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to public services.

##### A. State Regulations

##### 1. *Fire Protection Services Regulations and Plans*

##### Public Resources Code (PRC) Sections 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.)

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC Section 4142, which allows for such cooperative agreements for the purpose of preventing and suppressing forest fires or other fires. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC Section 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.)

##### PRC Sections 4102 and 4127 - State Responsibility Areas (SRAs)

PRC Section 4102 specifies that "'State responsibility areas' means areas of the state in which the financial responsibility of preventing and suppressing fires has been determined by the [State Fire] Board pursuant to Section 4125, to be primarily the responsibility of the state." These areas may contain State or privately-owned forest, watershed, and rangeland. §§ 4126-4127 of the PRC further specify the standards that define what does and does not constitute an SRA. (CA Legislative Info, n.d.)

##### California Code of Regulations (CCR) Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code which contains complete regulations and general construction building standards of State of California adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 9 refers to the California Fire Code, which contains other



fire safety-related building standards. In particular, Chapter 7A, “Materials and Construction Methods for Exterior Wildfire Exposure,” in the 2019 California Building Code addresses fire safety standards for new construction and Section 701A.3.2 addresses “New Buildings Located in Any Fire Hazard Severity Zone.” (BSC, n.d.)

☐ **CCR Title 14 – Natural Resources**

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (Westlaw, n.d.)

☐ **California Government Code (CGC) Sections 51178-51179 – Very High Fire Hazard Severity Zones**

Section 51178 specifies that the Director of CalFire, in cooperation with local fire authorities, must identify areas that are Very High Fire Hazard Severity Zones (VHFHSZs) in Local Responsibility Areas (LRAs), based on consistent statewide criteria and the expected severity of fire hazard. It further specifies that VHFHSZs “shall be based on fuel loading, slope, fire weather and other relevant factors,” including areas subject to Santa Ana winds which are a “major cause of wildfire spread.” Section 51179 states that a local agency (such as a county) must also designate (and map) the VHFHSZs in its jurisdiction by ordinance. (See the discussion on Ordinance No. 787, below, regarding Riverside County’s VHFHSZs). Other portions of the Government Code outline when a local agency may use its discretion to exclude areas from VHFHSZ requirements or add areas not designated by the State of California to its VHFHSZ areas. (CA Legislative Info, n.d.)

☐ **CGC Section 51182 – Defensible Space**

Pursuant to this code, a person who “owns, leases, controls, operates or maintains an occupied dwelling or occupied structure in, upon or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land or land that is covered with flammable material” in a very high fire hazard severity zone designated by the local agency pursuant to § 51182, shall at all times maintain a specified amount of “defensible space” to protect structures in high fire hazard areas. (CA Legislative Info, n.d.)

☐ **PRC Section 4213 - Fire Prevention Fees**

Pursuant to PRC Section 4213, in July of 2011, the State of California began assessing an annual “Fire Prevention Fee” for all habitable structures within the State’s Responsibility Area (SRA) to pay for fire prevention services. The SRA is the portion of the state where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As of 2013, the fee is up to \$150 per habitable structure (i.e., a building that can be occupied for residential use, which does not include incidental buildings such as detached garages, barns, outdoor bathrooms, sheds, etc.). (FindLaw, 2020b)



## 2. *School Services Regulations and Plans*

### Assembly Bill (AB) 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions within the School Facilities Program (SFP). The SFP provides State of California funding assistance for new facility construction projects and modernization projects. The Critically Overcrowded School Facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply. (CA Legislative Info, 2002)

### Leroy F. Greene School Facilities Act of 1998 (Senate Bill [SB] 50)

Senate Bill 50 (SB 50) was enacted by the State Legislature in 1998, which amended existing state law governing school fees. In particular, SB 50 amended prior California Government Code (CGC) Section 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any state or local agency involving...the planning, use, or development of real property....” (CA Legislative Info, 1998)

The legislation also amended CGC Section 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use or development of real property.” Further, SB 50 established the base amount of allowable developer fees: \$1.93 per square foot for residential construction and \$0.31 per square foot for commercial. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years. (CA Legislative Info, 1998)

In certain circumstances, for residential construction, school districts can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50% of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions: (CA Legislative Info, 1998)

- At least 30% of the district’s students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50% of the votes cast.
- The district has passed bonds equal to 30% of its bonding capacity.
- Or, at least 20% of the district’s teaching stations are relocatable classrooms.

Additionally, if the State of California’s bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as “Level 3 fees,” these fees are





equal to 100% of land and construction costs of new schools required as a result of new developments. (CA Legislative Info, 1998)

### 4.16.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XV of Appendix G to the State CEQA Guidelines addresses typical adverse effects to public services, and includes the following threshold question to evaluate the Project's impacts to public services (OPR, 2018a):

- *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 protection?*
  - *Police protection?*
  - *Schools?*
  - *Parks?*
  - *Other public facilities?*

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, and have been updated to reflect the 2018 updates to Section XV of Appendix G to the State CEQA Guidelines (listed above). Accordingly, the following threshold questions are used to evaluate the Project's impacts to public services:

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?*
- b. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?*
- c. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?*



- d. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?*
- e. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health care services?*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on public services.

**4.16.4 IMPACT ANALYSIS**

***Threshold a.:* *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection facilities?***

The Project, which would entail development of the 582.6-acre Project site with light industrial, business park, and commercial retail land uses, would place additional demand on the Riverside County Fire Department (RCFD), which provides fire protection services in the Project area. Implementation of the Project would cumulatively affect the Department’s ability to service the planned population. The Project would require an “Urban-Category II” level of service as defined by the Riverside County Fire Protection Master Plan. This classification requires a fire station be within three roadway miles of the Project site, and a full first alarm assignment team operating on the scene within 15 minutes of dispatch. The fire station that would serve the Project is Station 3 (Nuview), which is currently located approximately 1.5 miles east of the Project site. The Project site also could be served by Station 90 ((North Perris City), which is located approximately 2.8 miles west of the Project site, or Station 1 (Perris), located approximately 3.6 miles southwest of the Project site. With buildout of General Plan Circulation Element roadways, including Orange Avenue and the Mid-County Parkway (MCP), the Project site would be located within 3.0 roadway miles of the nearest fire station, and a full first alarm assignment team could operate on site within 15 minutes of dispatch. Thus, the RCFD would be able to meet the Urban-Category II Land Use protection goals of the Fire Protection Master Plan for the Project.

As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety. Among other items, these requirements include conformance with the Uniform Building Code Section 1503, which requires that all buildings be constructed with fire retardant roofing material, as well as standard Riverside County Fire



Department conditions of approval (COAs) for specific plans, which prohibit flag lots and require alternative/secondary access routes to neighborhoods. The alternative/secondary access routes would be required to be maintained throughout construction and buildout of the Project. Additionally, the Project would be subject to the fire code standards established as part of Riverside County Ordinance No. 787 (Fire Code Standards).

Nonetheless, development of the proposed Project would impact fire services by placing an additional demand on existing County Fire Department resources and personnel. As set forth by the Riverside County Fire Protection Master Plan, a new fire station and/or appropriate fire company is required for the development of 2,000 dwelling units or more. No residential uses are proposed as part of the Project, and thus the Project would not result in the need for a new fire station in the local area based on this standard. Notwithstanding, buildout of the Primary Land Use Plan would result in the construction of up to 7,350,000 s.f. of light industrial building area, 1,069,398 s.f. of Business Park building area, and up to 121,968 s.f. of commercial retail building area, while buildout of the Alternative Land Use Plan would result in up to 7,350,000 s.f. of light industrial building area, 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area. The proposed land uses on site would generate up to between 8,950 and 9,162 new jobs on site. Project impacts to fire protection services would include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population. Although new fire protection facilities ultimately may be needed in the Project area to serve the Project and other future development in the area, it is not possible to identify environmental impacts that may be associated with the development of any new fire protection facilities until a specific proposal and design for the facility is prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities.

However, the Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction. Accordingly, Project-related impacts to fire protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

***Threshold b.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered sheriff facilities or the need for new or physically altered sheriff facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for sheriff services?***

Buildout of the Primary Land Use Plan would result in the construction of up to 7,350,000 s.f. of light industrial building area, 1,069,398 s.f. of Business Park building area, and up to 121,968 s.f. of commercial retail building area, while buildout of the Alternative Land Use Plan would result in up to 7,350,000 s.f. of light industrial building area, 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building



area. The proposed land uses on site would generate up to between 8,950 and 9,162 new jobs on site. Development of the property and the introduction of new businesses on site could result in an incremental increase in criminal activity such as burglaries, thefts, auto thefts, vandalism, etc. However, according to the Riverside County Sheriff’s Department (RCSD), there is not a direct correlation between population growth, the number of crimes committed, and the number of RCSD personnel needed to respond to these increases. As the population and use of an area increases, however, additional financing of equipment and manpower needs are required to meet the increased demand. The proposed Project would result in an increase in the cumulative demand for services from the RCSD, which provides police protection services to the Project site. Specifically, the Project would generate a demand for up to approximately 14 new sworn officers (9,162 employees x 1.5 officers/1,000 population = 13.7 officers), based on the 1.5 per 1,000 population service standard (Riverside County, 2015a, Table 4.17-H). Staff necessary to support the additional deputy would include an appropriate level of civilian, investigation, and supervisory personnel. The proposed Project would not, however, in and of itself result in the need for new or expanded sheriff facilities to accommodate new personnel.

The Project is required to adhere to Riverside County Ordinance No. 659, which requires payment of a Development Impact Fee (DIF) to assist the County in providing for sheriff protection services, including new or expanded facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and sheriff facilities construction. Accordingly, Project-related impacts to sheriff protection services are evaluated as less than significant and no mitigation beyond payment of DIF fees would be required.

Therefore, implementation of the Project would not result in the need for new or expanded sheriff facilities, and impacts would be less than significant. The Project’s incremental demand for sheriff protection services also would be less than significant because the Project would be required to contribute DIF fees. Accordingly, a less-than-significant impact would occur with respect to sheriff protection services or facilities as a result of implementation of the proposed Project.

***Threshold c.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services?***

As previously indicated, the northern portions of the Project site are located within the VVUSD, while the southern portions of the Project site are located within the NUSD and the PUHSD. However, no residential uses are proposed as part of the Project. As such, the Project would not result in a direct demand for new or expanded school services in the local area. Notwithstanding, the Project may indirectly result in new residents within the County, which could place additional demand on school facilities in the surrounding areas. Although the VVUSD, NUSD, and/or PUHSD may need to construct new school facilities to meet the growing demand within this portion of unincorporated Riverside County, there are no current publicly-available plans detailing where such facilities would be built. The Project would not directly cause or contribute to the need



for new or expanded school facilities, and it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the applicable school district, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees (as discussed below).

Although it is not possible to identify physical environmental effects that may result from new or expanded school facilities, the Project Applicant would be required to contribute fees to the VVUSD, NUSD, and/or PUHSD in accordance with Riverside County Ordinance No. 575. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. Although the Project would not result in a direct increase in demand for school services, mandatory payment of school impact fees still would be required and would ensure that the Project’s impacts to school facilities and services would be less than significant. Accordingly, impacts would be less than significant and no mitigation beyond payment of fees would be required.

***Threshold d.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services?***

Buildout of the Primary Land Use Plan in up to 7,350,000 s.f. of light industrial building area, 1,069,398 s.f. of Business Park building area, and up to 121,968 s.f. of commercial retail building area, while buildout of the Alternative Land Use Plan would result in up to 7,350,000 s.f. of light industrial building area, 936,540 s.f. of business park building area, and up to 126,542 s.f. of commercial retail building area. Land uses proposed as part of the Project would not result in a direct increase in the County’s population.

Although use of the internet has resulted in decreased demand being placed on library services nation-wide, the County continues to maintain its standards for book titles and library square footage. Library services in the County of Riverside are provided by the Riverside County Public Library System (RCPLS). Buildout of the Project would result in up to 9,162 new employees under the Primary Land Use Plan and up to 8,950 employees under the Alternative Land Use Plan. Assuming that all of the jobs produced by the Project would consist of new residents within the County, in order to attain the RCPLS level of service standard of 2.5 titles-per-capita, the Project-generated employees would require an additional 22,905 titles (2.5 titles-per-capita x 9,162 employees = 22,905 titles) under the Primary Land Use Plan, and 22,375 titles (2.5 titles-per-capita x 8,950 employees = 22,375 titles) under the Alternative Land Use Plan. To attain the RCPLS standard of 0.5 square foot of library space per capita, the Project would create the demand for 4,581 s.f. of additional library space (0.5 s.f. of library space per capita x 9,162 employees = 4,581 s.f.) under the Primary Land Use Plan and



4,475 s.f. of additional library space (0.5 s.f. of library space per capita x 8,950 employees = 4,475 s.f.). However, these estimates are conservative in nature because the majority of jobs that would be generated by the Project likely would be filled by existing County residents, given the County’s generally poor jobs-to-housing ratio. Thus, the Project’s impacts to the local library system likely would be substantially less than described above. (Riverside County, 2015a, Table 4.17-W)

The provision of additional library space would be addressed through the County’s compliance with the adopted level of service standards. Additionally, mandatory compliance with Riverside County Ordinance No. 659 would require the payment of impact fees. These fees would provide funding for library books and library expansion projects. Although new library facilities may be under consideration by the RCPLS in the Project area, it is not possible to identify environmental impacts that may be associated with the development of any new library facilities until a specific proposal and design for the facility is prepared by the RCPLS. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. Any mitigation measures required for new or expanded library facilities could be funded, in part, from property taxes to such purposes. As such, Project impacts to library facilities and resources are evaluated as less than significant.

***Threshold e.: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered health care facilities or the need for new or physically altered health care facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for health care services?***

As previously indicated, the nearest medical facilities to the Project site are the Riverside County Regional Medical Center, located at 26520 Cactus Avenue in Moreno Valley, or approximately 5.7 miles north of the Project site; and the Menifee Valley Medical Center, located at 28400 McCall Blvd in the City of Menifee, or approximately 5.7 miles south of the Project site. The majority of jobs that would be generated by the Project are anticipated to be filled by existing County residents. The Primary Land Use Plan would result in up to approximately 9,162 employees, while the Alternative Land Use Plan would result in up to 8,950 employees. Using a 1.9 hospital beds per 1,000 persons generation factor, the Project would generate the need for approximately 17 hospital beds under both the Primary Land Use Plan and Alternative Land Use Plan. However, as most of the future jobs on the Project site would be filled by existing County residents, a majority of the projected demand for health care services and hospital beds would not represent a new demand for such resources within the County.

The provision of private health care is largely based on economic factors and demand and is beyond the scope of analysis required for this EIR. However, EIR No. 521 concluded impacts associated with buildout of the General Plan would be less than significant, and further notes that: “compliance with...existing General Plan policy and existing Mitigation Measures 4.15.7A and 4.15.7B from EIR No. 441, would further reduce or avoid the insignificant impacts...” (Riverside County, 2015a, p. 4.17-18). Mitigation Measure 4.15.7A



requires the County to perform periodic medical needs assessments to evaluate the current medical demand and level of medical service provided within each Area Plan every three years. Mitigation Measure 4.15.7B requires the County to fund the new construction and/or expansion of existing medical facilities according to the level of demand for medical services based on the needs assessment required as part of Mitigation Measure 4.15.7A. Furthermore, mandatory compliance with County Ordinance No. 659 requires a development impact fee payment to the County that is partially allocated to public health services and facilities. While new or expanded health care facilities may ultimately be needed within the County due to the anticipated growth in population, it is not possible to identify environmental impacts that may be associated with the development of any new health care facilities until a specific proposal and design for the facility is prepared. Accordingly, impacts due to the construction of new or expanded health care facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). As such, impacts to public medical facilities and resources associated with the proposed Project would be less than significant.

#### **4.16.5 CUMULATIVE IMPACT ANALYSIS**

The cumulative study area for public services encompasses the service area of the RCFD, RCSD, VVUSD, NUSD, PUHSD and/or RCPLS, and assumes full buildout of the General Plans for jurisdictions within these service areas.

Although the proposed Project would be adequately served by fire protection services, based on the proximity and response times estimated from nearby fire station facilities, the Project would nonetheless result in an incremental increase in requests for service, which would affect the fire department's ability to provide acceptable levels of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, increased traffic volumes, and increased population. When considered in the context of on-going cumulative development throughout western Riverside County, such impacts would be cumulatively considerable. However, the proposed Project and all cumulative developments within unincorporated Riverside County would be required to contribute DIF fees pursuant to County Ordinance No. 659. Mandatory DIF fee contributions by the Project and cumulative developments would ensure that adequate funding is provided to the Riverside County Fire Department for the acquisition of additional facilities, equipment, and personnel. Accordingly, the proposed Project's impact to the RCFD is evaluated as less-than-cumulatively considerable.

Although the Project site would be adequately served by sheriff facilities, the increased population that would be generated by the Project, when considered in conjunction with other on-going development throughout western Riverside County, has the potential to adversely affect service response times. However, the proposed Project and all cumulative developments would be required to contribute DIF fees pursuant to County Ordinance No. 659, which would help to provide for adequate equipment and personnel in the Project area. Therefore, with mandatory payment of DIF fees, Project impacts to police protection services would be less-than-cumulatively considerable.

The proposed Project would entail development of the site with light industrial, business park, and commercial retail land uses, and therefore the Project would not result in a direct demand for school services or new or expanded school facilities. Although the Project may indirectly result in an increase in the population within



the VVUSD, NUSD, and/or PUHSD, the Project Applicant would be required to contribute fees in accordance with Riverside County Ordinance No. 575. Other cumulative developments, including both residential and non-residential developments, would similarly be required to contribute fees pursuant to Riverside County Ordinance No. 575, or similar ordinances within cities within the service area of these school districts. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes full and complete mitigation for project-related impacts to school services. As such, and with mandatory fee payment, the Project's impacts to school services and facilities would be less-than-cumulatively considerable.

The Project would entail development of the Project site with light industrial, business park, and commercial retail land uses, and therefore the Project would not result in a direct demand for library services. Although the Project may result in an indirect increase in the County's population, the Project is not expected to result in the need for new or expanded library services or facilities. Furthermore, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project and all cumulative developments would contribute property taxes and would be required to contribute DIF fees to Riverside County pursuant to County Ordinance No. 659, which could be used for the purpose of acquiring book titles and/or additional library square footage. Any mitigation measures required for new or expanded library facilities also could be funded, in part, from property taxes allocated by Riverside County to such purposes. Therefore, because environmental impacts associated with new or expanded library facilities cannot be known at this time and would be determined in the future once Riverside County identifies a specific proposal for new or expanded library facilities, Project impacts to library services and facilities are evaluated as less than significant on a cumulatively-considerable basis.

The proposed Project, when considered in conjunction with on-going growth and development in western Riverside County, would cumulatively impact the ability of local medical facilities that provide health services. However, the Project and all cumulative developments would be required to comply with County Ordinance No. 659, which requires a development impact fee payment to the County that is partially allocated to public health services and facilities. With mandatory compliance with Ordinance No. 659, the Project's impacts to health services and facilities would be less than significant on a cumulative basis.

#### **4.16.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION**

Threshold a: Less-than-Significant Impact. Although the Project would contribute to a need for new or expanded fire protection facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded fire protection facilities until a specific proposal and design for such facilities are prepared by the RCFD. Accordingly, impacts due to the construction of new or expanded fire protection facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such fire protection facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded fire protection facilities.





Additionally, with payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Fire Department would be reduced to less-than-significant levels.

Threshold b: Less-than-Significant Impact. With payment of mandatory DIF fees, the proposed Project's potential direct and cumulatively-considerable impacts to the Riverside County Sheriff's Department would be reduced to less-than-significant levels, and the Project would not result in or require the construction of new police protection facilities that could result in a significant impact to the environment.

Threshold c: Less-than-Significant Impact. The Project would not directly generate a resident population, and thus would not directly impact school services in the local area. Although the Project may indirectly result in new residents within the service area of the VVUSD, NUSD, and/or PUHSD, and thus may indirectly result in an incremental increase in demand for new school facilities, there are no current publicly-available plans detailing where such facilities would be built. As such, it is not possible to identify environmental impacts that may be associated with the construction of new or expanded school facilities until a specific proposal and design for the facility is prepared by the VVUSD, NUSD, and/or PUHSD, and an analysis of potential physical environmental impacts resulting from the construction and operation of new or expanded school facilities would be speculative in nature (see State CEQA Guidelines § 15145). Environmental effects of such school facilities and any associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded school facilities. Any mitigation measures required for new or expanded school facilities could be funded, in part, from property taxes and/or through payment of school impact fees. Furthermore, the payment of mandatory school impact fees would ensure that the Project would result in less-than-significant direct or cumulatively-considerable impacts to the ability of the VVUSD, NUSD, and/or PUHSD to provide for school services.

Threshold d: Less-than-Significant Impact. The Project would not directly generate a resident population, and thus would not directly impact library services in the local area. Although the Project may indirectly result in new residents within the local area, and thus could result in an incremental demand for increased library facilities, it is not possible to identify environmental impacts that may be associated with such new or expanded library facilities until a specific proposal and design for such facilities are prepared by Riverside County. Accordingly, impacts due to the construction of new or expanded library facilities are too speculative for evaluation in this EIR (State CEQA Guidelines § 15145). Environmental effects of such library facilities and associated mitigation would be identified through a future CEQA process required in association with any future proposals for new or expanded library facilities. However, the Project would be required to contribute DIF fees, which would be used in part to provide for library space and/or new book volumes. Accordingly, with payment of DIF fees, Project impacts to library services and facilities are evaluated as less than significant on both a direct and cumulatively-considerable basis.

Threshold e: Less-than-Significant Impact. With payment of mandatory DIF fees, the Project would result in less-than-significant direct and cumulatively-considerable impacts to health services facilities, and the Project would not result in or require the construction of new health services facilities that could result in a significant impact to the environment.



#### 4.16.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the following applicable Mitigation Measures identified by County EIR No. 441 related to public services:
  - EIR No. 441 Mitigation Measure 4.15.2A: The County shall require as a part of the development review process, proponents of new businesses, recreational, and commercial land uses such as shopping centers, health clubs, large hotels over 200 rooms, convention centers, and commercial recreational activities be required to provide on-site security.
  - EIR No. 441 Mitigation Measure 4.15.2D: The County shall require the development applicant to pay the County Sheriff's established development mitigation fee prior to issuance of a certificate of occupancy on any structure as they are developed. The fees are for the acquisition and construction of public facilities.
  - EIR No. 441 Mitigation Measure 4.15.3E: The County shall require all future commercial, industrial and multifamily residential development to provide for adequate areas for the collection and loading of recyclable materials (i.e., paper products, glass, and other recyclables) in compliance with the State Model Ordinance, implemented on September 1, 1994, in accordance with AB 1327, Chapter 18, California Solid Waste Reuse and Recycling Access Act of 1991.
  - EIR No. 441 Mitigation Measure 4.15.3F: The County shall require all development projects to coordinate with appropriate County departments and/or agencies to ensure that there is adequate waste disposal capacity to meet the waste disposal requirements of the project, and the County shall recommend that all development projects incorporate measures to promote waste reduction, reuse, recycling, and composting.
- As a condition of Project approval, the proposed Project would be required to conform to all mandatory local, State, and federal laws, ordinances, and standards relating to fire safety.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for sheriff protection facilities, including sheriff stations. Payment of the DIF fee would ensure that funds are available for additional sheriff personnel as well as capital improvements, such as land/equipment purchases and sheriff station construction.



- The Project is required to comply with Riverside County Ordinance No. 575, which requires mandatory payment of school impact fees pursuant to Public Education Code § 17072.10-18.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for library facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and library construction or expansion.
- The Project would be required to adhere to Riverside County Ordinance No. 659, which requires payment of a development impact fee (DIF) to assist the County in providing for health facilities. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and health facility construction.

***Mitigation***

Impacts would be less-than-significant; therefore, no mitigation is required.



## 4.17 RECREATION

This Subsection provides an overview of the existing parks and recreational facilities that exist within the Project vicinity and that could potentially be directly or indirectly physically affected by implementation of the proposed Project. The analysis herein is based in part on the Riverside County General Plan Multipurpose Open Space Element and Healthy Communities Element.

### 4.17.1 EXISTING CONDITIONS

#### A. Federal Parks

There are no federal parks located within the area surrounding the Project site. The nearest federal park is the Cleveland National Forest located approximately 15.2 miles southwest of the Project site. Additionally, the San Bernardino National Forest is located approximately 17.0 miles northeast of the Project site. (Riverside County, 2021a, p. OS-2; Google Earth, 2021)

#### B. State Parks

The nearest California State Park is the Lake Perris State Recreation Area located approximately 0.5 mile north of the Project site. This 9,615-acre park provides recreational activities such as hiking, horseback riding, camping and bird watching as well as numerous recreational water activities on Lake Perris. (Google Earth, 2021; Riverside County, 2015a, p. 4.16-8)

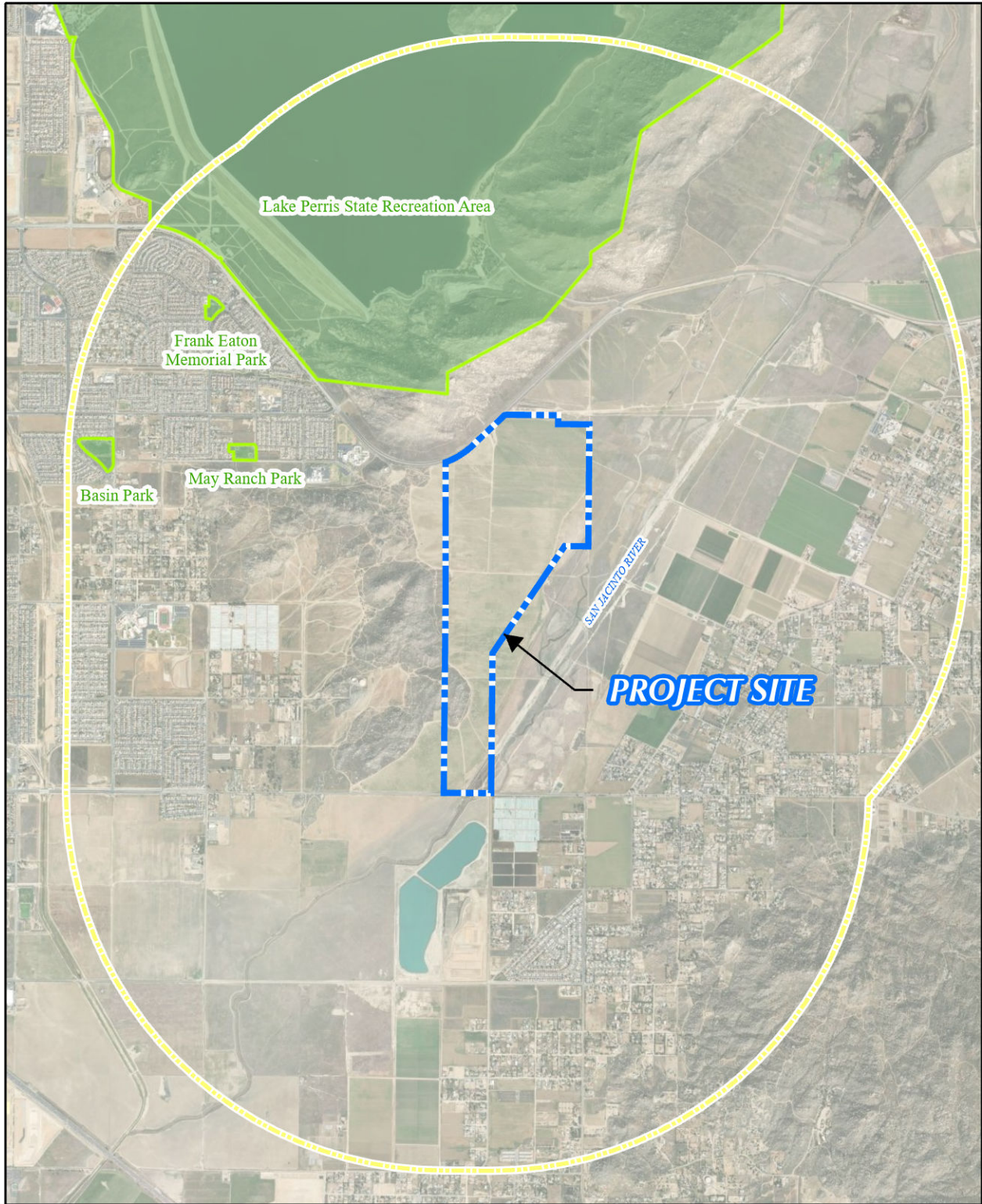
#### C. Regional and Local Parks

Several regional and local parks occur within a two-mile radius of the Project site. These facilities are depicted on Figure 4.17-1, *Existing Local and Regional Parks and Recreation Facilities*, and are described below:

- **May Ranch Park.** May Ranch Park, which is located approximately 1.0 mile west of the Project site, contains barbeques, a playground, a basketball court, and a baseball field within its 6.9 acres.
- **Frank Eaton Memorial Park.** Frank Eaton Memorial Park, which is located approximately 1.4 miles northwest of the Project site, offers a shaded picnic area, a field, and a playground within its 4.4 acres.
- **Basin Park.** Basin Park, which is located approximately 1.7 miles west of the Project site, offers a playground, walking trail, and large field area within its 9.0 acres.

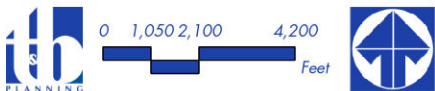
#### D. Regional Trails and Bikeway Systems

The Lakeview/Nuevo Area Plan (LNAP) identifies the County's long-term objectives for recreational trails and bikeways within the Lakeview/Nuevo Area. As previously shown on EIR Figure 2-11, *LNAP Trails and Bikeway System*, the General Plan Circulation Element and LNAP identify numerous planned trails on and



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 4.17-1



**Existing Local and Regional Parks  
and Recreation Facilities**



adjacent to the Project site. A “Combination Trail (Regional Trail/Class I Bike Path)” is planned to traverse the southern and northeastern portions of the Project site. A “Community Trail” is planned to traverse the central portions of the Project site in a west-east orientation, with this trail continuing in a north-south alignment in the eastern portion of the site up to the northern site boundary, where it would connect to a proposed “Design Guidelines Trail.” The “Design Guidelines Trail” is planned along the southern alignment of the Ramona Expressway, and east along the northern Project boundary where it would connect to off-site portions of the Combination Trail (Regional Trail/Class I Bike Path). A “Regional Trail: Open Space” trail segment also is planned in the western portions of the site, primarily associated with the on-site hill form located in the southern portion of the site along the western Project boundary. (Riverside County, 2019b, Figure 8)

#### **4.17.2 APPLICABLE ENVIRONMENTAL REGULATIONS**

The following is a brief description of the State and local environmental laws and related regulations associated with recreation and parks.

##### **A. State Regulations**

###### **1. Quimby Act, California Government Code § 66477**

The State of California’s Quimby Act was established by the California Legislature for the purpose of preserving open space and providing park facilities for California’s growing communities. The Quimby Act allows local agencies to establish ordinances requiring residential subdivisions to provide land or “in-lieu-of” fees for park and recreation purposes. This State Act requires the dedication of land and/or imposes a requirement of fees for park and recreational purposes as a condition of approval of tentative tract map or parcel map. (CA Legislative Info, n.d.)

##### **B. Local Regulations**

###### **1. Riverside County Ordinance No. 460**

Riverside County Ordinance No. 460, Section 10.35 (Park and Recreation Fees and Dedications) implements the Quimby Act by establishing a requirement for dedication of three acres of parkland per 1,000 residents, or payment of a fee in lieu of such dedication. An exception exists in cases where a Community Parks and Recreation Plan, as approved by the Board of Supervisors, applies and has determined that the amount of existing neighborhood and community park area exceeds that limit, in which case the Board may determine that the public interest, convenience, health, welfare and safety requires that a higher standard, not to exceed five acres of land per 1,000 persons residing within the County, shall be devoted to neighborhood and community park purposes. In the case of the proposed Project, there are no Community Parks and Recreation Plans applicable to the Project area.

#### **4.17.3 BASIS FOR DETERMINING SIGNIFICANCE**

Section XVI of Appendix G to the State CEQA Guidelines addresses typical adverse effects to parks and recreation, and includes the following threshold questions to evaluate the Project’s impacts to recreational resources (OPR, 2018a):



- *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Significance thresholds are set forth in Riverside County’s Environmental Assessment Checklist, are derived from Section XVI of Appendix G to the State CEQA Guidelines (listed above), and state that the proposed Project would have a significant impact to parks and recreation if construction and/or operation of the Project would:

- Include recreational facilities or require the 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;*
- Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees); or*
- Include the construction or expansion of a trail system.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist were used to evaluate the significance of the proposed Project’s impacts on parks and recreation.

**4.17.4 IMPACT ANALYSIS**

***Threshold a:*** *Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

***Threshold d:*** *Would the Project include the construction or expansion of a trail system?*

The Project proposes a mixture of light industrial, business park, and commercial retail land uses, which would not directly result in an increased demand for recreational facilities. As such, because the Project does not include any residential uses, the Project would not result in a direct demand for recreational resources. Thus, the Project would not directly require the construction or expansion of recreational facilities off site that may have an adverse physical effect on the environment due to new Project-generated population growth in the area.

However, proposed SP 239A1 includes a conceptual non-vehicular circulation and mobility plan, as previously depicted on Figure 3-6. As shown, the western side of Antelope Road would have an enhanced parkway that includes an 8-foot bike lane and 5-foot meandering sidewalk along the eastern edge of the roadway, with a community trail proposed along the western side of the roadway. On-site portions of Orange Avenue would include meandering sidewalks along both sides of the roadway. Street “A” would include non-curb adjacent



sidewalks along both sides of the roadway. A Class I bike lane also is proposed along the Project site’s frontage with Ramona Expressway. A Regional Trail also is proposed around proposed Planning Area 9, while a trail easement would be accommodated along the northern boundary of proposed Planning Area 11. Although the Project would result in the construction of trail facilities on site, these trails would occur in areas already planned for physical disturbance as part of the Project, and there would be no impacts to the environment specifically related to the construction of proposed trails and pedestrian facilities that have not already been addressed throughout this EIR (i.e., for impacts to biological or cultural resources). As such, and assuming implementation of the mitigation measures identified throughout this EIR, impacts associated with proposed trails and pedestrian facilities on site would be less than significant.

***Threshold b: Would the Project include the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

The Project does not propose any residential uses or other land use that may directly or indirectly generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities, as a majority of the Project’s future jobs are anticipated to be filled by existing or future planned residents within the County. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

***Threshold c: Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?***

The Project site is located within County Service Area (CSA) No. 146; however, CSA 146 was established for the purposes of lighting and library services, and was not established for purposes of recreational facilities (RCIT, n.d.). The Project site is not located within a Community Parks and Recreation Plan. Additionally, the provisions of Section 10.35 of Riverside County Ordinance No. 460, which addresses parkland dedication and in-lieu fees, are not applicable to the proposed Project because the Project does not include any residential subdivision of land; thus, the Project would not be subject to payment of in-lieu fees for recreational resources. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.

**4.17.5 CUMULATIVE IMPACT ANALYSIS**

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within two miles of the Project site. Although it is not anticipated that future Project employees would substantially utilize recreational facilities in the local area, this study area was selected because any use of local recreation facilities by future Project employees likely would occur in close proximity to the Project site.

As discussed under the analysis of Thresholds a. and d., cumulatively-considerable impacts associated with the construction of proposed trails and pedestrian facilities on site have been evaluated throughout this EIR





under the appropriate subject heading (e.g., air quality, biological resources, etc.). Where cumulatively-considerable impacts have been identified associated with Project implementation, mitigation measures have been identified to reduce construction-related impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR for the Project site. Accordingly, cumulatively-considerable impacts due to the construction of on-site trails and pedestrian facilities would be less than significant.

The Project does not propose any residential uses or other land uses that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Although there may be a nominal increase in the use of local recreation facilities, Project employees are not expected to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. Although other cumulative developments in the local area that involve residential use and that don't accommodate adequate recreational facilities may result in physical deterioration of existing recreational facilities, the Project's contribution to such effects would be de minimus and would be less than significant on both a direct and cumulatively-considerable basis.

The Project site is not located within a recreational-related Community Service Area (CSA), and is not located within a park district with a Community Parks and Recreation Plan. The Project also would not be subject to payment of Quimby fees or fees pursuant to Section 10.35 of Riverside County Ordinance No. 460 because the Project does not include any residential uses. Accordingly, impacts due to a conflict with a CSA, due to Quimby fees, or due to a conflict with the park dedication requirements of Riverside County Ordinance No. 460 would be less-than-cumulatively considerable.

#### 4.17.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Thresholds a. and d.: Less-than-Significant Impact. The physical construction of the on-site trails and pedestrian facilities has been addressed under the relevant issue areas identified throughout this EIR (e.g., air quality, biological resources, cultural resources, etc.). Under each of these topics, the Project impacts are determined to be less than significant, or mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no components of the planned trails or pedestrian facilities on site that have not already been addressed and accounted for throughout this EIR. Accordingly, Project impacts due to parkland development on site would be less than significant, requiring no mitigation beyond that which is identified in other portions of this EIR.

Threshold b.: Less-than-Significant Impact. The Project does not propose any residential uses or other land use that may generate a population that would directly increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. The Project site is not located within a CSA that was established for recreational facilities, the Project site is not located within a Community Parks and Recreation Plan, and



the Project is not subject to payment of in-lieu fees (Quimby fees) for recreational facilities pursuant to Section 10.35 of Riverside County Ordinance No. 460. Accordingly, impacts due to a conflict with a Community Parks and Recreation Plan and due to the need for payment of in-lieu fees for parkland acquisition and construction would be less than significant.

#### **4.17.7 APPLICABLE REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

Impacts to recreation would be less than significant; thus, mitigation measures are not required.



## 4.18 TRANSPORTATION

The following analysis is based on several technical studies prepared by Urban Crossroads, Inc. (herein, “Urban Crossroads”). The first report addresses Project-related worker Vehicle Miles Traveled (VMT) pursuant to the Riverside County *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled* (December 2020) (herein, “County Guidelines”), is entitled, “Stoneridge Commerce Center Specific Plan (SP No. 239, A1) Vehicle Miles Traveled (VMT) Analysis” (herein, “VMT Analysis”), dated December 16, 2022, and included as EIR *Technical Appendix L1* (Urban Crossroads, 2022a). Although not required by the County Guidelines, the second report addresses the Project’s potential impacts to VMT associated with Project-related truck trips, is entitled, “Stoneridge Commerce Center SP No. 239, A1 Supplemental VMT Analysis” (herein, “Truck VMT Analysis”), is dated December 16, 2022, and is included as EIR *Technical Appendix L2* (Urban Crossroads, 2022b). Additionally, and although not relied upon herein to evaluate the Project’s impacts to the environment, the discussion within this Subsection also relies in part on a third technical report prepared by Urban Crossroads, entitled, “Stoneridge Commerce Center Specific Plan (SP No. 239, A1) Traffic Impact Analysis” (herein, “TA”), dated January 6, 2023, and included as EIR *Technical Appendix L3* (Urban Crossroads, 2023e). Refer to Section 7.0, *References*, for a complete list of reference sources.

In addition, the Riverside County Transportation Commission (RCTC) is undertaking a planning effort for a new east-west transportation corridor referred to as the Mid-County Parkway (MCP). If constructed, a portion of the MCP would traverse the northern portions of the Project site. However, it is currently unknown when or even if RCTC would construct the MCP. As such, the analysis in the Project’s TA evaluates different scenarios based on whether the MCP is anticipated to be in place. For near-term (2032) conditions, it is assumed that the RCTC will not have finalized plans for the MCP; thus, the analysis of near-term conditions assumes that either Alternative Truck Routes 1 or 2 would be implemented, as described previously in EIR subsection 3.6.5.B.2. For long-term conditions, two analysis scenarios are presented, with one scenario evaluating potential Level of Service (LOS) effects without the construction of the MCP (i.e., with implementation of Alternative Truck Routes 1 or 2), and a second scenario evaluating potential LOS effects with implementation of the MCP (i.e., implementation of Alternative Truck Route 6). Under the long-term scenario without construction of the MCP, business park and commercial retail land uses would be developed within the MCP alignment (i.e., the Primary Land Use Plan). Under long-term conditions with construction of the MCP, no development of business park and commercial uses would occur within the MCP alignment (i.e., the Alternative Land Use Plan). Refer to Section 3.0 of this EIR for a description of the Primary Land Use Plan and Alternative Land Use Plan and for a description of Alternative Truck Routes 1, 2, and 6.

On December 28, 2018, updates to the California Environmental Quality Act (CEQA) Guidelines were approved by the Office of Administrative Law (OAL). As part of the updates to the CEQA Guidelines, thresholds of significant for evaluation of impacts to transportation have changed. As required by Senate Bill (SB) 743, new Threshold b. of the CEQA Guidelines for Transportation requires an evaluation of impacts due to VMT, which replaced the Level of Service (LOS) criteria (i.e., automobile delay) that has been utilized in the past to evaluate potential effects to transportation under CEQA. Pursuant to CEQA Guidelines Section 15064.3(a), “...a project’s effect on automobile delay shall not constitute a significant environmental impact.”



#### 4.18.1 EXISTING CONDITIONS

##### A. Existing Vehicle Miles Traveled (VMT)

Urban Crossroads has obtained a VMT data table from County Staff for all Traffic Analysis Zones (TAZs) within Riverside County that identifies VMT per capita and VMT per employee. The data utilizes the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure baseline VMT performance for individual TAZs. Under existing conditions, the existing regional VMT per Service Population (“SP”; i.e., residents, employees, etc.) is 37.9 VMT per SP, while the existing Countywide average VMT per employee is 14.2 work VMT per employee. (Urban Crossroads, 2022b, pp. 2-3)

##### B. Definition of Level of Service (LOS)

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. (Urban Crossroads, 2023e, p. 65)

##### C. Study Area Description

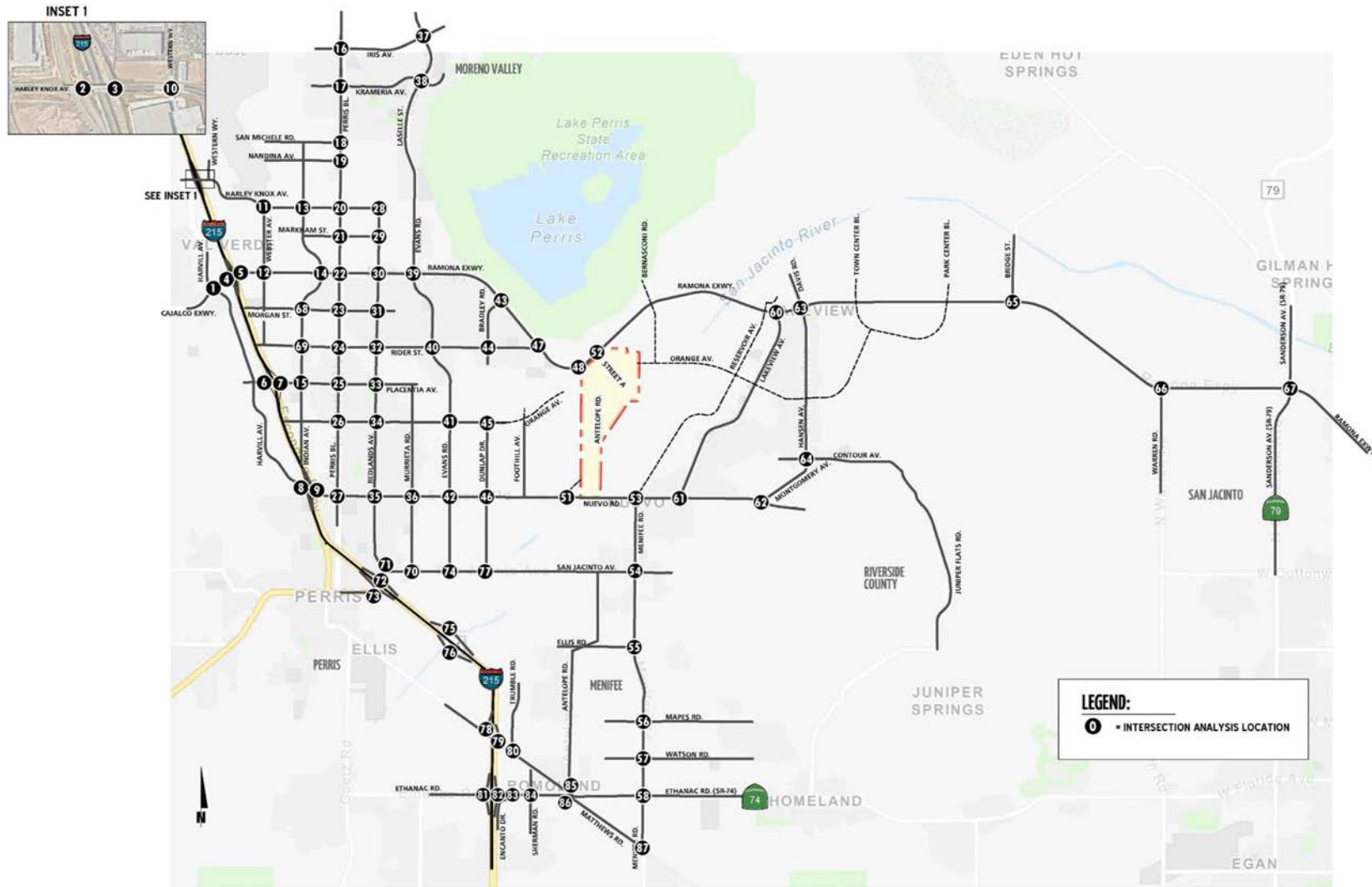
Based on consultation with Riverside County staff, the study area for purposes of the Project’s TA includes a total of 87 study area intersections. Figure 4.18-1, *Study Area Intersections – Primary Land Use Plan*, shows the locations of the study area intersections with implementation of the Primary Land Use Plan (i.e., Alternative Truck Routes 1 or 2), while Figure 4.18-2, *Study Area Intersections – Alternative Land Use Plan*, depicts the locations of the study area intersections with implementation of the Alternative Land Use Plan (i.e., Alternative Truck Route 6). Table 4.18-1, *Study Area Intersections*, provides a summary of the intersections evaluated as part of the Project’s TA. The study area includes intersections where the Project is anticipated to contribute 50 or more peak hour trips per the County Guidelines. The “50 peak hour trip” criteria represent a minimum number of trips at which a typical intersection would have the potential to be substantively affected by a given development proposal. The 50 peak hour trip criterion is a traffic engineering rule of thumb that is accepted and widely used within Riverside County for estimating a potential area of influence (i.e., study area). (Urban Crossroads, 2023e, p. 8)

##### D. Existing Traffic

Traffic counts within the Project’s study area were collected by Urban Crossroads in April, August, and October, 2022, when local schools were in session and operating on a typical bell schedule. Traffic counts were conducted between the hours of 7:00 to 9:00 AM and 4:00 to 6:00 PM. The 2022 weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the study area. Adjustments to the 2022 traffic counts were not made since local schools and businesses were operating normally and not affected by any closures associated with the COVID-19 pandemic. The raw manual peak hour turning movement traffic count data sheets are included in Appendix 3.1 to the Project’s TA (EIR



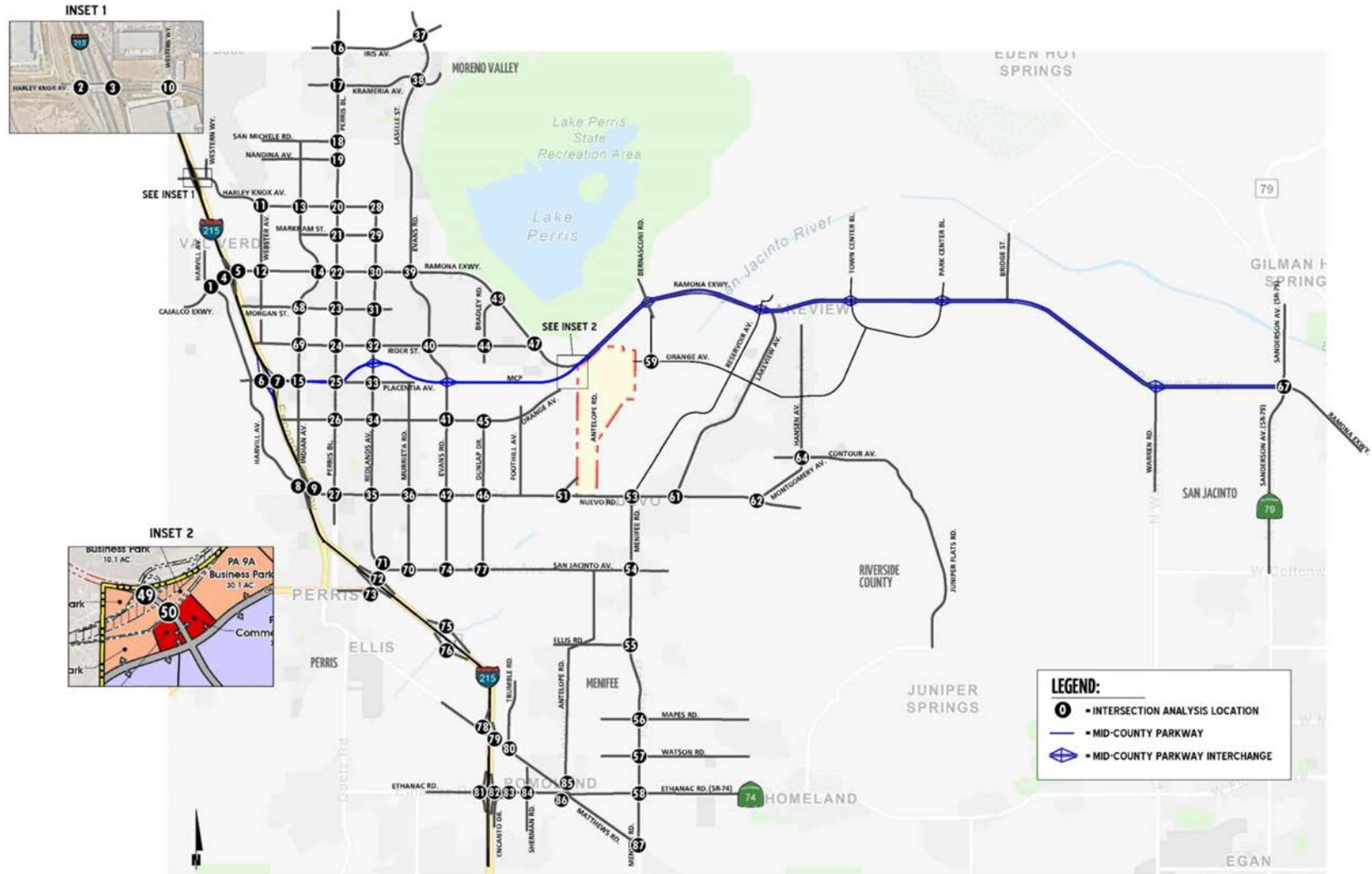
Figure 4.18-1 Study Area Intersections – Primary Land Use Plan



(Urban Crossroads, 2023e, Exhibit 1-3)



Figure 4.18-2 Study Area Intersections – Alternative Land Use Plan



(Urban Crossroads, 2023e, Exhibit 1-4)



**Table 4.18-1 Study Area Intersections**

<b>ID</b>	<b>Intersection Location</b>	<b>Jurisdiction</b>	<b>CMP?</b>
1	Harvill Av. & Cajalco Exwy.	County of Riverside	No
2	I-215 Southbound Ramps & Harley Knox Bl.	County of Riverside, Caltrans	No
3	I-215 Northbound Ramps & Harley Knox Bl.	Perris, Caltrans	No
4	I-215 Southbound Ramps & Ramona Exwy.	County of Riverside, Caltrans	No
5	I-215 Northbound Ramps & Ramona Exwy.	Perris, Caltrans	No
6	I-215 SB Ramps & Placentia Av. – Future Intersection	County of Riverside, Caltrans	No
7	I-215 NB Ramps & Placentia Av. – Future Intersection	Perris, Caltrans	No
8	I-215 SB Ramps & Nuevo Rd.	County of Riverside, Caltrans	No
9	I-215 NB Ramps & Nuevo Rd.	Perris, Caltrans	No
10	Western Wy. & Harley Knox Bl.	Perris	No
11	Webster Av. & Harley Knox Bl.	Perris	No
12	Webster Av. & Ramona Exwy.	Perris	No
13	Indian Av. & Harley Knox Bl.	Perris	No
14	Indian Av. & Ramona Exwy.	Perris	No
15	Indian Av. & Placentia Av.	Perris	No
16	Perris Bl. & Iris Av.	Moreno Valley	No
17	Perris Bl. & Krameria Av.	Moreno Valley	No
18	Perris Bl. & San Michele Rd.	Moreno Valley	No
19	Perris Bl. & Nandina Av.	Moreno Valley	No
20	Perris Bl. & Harley Knox Bl.	Perris	No
21	Perris Bl. & Markham St.	Perris	No
22	Perris Bl. & Ramona Exwy.	Perris	No
23	Perris Bl. & Morgan St.	Perris	No
24	Perris Bl. & Rider St.	Perris	No
25	Perris Bl. & Placentia Av.	Perris	No
26	Perris Bl. & Orange Av.	Perris	No
27	Perris Bl. & Nuevo Rd.	Perris	No
28	Redlands Av. & Harley Knox Bl.	Perris	No
29	Redlands Av. & Markham St.	Perris	No
30	Redlands Av. & Ramona Exwy.	Perris	No
31	Redlands Av. & Morgan St.	Perris	No
32	Redlands Av. & Rider St.	Perris	No
33	Redlands Av. & Placentia Av.	Perris	No
34	Redlands Av. & Orange Av.	Perris	No
35	Redlands Av. & Nuevo Rd.	Perris	No
36	Murrieta Rd. & Nuevo Rd.	Perris	No
37	Lasselle St. & Iris Av.	Moreno Valley	No
38	Lasselle St. & Krameria Av.	Moreno Valley	No
39	Evans Rd. & Ramona Exwy.	Perris	No
40	Evans Rd. & Rider St.	Perris	No
41	Evans Rd. & Orange Av.	County of Riverside, Perris	No
42	Evans Rd. & Nuevo Rd.	Perris	No
43	Bradley Rd. & Ramona Exwy.	County of Riverside, Perris	No
44	Bradley Rd. & Rider St.	Perris	No
45	Dunlap Dr. & Orange Av.	County of Riverside, Perris	No
46	Dunlap Dr. & Nuevo Rd.	County of Riverside, Perris	No
47	Ramona Exwy. & Rider St.	County of Riverside, Perris	No



**Table 4.18-1 Study Area Intersections**

<b>ID</b>	<b>Intersection Location</b>	<b>Jurisdiction</b>	<b>CMP?</b>
48	Antelope Rd. & Ramona Exwy. – Future Intersection	County of Riverside	No
49	MCP WB Ramps & Antelope Rd. – Future Intersection	County of Riverside	No
50	MCP EB Ramps & Antelope Rd. – Future Intersection	County of Riverside	No
51	Antelope Rd. & Nuevo Rd. – Future Intersection	County of Riverside	No
52	Street A & Ramona Exwy. – Future Intersection	County of Riverside	No
53	Menifee Rd./Reservoir Bl. & Nuevo Rd.	County of Riverside	No
54	Menifee Rd. & San Jacinto Av.	County of Riverside	No
55	Menifee Rd. & Ellis Rd.	County of Riverside	No
56	Menifee Rd. & Mapes Rd.	County of Riverside, Menifee	No
57	Menifee Rd. & Watson Rd.	Menifee	No
58	Menifee Rd. & Ethanac Rd. (SR-74)	Menifee	No
59	Bernasconi Rd. & Orange Av. – Future Intersection	County of Riverside	No
60	Lakeview Av. & Ramona Exwy.	County of Riverside	No
61	Lakeview Av. & Nuevo Rd.	County of Riverside	No
62	Montgomery Av. & Nuevo Rd.	County of Riverside	No
63	Hansen Av./Davis Rd. & Ramona Exwy.	County of Riverside	No
64	Hansen Av. & Contour Av.	County of Riverside	No
65	Bridge St. & Ramona Exwy.	County of Riverside	No
66	Warren Rd. & Ramona Exwy.	County of Riverside, San Jacinto	No
67	Sanderson Av. (SR-79) & Ramona Exwy.	San Jacinto, Caltrans	No
68	Indian Av. & Morgan St.	Perris	No
69	Indian Av. & Rider St.	Perris	No
70	Murrieta Rd. & San Jacinto Av.	Perris	No
71	Redlands Av. & San Jacinto Av.	Perris	No
72	Redlands Av. & I-215 NB Ramps	Perris, Caltrans	No
73	Redlands Av. & I-215 SB Ramps	Perris, Caltrans	No
74	Evans Rd. & San Jacinto Av.	Perris	No
75	Evans Rd. & I-215 NB Ramps	Perris, Caltrans	No
76	Evans Rd. & I-215 SB Ramps	Perris, Caltrans	No
77	Dunlap Dr. & San Jacinto Av.	County of Riverside, Perris	No
78	I-215 SB Ramps & SR-74	Perris, Caltrans	No
79	I-215 NB Ramps & SR-74	Perris, Caltrans	No
80	Trumble Rd. & SR-74	County of Riverside	No
81	I-215 SB Ramps & Ethanac Rd.	Perris, Caltrans	No
82	I-215 NB Ramps & Ethanac Rd.	Perris, Caltrans	No
83	Encanto Dr. & Ethanac Rd.	Perris	No
84	Sherman Rd. & Ethanac Rd.	Perris, Menifee	No
85	Antelope Rd. & SR-74	Menifee	No
86	Antelope Rd. & Ethanac Rd.	Menifee	No
87	Menifee Rd. & Matthews Rd.	Menifee	No

(Urban Crossroads, 2023e)

*Technical Appendix L3*), while the existing ADT, weekday AM, and weekday PM peak hour intersection volumes (in actual vehicles) are graphically provided in Appendix 3.2 to the Project’s TA. (Urban Crossroads, 2023e, pp. 102-103)





## ***E. Area Conditions***

Following is a summary of the Riverside County General Plan Circulation Network and a review of existing peak hour intersection operations, traffic signal warrant, and freeway facility operations analyses.

### **1. General Plan Circulation Elements**

#### ***Riverside County General Plan Circulation Element***

The Project site is located within Riverside County. The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified in the Riverside County General Plan Circulation Element, are described in Subsection 3.2 of the Project's TA (*Technical Appendix L3*). Exhibit 3-2 of the TA shows the Riverside County General Plan Circulation Element and Exhibit 3-3 of the TA illustrates the Riverside County General Plan roadway cross-sections. (Urban Crossroads, 2023e, p. 73)

#### ***General Plan Circulation Elements – Cities of Perris, Moreno Valley, Menifee, and San Jacinto***

Exhibits 3-4 and 3-5 of the Project's TA (*Technical Appendix L3*) show the City of Perris General Plan Circulation Element and roadway cross-sections, respectively. Exhibits 3-6 and 3-7 of the TA show the City of Moreno Valley General Plan Circulation Element and roadway cross-sections, respectively. Exhibits 3-8 and 3-9 of the Project's TA show the City of Menifee General Plan Circulation Element and roadway cross-sections, respectively. Exhibits 3-10 and 3-11 of the Project's TA show the City of San Jacinto General Plan Circulation Element and roadway cross-sections, respectively. (Urban Crossroads, 2023e, p. 83)

### **2. Truck Routes**

The County of Riverside's General Plan does not provide designated truck routes. Truck routes for the proposed Project have been determined based on discussions with County staff. Ramona Expressway is no longer a truck route within the City of Perris. As such, Project truck traffic has been routed to avoid utilizing Ramona Expressway. The City of Moreno Valley and City of Menifee truck routes are shown on Exhibits 3-13 and 3-14, respectively, of the Project's TA (*Technical Appendix L3*). These truck routes serve both the proposed Project and future cumulative development projects throughout the study area. (Urban Crossroads, 2023e, p. 83)

### **3. Bicycle and Pedestrian Facilities**

In an effort to promote alternative modes of transportation, the County of Riverside also includes a trails and bikeway system. The trails and bikeway system, shown on Exhibit 3-15 of the Project's TA (*Technical Appendix L3*), shows the proposed trails connected with major features within the County. There is a proposed community trail and design guidelines trail along Ramona Expressway, along the Project's frontage. There is a proposed community trail that bisects the Project site. Field observations conducted in 2022 indicates nominal pedestrian and bicycle activity within the study area. The City of Perris proposed bikeways and trails are shown on TA Exhibit 3-16, the City of Moreno Valley Bike Plan is shown on TA Exhibit 3-17, the City of Menifee Bikeway and Community Pedestrian network is shown on TA Exhibit 3-18, and the City of San Jacinto Bikeway Plan is shown on TA Exhibit 3-19. (Urban Crossroads, 2023e, p. 83)



#### **4. Transit Service**

The County of Riverside is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. RTA Route 30 runs along Walnut Avenue, Sherman Road, and Rider Street, as shown on Exhibit 3-20 of the Project's TA (*Technical Appendix L3*). However, there are currently no existing bus routes that serve the roadways within the study area in close proximity to the proposed Project. Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. (Urban Crossroads, 2023e, p. 101)

#### **5. Existing Conditions Analysis**

Refer to Section 3 of the Project's TA (*Technical Appendix L3*) for a discussion of intersection operations, traffic signal warrants, off-ramp queuing operations, freeway facility operations, and freeway merge/diverge ramp junction analysis for existing conditions.

### **4.18.2 APPLICABLE REGULATORY REQUIREMENTS**

#### **A. State Regulations**

##### **1. Assembly Bill 1358 (AB 1358) – Complete Streets Act**

In September 2008, Governor Schwarzenegger signed into law Assembly Bill 1358 (AB 1358), the Complete Streets Act. AB 1358 requires that the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, AB 1358 imposes a State-mandated local program. AB 1358 required the Office of Planning and Research (OPR) to prepare or amend guidelines for a legislative body to accommodate the safe and convenient travel of users of streets, roads, and highways in a manner that is suitable to the rural, suburban, or urban context of the general plan, and in doing so to consider how appropriate accommodation varies depending on its transportation and land use context. AB 1358 authorized OPR, in developing these guidelines, to consult with leading transportation experts, including, but not limited to, bicycle transportation planners, pedestrian planners, public transportation planners, local air quality management districts, and disability and senior mobility planners. (CA Legislative Info, n.d.)

##### **2. Statewide Transportation Improvement Program (STIP)**

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the Transportation Investment Fund and other funding sources. STIP programming generally occurs every two years. The programming cycle begins with the release of a proposed fund estimate in July of odd-numbered years, followed by California Transportation Commission (CTC) adoption of the fund estimate in August (odd years). The fund estimate serves to identify the amount of new funds available for the programming of transportation



projects. Once the fund estimate is adopted, Caltrans and the regional planning agencies prepare transportation improvement plans for submittal by December 15th (odd years). Caltrans prepares the Interregional Transportation Improvement Plan (ITIP) and regional agencies prepare Regional Transportation Improvement Plans (RTIPs). Public hearings are held in January (even years) in both northern and southern California. The STIP is adopted by the CTC by April (even years). (Caltrans, n.d.)

### **3. Senate Bill 743 (SB 743)**

Senate Bill 743 (SB 743, Steinberg, 2013), which was codified in Public Resources Code (PRC) Section (§) 21099, required changes to the implementing CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: “During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy...” (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 729.) Pursuant to § 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, § 15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (CRNA) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project’s transportation impacts. With the CRNA’s certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (PRC § 21099, subd. (b)(3).) (OPR, 2018)

### **4. Senate Bill 325 (SB 325) - Transportation Development Act (TDA, Mills-Alquist-Deddeh Act)**

The Mills-Alquist-Deddeh Act (SB 325) was enacted by the California Legislature to improve existing public transportation services and encourage regional transportation coordination. Known as the Transportation Development Act (TDA) of 1971, this law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. TDA established two funding sources: the Local Transportation Fund (LTF), and the State Transit Assistance (STA) fund. Providing certain conditions are met, counties with a population under 500,000 (according to the 1970 federal census) may also use the LTF for local streets and roads, construction, and maintenance. The STA funding can only be used for transportation planning and mass transportation purposes. (Caltrans, n.d.)

### **5. Road Repair and Accountability Act of 2017 (Senate Bill 1 (SB 1))**

On April 28, 2017, Governor Brown signed Senate Bill 1 (SB 1) (Chapter 5, Statutes of 2017), known as the Road Repair and Accountability Act of 2017. SB 1 augments the base of the State Transit Assistance program essentially doubling the funding for this program. To provide for SB 1 reporting and transparency, transit agencies are asked to work with Caltrans to report on planned expenditures for these augmented funds. (Caltrans, n.d.)



**B. Regional Regulations**

**1. SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)**

The Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code § 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project site is within SCAG's regional authority. On September 3, 2020, SCAG adopted the *2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* ("RTP/SCS"; also referred to herein as "Connect SoCal") with goals to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats (SCAG, 2020, p. 9). Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in 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, 2020). Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The Goods Movement Technical Report of Connect SoCal is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on, the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018, SCAG published a document entitled, *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, State highways, and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet (s.f.) of warehouse building space, and undeveloped land that could accommodate an additional 338 million s.f. of new warehouse building space. These regions attract robust logistics activities and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018, p. ES-1)



## **2. *Riverside County Congestion Management Program (CMP)***

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. The Riverside County CMP became effective with the passage of Proposition 111 in 1990 and updated most recently in 2011. The RCTC adopted the 2011 CMP for Riverside County in December 2011. There are no Study Area intersections identified as a Riverside County CMP facility. (Urban Crossroads, 2023e, p. 7)

## **3. *Western Riverside Council of Governments Transportation Uniform Mitigation Fee***

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all of western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the western Riverside County sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The most recent Nexus Study update was approved by the WRCOG Executive Committee in July 2017. The updated Nexus Study continues to demonstrate the relationship between the TUMF fee levels and the cost of anticipated improvements to the Regional System of Highways and Arterials (RSHA) necessitated by new development throughout western Riverside County. (WRCOG, 2018, p. 3)

### **C. Local Regulations**

#### **1. *Riverside County Ordinances***

Ordinances specifically applicable to the circulation system are presented below (Riverside County, 2015a, p. 4.18-28):

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways.
- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads.
- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. The ordinance also includes the provisions for the establishment of Road and Bridge Benefit Districts and associated fees.
- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications.



- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499, subject to the control of the Board of Supervisors, delegates to the Riverside County Transportation Director the administration of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses.
- Ordinance No. 500 – Permissible vehicle weight on highways, roads and bridges: Ordinance No. establishes weight prohibitions and reductions for vehicles travelling along County roadways.
- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a development impact fee (DIF) for the development of infrastructure, including County roadways and the installation of traffic signals.
- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. This is a deposit-based fee program and provides for unused fees to be refunded to the applicant.
- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF program for western Riverside County. The fees are collected by Riverside County and administered by WRCOG to make roadway improvements in the WRCOG area. TUMF funds are intended for use solely for the engineering, construction, and right-of-way acquisition for regional facilities. TUMF funds may not be used to defray operational and maintenance expenses. Facilities eligible for TUMF are designated by WRCOG and updated periodically. They include streets, arterials, and road improvements as defined in the ordinance.

## 2. Designated Truck Routes

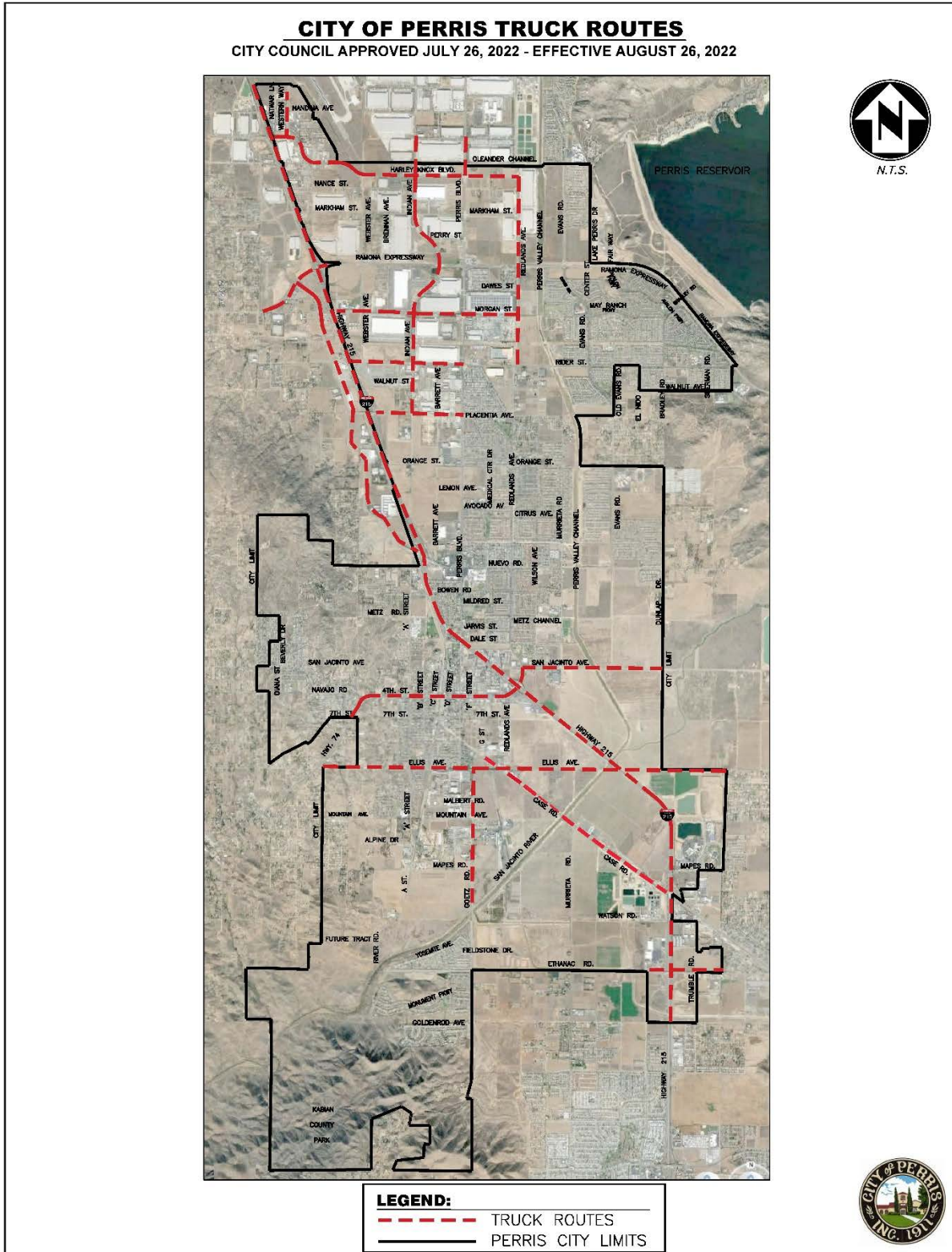
The County of Riverside’s General Plan and ordinances do not identify designated truck routes. Truck routes for the proposed Project within unincorporated Riverside County have been determined based on discussions with County staff. (Urban Crossroads, 2023e, p. 83)

On July 26, 2022, the City of Perris adopted Ordinance No. 1413, which became effective August 26, 2022. Ordinance No. 1413 modified the list of approved truck routes within the City. Ordinance No. 1413 removed a number of previously-designated truck routes, including Ramona Expressway. Part of the purpose of recirculating this EIR for public review is to evaluate and consider the City of Peris’ modified truck routes, as the truck routes evaluated in the DEIR reflected the truck routes that were in place prior to adoption of Ordinance No. 1413, including Ramona Expressway. Figure 4.18-3, *City of Perris Truck Routes*, depicts the currently-adopted truck routes within the City of Perris. (Perris, 2022)

Exhibit 3-14 of the Project’s TA (*Technical Appendix L3*) shows the adopted truck routes within the City of Perris, while the City of Moreno Valley truck routes are shown on Exhibit 3-13 of the Project’s TA. These truck routes would serve both the proposed Project and future cumulative development projects throughout the study area prior to the completion of the MCP. (Urban Crossroads, 2023e, p. 83)



Figure 4.18-3 City of Perris Truck Routes





It should be noted that although Ethanac Road is a truck route within the City of Menifee, Ethanac Road does not extend through from Menifee Road to the I-215 Freeway. As such, truck traffic must utilize Menifee Road south to Matthews Road, then north to reach SR-74. However, these portions of Menifee Road and Matthews Road are not identified as truck routes within the City of Menifee General Plan, and thus Ethanac Road is not a viable truck route for Project-related truck trips. (Urban Crossroads, 2023e, p. 83)

### 4.18.3 BASIS FOR DETERMINING SIGNIFICANCE

#### A. Thresholds of Significance

Section XVII of Appendix G to the CEQA Guidelines addresses typical adverse effects related to transportation, and includes the following threshold questions to evaluate a project's impacts to transportation:

- Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Would the project conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?
- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Would the project result in inadequate emergency access or access to nearby uses?

The following thresholds are derived from Riverside County's Environmental Assessment Checklist, which incorporate the current Appendix G thresholds pursuant to the 2018 changes to the CEQA Guidelines, in order to evaluate the significance of the proposed Project's impacts on transportation. The proposed Project would result in a significant impact to transportation if the Project or any Project-related component would:

- a. *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;*
- b. *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);*
- 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 of roads;*
- e. *Cause an effect upon circulation during the project's construction;*
- f. *Result in inadequate emergency access or access to nearby uses; or*
- g. *Include the construction or expansion of a bike system or bike lanes.*





The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts on transportation.

***B. Thresholds of Significance for Vehicle Miles Travelled (VMT)***

***1. Screening Thresholds***

The County’s Guidelines describe that a project may be determined to have a less-than-significant impact and may be screened out of requiring a project level VMT analysis if it meets at least one of the County’s VMT screening criteria. Projects that do not meet any of the screening criteria require a project-level VMT analysis. Table 1 of the Project’s VMT Analysis (*Technical Appendix L1*) identifies the County’s adopted VMT screening criteria.

***2. VMT Metric and Significance Threshold***

County Guidelines note the VMT metric and threshold of significance used for VMT analyses in the County of Riverside are based on land use type (i.e., residential, office, retail, etc.) and are broadly categorized as either efficiency or net change metrics. Efficiency metrics include Work VMT per employee or VMT per capita, while “net change” refers to the net change in regional VMT. The net change metrics are typically used for projects that include a significant customer base such as commercial retail land uses. (Urban Crossroads, 2022a, p. 4)

The County Guidelines list the land use type Other Employment (i.e., not included in the basic office category) as the appropriate land use for industrial projects and is to utilize the efficiency metric Work VMT per employee. The measure for VMT threshold listed in the County Guidelines is existing countywide average VMT per employee with the following significance threshold: (Urban Crossroads, 2022a, p. 4)

*“A project would result in a significant project generated VMT impact if its VMT exceeds the existing county-wide average Work VMT per employee.” For the County of Riverside, the countywide average Work VMT per employee is 14.2 Work VMT per employee.”*

The Project’s retail land use component should be evaluated based on the regional net change metric and utilize an impact threshold of net regional increase in Total VMT. Consistent with County Guidelines, the County of Riverside was used as the boundary for this assessment. In addition, a 10-mile boundary area surrounding the Project’s TAZ also was conducted for informational purposes. The additional 10-mile boundary scenario is provided as the County boundary may be too expansive or limiting to measure the net change in VMT for a project of this size without model noise (i.e., convergence criteria), which may influence the results and to capture any trips that may be otherwise truncated by the Riverside County boundary, particularly to the west, where the 10 mile radius extends beyond the County boundary<sup>1</sup>. (Urban Crossroads, 2022a, pp. 4, 6)

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<sup>1</sup> California Office of Planning and Research (OPR) Technical Advisory; Page 6: “Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary.”



**3. VMT Modeling**

The County Guidelines identifies the Riverside County Traffic Analysis Model (RIVTAM) as the County’s preferred modeling tool for estimating VMT. RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area (Riverside County) of the Southern California Association of Governments (SCAG) regional traffic model. RIVTAM was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. (Urban Crossroads, 2022a, p. 4)

To estimate Project generated VMT, land use information such as building square footage must first be converted into a RIVTAM compatible dataset. The RIVTAM model utilizes socio-economic data (SED) (e.g., population, households and employment) instead of land use information for the purposes of vehicle trip estimation. Project employees are estimated by dividing the total building square footage by the appropriate employment factor outlined in the County of Riverside’s General Plan Appendix E-2. Table 4.18-2, *Employment Density Factors*, summarize the estimated number of employees for each condition used to represent the proposed Project in RIVTAM. (Urban Crossroads, 2022a, p. 4)

**Table 4.18-2 Employment Density Factors**

	With MCP	Without MCP
Industrial Employees	7,136	7,136
Business Park Employees	1,561	1,782
<b>Total Non-Retail Employees</b>	<b>8,697</b>	<b>8,918</b>
Retail Employees	253	244

(Urban Crossroads, 2022a, Table 2)

Project employment information was then coded into the TAZ to represent the Project. The RIVTAM model was then run inclusive of the Project’s employment for both the Primary Land Use Plan (Without MCP) and Alternative Land Use Plan (With MCP) conditions. (Urban Crossroads, 2022a, p. 5)

**4.18.4 IMPACT ANALYSIS**

***Threshold a: Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

The only applicable programs, plans, ordinances, or policies addressing the circulation system in the Project area are the Riverside County General Plan, the adopted Stoneridge Specific Plan, and Riverside County ordinances.

The land uses proposed as part of the Project are not consistent with the site’s existing General Plan land use designations of “Medium Density Residential (MDR),” “Medium High Density Residential (MHDR),” “Very High Density Residential (VHDR),” “Commercial Retail (CR),” “Community Center (CC),” “Open Space –



Conservation (OS-C),” “Open Space – Recreation (OS-R),” and “Open Space – Water (OS-W),” and the Project’s proposed land uses are not consistent with the adopted Stoneridge Specific Plan No. 239 (SP 239) land use designations of “Medium Residential (2-5 du/ac),” “Medium-High Residential (5-8 du/ac),” “Very High Residential (14-20 du/ac),” “Commercial,” “Parks,” “Open Space – Natural,” “Open Space – Recreational,” or “Schools.” However, the Project includes applications for GPA 190008, Amendment No. 1 to SP 239 (SP 239A1), and CZ 1900024. GPA 20007 would change existing land use designations to reflect those proposed as part of SP 239A1, which would include “Light Industrial (LI),” “Business Park (BP),” “Commercial Retail (CR),” “Open Space – Conservation (OS-C),” and “Open Space – Conservation Habitat” land uses. SP 239A1 would modify the adopted Stoneridge Specific Plan to accommodate the land uses proposed as part of the Project. CZ 1900024 would modify and establish the Planning Area boundaries, permitted uses, and development standards throughout the 582.6-acre site in order to reflect the land uses proposed as part of SP 239A1. Thus, with approval of GPA 20007, SP 239A1, and CZ 1900024, the Project would be fully consistent with the site’s General Plan and specific plan land use designations and zoning classifications.

EIR *Technical Appendix I* includes an analysis of the Project’s consistency with the policies of the Riverside County General Plan, and demonstrates that the proposed Project would not conflict with any applicable General Plan policy, including policies contained within the General Plan Circulation Element. Additionally, all roadway improvements proposed as part of the Project (i.e., improvements along Nuevo Road, Antelope Road, and Orange Avenue) are consistent with the roadway cross-sections identified by the General Plan for these roadways. As such, the Project has no potential to conflict with the circulation-related policies of the Riverside County General Plan, including policies related to transit, roadway, bicycle, and pedestrian facilities.

The following provides a brief discussion of the applicability and Project consistency with Riverside County ordinances addressing the circulation system, which were previously described in subsection 4.18.2.C.

- Ordinance No. 413 – Vehicle Parking: Ordinance No. 413 establishes regulations to vehicle parking on Riverside County roadways. All parking required of the proposed Project would be accommodated on site, and no on-street parking is proposed. Accordingly, the Project has no potential to conflict with Ordinance No. 413.
- Ordinance No. 452 – Speed Limits: Ordinance No. 452 pertains to prima facie speed limits on Riverside County roadways and establishes or amends prima facie speed limits on certain Riverside County roads. All Project-related traffic would be required to adhere to posted speed limits within the Project area. Accordingly, the proposed Project has no potential to conflict with Ordinance No. 452.
- Ordinance No. 460 – Subdivision of Land: Ordinance No. 460, in conjunction with the Subdivision Map Act, establishes regulations for the division of land and describes procedures. No land subdivisions are proposed as part of the Project; thus, the Project has no potential to conflict with this ordinance.



- Ordinance No. 461 – Road Improvement Standards and Specifications: Ordinance No. 461 adopts Road Improvement Standards and Specifications. All roadway improvements proposed as part of the Project have been designed to meet the requirements of the Riverside County Road Improvement Standards and Specifications, including improvements along Nuevo Road, Antelope Road, and Orange Avenue. Accordingly, the proposed Project would not conflict with Ordinance No. 461.
- Ordinance No. 499 – Encroachments in County Highways: Ordinance No. 499 regulates of the use of county highways, including county roads, for excavations and encroachments; construction, operation, and maintenance of utility facilities; planting, maintenance, and removal of trees; and the issuance, modification, and revocation of permits for such uses. Any Project-related roadway improvements that encroach into County highways or roadways would be required to comply with the provisions of Ordinance No. 499; thus, the Project would not conflict with this ordinance.
- Ordinance No. 659 – Development Mitigation Fee for Residential Development (DIF Program): Ordinance No. 659 establishes a DIF for the development of infrastructure, including County roadways and the installation of traffic signals. The Project would be conditioned to contribute fees pursuant to Ordinance No. 659, and as such the Project has no potential to conflict with this ordinance.
- Ordinance No. 671 – Consolidated Fees for Land Use and Related Functions: Ordinance No. 671 establishes a consolidated fee program for land use and related functions. There are no components of the proposed Project that would conflict with Ordinance No. 671.
- Ordinance No. 748 – Mitigation of Traffic Congestion Through Signalization: Ordinance No. 748 establishes a fee program for the installation of traffic signals based on a priority list. The Project would be conditioned to pay appropriate fees pursuant to Ordinance No. 748. As such, the Project has no potential to conflict with this ordinance.
- Ordinance No. 824 – Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program: Ordinance No. 824 establishes a TUMF fee program for western Riverside County to fund roadway improvements in the Western Riverside Council of Governments (WRCOG) area. The Project would be conditioned by the County to require payment of appropriate TUMF fees; thus, the Project has no potential to conflict with Ordinance No. 824.

In addition, part of the reason for recirculating the Project’s EIR for public review is to address changes to the City of Perris’ officially-designated truck routes (refer to the discussion presented above in subsection 4.18.2.C.2 as well as the currently-adopted City of Perris truck routes, previously depicted on Figure 4.18-3). As previously discussed in RDEIR subsection 3.6.2.B.2, the Project as evaluated by this RDEIR includes three Alternative Truck Routes, identified herein as Alternative Truck Routes 1, 2, and 6. Provided below is an analysis demonstrating that the Project’s proposed truck routes would be consistent with or would not otherwise conflict with the City of Perris identified truck routes:



- Alternative Truck Route 1: Alternative Truck Route 1 would route all westbound trucks along Antelope Road south, then travel west on Nuevo Road, south on Dunlap Drive, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. Antelope Road, Nuevo Road, and Dunlap Drive are County facilities, and Riverside County does not designate truck routes. As shown on Figure 4.18-3, San Jacinto Avenue and Redlands Avenue are designated as truck routes within the City of Perris. Accordingly, implementation of Alternative Truck Route 1 would not conflict with any designated truck routes, including the truck routes adopted by the City of Perris pursuant to Ordinance No. 1413, and no impact would occur.
- Alternative Truck Route 2 would route all westbound trucks along Antelope Road south, then travel east on Nuevo Road, south on Menifee Road, west on San Jacinto Avenue, and south on Redlands Avenue to access the I-215 Freeway. These segments of Antelope Road, Nuevo Road, and Menifee Road, as well as the segment of San Jacinto Avenue between Menifee Road and the City of Perris limits, are County facilities, and Riverside County does not designate truck routes. As shown on Figure 4.18-3, San Jacinto Avenue and Redlands Avenue within the City of Perris are designated as truck routes pursuant to City of Perris Ordinance No. 1413. Accordingly, implementation of Alternative Truck Route 2 would not conflict with any designated truck routes, including the truck routes adopted by the City of Perris pursuant to Ordinance No. 1413, and no impact would occur.
- Alternative Truck Route 6 would route all westbound trucks along the MCP to the west to access the I-215. Under Alternative Truck Route 6, no Project-related truck trips would be routed to local roadways, except as necessary to access the MCP. There would be no Project-related truck traffic on any City of Perris roadways, with exception of the portion of the MCP that traverses through the City of Perris boundaries. Although the MCP is not identified as an officially-designated truck route by the City of Perris, the MCP facility currently does not exist, and City of Perris Ordinance No. 1413 was adopted to address the City's current truck routes based on roadways that existed at the time Ordinance No. 1413 was adopted in July 2022. As a regional transportation facility, it is anticipated that the City of Perris would update their list of approved truck routes to include the MCP if or when the MCP ultimately is constructed. Accordingly, implementation of Alternative Truck Route 6 would not result in a conflict with any designated truck routes, and no impact would occur.

Accordingly, and based on the foregoing analysis, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.

***Threshold b: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

As previously discussed, SB 743, approved in 2013, was intended to change the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines that were approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the



metric. As a component of OPR’s revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020. To aid in this transition, the Governor’s OPR released a Technical Advisory on Evaluating Transportation Impacts in CEQA, dated December 2018 (Technical Advisory). Based on OPR’s Technical Advisory, the County of Riverside has recently adopted their Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled in December of 2020 (herein, “County Guidelines”). The adopted County Guidelines have been utilized to evaluate the Project’s potential impacts due to VMT.

**A. VMT Screening**

The County Guidelines state that a project may be determined to have a less-than-significant impact and screened out of requiring a project-level VMT analysis if it meets at least one of the County’s VMT screening criteria. The County’s adopted VMT screening criteria are described in Table 4.18-3, *Screening for Land Use Projects Exempt from VMT Analyses*, along with a determination of each screening criteria’s applicability to the Project. As indicated in Table 4.18-3, the Project does not meet any of the screening criteria identified by the County Guidelines. As such, a Project-level VMT analysis was conducted for the Project and is discussed below.

**B. Project-Level VMT Analysis**

**1. Project Light Industrial and Business Park Land Uses**

For industrial and business park land uses the efficiency metric Work VMT per employee is used to evaluate potential impacts to VMT. Work VMT per employee is derived by dividing Project generated home-based work (HBW) VMT by the number of estimated Project employees. HBW VMT (Work VMT) is obtained from the RIVTAM model using the Production/Attraction method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., Project’s TAZ). Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). Productions and attractions are converted from person trips to vehicle trips for the purposes of calculating VMT and are then multiplied by the distance skims to calculate VMT. Table 4.18-4, *Project Work VMT Per Employee*, presents Project generated Work VMT from the RIVTAM model, along with the estimated number of Project employees, and the resulting Work VMT per employee for the Alternative Land Use Plan (With MCP) and Primary Land Use Plan (Without MCP) conditions. As shown in Table 4.18-4, Project generated HBW VMT per employee for the Project’s light industrial and business park uses would exceed the County’s adopted threshold by 26.1% for both the With MCP and Without MCP conditions. This is evaluated as a significant impact of the proposed Project. (Urban Crossroads, 2022a, p. 5)

**2.**

**Project Commercial Retail Land Uses**

Retail land use projects should contain an evaluation of regional net change in VMT using an impact threshold net increase in regional total VMT, which can be performed using the boundary method of calculating VMT. The boundary method is the sum of all weekday VMT on the roadway network within a designated boundary (i.e., County boundary or other designated geographic area). The boundary method estimates VMT by



**Table 4.18-3 Screening for Land Use Projects Exempt from VMT Analyses**

Screening Criteria	Description	Result
Small Projects Screening	Projects that generate fewer than 110 daily vehicle trips or projects that are below 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO <sub>2</sub> e) per year.	Does not meet.
High Quality Transit Areas (HQTA) Screening	High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.	Does not meet.
Local Serving Retail	The introduction of new Local serving retail has been determined to reduce VMT by shortening trips that will occur.	Does not meet <sup>1</sup> .
Affordable Housing	Lower-income residents make fewer trips on average, resulting in lower VMT overall.	Does not meet.
Local Essential Service	As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.	Does not meet.
Map-Based Screening	This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening smaller developments. Note that screening is limited to residential and office projects.	Does not meet.
Redevelopment Project	Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).	Does not meet.

1. Although no formal development plan for the retail component is proposed at this time, the Project would allow up to 126,542 square feet under the Alternative Land Use Plan (With MCP) condition and 121,968 square feet under the Primary Land Use Plan (Without MCP) condition of retail use. Once a retail development plan is available, the Retail building square footage would be re-evaluated for its applicability for the local serving retail screening criteria.

(Urban Crossroads, 2022a, Table 1)

**Table 4.18-4 Project Work VMT Per Employee**

	With MCP	Without MCP
Work VMT	155,295	159,467
Total Non-Retail Employees	8,697	8,918
Work VMT per Employee	17.9	17.9
County Threshold	14.2	14.2
Percent Above Threshold	+26.1%	+26.1%
Potentially Significant?	Yes	Yes

(Urban Crossroads, 2022a, Table 3)



multiplying vehicle trips on each roadway segment within the boundary by that segment’s length. This approach consists of all trips, including those trips that do not begin or end in the designated boundary. Consistent with County Guidelines, the County of Riverside was used as the boundary for this assessment. In addition, a 10-mile boundary area surrounding the Project’s TAZ also was conducted for informational purposes. The additional 10-mile boundary scenario is provided as the County boundary may be too expansive or limiting to measure the net change in VMT for a project of this size without model noise (i.e., convergence criteria), which may influence the results and to capture any trips that may be otherwise truncated by the Riverside County boundary, particularly to the west, where the 10 mile radius extends beyond the County boundary<sup>2</sup>. A more expansive boundary would be contrary to industry standards, and likely result in inaccurate results. (Urban Crossroads, 2022a, pp. 5-6)

Table 4.18-5, *Project Commercial Retail Total VMT Summary*, presents total VMT calculated using the boundary method for both With MCP and Without MCP conditions. As shown in Table 4.18-5 , total VMT is found to increase by less than 0.2% under most conditions, with the exception of the Primary Land Use Plan (Without MCP) condition using the County’s boundary, where VMT is estimated to decrease. Therefore, because under most study scenarios the Project’s commercial retail land uses would result in a net increase in VMT, VMT impacts associated with the Project’s commercial retail land uses would be significant. (Urban Crossroads, 2022a, p. 6)

**Table 4.18-5 Project Commercial Retail Total VMT Summary**

	Countywide Boundary With MCP	Countywide Boundary Without MCP	10-Mile Boundary With MCP	10-Mile Boundary Without MCP
Without Retail VMT	53,704,064	53,785,329	5,432,569	5,447,988
With Retail VMT	53,730,862	53,776,617	5,443,257	5,455,244
<b>Net Change in VMT</b>	<b>26,798</b>	<b>-8,712.93</b>	<b>10,687</b>	<b>7,256</b>

(Urban Crossroads, 2022a, Table 5)

**3. Total VMT Analysis**

In an effort to fully disclose potential VMT impacts, a supplemental VMT evaluation for the Project’s light industrial and business park uses was conducted to measure the Project’s estimated total VMT, inclusive of Project truck trips. The total VMT calculation differs from the County’s standard VMT metric for industrial projects of home-based work VMT in that the total VMT value includes all vehicle trips (i.e., passenger cars and trucks) and all trip purposes (i.e., not just home-based work trips or commute trips). It should be noted that this analysis of the Project’s impacts due to total VMT represents a highly conservative analysis, as the County Guidelines are clear that VMT analyses for light industrial and business park developments should be based on employee-generated VMT, not total VMT that includes heavy truck trips. (Urban Crossroads, 2022b, p. 1)

<sup>2</sup> California Office of Planning and Research (OPR) Technical Advisory; Page 6: “Lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary.”





Project-generated total VMT has been estimated from vehicle trip generation rates consistent with the Project’s Greenhouse Gas Analysis (“GHGA”; EIR *Technical Appendix T*) and multiplying those trips by the average trip length for each vehicle type. Average trip length for passenger cars was obtained from RIVTAM using the Origin/Destination (OD) method. The OD method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., TAZ or group of TAZ’s). The OD method accounts for all trips (i.e., both passenger car and truck) and trip purposes (i.e., total VMT) and therefore provides a more complete estimate of VMT. The passenger car trip length obtained from RIVTAM for the Project’s TAZ is 11.34 miles under the Alternative Land Use Plan (With MCP) condition and 11.37 miles under the Alternative Land Use Plan (Without MCP) condition. Light heavy-duty trucks (LHDT), medium heavy-duty trucks (MHDT) and heavy heavy-duty trucks (HHDT) trip lengths have been obtained from the South Coast Air Quality Management District’s (SCAQMD) Rule 2305 (Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce emissions [WAIRE] Program, May 2021). SCAQMD’s Rule 2305 is based on a 15.3-mile trip length for LHDT, 14.2-mile trip length for MHDT, and 39.9-mile trip length for HHDT. These trip lengths were utilized to be consistent with the Project’s GHGA. Table 4.18-6, *Project Total VMT*, provides the resulting total VMT estimates based on the vehicle trips and trip lengths identified above. (Urban Crossroads, 2022b, pp. 1-2)

**Table 4.18-6 Project Total VMT**

	With MCP	Without MCP
Automobile	228,205	226,510
Truck	127,000	129,356
<b>Total</b>	<b>355,205</b>	<b>355,866</b>

(Urban Crossroads, 2022b, Table 2)

Table 4.18-7, *Total VMT per SP*, presents the calculation of the efficiency metric Project generated total VMT per service population (SP) for both the Alternative Land Use Plan (with MCP) and Primary Land Use Plan (without MCP) conditions. Total VMT per SP is the Project’s total VMT divided by its SP (i.e., estimated number of Project employees) and is a common VMT metric used by many agencies throughout Southern California to evaluate the efficiency of travel. (Urban Crossroads, 2022b, p. 2)

Table 4.18-8, *Project Total VMT per SP Comparison*, compares the Project’s Total VMT per SP to an applicable impact threshold for purposes of determining an impact. Although not specified by the County Guidelines, but consistent with impact thresholds used by the County, it is reasonable to assume that exceeding the existing regional average VMT per SP would result in a potentially significant impact, consistent with thresholds identified in the WRCOG’s *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (January 2020). As previously noted, the existing regional average VMT per SP is 37.9. As shown in Table 4.18-8, the Project’s VMT per SP would exceed the existing regional VMT per SP for Riverside County. Although the County Guidelines indicate that VMT for light industrial and business park developments should be based on employee VMT (and not total VMT), in an effort to provide a conservative evaluation of the Project’s impacts due to VMT, the Project’s impacts due to total VMT represent a significant impact to transportation. (Urban Crossroads, 2022b, pp. 2-3)



**Table 4.18-7 Total VMT per SP**

	With MCP	Without MCP
SP	8,950	9,162
Total VMT	355,205	355,866
VMT per SP	39.7	38.8

(Urban Crossroads, 2022b, Table 3)

**Table 4.18-8 Project Total VMT per SP Comparison**

	With MCP	Without MCP
Regional Threshold	37.9	37.9
Project	39.7	38.8
Percent Above Threshold	+4.8%	+2.4%
Potentially Significant?	Yes	Yes

(Urban Crossroads, 2022b, Table 4)

#### 4. Cumulative VMT Analysis

The County Guidelines require that additional VMT estimates should be calculated for informational purposes and should not to be used as the basis for the determination of a significant VMT impact. Projects that involve amendments to specific plans, general plans, and/or community plans are required to complete a cumulative analysis irrespective of the findings of the project-generated VMT analysis. The cumulative analysis can be accomplished using the boundary method as previously described for the retail component, but inclusive of the entire Project (i.e., retail, business park, and industrial components) in the base year and cumulative year conditions. (Urban Crossroads, 2022a, p. 6)

Table 4.18-9, *Cumulative VMT Summary*, presents total cumulative VMT calculated using the boundary method for both the No Project and With Project conditions for Baseline and Cumulative years. As shown, total cumulative VMT would increase for both the Countywide and 10-mile boundary conditions with implementation of either the Primary Land Use Plan (without MCP) and Alternative Land Use Plan (with MCP) conditions. Although the County Guidelines indicate that a project’s cumulative effect on VMT should be evaluated only for informational purposes, in order to provide a conservative analysis of the Project’s potential VMT impacts, the Project’s cumulative impacts to VMT are identified as a significant impact. (Urban Crossroads, 2022a, p. 6)

***Threshold c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?***

The Project site is surrounded by undeveloped lands, with portions of the surrounding area consisting of grasslands and scattered residential uses. Further to the west of the Project site are the Lakeside Middle School, the Sierra Vista Elementary School, and a master-planned residential community located within the City of



**Table 4.18-9 Cumulative VMT Summary**

	County Boundary With MCP	County Boundary Without MCP	10-Mile Boundary With MCP	10-Mile Boundary Without MCP
Baseline No Project VMT	53,661,883		5,349,826	
Baseline With Project VMT	53,730,862	53,776,617	5,443,257	5,455,244
Cumulative No Project VMT	92,508,071		9,827,366	
Cumulative With Project VMT	92,744,584	92,748,054	9,953,861	9,954,934

(Urban Crossroads, 2022a, Table 6)

Perris. However, under near-term conditions (i.e., with implementation of Alternative Truck Routes 1 or 2) and in the event that the MCP is never constructed (i.e., the Primary Land Use Plan), all Project-related traffic would be routed to the south of the Project site, and would be directed away from the existing schools and master-planned residential uses within the City of Perris. Alternative Truck Routes 1 and 2 have been designed to route westbound trucks away from existing residential uses to the extent feasible. As such, with implementation of the Primary Land Use Plan, the Project would not result in hazards due to incompatible uses, and impacts would be less than significant.

Although Project-related truck traffic would utilize the MCP once constructed (i.e., with implementation of the Alternative Land Use Plan/Alternative Truck Route 6), which would traverse through the City of Perris and near existing residential uses within the City, the Project would not involve any improvements to the MCP and the MCP is planned as a regional transportation corridor for all vehicles, including heavy trucks. Thus, Project-related truck trips along the MCP with implementation of the Alternative Land Use Plan would not result in hazards due to incompatible uses, and impacts would be less than significant.

The Project has been conditioned to construct improvements, contribute fair-share payments, or to pay DIF or TUMF fees towards required improvements at all study area intersections, and the Project would result in the construction of roadways on site (as described in EIR Section 3.0). Tables 1-4, 1-5, and 1-9 of the Project’s TA, included as *Technical Appendix L3*, identifies the list of transportation-related improvements required for Alternative Truck Routes 1, 2, and 6, respectively). All improvements that would be constructed as part of the Project would be constructed in accordance with applicable Riverside County standards, and there are no components of the Project’s proposed roadway or intersection improvements that would result in hazards due to a geometric design feature. Impacts would therefore be less than significant.

**Threshold d: Would the Project cause an effect upon, or a need for new or altered maintenance of roads?**

Implementation of the proposed Project would result in the establishment of new roadways requiring maintenance, including Antelope Road, Orange Avenue, and Street “A.” Additionally, it is anticipated that roadways internal to the Project site also would be public roadways. In addition, Project traffic would utilize existing and future planned roadways, and would thereby incrementally increase the need for maintenance of these facilities. Although the Project would result in the need for new or altered maintenance of roadways and would increase traffic on existing and planned roadways, any incremental increase in the need to maintain public roadway facilities would be offset by tax revenue generated by the Project’s proposed land uses. There



are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant

***Threshold e: Would the Project cause an effect upon circulation during the project’s construction?***

Aside from Ramona Expressway and Nuevo Road, planned roadways within and abutting the Project site are unimproved. Thus, with exception of these roadways, the Project would have no potential to cause an effect upon circulation during the Project’s construction. Although it is unlikely that improvements planned to Ramona Expressway and Nuevo Road would adversely affect circulation during the Project’s construction phase, a significant impact is nonetheless identified requiring mitigation in the form of a traffic control plan for implementing developments. Additionally, a significant impact could occur if roadways planned on and abutting the Project site are improved prior to the commencement of Project construction activities. Accordingly, prior to mitigation, a significant direct impact would result from Project implementation.

***Threshold f: Would the Project result in inadequate emergency access or access to nearby uses?***

The Project Applicant proposes a network of internal roadways within and abutting the Project site that would be constructed to County standards. During the County’s review of the proposed Project, the County reviewed the proposed design plans to ensure that adequate emergency access would be available at the site. Additionally, the County would review future implementing development applications (e.g., tentative maps, parcels maps, plot plans, etc.) to ensure that adequate emergency access is accommodated. Furthermore, proposed roadway improvements to abutting roadways, including Ramona Expressway, Nuevo Road, and internal roadways would substantially improve emergency access in the local area. Accordingly, the proposed Project would not result in inadequate emergency access during long-term operation of the Project and impacts would be less than significant.

Due to temporary lane closures that may occur during the Project’s construction phase, Project-related construction activities may conflict with emergency access routes and access to nearby uses during frontage improvements to Ramona Expressway, Nuevo Road, and other roadways on or abutting the site that may be improved prior to the start of Project construction. Although it is anticipated a less-than-significant impact would occur, out of an abundance of caution, a temporary significant impact is identified. Accordingly, near-term impacts to emergency access would be significant prior to mitigation.

***Threshold g: Would the Project include the construction or expansion of a bike system or bike lanes?***

According to the Non-Vehicular Circulation Plan included as part of SP 239A1, which was designed to implement Figure 8, *Trails and Bikeway System*, of the LNAP, the Project would accommodate a Community Trail and an enhanced parkway (including an 8-foot bike lane and meandering sidewalk) along Antelope Road, and would accommodate a Class I bike lane along the site’s frontage with Ramona Expressway. However, impacts associated with the construction of these on-site trails are inherent to the Project’s construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified,



feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.

#### 4.18.5 CUMULATIVE IMPACT ANALYSIS

Cumulative impacts associated with transportation were largely evaluated in the preceding subsection (subsection 4.18.4). A summary of the impacts identified therein is provided below. Direct impacts are identified in subsection 4.18.4 and are not discussed below. Additionally, impacts that were shown to be less than significant in subsection 4.18.4 are not discussed below.

##### A. Threshold a.

As discussed under the analysis of Threshold a., future development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR *Technical Appendix I* demonstrates that with approval of the Project's proposed General Plan Amendment No. 190008, SP 239A1, and CZ 1900024, the proposed Project would not conflict with any applicable policies of the General Plan, LNAP, or SP 239, including policies within the General Plan Circulation Element, LNAP, and SP 239 that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. Other cumulative projects similarly would be required to comply with all applicable ordinances, and would be required to comply with all applicable General Plan and LNAP policies (or the policies of the general plans of cities within the Project's Study Area). Impacts would be less-than-cumulatively considerable. Accordingly, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant on a cumulatively-considerable basis.

##### B. Threshold b.

As indicated under the analysis of Threshold b., for the Project's light industrial and business park uses, the Project-generated Work VMT per employee would exceed the County's adopted threshold of 14.24 VMT per employee by 26.1% under both the Primary Land Use Plan (Without MCP) and Alternative Land Use Plan (With MCP). The Project's commercial retail land uses under most study scenarios also would result in a net increase in VMT within the County and/or 10-mile radius of the Project site. In addition, when conservatively considering the Project's truck-related trips, the Project would exceed the County's threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). In addition, Table 4.18-9 shows that the Project's also would result in a significant cumulatively-considerable impact because the Project would result in a net increase in VMT within Riverside County and within a 10-mile radius of the Project site. Other cumulative projects within the Project region also have the potential to exceed the County's thresholds of significance for VMT. Accordingly, VMTs associated with the Project would be significant on a cumulatively-considerable basis.



**C. Threshold c.**

As indicated under the analysis of Threshold c., future implementing projects (e.g., tentative tract maps, plot plans, etc.) within the Project site would be reviewed by Riverside County to ensure that no hazards due to a geometric design feature would result from roadway improvements planned as part of implementing development. Other cumulative developments would similarly be required to demonstrate to Riverside County that no unsafe geometric design features would result. As such, cumulatively-considerable impacts would be less than significant.

As also indicated under the analysis of Threshold c., although the truck trips that would be generated by the Project have the potential to conflict with traffic related to residential uses, prior to completion of the MCP the majority of the Project's truck traffic would be routed to the south, and would be routed away from existing residential uses to the extent feasible. With implementation of the MCP, although Project truck trips would pass by existing school and residential uses within the City of Perris, the MCP is being planned to serve all forms of traffic, including truck trips. As such, the Project would not result in increased hazards to transportation as a result of incompatible uses, and impacts due to incompatible uses would be less-than-cumulatively considerable.

**D. Threshold d.**

Tax revenue generated by the Project and cumulative developments would offset any increased need for roadway maintenance as a result of new development within Riverside County. There are no components of the proposed Project or other cumulative developments within the Project vicinity that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, impacts would be less-than-cumulatively considerable.

**E. Threshold e.**

Although it is not anticipated, it is possible that Project construction activities could overlap with construction activities associated with other cumulative developments. Both the Project and other cumulative developments would be required to implement appropriate traffic control measures during construction so as not to significantly adversely affect the circulation system. Nonetheless, in the absence of mitigation, the Project's potential impacts during construction would be cumulatively considerable.

**F. Threshold f.**

Proposed roadway improvements to abutting roadways, including Ramona Expressway, Nuevo Road, and internal roadways, would substantially improve emergency access in the local area. Accordingly, the proposed Project would not result in inadequate emergency access during long-term operation of the Project and impacts would be less-than-cumulatively considerable. However, temporary lane closures that may occur during the Project's construction phase could overlap with construction activities associated with cumulative developments. Although it is anticipated a less-than-significant impact would occur, out of an abundance of caution, a significant temporary impact is identified. Accordingly, impacts would be cumulatively-considerable prior to mitigation.



**G. Threshold g.**

The Project would accommodate a Community Trail and an enhanced parkway (including an 8-foot bike lane and meandering sidewalk) along Antelope Road, and would accommodate a Class I bike lane along the site's frontage with Ramona Expressway. However, impacts associated with the construction of these on-site trails are inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant cumulatively-considerable impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no cumulatively-considerable impacts associated with the construction of bike systems or bike lanes that have not already been addressed by this EIR. As such, impacts would be less than significant on a cumulatively-considerable basis.

**4.18.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION**

Threshold a.: Less-than-Significant Impact. The proposed development on site would be required to comply with all applicable Riverside County ordinances related to the circulation system. In addition, EIR *Technical Appendix I* includes a detailed analysis of the proposed Project's consistency with the Riverside County General Plan and LNAP policies. As demonstrated in the analysis therein, with approval of the Project's proposed General Plan Amendment No. 190008, the proposed Project would not conflict with any applicable policies of the General Plan or LNAP, including policies within the General Plan Circulation Element and LNAP that relate to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities. In addition, the Alternative Truck Routes as described in RDEIR subsection 3.6.2.B.2 would not conflict with any of the City of Perris truck routes that were adopted pursuant to City of Perris Ordinance No. 1413. Accordingly, impacts would be less than significant.

Threshold b.: Significant Direct and Cumulatively-Considerable Impact. Implementation of either the Primary Land Use Plan (without MCP) or Alternative Land Use Plan (with MCP) would exceed the County's threshold of significance for Project work VMT per employee by 26.1%. In addition, under most scenarios, the Project's commercial retail land uses would result in a net increase in VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although not required pursuant to the County Guidelines, the analysis of the Project's total VMT indicates that the Project's total VMT per SP would exceed the County's threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). Additionally, the cumulative analysis of the Project's impacts to VMT demonstrates that the Project, when considered in the context of cumulative development, would result in a net increase in total VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Accordingly, prior to mitigation, the Project's impacts due to VMT would be significant on both a direct and cumulatively-considerable basis.

Threshold c.: Less-than-Significant Impact. Improvements planned as part of the Project would be constructed to County standards, and would not increase hazards due to a geometric design feature. Although the Project's light industrial and business park land uses have the potential to result in conflicts with traffic from surrounding school, rural residential, and master-planned residential communities, under near-term conditions (i.e., with implementation of Alternative Truck Routes 1 or 2) and in the event that the MCP is never constructed (i.e., the Primary Land Use Plan), all Project-related traffic would be routed to the south of the Project site, and



would be directed away from the existing schools and master-planned residential uses within the City of Perris. Alternative Truck Routes 1 and 2 have been designed to route westbound trucks away from existing residential uses to the extent feasible. As such, with implementation of the Primary Land Use Plan, the Project would not result in hazards due to incompatible uses, and impacts would be less than significant. Although Project-related truck traffic would utilize the MCP once constructed (i.e., with implementation of the Alternative Land Use Plan/Alternative Truck Route 6), which would traverse through the City of Perris and near existing residential uses within the City, the Project would not involve any improvements to the MCP and the MCP is planned as a regional transportation corridor for all vehicles, including heavy trucks. Thus, Project-related truck trips along the MCP with implementation of the Alternative Land Use Plan would not result in hazards due to incompatible uses, and impacts would be less than significant. All improvements that would be constructed as part of the Project would be constructed in accordance with applicable Riverside County standards, and there are no components of the Project's proposed roadway or intersection improvements that would result in hazards due to a geometric design feature. Impacts would therefore be less than significant.

Threshold d.: Less-than-Significant Impact. There are no components of the proposed Project that would result in or require a substantial increase in expenditures by Riverside County for public road maintenance such that environmental impacts would result. As such, Project impacts would be less than significant.

Threshold e.: Significant Direct and Cumulatively-Considerable Impact. Although it is unlikely that improvements planned to Ramona Expressway and Nuevo Road would adversely affect circulation during the Project's construction phase, a significant impact is nonetheless identified requiring mitigation in the form of a traffic control plan for implementing developments. Additionally, a significant impact could occur if roadways planned on and abutting the Project site are improved prior to the commencement of Project construction activities. Accordingly, prior to mitigation, a significant direct impact would result from Project implementation.

Threshold f.: Significant Direct and Cumulatively-Considerable Impact. Due to temporary lane closures that may occur during the Project's construction phase, Project-related construction activities may conflict with emergency access routes and access to nearby uses during frontage improvements to Ramona Expressway, Nuevo Road, and other roadways on or abutting the site that may be improved prior to the start of Project construction. Although it is anticipated a less-than-significant impact would occur, out of an abundance of caution, a temporary significant impact is identified. Accordingly, near-term impacts to emergency access would be significant prior to mitigation.

Threshold g.: Less-than-Significant Impact. Impacts associated with the construction of on-site trails and bicycle facilities are inherent to the Project's construction phase, and such impacts have been evaluated throughout this EIR. Where significant impacts have been identified, feasible mitigation measures have been identified to reduce impacts to the maximum feasible extent. There are no impacts associated with the construction of bike systems or bike lanes that have not already been addressed herein. As such, impacts would be less than significant.





#### 4.18.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Prior to issuance of building permits, the Project Applicant shall pay appropriate Development Impact Fee Program (DIF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 659.
- Prior to final building inspection, the Project Applicant shall pay appropriate Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance (TUMF) fees at the rates then in effect in accordance with Riverside County Ordinance No. 824.
- As required by provision 3.9 of Riverside County Board of Supervisors Policy F-3, "*Good Neighbor*" Policy for Logistics and Warehouse/Distribution Uses, Riverside County shall review future implementing discretionary applications (i.e., plot plans, conditional use permits, etc.) to ensure that, to the extent feasible, separate entries and exit points for trucks and vehicles have been accommodated for any future warehouse/distribution facilities in order to minimize vehicle/truck conflicts.
- Prior to approval of any implementing developments (i.e., tentative tract maps, plot plans, conditional use permits, etc.), the Project Applicant or implementing developer shall prepare a Traffic Impact Analysis (TIA) in compliance with the Riverside County Transportation Department's "Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled" (December 2020). Appropriate conditions of approval shall be imposed on future implementing developments based on the results of the future-required TIA(s) to address projected Level of Service (LOS) deficiencies along the transportation network. Anticipated Project-related responsibilities for improvements, fee payments, and fair-share contributions associated with Alternative Truck Route 1 (Primary Land Use Plan), Truck Route 2 (Primary Land Use Plan), and Alternative Truck Route 6 (Alternative Land Use Plan) are presented in Tables 1-4, 1-5, and 1-9 of the Project's Traffic Analysis ("TA"; EIR *Technical Appendix L3*), respectively. The actual improvements, fee payments, and fair-share contributions shall be based on the results of the TIA(s) required for each implementing development, and may vary from the list of improvements, fee payments, and/or fair-share contributions listed in the Project's TA.

##### **Mitigation**

- MM 4.18-1 Prior to approval of future implementing projects (i.e., plot plans, conditional use permits, etc.), the Project Applicant shall prepare a project-level Vehicle Miles Travelled (VMT) analysis to identify site-specific Transportation Demand Management (TDM) measures to reduce VMTs associated with the Project's proposed uses to the maximum feasible extent. TDM strategies that may be applicable at the implementing project level may include:



- Reduced parking supply.
- Transit Rerouting and Transit Stops.
- Commute trip reduction (CTR) programs offered by individual building tenants that would encourage the use of vanpools, carpooling, public transit, and biking.
- Incorporating designated carpool/vanpool parking in desirable locations to encourage employees to carpool/vanpool to work that can lead to reduced commute VMT
- CTR programs may also provide for alternative work or compressed work schedules to reduce the number of days an employee commutes to work.
- Future building designs may include sidewalks to provide non-vehicular connections to existing trails and external pedestrian networks in order to improve pedestrian access.
- Provision of on-site facilities to provide end of trip services for bicycling such as secure bike parking, storage lockers and showering facilities.

Riverside County shall condition the future implementing projects to implement the TDM strategies identified as part of the future-required VMT analyses.

MM 4.18-2 All owner users and future tenants shall participate in Riverside County's Rideshare Program. The purpose of this program is to encourage 2+ person occupancy vehicle trips and encourage other alternative modes of transportation. Carpooling opportunities and public transportation information shall be advertised to employees of the building tenant. Developer and all successors shall include the provisions of this obligation in all leases of the Project so that all tenants shall fulfill the terms and conditions of this mitigation measure.

MM 4.18-3 Prior to the issuance of grading permits or improvement plans affecting Ramona Expressway, Nuevo Road, or any other roadways within the Project site that have been improved, the Project Applicant shall prepare and the County of Riverside shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices (CA MUTCD). Prior to approval of the temporary traffic control plan by Riverside County, Riverside County shall provide a copy to the Department of Water Resources, Division of Operation and Maintenance, for review and comment to ensure that the temporary traffic control plan does not interfere with emergency or maintenance access to the Perris Dam. A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.

MM 4.18-4 Prior to approval of any implementing permits or approvals (i.e., plot plans, conditional use permits, etc.), the County shall condition the implementing permits/approvals to require that all Project-related truck traffic shall utilize the appropriate Alternative Truck Route, as described in RDEIR subsection 3.6.2.B. The condition of approval shall require that all future



tenant leases shall include language restricting truck traffic to the appropriate Alternative Truck Route, and the condition of approval shall further the keeping of records demonstrating compliance with these requirements. Furthermore, the condition of approval shall require the posting of signs in appropriate locations directing Project truck traffic to the appropriate Alternative Truck Route, and Riverside County shall verify that the signs have been installed prior to final building inspection.

#### 4.18.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold b.: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-1 and MM 4.18-2, the future tenants of the proposed Project are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those listed above cannot be guaranteed to reduce Project VMT to a level of less than significant. The inclusion of VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings also is noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. Accordingly, Project impacts due to VMT would be significant and unavoidable on both a direct and cumulatively-considerable basis.

Threshold e.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.18-3 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. Implementation of the required mitigation would ensure that Project-related construction activities would not substantially affect circulation during the Project's construction. With implementation of the required mitigation, impacts would be reduced to less-than-significant levels.

Threshold f.: Less-than-Significant Impact with Mitigation Incorporated. Mitigation Measure MM 4.18-3 requires the Project Applicant to prepare and obtain Riverside County approval of a temporary traffic control plan prior to issuance of grading permits. With implementation of the required mitigation, the Project would not result in inadequate emergency access or access to nearby uses during the Project's construction phase. Accordingly, with implementation of the required mitigation, impacts would be reduced to less-than-significant levels.



## 4.19 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection documents the results of the County’s consultation with local Native American Tribes. It should be noted that much of the written and oral communication between Native American tribes and Riverside County is considered confidential in respect to places that have traditional tribal cultural significance (Gov. Code § 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

### 4.19.1 EXISTING CONDITIONS

Refer to EIR subsection 4.5.1 for a complete description of the cultural setting existing site conditions, and the archaeological and historical resources assessment.

### 4.19.2 REGULATORY SETTING

The following is a brief description of the State environmental laws and related regulations addressing Tribal Cultural Resources (TCRs). Refer also to EIR subsection 4.5.2 for a complete description of federal, State, and local environmental laws and regulations governing the protection of cultural resources.

#### A. *Traditional Tribal Cultural Places Act (Senate Bill 18, “SB 18”)*

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places (“cultural places”) through local land use planning. SB 18 also requires the Governor’s Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations. (OPR, 2005)

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government. (OPR, 2005)

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code § 65300 et seq.) and specific plans (defined in Government Code § 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code § 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. (OPR, 2005)



***B. Assembly Bill 52 (AB 52)***

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. (OPR, 2017b)

The Public Resources Code now establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” (Pub. Resources Code, § 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, § 21080.3.1.) (OPR, 2017b)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code § 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015. (OPR, 2017b)

§ 21074 of the Public Resources Code defines “tribal cultural resources.” In brief, in order to be considered a “tribal cultural resource,” a resource must be either:

- (1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
- (2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource. (OPR, 2017b)

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe. (OPR, 2017b)



### 4.19.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XVIII of Appendix G to the State CEQA Guidelines addresses typical adverse effects on tribal cultural resources, and includes the following threshold question to evaluate the Project's impacts to tribal cultural resources (OPR, 2018a):

- 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, 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)?
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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?

Significance thresholds are set forth in Riverside County's Environmental Assessment Checklist, as modified based on the 2018 updates to Section XVIII of Appendix G to the State CEQA Guidelines, and indicate significant impacts would occur if the Project or any Project-related component would:

- a. *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, 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*
  1. *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); or*
  2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.*

### 4.19.4 IMPACT ANALYSIS

***Threshold 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, 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:*

- 1. 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); or*
- 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Changes in the California Environmental Quality Act, effective July 2015, require that the County address another category of cultural resources – tribal cultural resources. Tribal Cultural Resources (TCRs) are those resources with inherent tribal values that are difficult to identify through the same means as archaeological resources. These resources can be identified and understood through direct consultation with the tribes who attach tribal value to the resource. Tribal cultural resources may include Native American archaeological sites, but they may also include other types of resources such as a cultural landscape. Also relevant is the category termed “traditional cultural property” (TCP) which is typically associated with cultural resource management performed under federal auspices. “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. A TCP can be defined, generally, as one that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community. A landscape can be a TCP and by extension a TCR, provided the cultural landscape meets the criteria and that the landscape is geographically defined in terms of the size and scope. The appropriate treatment of tribal cultural resources is determined through consultation with tribes.

In compliance with Assembly Bill 52 (AB 52), notices regarding this project were mailed to all requesting tribes on March 26, 2020. Requests to consult were received from the Agua Caliente Band of Cahuilla Indians (Agua Caliente), Temecula Band of Luiseño Indians (Pechanga), Rincon Band of Luiseño Indians (Rincon) and the Soboba Band of Luiseño Indians (Soboba). No response was received from the Cabazon Band of Cahuilla Indians, Cahuilla Band of Indians, Colorado River Indian Tribes (CRIT), Morongo Band of Mission Indians. The Pala Band of Mission Indians (Pala) response was received after the 30-day response period. An email was sent to Pala on September 30, 2020 offering consultation with the tribe, but Pala did not request to consult.

The Agua Caliente Band of Cahuilla Indians responded in a letter dated April 17, 2020. The proposed Project was discussed during a meeting held on May 4, 2020. All Project cultural reports were provided to Agua Caliente and the Project was again discussed on August 25, 2020. During this meeting the tribe expressed concern that the Project is situated in a very sensitive area. Further, the Project is situated in within and adjacent to a Tribal Cultural Resource. This resource is a landscape and is composed of multiple contributing cultural locations and archaeological sites. It is considered a Traditional Cultural Property to the Agua Caliente Band



of Cahuilla Indians and is identified by the name “South Bernasconi Hills Complex.” The TCR includes ethnobotanical food sources such as plants, berries, seeds and nuts, animals, and other naturally occurring resources.

This landscape level Tribal Cultural Resource is extremely significant to the history of the Tribe. Agua Caliente Cahuilla were an integral part of the natural world, tended the land through a reciprocal relationship with the land. It is tangible evidence of the ancestors' ability to prosper in an unpredictable environment, a focus on subsisted acquisition, their resiliency in a harsh place, and exhibits reciprocity with adjacent tribal communities.

Agua Caliente recommends the presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior’s Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

Rincon requested to consult in a letter dated April 3, 2020 and consultation was initiated on June 18, 2020. All of the Project exhibits and cultural reports were provided to Rincon. Rincon expressed concern that the Project is situated within a sensitive area and recommended avoidance of all cultural sites and resources. Soboba requested to consult in a letter dated March 31, 2020. An initiation meeting was held on September 23, 2020. The tribe requested all of the cultural reports and site plans. These were provided to Soboba. Soboba was provided with the cultural report and the conditions of approval. Soboba provided specific information that the Project is situated within the boundaries of a Traditional Cultural Place/Tribal Cultural Landscape (TCP/TCL), named Ta’awila.

Pechanga requested to consult in a letter dated April 28, 2020 and consultation was initiated on May 20, 2020. Pechanga told Riverside County Planning staff that the Project is in a Traditional Cultural Property (TCP). The Phase I and Phase II reports, site exhibits and the Phase I addendum were provided to Pechanga several times. Several meetings were held including July 02, 2020, August 12, 2020, August 28, 2020, and March 29, 2021. During these meetings Pechanga told County Planning staff that the project was situated within a Traditional Cultural Property/Traditional Cultural Landscape. Pechanga provided the following information:

*“...The cultural landscape includes permanent residential village sites, short-term residence sites, and resource procurement and processing areas, ritual/ ceremonial areas, private and communal space, and geographic features including valleys, springs, bodies of water and mountain ranges, and trail systems. Within that cultural landscape there may have existed numerous village complexes or clusters, which could have contained multiple neighborhoods, each with their own communal territory.”*

Pechanga asserts that the Project lies within a portion of the village of Páyve:

*“A striking aspect of this village site is its association with the spirit Táakwish and, associated with Táakwish, Páavo’ itself. As described, this being had several well-known long-standing roosts*





*scattered throughout Luiseño territory and beyond, aside from its Táakwish Póki near San Jacinto Peak. One of these roosts was on the top of the south flank of Bernasconi Pass, essentially in the heart of the village of Páyve. The horrific diet of this being, consisting of cannibalizing his relatives among the Káamalam during Origin Times, and of human souls during the current age of humans, is made visible by a vertical rock outcrop representing a stream of “Táakwish’ Shit” running down the hill. This feature was pointed out by both Vincent Ibanez (personal communication 2017) and William Pink (personal communication 2017). Both consultants, when asked about the advisability of locating a community directly below the roost of such a monster, stated that this could be managed by maintaining an alertness to when Táakwish was present and making sure to live in a manner that did not cause him to notice people breaking the social norms of society which might invite punishment. One of the several notable features of the natural and spiritual landscape associated with Páyve is the view directly out from the Bernasconi Pass due east – this is to San Jacinto Peak itself and the slightly downslope home of Táakwish...”*

Pechanga told Planning Department staff that the proposed Project has recorded sites with bedrock milling features, which are contributing elements of the TCP/TCL and are part of the village complex. Also, there is a high potential of finding subsurface cultural resources during any ground-disturbing activities associated with the proposed Project. Pechanga expressed concern that the Project may impact the viewshed of this portion of the TCP and might have a cumulative impact on the TCP by disturbing contributing elements of the TCP (the bedrock milling sites) found within the Project site.

Planning Department staff have determined that the Project would impact the viewshed (aesthetics) but would not significantly damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features. Although the Project site and surrounding areas would be developed in the long-term with a mixture of urban and rural land uses, future development is not anticipated to obstruct views of any scenic vistas or views. The future development in the area would not adversely affect views of the existing hill forms that occur on and off site near the Project’s western boundary or the Bernasconi Hills that surround the Lake Perris State Recreation Area. However, while the viewshed to the peaks may not be impacted by development, the views to the San Jacinto River, the large village of Páyve and Páavo, Mystic Lake would be obstructed. This viewshed is important to the tribes and connects the area with other important places within the viewshed. Currently, there is very little development in the area and although development of the Project would add to obstruction of the viewshed this would not be a significant impact. However, based on the results of the County’s consultation efforts with local Native American tribes, it was determined that because the Project incorporates a large open space area adjacent to the San Jacinto River, does not afford prominent views of Mystic Lake (Perris Lake), and would not obstruct views of upper elevations within the viewshed, Project impacts to the viewshed of these tribal cultural resources would be less than significant.

Based on the design of the proposed Project, and as documented more fully in EIR Subsection 4.5, *Cultural Resources*, the Project would avoid impacts to most of the previously-identified cultural resources within the Project site. Specifically, Sites P-33-003743, P-33-003744, Temp-1, and Temp-2 occur within areas planned for long-term conservation as open space as part of the Project, and Project-related grading activities would not impact these sites. Furthermore, although impacts to Site SR-001 would be less than significant, the Project



Applicant has agreed to a requirement to design future grading plans to completely avoid disturbance to Site SR-001 (refer to EIR Mitigation Measure MM 4.5-1). Although the Project would result in direct impacts to Site SR-002, a significance assessment of the site according to the criteria listed in Section 15064.5 of the State CEQA Guidelines clarifies that the site does not qualify as a significant archaeological resource under any of the stated criteria. (BFSA, 2020, p. 4.0-14)

However, all the consulting tribes expressed concern that the Project area is sensitive for cultural resources and there is the possibility that previously unidentified resources might be found during ground disturbing activities. The Project would be subject to compliance with EIR Mitigation Measure MM 4.5-1, which requires a Tribal Monitor from the consulting Tribe(s) to be present during grading activities so that any Tribal Cultural Resources found during project construction activities will be handled in a culturally appropriate manner.

Additionally, and as required by EIR Mitigation Measure 4.5-2, the Project also would be required to adhere to State Health and Safety Code Section 7050.5 in the event that human remains are encountered and by ensuring that no further disturbance occur until the County Coroner has made the necessary findings as to origin of the remains. Furthermore, pursuant to Mitigation Measure 4.5-2 and Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made.

In addition, EIR Mitigation Measure MM 4.5-1 requires the identification of the procedures to be followed should any unanticipated cultural resources be identified during ground disturbing activities. With implementation of EIR Mitigation Measures MM 4.5-1 and MM 4.5-2, impacts to any previously unidentified Tribal Cultural Resources would be reduced to less-than-significant levels.

Notwithstanding, because mitigation measures are required, Project impacts to tribal cultural resources would be significant prior to implementation of the mitigation measures identified in EIR Subsection 4.5.

#### **4.19.5 CUMULATIVE IMPACT ANALYSIS**

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development within western Riverside County. This study area was selected for evaluation because it encompasses a broad region with similar geological, biological, and climatic conditions.

As indicated under the analysis of Threshold a., while development of the Project as proposed would not result in impacts to the viewshed of local area peaks, the views to the San Jacinto River, the large village of Páyve and Páavo, Mystic Lake would be obstructed. This viewshed is important to the tribes and connects the area with other important places within the viewshed. Currently, there is very little development in the area and although development of the Project would add to obstruction of the viewshed. However, based on the results of the County's consultation efforts with local Native American tribes, it was determined that because the Project incorporates a large open space area adjacent to the San Jacinto River, does not afford prominent views of Mystic Lake (Perris Lake), and would not obstruct views of upper elevations within the viewshed, Project impacts to the viewshed of these tribal cultural resources would be less than significant on a cumulatively-



considerable basis. However, the Project has the potential to result in impacts to previously-unidentified Tribal Cultural Resources that may be present beneath the ground surface of the Project site. Other developments envisioned with buildout of the Riverside County General Plan and the general plans of cities within the County also have the potential to result in impacts to Tribal Cultural Resources, including sites or resources that may be buried beneath the ground surface. As such, Project impacts to Tribal Cultural Resources would be cumulatively considerable prior to mitigation.

#### 4.19.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Significant Direct and Cumulatively-Considerable Impact. Although Project impacts to Tribal Cultural Resources on site, including the San Jacinto River, Mystic Lake (Perris Lake), and the village of Páyve and Páavo would be less than significant, based on the results of the County's consultation efforts with local Native American tribes, the Project has the potential to result in significant impacts to previously-undiscovered Tribal Cultural Resources, and could result in significant impacts to previously-identified Tribal Cultural Resources within the Project site in the absence of protective measures. As such, Project impacts to Tribal Cultural Resources represent a potentially significant impact for which mitigation would be required.

#### 4.19.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION

##### *Applicable County Regulations and Design Requirements*

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code Section 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code Section 6254 (r).

##### *Mitigation*

Mitigation Measures MM 4.5-1 and MM 4.5-2 shall apply (refer to EIR Subsection 4.5, *Cultural Resources*). The mitigation measures included in EIR Subsection 4.5 have been drafted to include all of the mitigation requirements requested during the Project's Tribal Consultation process. No additional mitigation measures are required.

#### 4.19.8 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Threshold a.: Less-than-Significant Impact with Mitigation. Implementation of EIR Mitigation Measures MM 4.5-1 and MM 4.5-2 would ensure appropriate treatment of any Tribal Cultural Resources that may be identified during Project-related ground-disturbing activities, including human remains. Implementation of



the required mitigation would reduce Project impacts to Tribal Cultural Resources to below a level of significance.



## 4.20 UTILITIES AND SERVICE SYSTEMS

This Subsection evaluates the Project’s potential to result in impacts on existing utilities and service systems and/or impacts to the environment that could result from the Project’s proposed utilities and service system improvements. The analysis in this Subsection relies on a Project-specific Water Supply Assessment (WSA) prepared for the Project by EMWD, titled “Water Supply Assessment Report – Stoneridge Commerce Center SP 239, Amendment #1,” dated June 11, 2020, and included as *Technical Appendix M* to this EIR (EMWD, 2020). Subsequent to preparation of the Project’s WSA, the EMWD adopted an updated Urban Water Management Plan (UWMP) in July 2021, entitled, “2020 Urban Water Management Plan.” The updated 2020 UWMP accounts for the Project’s anticipated water demand, based on the analysis previously conducted as part of the Project’s WSA. The EMWD 2020 UWMP is herein incorporated by reference and is available for public review at EMWD, 2270 Trumble Road, Perris, California 92570, or online at <https://www.emwd.org/post/urban-water-management-plan>. (EMWD, 2021a). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.20.1 EXISTING CONDITIONS

The Project site is located within the service boundaries of the Eastern Municipal Water District (EMWD) for water and sewer service, Southern California Edison for electricity, and the Southern California Gas Company (SoCal Gas) for natural gas, with numerous service providers for cable television and telephone services. Solid waste hauling service to the Project site is provided by the Waste Management of the Inland Empire.

#### A. Water Service and Supply

Water service to the Project area is provided by the EMWD. EMWD provides potable water, recycled water, and wastewater services to an area of approximately 555 square miles in western Riverside County. The service area includes seven incorporated cities in addition to unincorporated areas of Riverside County. EMWD is both a retail and wholesale agency. Approximately half of EMWD’s retail demands are supplied using local sources, while the balance is served by imported water purchased from the Metropolitan Water District (MWD). EMWD also purchases imported water from MWD to supplement the local supplies of its wholesale customers. Imported water is delivered to EMWD either as potable water treated by MWD, or as raw water that EMWD can either treat at one of its two local filtration plants or deliver as raw water for non-potable uses. (EMWD, 2021a, pp. E-2 and 3-2)

EMWD has four sources of water supply: imported water from MWD, local groundwater, desalinated groundwater, and recycled water. Delivery points for each source of water are located throughout the EMWD service area. Potable imported water is treated and delivered to EMWD directly from MWD’s two large filtration plants. The Henry J. Mills (Mills) Water Treatment Plant treats water from Northern California and provides it to EMWD through two connection points located in the northeast portion of EMWD’s service area. The Robert F. Skinner (Skinner) Water Treatment Plant treats a blend of Colorado River water and water from Northern California and provides it to EMWD through a connection point in the southwest portion of EMWD’s service area. (EMWD, 2021a, p. 3-3)



EMWD owns and operates two microfiltration plants that filter raw imported water delivered through MWD, removing particulate contaminants to achieve potable water standards. The two treatment plants, the Perris Water Filtration Plant and the Hemet Water Filtration Plant, are located in Perris and Hemet, respectively. Raw water from MWD also is used for groundwater replenishment in the eastern part of EMWD. EMWD and others can extract this water at a later date for beneficial uses. Untreated water from MWD used for agricultural purposes is delivered in the northeast for use by EMWD retail and wholesale accounts and in the south for RCWD agricultural accounts. (EMWD, 2021a, p. 3-3)

EMWD's local supplies include groundwater, desalinated groundwater, and recycled water. Groundwater is pumped from the Hemet/San Jacinto and West San Jacinto areas of the San Jacinto Groundwater Basin. Groundwater in portions of the West San Jacinto Basin is high in salinity and requires desalination for potable use. EMWD owns and operates two desalination plants that convert brackish groundwater from the West San Jacinto Basin into potable water. EMWD also owns, operates, and maintains its own recycled water system that consists of four Regional Water Reclamation Facilities and several storage ponds spread throughout EMWD's service area that are all connected through the recycled water system. EMWD's goal is to beneficially use 100 percent of the recycled water it produces. (EMWD, 2021a, p. 3-2)

EMWD produces potable and brackish groundwater from the San Jacinto Groundwater Basin that underlies the EMWD service area. EMWD's groundwater wells pump primarily from the eastern portion of EMWD, with the largest amount of production taking place around the cities of Hemet and San Jacinto. EMWD owns and operates two desalination plants in Sun City, the Menifee Desalter and the Perris I Desalter, which treat brackish groundwater through reverse osmosis to achieve potable water standards. (EMWD, 2021a, p. 3-3)

In addition to the potable water system, EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat municipal sewage and produce water for recycling. The four RWRFs, the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds, to manage the delivery of recycled water. (EMWD, 2021a, p. 3-3)

Table 4.20-1, *EMWD Actual Demands for Potable and Raw Water*, depicts the water deliveries within the EMWD Urban Water Service Area for 2020. Additionally, Table 4.20-2, *Total EMWD Demand Projections*, presents projected water demand within the EMWD service area through year 2045. Table 4.20-3, *EMWD Projected Water Supplies*, presents the projected water supply up to year 2045 for water use within the EMWD, inclusive of water transfers to other water agencies. As shown, the EMWD forecasts being able to meet water demands from its wholesale and retail customers through the year 2045, primarily through purchasing or importing water from MWD.



Table 4.20-1 EMWD Actual Demands for Potable and Raw Water

USE TYPE	ADDITIONAL DESCRIPTION	LEVEL OF TREATMENT WHEN DELIVERED	2020 VOLUME
Single Family		Drinking Water	52,162
Multi-Family		Drinking Water	6,535
Commercial		Drinking Water	4,267
Industrial		Drinking Water	571
Institutional/Governmental		Drinking Water	1,629
Landscape		Drinking Water	8,155
Agricultural irrigation		Drinking Water	1,114
Agricultural irrigation		Raw Water	446
Other		Drinking Water	1,287
Non-Revenue	System losses & unbilled, authorized consumption	Drinking Water	8,507
<b>TOTAL:</b>			<b>84,673</b>
Groundwater Recharge	Imported water recharge to the Hemet/San Jacinto Basin	Raw Water	6,467
Sales/Transfers/Exchanges to Other Agencies	City of Perris Water System	Drinking Water	1,685
Sales/Transfers/Exchanges to Other Agencies	Western Municipal Water District Murrieta Division	Drinking Water	1,809
Sales/Transfers/Exchanges to Other Agencies	Nuevo Water Company	Drinking Water	409
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District	Drinking Water	11,105
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District	Raw Water	13,923
Sales/Transfers/Exchanges to Other Agencies	City of Hemet	Drinking Water	0
Sales/Transfers/Exchanges to Other Agencies	City of San Jacinto	Drinking Water	0
Sales/Transfers/Exchanges to Other Agencies	Lake Hemet Municipal Water District	Raw Water	986
<b>TOTAL:</b>			<b>36,384</b>

1) Passive water savings due to the restrictions outlined in the Administrative Code are included in the demand projections for EMWD's retail service area.

2) Landscape demands remain constant/decrease over time as landscape accounts are offset by conversion to the recycled water system.

3) Projections for losses in the table include system losses (real and apparent) and unbilled, authorized consumption. EMWD's water loss audits are completed on a fiscal year basis (rather than calendar year) and report estimated system losses.

(EMWD, 2021a, Tables 4-1 and 4-2)



**Table 4.20-2 Total EMWD Demand Projections**

USE TYPE	ADDITIONAL DESCRIPTION	PROJECTED WATER USE				
		2025	2030	2035	2040	2045
Single Family		66,900	71,700	76,700	80,500	84,000
Multi-Family		8,500	9,100	9,700	10,200	10,600
Commercial		6,100	6,500	7,000	7,300	7,600
Industrial		600	600	700	700	700
Institutional/Governmental		2,700	2,900	3,100	3,200	3,400
Landscape		8,400	7,600	6,800	6,200	5,500
Agricultural irrigation	Potable Water	1,500	1,500	1,500	1,500	1,500
Agricultural irrigation	Raw Water	500	500	500	500	500
Other		0	0	0	0	0
Non-Revenue	System losses & unbilled, authorized consumption	7,400	7,900	8,400	8,800	9,200
<b>TOTAL:</b>		<b>102,600</b>	<b>108,300</b>	<b>114,400</b>	<b>118,900</b>	<b>123,000</b>
Groundwater Recharge	Imported water recharge to the Hemet/San Jacinto Basin	7,500	7,500	7,500	7,500	7,500
Sales/Transfers/Exchanges to Other Agencies	City of Perris Water System	1,800	1,900	2,100	2,200	2,300
Sales/Transfers/Exchanges to Other Agencies	Western Municipal Water District Murrieta Division	1,000	1,300	1,600	2,000	2,300
Sales/Transfers/Exchanges to Other Agencies	Nuevo Water Company	500	1,000	1,100	1,200	1,200
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District (Potable)	27,100	20,000	21,000	15,200	16,500
Sales/Transfers/Exchanges to Other Agencies	Rancho California Water District (Raw)	15,200	15,200	15,200	22,300	22,300
Sales/Transfers/Exchanges to Other Agencies	City of Hemet	0	0	0	0	0
Sales/Transfers/Exchanges to Other Agencies	City of San Jacinto	0	0	0	0	0
Sales/Transfers/Exchanges to Other Agencies	Lake Hemet Municipal Water District	5,100	5,500	5,900	6,300	6,700
<b>TOTAL:</b>		<b>58,200</b>	<b>52,400</b>	<b>54,400</b>	<b>56,700</b>	<b>58,800</b>

- 1) Passive water savings due to the provisions outlined in the Administrative Code are included in the demand projections for EMWD's retail service area.
- 2) Landscape demands remain constant/decrease over time as landscape accounts are offset by conversion to the recycled water system.
- 3) Projections for losses in the table include system losses (real and apparent) and unbilled, authorized consumption.
- 4) Lake Hemet Municipal Water District generally receives raw water, but may purchase some potable water in the future based on operational conditions
- 5) Groundwater recharge will occur under the Hemet/San Jacinto Water Management Plan.

(EMWD, 2021a, Tables 4-3 and 4-4)





**Table 4.20-3 EMWD Projected Water Supplies**

WATER SUPPLY	ADDITIONAL DETAIL ON WATER SUPPLY	PROJECTED WATER SUPPLY (AFY)				
		REASONABLY AVAILABLE VOLUME				
		2025	2030	2035	2040	2045
Purchased or Imported Water	Metropolitan Treated/ Untreated	66,447	72,147	70,247	74,747	78,847
Groundwater (not desalinated)	Pumped from the Hemet/San Jacinto Basin	7,303	7,303	7,303	7,303	7,303
Groundwater (not desalinated)	Pumped from the West San Jacinto Basin	11,450	11,450	11,450	11,450	11,450
Desalinated Water - Groundwater	Desalinated water from the West San Jacinto Basin	13,400	13,400	13,400	13,400	13,400
Recycled Water	Excludes Storage Pond Incidental Recharge / Evaporation	43,330	49,020	54,500	59,800	64,100
Other	Purified Water Replenishment (IPR)	4,000	4,000	12,000	12,000	12,000
<b>TOTAL:</b>		<b>145,930</b>	<b>157,320</b>	<b>168,900</b>	<b>178,700</b>	<b>187,100</b>
Purchased or Imported Water	Metropolitan Treated / Untreated	50,700	44,900	46,900	49,200	51,300
Purchased or Imported Water	Soboba Settlement Water	7,500	7,500	7,500	7,500	7,500
Recycled Water		4,770	5,180	5,600	5,600	5,600
<b>TOTAL:</b>		<b>62,970</b>	<b>57,580</b>	<b>60,000</b>	<b>62,300</b>	<b>64,400</b>

The projected recycled water supply total is inclusive of recycled water that is required to be recharged as part of EMWD's planning Purified Water Replenishment (PWR) Program – an Indirect Potable Reuse project with multiple phases. This recharge volume is reported under the groundwater recharge line item in Table 6-7 (DWR 6-4R) as a demand/beneficial use of EMWD's recycled water supply. The projected supply total under the "other" category reflects the volume of water produced by PWR that will be used to meet demands on EMWD's potable water system.

Soboba Settlement requires Metropolitan to provide a long term annual average recharge of 7,500 AFY - any portion unused by the Soboba Tribe is split for use by EMWD, LHMWD, City of Hemet, and the City of San Jacinto

(EMWD, 2021a, Table ES-3)

**B. Sewer Service and Treatment**

EMWD provides wastewater collection, treatment, and recycled water services throughout the Project area. Five (5) operational RWRFs are operated throughout EMWD, and include the San Jacinto Valley RWRf, the Moreno Valley RWRf, the Temecula Valley RWRf, the Sun City RWRf, and the Perris Valley RWRf. As shown below in Table 4.20-4, *Wastewater Treatment Capacity*, the five RWRFs have a combined capacity of 78,000,000 gallons per day (gpd). In addition to treatment facilities, EMWD has several recycled water storage ponds throughout EMWD service area. (EMWD, 2021a, p. 3-2)

**Table 4.20-4 Wastewater Treatment Capacity**

Facility	Typical Daily Flows (gpd)	Current Capacity (gpd)	Planned Capacity (gpd)
Moreno Valley Regional Water Reclamation Facility	11,500,000	16,000,000	18,000,000
Perris Valley Regional Water Reclamation Facility	15,500,000	22,000,000	100,000,000
San Jacinto Valley Regional Water Reclamation Facility	7,000,000	14,000,000	27,000,000
Sun City Regional Water Reclamation Facility	2,400,000	3,000,000	15,000,000+
Temecula Valley Regional Water Reclamation Facility	14,000,000	23,000,000	28,000,000
<b>Totals:</b>	<b>50,400,000</b>	<b>78,000,000</b>	<b>188,000,000+</b>

(EMWD, n.d.)

Collectively, the RWRFs within EMWD collect and treat approximately 50.4 million gpd of wastewater, and have a capacity to treat approximately 78.0 million gpd. Sewer flows from the Project site would be treated by the Perris Valley RWRf, which has a daily capacity of 22.0 million gpd and typical daily flows of 15.5 million gpd. (EMWD, n.d.) EMWD treats all of the wastewater collected in its service area to tertiary standards. The majority of recycled water sold is used for agricultural irrigation. A portion of the water sold for agriculture is used in lieu of groundwater, preserving the groundwater basin, and improving water supply



reliability. In addition to meeting agricultural demand, recycled water is delivered to municipal customers for landscape irrigation. EMWD also sells recycled water to the California Department of Fish and Wildlife (CDFW) for environmental use within the San Jacinto Wildlife Area and to recreational customers that are comprised of private duck clubs and bird sanctuaries that use recycled water for ponds. EMWD uses existing storage facilities to store water during off peak periods for delivery in peak months and maximize the amount of recycled water sold. (EMWD, 2021a, pp. 6-12 and 6-14)

**C. Stormwater Drainage**

Under existing conditions, runoff from the Project site generally flows in a west to east direction and discharges directly into the San Jacinto River, which traverses the southeastern corner of the Project site.

**D. Solid Waste Collection and Disposal**

Solid waste collection and disposal is provided by the Riverside County Department of Waste Resources (RCDWR) through a franchise agreement with a private company, Waste Management Inc. of the Inland Empire (WMIE). Waste within the Project area is sent to transfer stations and landfills managed by the RCDWR and WMIE. Solid Waste from the Project site would be taken to the Moreno Valley Transfer Station (MVTs) before being loaded into larger trucks and transferred to either the El Sobrante Landfill, Lamb Canyon Landfill, or the Badlands Landfill for disposal. The following is a description of these facilities:

- Moreno Valley Transfer Station. Solid waste generated within the Project area is collected by WMI, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTs) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation. (RCDWR, 2023)
- El Sobrante Landfill. The El Sobrante Landfill is located in the southeast area of the City of Corona at 10910 Dawson Canyon Road and accessed from Interstate-15 (I-15) at Temescal Canyon Road. The landfill is operated and owned by USA Waste Services of California, Inc. of which WMIE is a subsidiary. The existing landfill encompasses 1,322 acres, of which 645 acres are permitted for refuse disposal. The landfill is currently permitted to receive 70,000 tons per week (tpw), and must a lot a minimum of 28,000 tpw for in-County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2021 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 50.1 million tons. The El Sobrante Landfill is projected to reach capacity in 2057. (RCDWR, 2023)
- Lamb Canyon Landfill. The Lamb Canyon Landfill is located between the City of Beaumont and the City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by RCDWR. The landfill encompasses approximately 1,189 acres, of which of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is



currently permitted to receive 5,000 tpd and had an estimated total disposal capacity of approximately 21.1 million tons. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2023 (beginning of day), the landfill has a total remaining capacity of approximately 7.3 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2022 to December 2022, the Lamb Canyon Landfill accepted a daily average of 1,969 tons with a period total of approximately 606,481 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site. (RCDWR, 2023)

- Badlands Landfill. The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by RCDWR. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd. The site has an estimated total capacity of approximately 21.4 million tons. As of January 1, 2023 (beginning of day), the landfill had a total remaining disposal capacity of approximately 3.5 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2026. From January 2022 to December 2022, the Badlands Landfill accepted a daily average of 2,660 tons with a period total of approximately 819,166 tons. Landfill expansion potential exists at the Badlands Landfill site. Data from September 2022 shows that the Badlands Landfill received an average of 2,517 tpd (including 2,304 tpd of in-County waste). As of December 18, 2020, the landfill had a total remaining disposal capacity of approximately 7.8 million cubic yards. The Badlands Landfill is projected to reach capacity at the earliest in 2059. (RCDWR, 2023)

#### 4.20.2 APPLICABLE REGULATORY REQUIREMENTS

The following is a brief description of the federal, State, and local environmental laws and related regulations related to utilities and service systems.

##### 1. *Applicable Water Supply Regulations*

###### Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020e)



**Safe Drinking Water Act**

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes EPA 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 1996 amendments to SDWA require that EPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for EPA, also encourage attainment of secondary standards (nuisance-related). Under the Act, EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection of fluids. (EPA, 2020j)

**2. *Applicable Energy Conservation Regulations***

**United States Department of Energy/Federal Energy Regulatory Commission**

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority. (FERC, n.d.)



**B. State Regulations**

**1. Applicable Water Supply Regulations**

**Water Conservation in Landscaping Act**

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. When such an ordinance had not been adopted, a finding as to why (based on the climatic, geologic, or topographical conditions) such an ordinance is not necessary, must be adopted. In the absence of such an ordinance or findings, the policies and requirements contained in the “model” ordinance drafted by the State of California shall apply within the affected jurisdiction. (CA Legislative Info, n.d.)

**Water Recycling in Landscaping Act**

In 2000, Senate Bill 2095 (Water Recycling in Landscaping Act) was approved by Governor Davis requiring any local public or private entity that produces recycled water and determines that within 10 years it will provide recycled water within the boundaries of a local agency, to notify the local agency of that fact. In turn, local agencies are required to adopt and enforce within 180 days a specified recycled water ordinance, unless the local agency adopted a recycled water ordinance or other regulation requiring the use of recycled water in its jurisdiction prior to January 1, 2001. (CA Legislative Info, n.d.)

**Urban Water Management Planning Act**

The Urban Water Management Planning Act (UWMP Act) was proposed and adopted to ensure that water planning is conducted at the local level, as the State of California recognized that two water agencies in the same region could have very different impacts from a drought. The UWMP Act requires water agencies to develop Urban Water Management Plans (UWMPs) over a 20-year planning horizon, and further required UWMPs to be updated every five years. UWMPs are exempt from compliance with CEQA. (DWR, 2016, p. 1-2)

The UWMPs provide a framework for long term water planning and inform the public of a supplier’s plans for long-term resource planning that ensures adequate water supplies for existing and future demands. This part of the California Water Code (CWC) requires urban water suppliers to report, describe, and evaluate: (DWR, 2016, p. 1-3)

- Water deliveries and uses;
- Water supply sources;
- Efficient water uses;
- Demand management measures; and
- Water shortage contingency planning.

The UWMP Act has been modified over the years in response to the State’s water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009 and as a result of



the governor’s call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020. (DWR, 2016, p. 1-2)

□ **Government Code § 66473.7(b)(2) (Senate Bill 221)**

Under Senate Bill (SB) 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply. SB 221 is intended as a ‘fail safe’ mechanism to ensure that collaboration on finding the needed water supplies to serve a new large subdivision occurs before construction begins. SB 221 requires the legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove a tentative map, must include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available. Proof of the availability of a sufficient water supply must be requested by the subdivision applicant or local agency, at the discretion of the local agency, and id based on written verification from the applicable public water system within 90 days of a request. SB 221 does not apply to any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households. (DWR, 2003; CA Legislative Info, n.d.)

□ **California Senate Bill 610**

The California Water Code (Water Code) §§ 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires 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 next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912 [a]) subject to CEQA. (DWR, 2003; CA Legislative Info, n.d.) For the purposes of SB 610, “project” means any of the following:

- (1) A proposed residential development of more than 500 dwelling units.
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- (4) A proposed hotel or motel, or both, having more than 500 rooms.
- (5) 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.



- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.
- (7) 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. (DWR, 2003; CA Legislative Info, n.d.)

Because the Project proposes more than 650,000 s.f. of light industrial uses (in addition to the Project's Business Park and Commercial Retail uses), a water supply assessment was required and is included in EIR *Technical Appendix M*.

**CA. Water Code § 10610 et seq. (Senate Bill 901)**

Signed into law on October 16, 1995, Senate Bill (SB) 901 required every urban water supplier to identify as part of its urban water management plan, the existing and planned sources of water available to the supplier over a prescribed 5-year period. The code requires the water service purveyor to assess the projected water demand associated with a proposed project under environmental review. Later provisions of SB 901 required compliance in the event that the proposed Project involved the adoption of a specific plan, amendment to, or revision of the land use element of a general plan or specific plan that would result in a net increase in the state population density. Upon completion of the water assessment, cities and counties may agree or disagree with the conclusions of the water service purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings. (CA Legislative Info, n.d.)

**Executive Order B-29-15**

Executive Order (EO) B-29-15 ordered the State Water Resources Control Board (SWRCB) to impose restrictions to achieve a 25-percent reduction in potable urban water usage through February 28, 2016; directed the California Department of Water Resources (DWR) to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes; and directed the California Energy Commission to implement a statewide appliance rebate program to provide monetary incentives for the replacement of inefficient household devices. (SWRCB, 2020)

**Executive Order B-37-16**

Signed on May 9, 2016, EO B-37-16 established a new water use efficiency framework for California. The order bolstered the state's 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. (SWRCB, 2020)

**Executive Order B-40-17**

Signed on April 7, 2017, EO B-40-17 ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices. The order was built on actions taken in Executive Order B-37-16, which remains in effect. In a related action, state agencies, including the Department of Water Resources (DWR), released a plan to continue making water conservation a way of life. (SWRCB, 2020)



☐ **Sustainable Groundwater Management Act (SGMA)**

The Sustainable Groundwater Management Act (SGMA) established a new structure for managing California's groundwater resources at a local level by local agencies. SGMA required, by June 30, 2017, the formation of locally-controlled groundwater sustainability agencies (GSAs) in the State's high- and medium-priority groundwater basins and subbasins (basins). A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. The GSP Emergency Regulations for evaluating GSPs, the implementation of GSPs, and coordination agreements were adopted by DWR and approved by the California Water Commission on May 18, 2016. (DWR, n.d.)

☐ **Senate Bill 610 (SB 610)**

SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the CEQA process, and defines the role Urban Water Management Plans (UWMPs) play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks 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
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.





In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier. (OPR, 2017c, p. 69 )

**Senate Bill 606 (SB 606)**

SB 606 would require an urban retail water supplier to calculate an urban water use objective no later than November 1, 2023, and by November 1 every year thereafter, and its actual urban water use by those same dates. The bill would require an urban retail water supplier to submit a report to the department for these purposes by those dates. SB 606 would authorize the board to issue information orders, written notices, and conservation orders to an urban retail water supplier that does not meet its urban water use objective, as specified. The bill would authorize the board to waive these requirements for a period of up to 5 years, as specified. SB 606 would impose civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. The bill would also authorize the board to issue a regulation or informational order requiring a wholesale water supplier, urban retail water supplier, or distributor of a public water supply to provide a monthly report relating to water production, water use, or water conservation. (SWRCB, , n.d.)

**Assembly Bill 1668 (AB 1668)**

AB 1668 requires the State Water Resources Control Board, in coordination with the Department of Water Resources, to adopt long-term standards for the efficient use of water, as provided, and performance measures for commercial, industrial, and institutional water use on or before June 30, 2022. The bill, until January 1, 2025, establishes 55 gallons per capita daily as the standard for indoor residential water use. Beginning January 1, 2025, the bill establishes the greater of 52.5 gallons per capita daily or a standard recommended by the State Water Resources Control Board and beginning January 1, 2030, the bill establishes the greater of 50 gallons per capita daily or a standard recommended by the State Water Resources Control Board. AB 1668 imposes civil liability for a violation of an order or regulation issued pursuant to these provisions, as specified. (SWRCB, n.d.)

**California Plumbing Code**

Title 24, Part 5 of the California Code of Regulations establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, was published by the California Building Standards Commission and went into effect on January 1, 2019. (BCS, n.d.)

**California Code of Regulations (CCR) Title 20 and 24**

Title 20 includes state and federal minimum efficiency requirements for energy and water use in regulated appliances. These appliances include, but are not limited to, water heaters, furnaces, heat pumps, air



conditioners, refrigerators, pumps, lamps and ballasts, computers, spray sprinkler bodies and showerheads. Manufacturers are responsible for certifying regulated appliances to the California Energy Commission's Modernized Appliance Efficiency Database System. This serves as the manufacturer's claim that it has met all applicable requirements, including testing, and marking products. (Westlaw, n.d.)

Title 24 of the California Code of Regulations is a broad set of requirements for energy conservation, green design, construction and maintenance, fire and life safety, and accessibility that apply to the structural, mechanical, electrical, and plumbing systems in a building. Title 24 was published by the California Building Standards Commission and applies to all buildings in California. Title 24 receives updates every three years with the latest revisions being in 2019. Title 24 energy compliance requirements apply to new construction and any new installations or retrofits in existing buildings. Older buildings do not have to upgrade their systems, but if they choose to renovate, their new systems must meet Title 24 standards. (BCS, n.d.)

#### ☐ **California Water Plan**

The California Water Plan is the State's strategic plan for sustainably managing and developing water resources for current and future generations. Required by Water Code Section 10005(a), it presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The plan is updated every five years; provides a way for various groups to collaborate on findings and recommendations and make informed decisions regarding California's water future; can't mandate actions or authorize spending for specific actions; doesn't make project- or site-specific recommendations nor include environmental review or documentation as would be required by CEQA; and requires policy- and law-makers to take definitive steps to authorize the specific actions proposed in the plan and appropriate funding needed for their implementation.

California Water Plan Update 2018 (Update 2018) provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges. It reaffirms State government's unique role and commitment to sustainable, equitable, long-term water resource management; it also introduces implementation tools to inform sound decision-making. The plan's broad and diverse portfolio of recommended actions address California's critical, systemic, and institutional challenges. (DWR, 2018)

#### ☐ **California Water Action Plan**

The California Water Action Plan is a roadmap for the State's journey towards sustainable water management. The first California Water Action Plan was released in January 2014 under Governor Brown's administration and updated in 2016. The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality, declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks. (CDFW, n.d.)



## 2. *Applicable Solid Waste Regulations*

### **California Solid Waste Integrated Waste Management Act (AB 939, 1989)**

The Integrated Waste Management Act (IWMA) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (CIWMB) and local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal (it should be noted that the CIWMB no longer exists, and its duties have been assumed by CalRecycle). As part of the IWMA, the CIWMB was given a purpose to mandate the reduction of disposed waste. (CalRecycle, 2018a) The IWMA also required, among other items, each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan (IWMP) and each city or county plan to include an implementation schedule which shows diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities. (CalRecycle, 2018a)

### **Waste Reuse and Recycling Act (AB 1327)**

The Waste Reuse and Recycling Act (WRRRA) required the CIWMB to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRRA requires all development projects that are commercial, industrial, institutional, 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. (CalRecycle, 2018b)

### **Mandatory Commercial Recycling Program (AB 341)**

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011 [Chesbro, AB 341]) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. CalRecycle initiated formal rulemaking with a 45-day comment period beginning Oct. 28, 2011. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB-341 was designed to help meet California's recycling goal of 75% by the year 2020. AB 341 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. In addition, multi-family apartments with five or more units are also required to form a recycling program. (CalRecycle, 2020)

### **Senate Bill 1374 (SB 1374)**

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (SB 1374) were codified in Public Resources Code Section 42919. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. The model ordinance was adopted by CalRecycle on March 16, 2004. (CA Legislative Info, n.d.)



**Assembly Bill 1826 (AB 1826)**

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines “organic waste” as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a “business” as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week also are required to arrange for organic waste recycling services. CalRecycle may reduce this triggering threshold for organics recycling to 2 cubic yards or more of commercial solid waste per week as of January 1, 2020. (CA Legislative Info, n.d.)

**Zero Waste California**

Zero Waste California is a state program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies. (CalRecycle, n.d.)

**Senate Bill 1383 (SB 1383)**

Senate Bill 1383 was adopted in September 2016, and CalRecycle began the formal regulation rulemaking on January 18, 2019. SB 1383 is intended to address short-lived climate pollutants and harmful super pollutants with significant warming impacts by reducing organic waste (food waste, green waste, paper products, etc.) and disposal by 75% by 2025. In other words, the State must reduce organic waste disposal by more than 20 million tons annually by 2025. The law also requires that 20% of currently disposed edible food be recovered for human consumption by 2025. The SB 1383 regulations also require that jurisdictions conduct education and outreach on organics recycling to all residents, businesses (including those that generate edible food that can be donated), haulers, solid waste facilities, and local food banks and other food recovery organizations.

**3. *Applicable Energy Conservation Regulations***

**California Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CA. Code Regs. 6)**

The Building Energy Efficiency Standards were first adopted in 1976 and have been updated periodically since then as directed by statute. In 1975 the Department of Housing and Community Development adopted rudimentary energy conservation standards under their State Housing Law authority that were a precursor to the first generation of the Standards. However, the Warren-Alquist Act was passed one year earlier with explicit direction to the Energy Commission (formally titled the State Energy Resources Conservation and



Development Commission) to adopt and implement the Standards. The Energy Commission’s statute created separate authority and specific direction regarding what the Standards are to address, what criteria are to be met in developing the Standards, and what implementation tools, aids, and technical assistance are to be provided. (CEC, 2018)

The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an “energy budget” in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards. (CEC, 2018)

The 2019 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the ASHRAE 90.1 2017 national standards. The 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. (CEC, 2018)

Public Resources Code Section 25402.1 also requires the Energy Commission to support the performance standards with compliance tools for builders and building designers. The Alternative Calculation Method (ACM) Approval Manual adopted by regulation as an appendix of the Standards establishes requirements for input, output, and calculational uniformity in the computer programs used to demonstrate compliance with the Standards. From this, the Energy Commission develops and makes publicly available free, public domain building modeling software in order to enable compliance based on modeling of building efficiency and performance. The ACM Approval Manual also includes provisions for private firms seeking to develop compliance software for approval by the Energy Commission, which further encourages flexibility and innovation. (CEC, 2018)

**California Solar Rights and Solar Shade Control Acts**

The Solar Rights Act sets parameters for establishing solar easements, prohibits ordinances and private covenants which restrict solar systems, and requires communities to consider passive solar and natural heating and cooling opportunities in new construction. This Act is applicable to all California cities and counties. California’s solar access laws appear in the state’s Civil, Government, Health and Safety, and Public Resources Codes. California Pub Res Code § 25980 sets forth the Solar Shade Control Act, which encourages the use of trees and other natural shading except in cases where the shading may interfere with the use of active and passive solar systems. (EPIC, 2014; EPIC, 2010)



**Alternative Fuels Plan**

On September 24, 2009, the California Air Resources Board (CARB) adopted amendments to the “Pavley” regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California’s commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB’s September amendments will cement California’s enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments will also prepare California to harmonize its rules with the federal rules for passenger vehicles. (CARB, n.d.)

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles On June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the U.S. EPA in March 2008. That decision was based on a finding that California’s request to reduce GHG emissions from passenger vehicles did not meet the Clean Air Act requirement of showing that the waiver was needed to meet “compelling and extraordinary conditions.” (CARB, n.d.)

The ARB’s Board originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. These regulations were authorized by the 2002 legislation Assembly Bill 1493 (Pavley). (CARB, n.d.)

The regulations had been threatened by automaker lawsuits and were stalled by the U.S. EPA’s delay in reviewing and then initially denying California’s waiver request. The parties involved entered a May 19, 2009 agreement to resolve these issues. With the granting of the waiver on June 30, 2009, it is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs. (CARB, n.d.)

The CARB has adopted a new approach to passenger vehicles – cars and light trucks – by combining the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. (CARB, n.d.)

**California Independent System Operator (ISO)**

The California ISO is an independent public benefit corporation responsible for operating California’s long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system. (California ISO, n.d.)



**California Public Utilities Commission (PUC)**

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC’s responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities. (CPUC, n.d.)

**California Energy Commission (CEC)**

The CEC is a planning agency which provides guidance on setting the state’s energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured. (CEC, n.d.)

**Senate Bill 1389 (SB 1389)**

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. The Volume I, which was published on August 1, 2018, highlights the implementation of California’s innovative policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources. (CA Legislative Info, n.d.)

**2022 California Green Building Standards Code (CAL Green; Part 11 of Title 24, California Code of Regulations)**

California Code of Regulations, Title 24, Part 11 is referred to as the California Green Building Standards Code (CALGreen Code). The most recent version of CALGreen became effective January 1, 2022, and is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State of California (including residential structures and elementary schools). The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation



and resource efficiency; and (5) Environmental air quality.” The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Section 5.408.3 of the CALGreen Code 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, such material may be stockpiled on-site until the storage site is developed. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code. (CEC, 2018)

### 4.20.3 BASIS FOR DETERMINING SIGNIFICANCE

#### A. Thresholds of Significance

According to Section XIX of Appendix G to the State CEQA Guidelines, the proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would (OPR, 2018a):

- *Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;*
- *Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*
- *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments;*
- *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*
- *Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

The following thresholds are derived from Riverside County’s Environmental Assessment Checklist, as modified by the 2018 updates to Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project’s impacts on utilities and service systems. The proposed Project would result in a significant impact to utilities and service systems if the Project or any Project-related component would:

- a. *Require or result in the 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 insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;*
- c. *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;*
- d. *Result in a determination by the wastewater treatment provider that serves or may service the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments;*
- e. *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;*
- f. *Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan);*
- g. *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:*
  - 1. *Electricity;*
  - 2. *Natural gas;*
  - 3. *Communications systems;*
  - 4. *Street lighting;*
  - 5. *Maintenance of public facilities, including roads; or*
  - 6. *Other governmental services.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts to utilities and service systems.

**4.20.4 IMPACT ANALYSIS**

***Threshold a.: Would the Project 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?***

**A. Water Service**

As discussed in EIR subsection 3.5.2.E, a total of four (4) points of connection are proposed to existing EMWD water mains located off-site: (1) at the intersection of Old Evans Road and Walnut Ave; (2) at the intersection of the Ramona Expressway and the proposed Street “A”; (3) within Nuevo Road, approximately 1 mile west



of the intersection of Nuevo Road and proposed Antelope Road; and (4) at the intersection of Nuevo Road and Olivas Avenue. As depicted on EIR Figure 3-8, a proposed 36-inch line would be constructed within Walnut Avenue and a portion of the Ramona Expressway between the existing point of connection at Old Evans Road and proposed Antelope Road on site. An existing water tank located near the eastern terminus of Walnut Avenue, south of Ramona Expressway, would be demolished and replaced with two 2.5-3.0 million-gallon water tanks. As also shown on Figure 3-8, the Project Applicant would construct an off-site 36-inch water main within Nuevo Road between the existing point of connection in Nuevo Road (west of the Project site) and Antelope Road, which would be extended north to the on-site portions of Antelope Road. An additional 24- to 30-inch water main would be constructed within Nuevo Road between the existing point of connection at Olivas Avenue and proposed Antelope Road, which would extend northerly to the on-site portions of Antelope Road.

Within the Project site, a series of water lines and a booster station would be constructed. Specifically, a 30- to 36-inch water main (Pressure Zone 1720) would be constructed within the on-site portions of Antelope Road, with a booster station planned near proposed Planning Area 4. A 36-inch water main (Pressure Zone 1720) would be constructed within Orange Avenue, east of Antelope Road, and would extend off-site to planned domestic water infrastructure located east of the Project site. A 12-inch water line (Pressure Zone 1720) would be constructed within Street "A" between the existing point of connection in Ramona Expressway and Orange Avenue, and would connect to the proposed 36-inch main within Orange Avenue. Under the Alternative Land Use Plan, Street "A" would not be constructed, and the 12-inch water line would be installed within an internal roadway that would provide access to Planning Areas 6 and 7. To the west of Antelope Road, a 12-inch water line (Pressure Zone 1720) is proposed within Orange Avenue and would serve the northwestern portions of the Project site. A 36-inch water main within Antelope Road (Pressure Zone 1627) would extend on site and would provide potable water services to the southern portions of the Project site.

Impacts associated with the above-described Project-related water facilities are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water improvements, with exception of impacts due to the construction of the two off-site water tanks; however, impacts associated with these off-site water tanks are addressed in EIR Subsections 4.4, *Biological Resources*, and 4.5, *Cultural Resources*, which include mitigation to reduce impacts to biological and cultural resources to less-than-significant levels. As such, with the mitigation measures specified in this EIR, Project impacts due to water improvements would be less than significant.

#### **B. Wastewater Facilities**

As discussed in EIR subsection 3.5.2.E, a series of sewer lines and sewer lift stations are proposed to divert flows toward an existing 27-inch gravity main in Pico Avenue that flows to the existing Perris Valley Regional Water Reclamation Facility (PVRWRF) to the south. A series of sewer lines, force mains, and lift stations would be constructed to convey wastewater generated on site to the existing 27-inch gravity main. Impacts associated with the proposed sewer system are inherent to the Project's construction phase, and impacts have



been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer improvements that have not already been addressed by this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to sewer improvements would be less than significant.

**C. Wastewater Treatment**

Wastewater generated by the Project would be conveyed to the Perris Valley Regional Water Reclamation Facility (PVRWRF). As previously indicated in Table 4.20-4, the PVRWRF receives typical flows of 15.5 million gpd with an overall capacity of 22 million gpd, resulting in an excess capacity of 6.5 million gpd. As shown in Table 4.20-5, *Project-Related Wastewater Generation – Primary Land Use Plan*, and Table 4.20-6, *Project-Related Wastewater Generation – Alternative Land Use Plan*, at buildout the Project is anticipated to generate between approximately 658,260 gpd and 667,050 gpd, based on the rates used in EIR No. 521, which was prepared in conjunction with the County's 2015 General Plan Update. The Project's wastewater generation would represent between approximately 10.1% and 10.3% of the PVRWRF's current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate projected excess capacity at the PVRWRF (under both the Primary and Alternative Land Use Plans), based on 15.5 million gpd of existing typical daily flows and an ultimate planned capacity of 100 million gpd (resulting in a future excess capacity of 84.5 million gpd). Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF beyond the expansions that already are planned for this facility, and impacts would therefore be less than significant.

**D. Storm Water Drainage System**

As discussed in EIR subsection 3.5.2.D, on-site flows would be conveyed to the three (3) "primary" drainage basins onsite: two (2) "primary" basins located within proposed Planning Area 3 and one (1) "primary" basin located within proposed Planning Area 4. Additionally, catch basins and/or infiltration BMPs are proposed within Orange Avenue and Antelope Road in order to reduce the mitigation required within the primary drainage basins identified above. After the flows are captured by the drainage basins, mitigated flows would then outlet towards the San Jacinto River. Impacts associated with the proposed drainage system are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed storm drainage improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to stormwater drainage improvements would be less than significant.



**Table 4.20-5 Project-Related Wastewater Generation – Primary Land Use Plan**

Land Use	Acreage	Generation Factors	Wastewater Generation (gpd)
Industrial <sup>1</sup>	438.8 acres	1,500 gpd/acre	657,450
Commercial	8.0 acres	1,200 gpd/acre	9,600
<b>Total:</b>	--	--	<b>667,050</b>

1. “Industrial” includes both proposed “Light Industrial” and “Business Park” land uses. (Riverside County, 2015, Table 4.19-BJ)

**Table 4.20-6 Project-Related Wastewater Generation – Alternative Land Use Plan**

Land Use	Acreage <sup>2</sup>	Generation Factors	Wastewater Generation (gpd)
Industrial <sup>1</sup>	432.2 acres	1,500 gpd/acre	648,300
Commercial	8.3 acres	1,200 gpd/acre	9,960
<b>Total:</b>	--	--	<b>658,260</b>

1. “Industrial” includes both proposed “Light Industrial” and “Business Park” land uses.  
 2. Acreage shown for Business Park excludes 7.1 acres within Planning Area 6 and 1.4 acres within Planning Area 7, and acreage shown for Commercial Retail excludes 0.2 acres within Planning Area 8A. These areas would be located within the alignment of the MCP, and thus would not be developed with Business Park or Commercial Retail uses. (Riverside County, 2015, Table 4.19-BJ)

***Threshold b.: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

EMWD is responsible for supplying the region with its potable and non-potable water needs. In June of 2016, the EMWD Board of Directors adopted the 2015 UWMP. This plan provided information on EMWD's projected supplies and demands in five-year increments through the year 2040, and reported EMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. Based on a previous design for the proposed Project and the 2015 UWMP, the EMWD prepared and adopted a WSA report for the Project (included as *Technical Appendix M*) demonstrating the EMWD’s ability to serve the proposed Project with potable water from existing water supplies, without needing to expand water sources or otherwise deplete any of EMWD’s existing sources of water, or any potential additional source. Since the WSA was prepared by the EMWD, the Project has been redesigned to reduce the maximum amount of Light Industrial building area from 8,461,530 square feet (s.f.) to 7,350,000 s.f., with no changes to the maximum amount of building area proposed for the Project’s Business Park or Commercial Retail land uses. Thus, the Project’s WSA provides an overestimate of the current Project’s water demands, but still shows EMWD would have sufficient water supplies to serve the Project during normal, dry, and multiple dry years through at least 2040, even when assuming a higher demand for potable water associated with the Project’s Light Industrial uses. In addition, in July 2021 the EMWD adopted its 2020 UWMP, which supersedes and replaces the 2015 UWMP. Because the Project’s WSA was prepared prior to the adoption of the 2020 UWMP, the 2020 UWMP incorporates the findings of the Project’s WSA; thus, the 2020 UWMP already accounts for the water demands associated with the previously-proposed project (i.e., assuming 8,461,530 s.f. of Light Industrial building area). Because the 2020 UWMP already accounts for the Project’s water demands (with 1,111,530 s.f. more Light Industrial



building area than is currently proposed), and because the 2020 UWMP demonstrates the EMWD’s ability to serve the Project and reasonably foreseeable development through 2045 during normal, dry, and multiple dry years without depleting existing water supplies, or needing to develop new water supplies, the 2020 UWMP already demonstrates the EMWD’s ability to provide potable water service to the Project through at least 2045. Notwithstanding, the following analysis is based on the findings of the Project’s WSA, which evaluated consistency with the EMWD’s 2015 UWMP.

**Population Projection**

In 2015, EMWD updated the population projections from its 2010 UWMP using information from EMWD’s Database of Proposed Projects and the 2015 Empire Economics Absorption Study. EMWD’s 2010 UWMP used the Riverside County Center for Demographic Research (RCCDR) 2010 Projection, which considered land use and land agency information to develop future population projections, which was adopted by the Western Riverside Council of Governments. (EMWD, 2020a, p. 4)

Consistent with the significant percentage of undeveloped land within EMWD’s service area, growth was anticipated to continue throughout the 2015 UWMP’s 25-year planning horizon, as shown in Table 4.20-7, *EMWD Service Area Projected Population – 2020-2040*. At the time the Project’s WSA was prepared, approximately 40 percent of EMWD’s service area was built out. As population and the associated water demands increase, EMWD indicated it would increase the amount of water imported via MWD. Alternatively, the WSA noted that local supply projects may eventually offset some of the imported water increases. (EMWD, 2020a, p. 4)

**Table 4.20-7 EMWD Service Area Projected Population – 2020-2040**

	2020	2025	2030	2035	2040
EMWD – Retail Service Area	617,100	699,800	784,100	864,200	939,100
City of Hemet Water Department	26,900	27,900	28,900	29,800	30,800
City of Perris / North Perris Water System	13,100	13,800	14,500	15,100	15,800
City of San Jacinto Water Department	16,100	18,500	20,800	23,100	25,500
Lake Hemet Municipal Water District	47,200	51,400	55,500	59,400	63,700
Nuevo Water Company	2,600	3,000	3,400	3,900	4,300
Other (Murrieta Division, etc.)	5,000	6,200	7,600	8,700	10,100
Rancho California Water District	128,500	146,500	160,400	174,400	185,300
<b>Total</b>	<b>856,500</b>	<b>967,100</b>	<b>1,075,200</b>	<b>1,178,600</b>	<b>1,274,600</b>

(EMWD, 2020, Table 1)



**Overview of Supplies**

EMWD has four sources of water supply: imported water purchased from MWD, local potable groundwater, local desalinated groundwater, and recycled water. On average from 2010 through 2015, EMWD’s water supply portfolio averaged approximately 57 percent imported water, 10 percent groundwater, four percent desalinated groundwater, and 29 percent recycled water. These figures included water that was indirectly served as wholesale water. Please note that the average proportion of imported water in EMWD’s water supply portfolio was affected by sizeable reductions in 2015 (relative to prior years) due to the mandatory water use restrictions enacted by the State Water Resources Control Board in response to severe Statewide drought conditions. An annual breakdown of EMWD’s supplies is shown in Table 4.20-8, *EMWD Water Supply Portfolio (AF)*, which supplements information from the 2015 UWMP. General locations of EMWD’s water supplies are shown in Figure 1 of the Project’s WSA (*Technical Appendix M*). (EMWD, 2020a, p. 5)

**Table 4.20-8 EMWD Water Supply Portfolio (AF)**

Type	Source	2015	2016	2017	2018	2019
Imported – MWD Treated	Metropolitan Water District	41,800	51,200	61,600	57,100	55,200
Imported – EMWD Treated	Metropolitan Water District	18,600	15,500	12,900	18,300	19,000
Imported – Raw <sup>(1)</sup>	Metropolitan Water District	16,200	13,300	10,900	14,900	12,400
Groundwater <sup>(2)</sup>	San Jacinto River Groundwater Basin	14,600	14,200	13,300	13,600	8,000
Desalination <sup>(3)</sup>	San Jacinto River Groundwater Basin	7,300	6,500	6,300	7,500	7,400
Recycled Water <sup>(4)</sup>	Regional Water Reclamation Facilities	45,400	45,200	44,100	45,900	42,300
<b>Total</b>		<b>143,900</b>	<b>145,900</b>	<b>149,100</b>	<b>157,300</b>	<b>144,300</b>

- (1) Total does not include water that was recharged under the Soboba Settlement Agreement.
  - (2) Groundwater totals may include raw, brackish groundwater used to augment recycled water system (served to agricultural customers). Portions of the groundwater basin from which EMWD pumps potable groundwater are adjudicated under the Hemet-San Jacinto Watermaster and subject to adjusted base production rights.
  - (3) Refers to flow effluent from EMWD’s desalination facilities (as opposed to total pumping from brackish wells, which are the influent flow).
  - (4) Recycled water total excludes discharge but includes system losses (such as storage pond evaporation and incidental recharge).
- (EMWD, 2020a, Table 2)

As future development increases the water demands within EMWD’s service area, the EMWD anticipates that the majority of the new demands will be met through additional imported water from MWD. Imported supply sources will be supplemented by local supply projects increasing the desalination of brackish groundwater and use of recycled water. EMWD also plans to continue its efforts to enhance water use efficiency within its service area. Table 4.20-9, *EMWD Projected Water Supplies – Average Year Hydrology*, shows EMWD’s projected water supplies for both retail and wholesale service throughout the planning horizon set within its 2015 UWMP under the assumption that new demands will primarily be met with increases in imported water.



These estimates do not account for all potential new local supply projects under development by EMWD or by agencies to which EMWD provides wholesale service. (EMWD, 2020a, p. 7)

**Table 4.20-9 EMWD Projected Water Supplies – Average Year Hydrology**

Type	Source	2020	2025	2030	2035	2040
Imported Water <sup>(1)</sup>	Metropolitan Water District	131,697	143,197	158,197	172,797	186,897
Groundwater <sup>(2)</sup>	San Jacinto River Groundwater Basin	12,303	12,303	12,303	12,303	12,303
Desalination	San Jacinto River Groundwater Basin	7,000	10,100	10,100	10,100	10,100
Recycled Water	Regional Water Reclamation Facilities	46,901	53,100	55,200	57,400	58,900
<b>Total</b>		<b>197,901</b>	<b>218,700</b>	<b>235,800</b>	<b>252,600</b>	<b>268,200</b>

(1) Includes 7,500 acre-feet annually to be delivered by MWD to meet the Soboba Settlement Agreement.

(2) Portions of the groundwater basin from which EMWD pumps potable groundwater are adjudicated under the Hemet-San Jacinto Watermaster and subject to adjusted base production rights.

(EMWD, 2020, Table 3)

EMWD’s water supply reliability is primarily established through MWD, of which EMWD is a member agency. In the 2015 UWMP prepared by the MWD, the reliability of water delivery through the State Water Project (SWP) and the Colorado River Aqueduct (CRA) was assessed by MWD. MWD determined that its water sources will continue to provide a reliable supply to its member agencies during normal, single-dry, and multiple-dry years during the 2015 UWMP planning horizon. Unprecedented shortages are addressed in the Water Shortage Contingency Analysis and Catastrophic Supply Interruption Planning portions of the UWMP-MWD. (EMWD, 2020a, p. 7)

As shown above in Table 4.20-9, EMWD’s projected water supplies from 2020 to 2040 would result in an increase in the amount of imported water by approximately 55,200 acre-feet per year (AFY), an increase desalination of groundwater by approximately 3,100 acre-feet, and an increase of recycled water by approximately 11,999 AFY, with no change in the amount of water that would be extracted from groundwater resources. A portion of the increased supplies would be used to serve the Project.

However, because EMWD would not require increased water supplies from groundwater sources through 2040, there would be no impacts to the environment resulting from increased groundwater extraction. Additionally, while the increase in water supply would result in more desalination of groundwater resources, EMWD currently has two Desalters (Perris and Menifee Desalters), and EMWD constructed the Perris II Desalter in 2022. In 2020, the Perris and Menifee Desalters treated a combined total of 9,050 acre-feet of brackish water, and the Perris II Desalter increased this capacity by approximately 6,000 AFY (EMWD, 2021, p. 34; EMWD, 2022). Combined, the Perris, Perris II, and Menifee Desalters have adequate capacity to treat the anticipated 10,100 AFY anticipated by 2040. Thus, the Project’s increased water demand from desalinated



water resources would not result in any significant environmental effects, as there would not be a need for expansion of EMWD's desalters.

Additionally, the anticipated increase of recycled water by approximately 11,999 AFY would occur as a result of increased wastewater flows at the EMWD RWRFs. As indicated under the discussion and analysis of the Project's impacts to sewer capacity under Threshold a., above, the Project would not result in or require an expansion to any EMWD facilities in order to treat wastewater generated by the Project; therefore, the Project's incremental increase in demand for recycled water would not result in any new or increased significant impacts to the environment.

As previously noted, EMWD's projected water supplies from 2020 to 2040 would result in an increase in the amount of imported water by approximately 55,200 AFY. A portion of these increased imported supplies would be used to serve the proposed Project. According to the Metropolitan Water District of Southern California's (MWD) 2020 UWMP, MWD currently obtains imported water supplies from the Colorado River Aqueduct (CRA) and the State Water Project (SWP). However, the MWD UWMP includes a detailed discussion of planning strategies undertaken by the MWD to reduce its reliance on imported water supplies from these sources. Please refer to Section 4 of the MWD UWMP for a detailed descriptions of programs being undertaken by MWD to reduce the its reliance on imported water supply from the Colorado River and SWP. The MWD UWMP is herein incorporated by reference pursuant to CEQA Guidelines Section 15150, and is available for public review on MWD's web site<sup>1</sup>. As shown in Table 4.20-10, *MWD Colorado River Supply Characterization (2021-2025)*, and Table 4.20-11, *MWD State Water Project (California Aqueduct) Supply Characterization (2021-2025)*, with implementation of MWD's programs, total deliveries of water from the Colorado River are expected to decrease from 1,250,000 AFY in 2021 to 1,122,000 AFY in 2025, while total deliveries from the SWP (Colorado River Aqueducts) are expected to decrease from 626,000 AFY in 2021 to 538,000 AFY in 2025. Accordingly, while the EMWD expects to increase its imported water by 55,200 AFY by 2040, the MWD is expected to reduce its imports of water from the Colorado River and via the SWP, meaning that the increase in EMWD's demand for imported water would be accommodated by water savings resulting from MWD's programs, as summarized in Table 4.20-10 and Table 4.20-11. As such, the Project's incremental demand for water, including water imported by EMWD from MWD, would not result in any new or increased impacts to the environment beyond what already occurs in association with MWD and EMWD facilities under existing conditions. Accordingly, impacts due to the Project's increased demand for water supply would be less than significant. (MWD, 2021, pp. 3-1 through 3-92)

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<sup>1</sup> MWD's 2020 UWMP is available on-line at: at <https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf>.





Table 4.20-10 MWD Colorado River Supply Characterization (2021-2025)

Hydrology	2021	2022	2023	2024	2025
<b>Current Programs</b>					
Basic Apportionment – Priority 4	550,000	550,000	550,000	550,000	550,000
DCP Contribution Reduction <sup>2</sup>	0	0	0	0	0
IID/MWD Conservation Program	105,000	105,000	105,000	105,000	105,000
Priority 5 Apportionment (Surplus)	0	0	0	0	0
PVID Land Management, Crop Rotation, and Water Supply Program	42,000	64,000	130,000	130,000	130,000
Lower Colorado Water Supply Project	9,000	9,000	9,000	9,000	9,000
Bard Seasonal Following Program	6,000	6,000	6,000	6,000	6,000
Lake Mead ICS Storage Program	400,000	400,000	400,000	100,000	100,000
Binational ICS	33,000	33,000	0	0	0
Forbearance for Present Perfected Rights	0	0	0	0	(2,000)
CVWD SWP/QSA Transfer Obligation	(50,000)	(50,000)	(50,000)	(50,000)	(50,000)
DWCV SWP Table A Obligation	(22,000)	(95,000)	(28,000)	(45,000)	(35,000)
DWCV Advance Delivery Account	22,000	95,000	28,000	45,000	35,000
SNWA Agreement Payback	0	0	0	0	0
IID Payback	(20,000)	(20,000)	(20,000)	(20,000)	(20,000)
<b>Subtotal of Current Programs</b>	<b>1,075,000</b>	<b>1,097,000</b>	<b>1,130,000</b>	<b>830,000</b>	<b>828,000</b>
<b>Additional Colorado River Exchange Supplies</b>					
Exchange with SDCWD	283,000	281,000	278,000	278,000	278,000
Exchange with United States	16,000	16,000	16,000	16,000	16,000
<b>Subtotal of Additional Colorado River Supplies</b>	<b>299,000</b>	<b>297,000</b>	<b>294,000</b>	<b>294,000</b>	<b>294,000</b>
<b>Maximum CR Supply Capability<sup>3</sup></b>	<b>1,374,000</b>	<b>1,394,000</b>	<b>1,424,000</b>	<b>1,124,000</b>	<b>1,122,000</b>
<i>Less CRA Capacity Constraint (amount above 1.25 MAF)</i>	<i>(124,000)</i>	<i>(144,000)</i>	<i>(174,000)</i>	0	0
<b>Subtotal of CR Core Supplies</b>	<b>919,000</b>	<b>866,000</b>	<b>996,000</b>	<b>979,000</b>	<b>987,000</b>
<b>Subtotal of CR Storage</b>	<b>331,000</b>	<b>384,000</b>	<b>254,000</b>	<b>145,000</b>	<b>135,000</b>
<b>Maximum Expected CRA Deliveries<sup>4</sup></b>	<b>1,250,000</b>	<b>1,250,000</b>	<b>1,250,000</b>	<b>1,124,000</b>	<b>1,122,000</b>

<sup>1</sup> Supply characterization for the Drought Risk Assessment is based on core supplies as defined in WSCP Appendix 4. Flexible and storage supplies from CR, SWP, and In-Region may be exercised as supply augmentation action to any potential core supply shortfall.

<sup>2</sup> DCP contribution beyond capacity of ICS accounts.

<sup>3</sup> Total amount of supplies available without taking into consideration CRA capacity constraint.

<sup>4</sup> The CRA delivery capacity is 1.25 MAF annually.

Note: Values based on repeat of 1988-1992 hydrologies.  
(MWD, 2021, Table A.3-8)



**Table 4.20-11 MWD State Water Project (California Aqueduct) Supply Characterization (2021-2025)**

Hydrology	2021	2022	2023	2024	2025
<b>Current Programs</b>					
MWD Table A <sup>2</sup>	221,000	940,000	274,000	442,000	345,000
DWCV Table A	22,000	95,000	28,000	45,000	35,000
Article 21 Supplies	0	0	0	0	0
San Gabriel Valley MWD Exchange and Purchase	2,000	2,000	2,000	2,000	2,000
<b>Subtotal of SWP Core Supplies</b>	<b>245,000</b>	<b>1,037,000</b>	<b>304,000</b>	<b>489,000</b>	<b>382,000</b>
San Luis Carryover <sup>3</sup>	200,000	0	69,000	0	0
Yuba River Accord Purchase	14,000	11,000	14,000	11,000	14,000
Central Valley Storage and Transfers					
Semitropic Program	40,000	0	40,000	44,000	41,000
Arvin Edison Program <sup>4</sup>	0	0	0	0	0
Mojave Storage Program	0	0	0	0	0
Antelope Valley/East Kern Acquisition and Storage	27,000	0	27,000	0	11,000
Kern Delta Program	50,000	0	50,000	50,000	40,000
Transfers and Exchanges	50,000	50,000	50,000	50,000	50,000
<b>Subtotal of SWP Flexible and Storage Programs</b>	<b>381,000</b>	<b>61,000</b>	<b>250,000</b>	<b>155,000</b>	<b>156,000</b>
<b>Programs Under Development</b>					
San Bernardino Valley Water District Program	0	0	0	0	0
<b>Subtotal of Proposed Programs</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Maximum Supply Capability</b>	<b>626,000</b>	<b>1,098,000</b>	<b>554,000</b>	<b>644,000</b>	<b>538,000</b>

<sup>1</sup> Supply characterization for the Drought Risk Assessment is based on core supplies as defined in WSCP Appendix 4. Flexible and storage supplies from CR, SWP, and In-Region may be exercised as supply augmentation action to any potential core supply shortfall.

<sup>2</sup> Includes Port Hueneme lease.

<sup>3</sup> Includes DWCV carryover.

<sup>4</sup> Take and put amounts limited due to water quality considerations.

Note: Values based on repeat of 1988-1992 hydrologies.

(MWD, 2021, Table A.3-8)

### EMWD Projected Demands

EMWD’s primary retail customers for potable/raw water can be divided into residential, commercial, industrial, institutional, and landscape sectors. The residential sector is EMWD’s largest customer segment; however, each sector plays a role in the growth and development of EMWD’s service area. The historic and projected customer distribution and water use by the various potable/raw retail customer types as reported by the Project’s WSA are shown in Table 4.20-12, *Retail Potable/Raw Water Deliveries by Customer Type (2005 - 2040)*. (EMWD, 2020, p. 16)

EMWD also provides wholesale water service to a number of sub-agencies, serves recycled water, and imports water for recharge purposes. These demands, along with system losses, are shown in Table 6 and Table 7 of the Project’s WSA (*Technical Appendix M*). Total demands are shown in Table 4.20-13, *Summary of System Water Demands (2005 - 2040)*. (EMWD, 2020, p. 17)

### Project Water Demands

According to the Project’s WSA (*Technical Appendix M*), the Project would result in an annual demand for approximately 1,101 acre-feet per year (AF/yr), as summarized in Table 4.20-14, *Project Water Demand Estimate*. As previously noted, the Project’s WSA assumed the Project site would be developed with 1,111,530 s.f. more Light Industrial building area than is currently proposed; thus, the Project water demand projections identified by the Project’s WSA overstate the Project’s actual future demand for potable water. The demand



evaluated in the 2015 UWMP for the Project site is shown in Table 4.20-15, *Water Demand Estimates Accounted for the Project Site by the 2015 UWMP*. As shown, the 2015 UWMP anticipated that the Project site would be developed with a mixture of Medium Density, Medium High Density, and Very High Density Residential, Public Facilities, Commercial Retail, and Open Space Conservation and Recreation land uses, with a future estimated water demand of approximately 1,059 AF/yr. Thus, the proposed Project’s water demand would exceed the 2015 UWMP forecasts for the site by approximately 42 AF/yr, when assuming 1,111,530 s.f. more Light Industrial building area than is currently proposed. Additionally, and as previously noted, EMWD’s 2020 UWMP accounts for the Project’s water demand (with the additional Light Industrial building area), and thus the Project’s water demand would not exceed the demand projections identified by the 2020 UWMP. (EMWD, 2020, p. 20)

**Table 4.20-12 Retail Potable/Raw Water Deliveries by Customer Type (2005 - 2040)**

Use Type <sup>(1)</sup>	Actual Deliveries - AF			Projected Deliveries – AF <sup>(2)</sup>				
	2005	2010	2015	2020	2025	2030	2035	2040
Single Family	62,300	54,000	45,700	64,800	72,900	81,100	89,000	96,800
Multi-Family	5,500	6,100	5,800	8,300	9,300	10,300	11,400	12,300
Commercial	3,900	4,200	4,600	6,500	7,300	8,100	8,900	9,700
Industrial	400	400	300	400	400	500	500	600
Institutional	2,900	2,300	2,000	3,000	3,300	3,700	4,100	4,400
Landscape <sup>(3)</sup>	7,500	8,900	7,700	7,500	7,500	7,500	7,500	7,300
Agriculture (Potable)	2,400	1,800	1,900	1,900	1,900	1,900	1,900	1,900
Agriculture (Raw)	100	500	900	1,000	1,000	1,000	1,000	1,000
<b>Total</b>	<b>85,000</b>	<b>78,200</b>	<b>68,900</b>	<b>93,400</b>	<b>103,600</b>	<b>114,100</b>	<b>124,300</b>	<b>134,000</b>

(1) Figures do not include system losses.

(2) Passive water savings due to restrictions outlined in the Administrative Code are included in the demand projections.

(3) Landscape demands remain constant or decrease over time as landscape accounts are offset by conversion to the recycled water system.

(4) Demand growth in the District’s service area has been below the projections completed for the 2015 UWMP. Retail potable/raw water deliveries in 2019 totaled approximately 71,140 AF.

(EMWD, 2020, Table 5)



**Table 4.20-13 Summary of System Water Demands (2005 - 2040)**

Category	Actual Demands - AF			Projected Demands - AF				
	2005	2010	2015	2020	2025	2030	2035	2040
Retail Demands	85,000	78,200	68,900	93,400	103,600	114,100	124,300	134,000
Wholesale Demands	29,300	27,100	21,700	50,500	54,100	57,700	61,200	64,800
Other Water Uses <sup>(1)</sup>	47,300	36,600	55,200	54,000	61,000	64,000	67,100	69,400
<b>Total</b>	<b>161,600</b>	<b>141,900</b>	<b>145,800</b>	<b>197,900</b>	<b>218,700</b>	<b>235,800</b>	<b>252,600</b>	<b>268,200</b>

(1) Includes retail and wholesale recycled water demands.  
(EMWD, 2020, Table 8)

**Table 4.20-14 Project Water Demand Estimate**

Category	Average Day Demand (gpd)	Annual Demand (MG)	Annual Demand (AF)
Business Park/Light Industrial	964,260	352.2	1,080.8
Commercial Retail	17,820	6.5	20.0
Open Space Conservation	-	-	-
Circulation (Roads)	-	-	-
<b>Total</b>	<b>982,080</b>	<b>359</b>	<b>1,101</b>

Note: The WSA's calculation of the Project's water demand overstates the Project's actual demand, as the Project has been redesigned and now includes 1,111,530 s.f. less Light Industrial building area than was evaluated by the WSA.  
(EMWD, 2020a, Table 9)

**Table 4.20-15 Water Demand Estimates Accounted for the Project Site by the 2015 UWMP**

Category	Average Day Demand (gpd)	Annual Demand (MG)	Annual Demand (AF)
Medium Density Residential	272,424	99.5	305.4
Medium High Density Residential	364,915	133.3	409.0
Very High Density Residential	23,926	8.7	26.8
Public Facilities	118,351	43.2	132.7
Commercial Retail	86,277	31.5	96.7
Open Space Recreation	79,137	28.9	88.7
Open Space Conservation	-	-	-
<b>Total</b>	<b>945,031</b>	<b>345</b>	<b>1,059</b>

(EMWD, 2020a, Table 10)



Although the Project's water demand (with the additional 1,111,530 s.f. of Light Industrial building area) would exceed the 2015 UWMP growth forecasts, the rate of demand growth in EMWD's service area occurred at a lower rate than the projections used in the 2015 UWMP, which forecast retail potable/raw water demands to reach 93,400 AF (without system losses) by calendar year 2020. Retail potable/raw water deliveries (including temporary construction meters but excluding system losses) in 2019 totaled approximately 71,140 AF, well below the demands projected for 2020. Since growth demands have not kept up with the 2015 UWMP projected deliveries, EMWD has determined that it would be able to meet the additional 42 AF demand presented by the Project. In addition, the Project's water demand is expressly and fully accounted for in the 2020 UWMP. (EMWD, 2020a, p. 20)

### ***Evaluation of Supply and Demand***

EMWD's 2015 UWMP included estimates of EMWD's demand during average, single and multiple dry years. The estimates for EMWD's retail system are documented in Table 11, Table 12, and Table 13 of the Project's WSA (*Technical Appendix M*), and are taken directly from the 2015 UWMP document. Similar estimates for EMWD's wholesale system are shown in Table 14, Table 15, and Table 16 of the WSA. More details on this analysis can be found in Section 7.6 (Supply and Demand Assessment) of the 2015 UWMP. An updated analysis presented in Section 7 of EMWD's 2020 UWMP. (EMWD, 2020, p. 21)

EMWD's 2015 UWMP discussed the supply reliability for EMWD during dry years. It was anticipated that the majority of water for future development will be supplied by imported water from MWD during single dry years. Typically, MWD does not place imported water limits on a member agency but predicts the future water demand based on regional growth information. The 2015 UWMP prepared by MWD showed that MWD would have the ability to meet all of its member agencies' project supplemental demand through 2040, even under a repeat of historic drought scenarios. These findings are confirmed by MWD's 2020 UWMP. Moreover, and as discussed above, while the EMWD currently expects to increase its imported water by 55,200 AFY by 2040, the MWD is expected to reduce its imports of water from the Colorado River and via the SWP, meaning that the increase in EMWD's demand for imported water would be accommodated by water savings resulting from MWD's programs, as previously summarized in Table 4.20-10 and Table 4.20-11. As such, the Project's incremental demand for water, including water imported by EMWD from MWD, would not result in any new or increased impacts to the environment beyond what already occurs in association with MWD and EMWD facilities under existing conditions. Accordingly, impacts due to the Project's increased demand for water supply would be less than significant. (EMWD, 2020, p. 23; MWD, 2021, Section 3)

Furthermore, EMWD maintains a Water Shortage Contingency Plan (WSCP) that aims to reduce demand during water shortage using significant penalties for wasteful water use. EMWD's WSCP details demand reductions for several stages of shortage through a 50 percent or greater reduction. Additional information about contingency planning is included in Chapter 8 of EMWD's 2015 UWMP, with no updated information provided in the 2020 UWMP. The WSCP was last updated on January 20, 2016, and is located in Title 5, Article 10 of the EMWD Administrative Code, which is available on EMWD's website ([www.emwd.org](http://www.emwd.org)). (EMWD, 2020, p. 23)



As of May 2023, EMWD was in Stage 1 of the WSCP in response to improved Statewide water supply conditions and the declared end of the drought emergency. (EMWD, 2020, p. 23)

### ***Water Supply Assessment***

#### **Potable Water**

From a facilities perspective, the Project would be conditioned to construct off-site and on-site water facilities needed to distribute water throughout the Project area. Prior to construction and as part of future implementing developments, the developer(s) would be required to contact EMWD staff to establish development design conditions and determine if any revisions are required to the preliminary master plan. Figure 3 of the Project's WSA (*Technical Appendix M*) shows existing water facilities in relation to the Project. (EMWD, 2020, p. 23)

The Project demand would be served using imported water from MWD, supplemented with new local supply projects during multiple-dry years, if needed. Allocation from MWD may result in water supplies being made available at a significantly higher cost depending on circumstances. (EMWD, 2020, p. 23)

#### **Recycled Water**

EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreation areas, greenbelts, open space common areas, commercial landscaping, and supply for aesthetic impoundment or other water features. According to EMWD's policies, the Project may be conditioned to construct a recycled water system separately from the potable water system. The system would need to be constructed to recycled water standards. The Project also may be conditioned to construct off-site recycled water facilities. EMWD would make a final determination on requirements for recycled water use and facilities during the development design conditions phase of the Project (i.e., as part of future implementing tentative tract maps, plot plans, etc.). However, as it is not currently known whether such facilities would be required or what such facilities would consist of, it is not possible to assess environmental effects that may be associated with such improvements (State CEQA Guidelines § 15145). Such improvements may be subject to additional evaluation per CEQA as appropriate with future discretionary review for future implementing developments. (EMWD, 2020a, p. 24)

### ***Conclusion***

EMWD relies on MWD and local resources to meet the needs of its growing population. MWD stated in its 2015 UWMP that with the addition of all water supplies, existing and planned, MWD has the ability to meet all of its member agencies' projected supplemental demand through 2040, even under a repeat of historic multiple-year drought scenarios. (EMWD, 2020, p. 24)

In the event that the lead agency determines adequate water supply exists for the proposed Project, the developer of the proposed Project is required to meet with EMWD Development Services Staff to establish development design conditions. Based on the results of the Project's WSA (*Technical Appendix M*), the EMWD has determined that it has adequate water supplies to serve the proposed Project. The development design conditions would detail water, wastewater, and recycled water requirements to serve the Project. An agreement developed prior to construction would determine whether additional funding is required to reduce



existing customer demand on imported supplies through the expansion of local resources. The reduction of existing customer demand on imported water supplies would free up allocated imported water to be used to serve this Project under multiple dry year conditions. The amount of funding would be determined by EMWD (if required) and may take the form of a new component of connection fees or a separate charge. (EMWD, 2020, pp. 24-25)

Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands. (EMWD, 2020, p. 24) Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project's effect on EMWD's regional water network would be less than significant.

Additionally, the Project's incremental increase in demand for water resources would not result in significant environmental effects. Specifically, because EMWD would not require increased water supplies from groundwater sources through 2040, there would be no impacts to the environment resulting from increased groundwater extraction. Additionally, while the increase in water supply would result in more desalination of groundwater resources, EMWD currently has two Desalters (Perris and Menifee Desalters), and EMWD constructed the Perris II Desalter in 2022. In 2020, the Perris and Menifee Desalters treated a combined total of 9,050 acre-feet of brackish water, and the Perris II Desalter increased this capacity by approximately 6,000 AFY. Combined, the Perris, Perris II, and Menifee Desalters have adequate capacity to treat the 10,100 AFY of wastewater anticipated by 2040. Thus, the Project's increased water demand from desalinated water resources would not result in any significant environmental effects, as there would not be a need for expansion of EMWD's desalters. Additionally, the anticipated increase of recycled water by approximately 11,999 AFY would occur as a result of increased wastewater flows at the EMWD RWRFs. As indicated under the discussion and analysis of the Project's impacts to sewer capacity under Threshold a., above, the Project would not result in or require an expansion to any EMWD facilities in order to treat wastewater generated by the Project; therefore, the Project's incremental increase in demand for recycled water would not result in any new or increased significant impacts to the environment. Furthermore, while the EMWD expects to increase its imported water by 55,200 AFY by 2040, the MWD is expected to reduce its imports of water from the Colorado River and via the SWP, meaning that the increase in EMWD's demand for imported water would be accommodated by water savings resulting from MWD's programs, as summarized in Table 4.20-10 and Table 4.20-11. As such, the Project's incremental demand for water, including water imported by EMWD from MWD, would not result in any new or increased impacts to the environment beyond what already occurs in association with MWD and EMWD facilities under existing conditions. Accordingly, impacts to the environment due to the Project's increased demand for water supply would be less than significant.



***Threshold c.: Would the Project 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?***

No septic systems are proposed as part of the Project. As discussed under the analysis of Threshold a., the Project would be provided sanitary sewer service by the EMWD, and no septic tanks are proposed as part of the Project. A description of proposed sewer improvements is provided in EIR subsection 3.5.2.E and are depicted on EIR Figure 3-9. As discussed therein, a series of sewer lines, lift stations, and force mains are proposed to convey sewer flows generated on site to an existing 27-inch gravity main in Pico Avenue that flows to the existing Perris Valley Regional Water Reclamation Facility (PVRWRF) to the south. Impacts associated with the Project’s proposed sewer improvements are inherent to the Project’s construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project’s impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project’s proposed sewer improvements that have not already been addressed in pertinent sections of this EIR. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant.

***Threshold d.: Would the Project 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?***

As discussed under the analysis of Threshold a., wastewater generated by the Project would be conveyed to the PVRWRF. As previously indicated in Table 4.20-4, the PVRWRF receives typical flows of 13.8 million gpd with an overall capacity of 22 million gpd, resulting in an excess capacity of 8.2 million gpd. As previously shown in Table 4.20-5 and Table 4.20-6, at buildout the Project is anticipated to generate between approximately 658,260 gpd and 667,050 gpd, based on the rates used in EIR No. 521, which was prepared in conjunction with the County’s 2015 General Plan Update. The Project’s wastewater generation would represent between approximately 10.1% and 10.3% of the PVRWRF’s current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the PVRWRF of 100 million gpd (under both the Primary and Alternative Land Use Plans). Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF beyond the expansions that already are planned for this facility, and impacts would therefore be less than significant.

***Threshold e.: Would the Project 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?***

As previously indicated, solid waste generated within the Project area is collected by WMIE, with the bulk of recyclable waste and green waste delivered to the MVTS for processing prior to being sent to one of the three regional landfills. The MVTS has a permitted capacity of 2,500 tpd. The El Sobrante Landfill is currently





permitted to receive 16,054 tpd, while the average daily tonnage in 2022 was 10,646 tpd. The Lamb Canyon Landfill is permitted to receive 5,000 tpd, while data from 2022 shows that the Lamb Canyon Landfill received a daily average of approximately 1,969 tpd. The Badlands Landfill is permitted to receive 4,500 tpd, while in 2022 the Badlands Landfill received an average of 2,660 tpd. (RCDWR, 2023)

As shown in Table 4.20-16, *Project Solid Waste Generation – Primary Land Use Plan*, and Table 4.20-17, *Project Solid Waste Generation – Alternative Land Use Plan*, buildout and occupancy of the Project is estimated to produce between 246.0 and 249.9 tons per day (tpd) of solid waste, or between 89,798.3 tons per year (tpy) and 91,222.2 tpy. Per the Riverside Countywide Integrated Waste Management Plan (CIWMP), which applies to the Project, up to 50 percent of its solid waste would need to be diverted from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes.

**Table 4.20-16 Project Solid Waste Generation – Primary Land Use Plan**

Land Use	Square Footage (s.f.)	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day (tpd)
Industrial <sup>1</sup>	8,419,398	10.8 tons/1,000 s.f.	90,929.5	249.1
Commercial	121,968	2.4 tons/1,000 s.f.	292.7	0.8
<b>Totals:</b>	<b>8,541,366 s.f.</b>	--	<b>91,222.2 tpy</b>	<b>249.9 tpd</b>

1. “Industrial” includes both Light Industrial and Business Park land uses.

Notes: s.f. = square feet; tpy = tons per year; tpd = tons per day.  
(Riverside County, 2015, Table 4.17-N)

**Table 4.20-17 Project Solid Waste Generation – Alternative Land Use Plan**

Land Use	Square Footage	Generation Factors	Total Solid Waste Generated (tpy)	Average Solid Waste per Day
Industrial <sup>1</sup>	8,286,540	10.8 tons/1,000 s.f.	89,494.6	245.2
Commercial	126,542	2.4 tons/1,000 s.f.	303.7	0.8
<b>Totals:</b>	<b>8,413,082</b>	--	<b>89,798.3 tpy</b>	<b>246.0 tpd</b>

1. “Industrial” includes both Light Industrial and Business Park land uses.

Notes: s.f. = square feet; tpy = tons per year; tpd = tons per day.  
(Riverside County, 2015, Table 4.17-N)

Solid waste generated by the Project would be transported to a local solid waste transfer facility, the Moreno Valley Transfer Station (MVTS). At full buildout, waste generated by the Project would represent between 9.8 and 10.0 percent of the permitted daily capacity at the MVTS (2,500 tpd). Given the estimated volume of solid waste generated by the Project on a daily basis during the buildout condition, it is anticipated that the MVTS would have sufficient capacity to accept solid waste to be disposed by the Project. As noted above, the CIWMP would require that up to 50 percent of the solid waste be diverted from area landfills, which would further ensure the Project’s solid waste generation does not exceed available landfill capacity. (CalRecycle, 2019d)



Waste from the MVTs would be ultimately disposed at either the El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill. As previously indicated, and based on average daily disposal data from 2022, the El Sobrante Landfill has an excess daily capacity of approximately 5,408 tpd, the Lamb Canyon Landfill has an excess daily capacity of approximately 3,031 tpd, and the Badlands Landfill has an excess capacity of 1,840 tpd (RCDWR, 2023). Thus, the Project’s generation of solid waste under the Primary Land Use Plan would represent approximately 4.6% of the excess capacity at the El Sobrante Landfill, 8.2% of the excess capacity at the Lamb Canyon Landfill, and 13.6% of the excess capacity at the Badlands Landfill. The Project’s generation of solid waste under the Alternative Land Use Plan would represent approximately 4.5% of the excess capacity at the El Sobrante Landfill, 8.1% of the excess capacity at the Lamb Canyon Landfill, and 13.4% of the excess capacity at the Badlands Landfill. Because the Project’s generation of solid waste would not exceed the excess daily capacity at the MVTs, El Sobrante Landfill, Lamb Canyon Landfill, or Badlands Landfill, it is anticipated that these regional landfill facilities would have sufficient daily capacity to accept solid waste generated by the Project. (CalRecycle, 2019d)

**Summary of Project Solid Waste Impacts**

As indicated above, regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project’s construction and operational phases. Accordingly, impacts would be less than significant.

***Threshold f.: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?***

The proposed Project would be regulated by the Riverside Countywide Integrated Waste Management Plan (RCWRMD, 1996). The CIWMP outlines goals, policies, and programs Riverside County and its cities would implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. Additionally, AB 341 made a legislative declaration that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, although the California Department of Resources Recycling and Recovery may not establish or enforce a diversion rate greater than the 50 percent diversion rate as set forth by the CIWMP (per Public Resources Code § 41780.01[b]).

The proposed Project would be regulated by the RCDWR and would be required to comply with the CIWMP’s requirement to divert up to 50 percent of its solid waste from area landfills. In conformance with the CIWMP, the Project Applicant is required to work with future contract refuse haulers to implement recycling and waste reduction programs for solid wastes. Implementation of a waste disposal strategy for the proposed Project would assist Riverside County in achieving the mandated goals of the Integrated Waste Management Act by developing feasible waste programs that encourage source reduction, recycling, and composting. The RCDWR is specifically charged with the responsibility of implementing programs that ensure that unincorporated Riverside County achieves 50% diversion of solid waste from landfill disposal as well as monitoring and reporting unincorporated Riverside County’s compliance with CIWMB and AB 939. With mandatory compliance to AB 939, AB 341, and RCDWR’s programs and policies, the Project would result in



a less-than-significant impact due to a conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP.

***Threshold g.:*** *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:*

- 1. Electricity;*
- 2. Natural Gas;*
- 3. Communications systems;*
- 4. Street lighting;*
- 5. Maintenance of public facilities, including roads; or*
- 6. Other governmental services?*

Electric service is currently available to the proposed Project site through Southern California Edison, although existing facilities would need to be expanded as necessary to provide service to the Project. However, the Project area already is served by existing electrical lines; therefore, the construction of electricity facilities as necessary to serve the proposed Project would occur within the areas already planned for impact by the Project or within existing improved roadways. Therefore, the construction of electrical facilities necessary to serve the proposed Project would not result in any significant impacts to the environment that are not already addressed by this EIR. No additional mitigation would be required.

There are no anticipated capacity restrictions which could limit the ability of the SoCal Gas Company to provide service to the proposed Project. Points of connection to SoCal Gas Company main lines would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that construction of any off-site natural gas utility connections would occur within existing disturbed public rights-of-way. As such, the construction of these utility connections is evaluated under the appropriate subject headings within this EIR, and no new impacts would occur specifically related to natural gas service that have not already been addressed.

Due to long-range planning efforts by the energy purveyors, Project implementation is not anticipated to result in the need for the construction or expansion of off-site gas generation facilities, although some new distribution lines would be necessary (as discussed above). Any future need for regional energy facilities related to cumulative growth in the service areas of SoCal Gas would be determined by the service agencies as part of their long-range growth projections. Accordingly, provision of gas service to the proposed Project site would not result in any significant environmental impacts not already addressed under relevant sections of this EIR.

Points of connection to telecommunication facilities would be resolved as the proposed Project and other projects planned for the area commence their utility design and interconnection plans. It is anticipated that any off-site construction of communication utility connections would occur within existing disturbed public



rights-of-way. As such, the construction of communication utility connections is evaluated under the appropriate subject headings within this EIR. No environmental impacts would occur from the provision of these utilities, as all lines would be installed within the disturbance areas of existing roadway rights-of-way and/or on site within areas already planned for physical impacts as part of the Project.

The Project would require a number of detention/water quality basins throughout the site, including the three primary drainage basins as well as potential smaller detention/water quality features within individual planning areas on site. However, the detention/water quality basins would be located in on-site areas that are planned for development, impacts to which have been evaluated throughout this EIR, and mitigation is identified where necessary to reduce impacts to a level below significance. Therefore, the construction of storm water drainage facilities needed to serve the Project would not result in any impacts to the environment beyond what is evaluated, disclosed, and mitigated by other sections of this EIR. Additional mitigation would not be required.

The Project would provide street lighting as required by the County in accordance with Ordinance No. 461 (Roadway Standards) and Ordinance No. 460 (Subdivision of the Land). All physical environmental impacts associated with street lighting and maintenance would occur within the boundaries of the on- and off-site improvement areas, the impacts of which are described throughout this EIR. Therefore, no additional impacts to the environment would occur that are not already addressed by this EIR, and additional mitigation would not be required.

Implementation of the proposed Project would result in the establishment of new public roadways within the Project site that would require maintenance by the County. Maintenance of the public roadways within the proposed Project would not result in any significant impacts to the environment. Impacts associated with the physical construction of these roadways already are evaluated in appropriate sections of this EIR, and any identified impacts have been mitigated to the maximum feasible extent. Maintenance of the major roadway facilities within the Project site would be funded through the Project developer's payment of Development Impact Fees (DIF) and future building owners' payment of property taxes. Therefore, the maintenance of roadways proposed by the Project would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this EIR, and a less-than-significant impact would occur.

No known other facilities would require off-site construction or maintenance as a result of the proposed Project.

Based on the foregoing analysis, impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

#### **4.20.5 CUMULATIVE IMPACT ANALYSIS**

The cumulative study area used for the analysis of water and wastewater includes areas within EMWD's service area for water and wastewater services, and is based on the buildout of the County General Plan and the general plans of cities within EMWD's service area. The cumulative study area for solid waste comprises western Riverside County, as all areas of western Riverside County are served by WMIE, and is based on the buildout of the County General Plan and the general plans of cities within western Riverside County. For the



remaining issue areas, the cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site.

As discussed under the analysis of Threshold a., the Project would require a number of improvements related to water, wastewater treatment, and storm drainage systems, although such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed water, wastewater, or storm drainage systems that could result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded water, wastewater treatment, and stormwater drainage systems would be less-than-cumulatively considerable.

The analysis of Threshold b., which is based on the Project-specific WSA (*Technical Appendix M*), demonstrates that the EMWD would have sufficient water supplies available to serve the Project as well as other reasonably foreseeable future development during normal, dry, and multiple dry years. Because the WSA evaluates the water demands of both the Project and other cumulative developments within EMWD's service area, the WSA demonstrates that cumulatively-considerable impacts to water supply would be less than significant. Furthermore, EMWD's 2020 UWMP accounts for the Project's water demands, and demonstrates that even with cumulative development the EMWD would have adequate water supplies to serve the Project and cumulative developments through 2045 during normal, dry, and multiple dry years. Other future projects within the service area of the EMWD would be required to evaluate effects on availability of water supplies and, if applicable to the type of development, prepare a WSA to ensure that significant cumulative effects are minimized or avoided. In addition, the Project and other cumulative developments within EMWD's service area would result in an increase in demand for potable water, which has the potential to cumulatively-contribute to the need for expansion of EMWD and/or MWD facilities. However, the EMWD has adequate capacity for desalination and wastewater treatment requiring no expansion of any existing facilities, the EMWD has adequate capacity to treat wastewater generated by the Project and other cumulative developments, and the MWD is implementing programs to reduce its import of water from the Colorado River and via the SWP. As such, the cumulative increase in demand for potable water sources also would not result in significant physical environmental effects.

As discussed under the analysis of Thresholds c. and d., the Project would require a number of improvements to provide sewer service to the Project site, although impacts associated with such improvements are inherent to the Project's construction phase. Cumulatively-considerable impacts associated with Project construction activities have been evaluated throughout this EIR, and where necessary mitigation measures have been identified to reduce the Project's cumulatively-considerable effects to the maximum feasible extent. There are no components of the Project's proposed wastewater improvements that would result in impacts not already evaluated by other sections of this EIR. Accordingly, impacts associated with the construction of new or expanded wastewater treatment conveyance facilities would be less-than-cumulatively considerable.



The Project's wastewater generation would represent between approximately 10.1% and 10.3% of the PVRWRF's current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the PVRWRF of 100 million gpd (under both the Primary and Alternative Land Use Plans). Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF. Although the Project and other cumulative developments ultimately would contribute to the need for expanded capacity at the PVRWRF, the EMWD already has plans to expand the PVRWRF to provide a total treatment capacity of 100 million gpd. Impacts associated with such expansion would be subject to CEQA once plans for such expansion have been prepared by the EMWD. As no such plans are currently available, it would be speculative to evaluate potential cumulatively-considerable impacts associated with the proposed expansion (State CEQA Guidelines § 15145). Accordingly, Project impacts due to wastewater capacity would be less-than-cumulatively considerable.

As previously discussed in the analysis provided under Threshold e., solid waste generated by construction and operation of the Project would represent nominal proportions of the daily disposal capacity at the potential transfer station (MVTs) and landfills (El Sobrante Landfill, Lamb Canyon Landfill, and/or Badlands Landfill). The transfer station and landfills are currently projected to remain open until as far into the future as 2057 (Baslands Landfill) and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. The Project would not directly result in the need for expanded solid waste disposal facilities, as the MVTs, El Sobrante Landfill, Lamb Canyon Landfill, and Badlands Landfill have sufficient existing capacity to handle solid waste generated by the Project. Rather, the Project's incremental contribution to solid waste generation may contribute to an ultimate need for expanding the solid waste disposal facilities that would serve the Project and/or the construction of additional solid waste disposal facilities. Moreover, it is possible that as other developments in the region are proposed, the RCDWR and WMIE may opt to construct new solid waste disposal facilities to serve those developments, and such facilities may or may not receive solid waste generated by the Project. Although the Project has the potential to cumulatively contribute to the demand for new/expanded solid waste disposal facilities, the construction of which could significantly impact the environment, it is too speculative for evaluation in the absence of a proposed expansion or development plan (State CEQA Guidelines § 15145). Therefore, the Project's cumulatively-considerable impacts to solid waste disposal facilities are evaluated as less than significant.

The Project would adhere to regulations set forth by local and state regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative developments would also be required to comply with such regulations. As such, the Project as well as other cumulative developments in the area would not result in cumulative impacts with respect to compliance with federal, State, and local statutes and regulations related to solid wastes. Impacts would be less-than-cumulatively considerable.

Cumulative impacts associated with the provision of facilities for electricity, natural gas, communications systems, storm water drainage, street lighting, maintenance of facilities, construction of off-site sewer and water lines, and other governmental services are evaluated throughout the appropriate issue areas in this EIR. In all cases, where cumulatively-considerable impacts associated with any Project component are identified, mitigation measures have been imposed to reduce such impacts to the maximum feasible extent. Accordingly,



cumulatively-considerable impacts associated with the provision of utility facilities to serve the proposed Project would be less than significant.

#### 4.20.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. Although the Project would require construction of new or expanded water, wastewater conveyance, and storm water drainage systems, impacts associated with the construction of such facilities have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed water, sewer, and drainage improvements that have not already been addressed. As such, with the mitigation measures specified in this EIR, Project impacts due to water, sewer, and drainage improvements would be less than significant. Additionally, the Project's wastewater generation would represent approximately between approximately 10.1% and 10.3% of the PVRWRF's current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the PVRWRF of 100 million gpd. Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF, and impacts would therefore be less than significant.

Threshold b.: Less-than-Significant Impact. Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for the proposed Project as part of its existing and future demands (EMWD, 2020a). Accordingly, sufficient water supplies are available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project's effect on EMWD's regional water network would be less than significant. In addition, the Project would result in an increase in demand for potable water, which has the potential to contribute to the need for expansion of EMWD and/or MWD facilities. However, the EMWD has adequate capacity for desalination and wastewater treatment requiring no expansion of any existing facilities; the EMWD has adequate capacity to treat wastewater generated by the Project and other cumulative developments; and the MWD is implementing programs to reduce its import of water from the Colorado River and via the SWP. As such, the Project's demand for potable water sources also would not result in significant physical environmental effects.

Thresholds c. and d.: Less-than-Significant Impact. Impacts associated with proposed wastewater conveyance facilities are inherent to the Project's construction phase, and impacts have been evaluated throughout this EIR under the appropriate subject headings (e.g., air quality, biological resources, etc.). Where significant direct or cumulative impacts are identified, mitigation measures have been imposed to reduce the Project's impacts to the maximum feasible extent. There are no environmental impacts that would occur specifically related to the Project's proposed sewer/wastewater improvements. As such, with the mitigation measures specified in this EIR, Project impacts due to proposed sewer improvements would be less than significant. Additionally, the Project's wastewater generation would represent between approximately 10.1% and 10.3% of the PVRWRF's current excess capacity (under the Alternative Land Use Plan and Primary Land Use Plan, respectively), and would represent approximately 0.8% of the ultimate planned capacity at the PVRWRF of



100 million gpd (for both land use plans). Accordingly, the Project would not result in or require the expansion of the existing facilities at the PVRWRF, and impacts would therefore be less than significant.

Threshold e.: Less-than-Significant Impact. Regional solid waste facilities would have adequate capacity to handle solid waste generated by the Project's construction and operational phases. The Project would not 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. Accordingly, impacts would be less than significant.

Threshold f.: Less-than-Significant Impact. With mandatory compliance to AB 939, AB 341, and RCDWR's programs and policies, the Project would not result in a significant impact due to noncompliance with regulations related to solid waste. A less-than-significant impact would occur.

Threshold g.: Less-than-Significant Impact. Impacts associated with the construction or expansion of utility facilities would be less than significant or otherwise mitigated to the maximum feasible extent by this EIR. No additional mitigation would be required.

#### **4.20.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- The Project is required to comply with the provisions of the California Solid Waste Integrated Waste Management Act, (AB 939, 1989) which mandates a reduction of disposed waste throughout California.
- The Project is required to comply with the provisions of the California Solid Waste Reuse and Recycling Act (AB 1327) which developed a model ordinance for adoption of recyclable materials in development projects. This Act requires all development projects that are commercial, industrial, institutional, 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.
- The Project is required to comply with the provisions of the Mandatory Commercial Recycling Program (AB 341): AB 341 made a legislative declaration that it is the policy goal of the state that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and required the Department of Resources Recycling and Recovery, by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.





- The Project would be subject to the following applicable standard conditions of approval imposed on the Project by the RCDWR:
  - Prior to issuance of a building permit, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for approval. At a minimum, the WRP must identify the materials (i.e., cardboard, concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts; the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials; the facilities and/or haulers that will be utilized; and the targeted recycling or reduction rate. During Project construction, the Project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept in order to demonstrate compliance with the WRP requirements. Arrangements can be made through the franchise hauler.
  - Prior to final building inspection, evidence (i.e., receipts or other type of verification) to demonstrate project compliance with the approved WRP shall be presented by the project proponent to the Planning Division of the Riverside County Department of Waste Resources in order to clear the project for occupancy permits. Receipts must clearly identify the amount of waste disposed and Construction and Demolition (C&D) materials recycled.
  - Hazardous materials are not accepted at Riverside County landfills. In compliance with federal, state, and local regulations and ordinances, any hazardous waste generated in association with the Project shall be disposed of at a permitted Hazardous Waste disposal facility. Hazardous waste materials include, but are not limited to, paint, batteries, oil, asbestos, and solvents.
  - Recycling Collection Plan: Prior to issuance of a building permit, the applicant shall submit one electronic (1) copy of a Recyclables Collection and Loading Area plot plan to the Riverside County Department of Waste Resources for review and approval to [WastePlanning@rivco.org](mailto:WastePlanning@rivco.org). The plot plan shall conform to the RCDWR's Design Guidelines for Recyclables Collection and Loading Areas, found at <http://www.rcwaste.org/business/planning/design>, and shall show the location of and access to the collection area for recyclable materials, shall demonstrate space allocation for trash and recyclable materials and have the adequate signage indicating the location of each bin in the trash enclosure. The project applicant is advised that clearance of the Recyclables Collection and Loading Area plot plan only satisfies the Waste Resources' conditions for Recyclables Collection and Loading Areas space allocation and other Recyclables Collection and Loading Area Guideline items. Detailed drawings of the Trash Enclosure and its particular construction details, e.g., building materials, location, construction methods etc., should be included as part of the Project plan submittal to the Riverside County Department of Building and Safety.
  - Recyclables Collection and Loading Area Inspection: Prior to final building inspection, the applicant shall construct the recyclables collection and loading area in compliance with the Recyclables Collection and Loading Area plot plan, as approved and verified through inspection by the Riverside County Department of Waste Resources.



- Recycling and Organics Compliance: Prior to final inspection, the applicant shall complete a Mandatory Commercial Recycling and Organics Recycling Compliance form (Form D). Form D requires applicants to identify programs or plans that address commercial and organics recycling, in compliance with State legislation/regulation. Once completed, Form D shall be submitted to the Recycling Section of the Department of Waste Resources for approval. For more information go to: [www.rcwaste.org/business/planning/applications](http://www.rcwaste.org/business/planning/applications). To obtain Form D, please contact the Recycling Section at 951-486-3200, or email to: [Waste-CompostingRecycling@rivco.org](mailto:Waste-CompostingRecycling@rivco.org).
- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services. Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal: (a) Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility; or (b) Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

### ***Mitigation***

The mitigation measures identified throughout this EIR for Project-related construction impacts (e.g., air quality, biological resources, etc.) shall apply. Project impacts to utilities and service systems would be less than significant; therefore, no additional mitigation is required related to utilities and service system improvements proposed as part of the Project.



## 4.21 WILDFIRE

Information in this Subsection is also based in part on a technical study for wildfire protection titled, “Fire Protection Plan, Stoneridge Commerce Center” (herein, “FPP”), prepared by Dudek, dated November 2019, and included as *Technical Appendix N* (Dudek, 2019). Refer to Section 7.0, *References*, for a complete list of reference sources.

### 4.21.1 EXISTING CONDITIONS

#### A. Fire Hazard Classification

The Project site and surrounding areas have largely been disturbed by on-going fire abatement grassland management, with exception of the hill form that straddles the western Project boundary in the southern portion of the Project site. According to Riverside County GIS, and as shown on Figure 4.21-1, *Fire Hazard Severity Areas*, a portion of the Project site, generally corresponding to proposed Planning Area 9, along with small portions of proposed Planning Areas 2 and 5, are classified as having a “High” fire hazard severity. The remaining portions of the Project site are not identified as being subject to wildland fire hazards. However, areas off-site and west of the Project site are classified as having a “High” fire hazard severity, while lands to the north of the Project site are classified as having a “Moderate” to “Very High” fire hazard severity. (RCIT, n.d.)

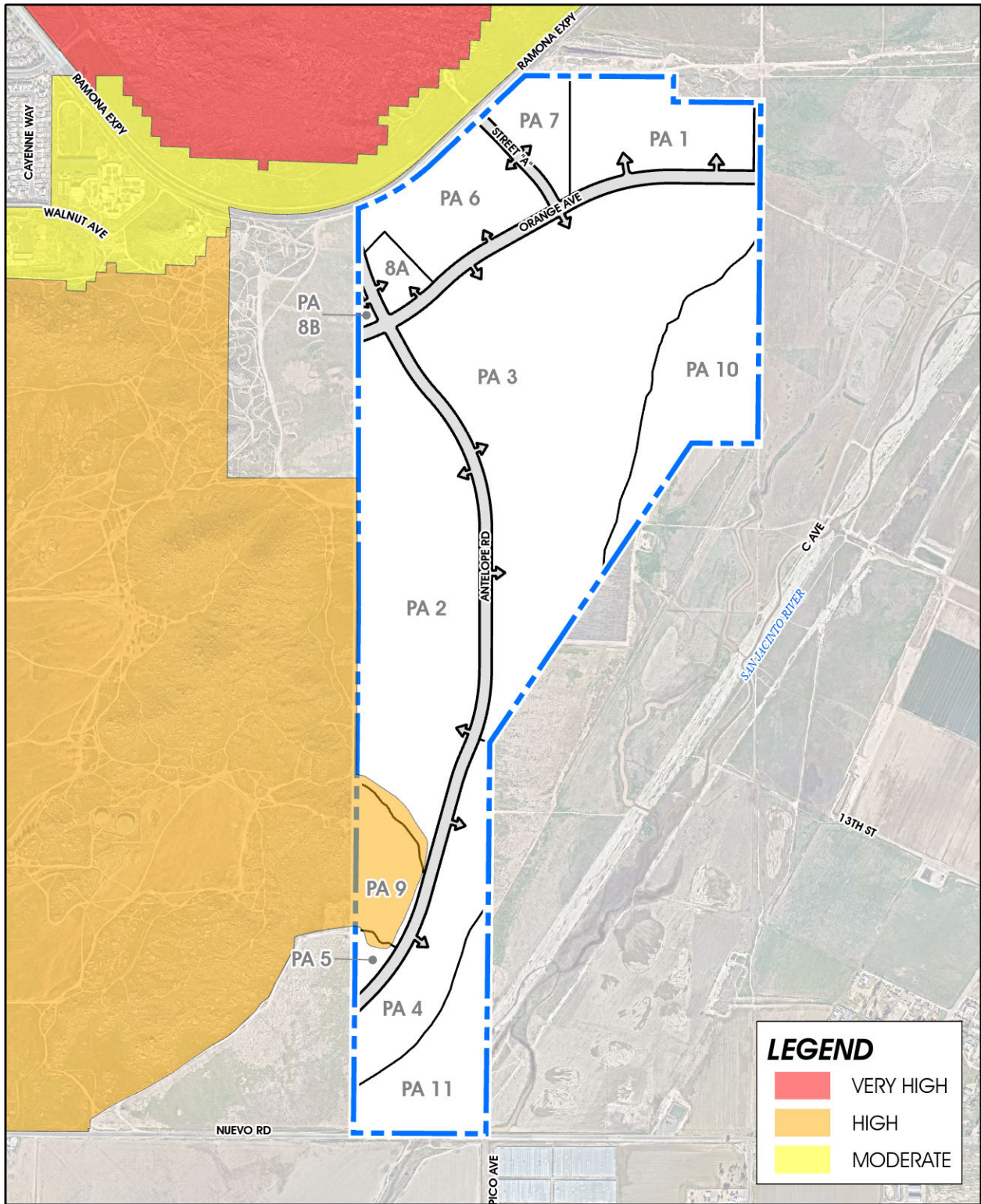
#### B. Topography

The Project site is generally situated along the eastern flank of relatively small hills associated with Lakeview Mountain plutonic rock and gently slopes southeast toward the San Jacinto River. The elevations on the site range from approximately 1,425 feet above mean sea level (amsl) in the southeastern corner of the Project site (i.e., within the San Jacinto River) to 1,695 feet amsl along the western Project boundary.

#### C. Climate

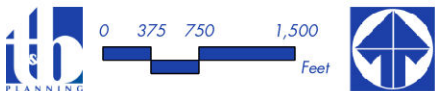
Throughout southern California, and specifically at the Project site, climate has a large influence on fire risk. The climate of Riverside County is typical of a Mediterranean area, with warm, dry summers and cold, wet winters. Temperatures average (average annual) around 61° F and reach up to 100°F. Precipitation has been averaging less than 16 inches and typically occurs between December and March. The prevailing wind is an on-shore flow between 7 and 11 mph from the Pacific Ocean. (Dudek, 2019, p. 12)

Fires can be a significant issue during summer and fall, before the rainy period, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the Project area as warm and dry air is channeled through nearby Cajon Pass from the dry, desert land to the east. Although Santa Ana events can occur anytime of the year, they generally occur during the autumn months, although the last few years have resulted in spring (April-May) and summer events. Santa Ana winds may gust up to 75 miles per hour (mph) or higher. This phenomenon markedly increases the wildfire danger and intensity in the Project area by drying out and preheating vegetation (fuel moisture of less than 5% for 1-hour fuels is possible) as well as accelerating oxygen supply, and thereby, making possible the burning of fuels that otherwise might not burn under cooler, moister conditions. (Dudek, 2019, p. 12)



Source(s): ESRI, Nearmap Imagery (2023), RCTLMA (2023)

Figure 4.21-1



**Fire Hazard Severity Areas**



## ***D. Vegetation***

### ***1. Fuels (Vegetation)***

The Project site and surrounding areas primarily support disturbed habitat, non-native grasslands, and sage scrub plant community. Vegetation types were derived from an on-site field assessment of the Project site conducted by Dudek. The majority of the south and east facing slopes adjacent to the site are vegetated with sage scrub interspersed with large rock outcropping and boulder areas. The flat lands are primarily disturbed, non-native grasslands. The vegetation cover types were assigned corresponding fuel models for use during site fire behavior modeling. (Dudek, 2019, p. 12)

### ***2. Vegetation Dynamics***

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels. (Dudek, 2019, pp. 12-13)

Vegetation plays a significant role in fire behavior, and is an important component to the fire behavior models used in the Project's FPP. A critical factor to consider is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes disrupts plant succession, setting plant communities to an earlier state where less fuel is present for a period of time as the plant community begins its succession again. In summary, high frequency fires tend to convert shrublands to grasslands or maintain grasslands, while fire exclusion tends to convert grasslands to shrublands, over time. In general, biomass and associated fuel loading will increase over time, assuming that disturbance (fire or grading) or fuel reduction efforts are not diligently implemented. It is possible to alter successional pathways for varying plant communities through manual alteration. (Dudek, 2019, p. 13)

## ***E. Fire History***

According to the site-specific FPP, there have been 50 fires recorded since 1953 by CALFIRE in their Fire and Resource Assessment Program (FRAP) database in the vicinity of the Project site, including in the upper northwest third of the site. These fires, occurring in 1953, 1958 (x3), 1973, 1974, 1977, 1978, 1979 (x9), 1981 (x2), 1982, 1986, 1988 (x2), 1989, 1991, 1992, 1993, 1994, 1995, 1996 (x4), 1997 (x2), 1998 (x2), 2005, 2011 (x2), 2012, 2014, 2015 (x2), and 2016, burned within a five-mile radius of the Project Area. A total of two fires, ranging from 1,145 acres (Yeager Fire in 1958) to 228 acres (#10 Fire), have burned onto the northwest portion of the Project site. Based on an analysis of the CALFIRE FRAP fire history data set, specifically the years in which the fires burned, the average interval between wildfires within roughly 5 miles from the Project site was calculated to be 2 years with intervals ranging between 1 and 7 years. (Dudek, 2019, pp. 13-14)



**F. Project Area Fire Risk Assessment**

Wildland fires are a common natural hazard in most of southern California with a long and extensive history. The southern California landscapes include a diverse range of plant communities, including vast tracts of grasslands and shrublands, like those found on and adjacent to Project site. Wildfire in this Mediterranean-type ecosystem ultimately affects the structure and functions of vegetation communities and will continue to have a substantial and recurring role. Supporting this are the facts that 1) native landscapes, from forest to grasslands, become highly flammable each fall; and 2) the climate of southern California has been characterized by fire climatologists as the worst fire climate in the United States with high winds (Santa Ana) occurring during autumn after a six-month drought period each year. Based on research, the anticipated growing population of northwest Riverside County Wildland-Urban Interface (WUI) areas, and the region's fire history, it can be anticipated that periodic wildfires may start on, burn onto, or spot into the Project site. The most common type of fire anticipated in the vicinity of the Project area is a wind-driven fire from the north/northeast, moving through the nonnative grasses and sage scrub shrubs found on the slopes and base of the Bernasconi Hills. (Dudek, 2019, p. 17)

**G. Existing Conditions Fire Behavior Summary**

Wildfire behavior in non-treated sage scrub and non-native grasslands varies based on timing of fire. A worst-case fire in the Project area under gusty Santa Ana winds and low fuel moistures is expected to be fast moving between 7.4 (sage scrub fuel type) and 16.7 mph (grass fuel type). Flame length values with intense radiant heat would range between 38.6 feet to 46.9 feet for grass and sage scrub fuels burning, respectively, in specific portions adjacent to the Project site. Spotting is projected to occur up to nearly 1.3 miles during a fire influenced by onshore winds and nearly 2.5 miles during a fire fanned by offshore, gusty winds. (Dudek, 2019, p. 17)

**4.21.2 APPLICABLE REGULATORY REQUIREMENTS**

The following is a brief description of the federal, State, and local environmental laws and related regulations related to wildfire hazards.

**A. Wildland Fire Hazards Regulations and Plans**

**1. Federal Regulations**

**Healthy Forests Restoration Act of 2003**

On August 22, 2002, President Bush established the Healthy Forests Initiative, directing the Departments of Agriculture and the Interior, and the Council on Environmental Quality, to improve regulatory processes to ensure more timely decisions, greater efficiency, and better results in reducing the risk of catastrophic wildland fires. On June 5, 2003, the Departments of Agriculture and the Interior adopted two new categorical exclusions from documentation in an environmental assessment or environmental impact statement (EIS): an exclusion for hazardous-fuel reduction and another for rehabilitation of resources and infrastructure damaged by wildfire (68 FR 33814). (DOI, n.d.)



## 2. State Regulations

### Public Resources Code (PRC) Sections 4290-4299

These sections establish minimum statewide fire safety provisions pertaining to: roads for fire equipment access; signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fire fuel breaks and greenbelts. With certain exceptions, all new construction after July 1, 1991, in potential wildland fire areas, is required to meet these statewide standards. The state requirements, however, do not supersede more restrictive local regulations. (CA Legislative Info, n.d.)

As defined by CalFire, wildland areas defined as State Responsibility Areas (SRAs) may contain substantial wildfire risks and hazards. They consist of lands exclusive of cities, and federal lands regardless of ownership. The primary financial responsibility for preventing and suppressing fires within wildlands belongs to the State of California. However, it is not the State of California's responsibility to provide fire protection services to buildings or structures located within the wildlands unless CalFire has entered into a cooperative agreement with a local agency for those purposes pursuant to PRC Section 4142. As such, wildland areas require disclosure of these fire hazards in real estate transactions, and owners of properties in wildland areas are subject to PRC Section 4291 maintenance requirements. The law requires CalFire every five years (1991, 1996, 2001, etc.) to provide maps identifying the boundaries of lands classified as SRAs to the Riverside County Assessor. (CA Legislative Info, n.d.)

### PRC Section 4213 – Fire Prevention Fees

Pursuant to PRC Section 4213, in July of 2011, the State of California began assessing an annual “Fire Prevention Fee” for all habitable structures within SRAs to pay for fire prevention services. SRAs are the portions of California where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within incorporated city boundaries, Tribal or federally owned land. As a result of AB 398, California Global Warming Solutions Act of 2006, the fire prevention fee was suspended as of July 1, 2017. (CA Legislative Info, n.d.)

### California Government Code (CGC) Section 51178

This section specifies that the Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent statewide criteria, and the expected severity of fire hazard. Per CGC § 51178, a local agency may, at its discretion, exclude from the requirements of § 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of § 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CalFire, following a finding supported by substantial evidence in the record that the requirements of § 51182 are necessary for effective fire protection within the new area. According to § 51182, such changes made by a local agency shall be final, and shall not be rebuttable by CalFire. (CA Legislative Info, n.d.)



California Code of Regulations (CCR) Title 14 – Natural Resources

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development within SRAs. Among other things, Title 14 requires the design, and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures (fire fuel modification zones, etc.). (Westlaw, n.d.)

CCR Title 24, Parts 2 and 9 – Fire Codes

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains other fire safety-related building standards. In particular, Chapter 7A, “Materials and Construction Methods for Exterior Wildfire Exposure,” in the 2010 California Building Code addresses fire safety standards for new construction. In addition, Section 701A.3.2, “New Buildings Located in Any Fire Hazard Severity Zone,” states: (BSC, n.d.)

*“New buildings located in any Fire Hazard Severity Zone within State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted on or after January 1, 2008, shall comply with all sections of this chapter.”*

### 4.21.3 BASIS FOR DETERMINING SIGNIFICANCE

Section XX of Appendix G to the State CEQA Guidelines, identifies the following thresholds for evaluating impacts due to wildfire (OPR, 2018a):

- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan;
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risk, and thereby expose project occupants to pollutant concentrations for a wildfire or the uncontrolled spread of a wildfire;
- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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; or





- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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.

The following thresholds are derived from Riverside County’s Environmental Assessment Checklist, and supplemented by the thresholds listed in Appendix G to the State CEQA Guidelines, in order to evaluate the significance of the proposed Project’s impacts due to wildfires:

- 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 substantially impair an adopted emergency response plan or emergency evacuation plan;*
- 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, 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;*
- 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 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;*
- 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 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; or*
- 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 expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.*

The significance thresholds set forth in Riverside County’s Environmental Assessment Checklist, as modified/updated per the 2018 updates to the State CEQA Guidelines, were used to evaluate the significance of the proposed Project’s impacts due to wildfires.

#### 4.21.4 IMPACT ANALYSIS

***Threshold a.: 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 substantially impair an adopted emergency response plan or emergency evacuation plan?***

The existing hill form that straddles the western boundary in the southern portions of the Project site, as well as small areas surrounding the hill form, are within a State Responsibility Area (SRA). In addition, lands



located off site to the west and north also are within an SRA. Although the Project site is not classified as a “Very High” fire hazard severity zone, areas to the north of the Project site are classified as having a “Very High” fire hazard severity zone. (RCIT, n.d.; CAL FIRE, 2019) However, there are no adopted emergency response plans or emergency evacuation plans applicable to the Project site or surrounding areas. Additionally, the Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Although Nuevo Road and the Ramona Expressway in the Project area may serve as unofficial emergency access routes, it is not expected that Project implementation would adversely affect the operations of these facilities during construction activities or operation of the Project at build out. The Project does not propose any residential uses, and therefore any impacts that occur from evacuating residents in response to a wildfire – particularly on nights and weekends – would not occur as a result of the Project. During construction and at Project build-out, the Project Applicant would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

***Threshold b.:*** *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, 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?*

***Threshold e.:*** *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 expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Areas in the western portion of the Project site are within a State Responsibility Area (SRA), and lands located off site to the west and north also are within an SRA. Although the Project site is not classified as a “Very High” fire hazard severity zone, areas to the north of the Project site are classified as having a “Very High” fire hazard severity zone. (RCIT, n.d.; CAL FIRE, 2019) In order to evaluate the Project’s potential to exacerbate wildfire risks, a Project-specific Fire Protection Plan (FPP) was prepared for the Project, the results and recommendations of which are discussed below.

Section 3 of the Project’s FPP (*Technical Appendix N*) provides a detailed discussion of the methodology and computer software used to assess fire risks in the local area. In summary, following field data collection efforts and available data analysis, fire behavior modeling was conducted to document the type and intensity of fire that would be expected adjacent to the project site given characteristic site features such as topography, vegetation, and weather. Dudek utilized BehavePlus software package version 5.5 to analyze potential fire behavior for the northern, eastern, southern, and western edges of the Project site, with assumptions made for the pre- and post-project slope and fuel conditions. Details regarding the BehavePlus analysis, including fuel moisture and weather input variables, are provided in Appendix C to the Project’s FPP. Based on the anticipated pre- and post-Project vegetation conditions, three different fuel models were used in the fire behavior modeling effort to address the Project’s fuel modification zones (as described below), and included: 1) Fuel Modification Zone 1 – irrigated, landscapes; 2) Moderate Load, Dry Climate Grass; and 3) Dry



Climate Shrub (sage scrub). The results of fire behavior modeling analysis for pre- and post-project conditions are presented in Tables 2 and 3, respectively, of the Project's FPP. (Dudek, 2019, pp. 15-17)

As previously noted, under existing conditions the Project site and surrounding areas are subject to wildland fire hazards. Based on the recommendations of the FPP, Section 2.8 of proposed SP 239A1 includes standards and requirements for addressing fire hazards as part of future implementing developments. Specifically, SP 239A1 requires the provision of 100 feet of Fuel Modification Zone (FMZ), where feasible. Two FMZ zones are identified, as follows:

- **FMZ Zone 1** would consist of an irrigated zone measuring 50 feet in width from the rear lot boundary for the properties located on the perimeter of the proposed Project. All highly flammable native vegetation, especially found on the Prohibited Plant List (which are identified on SP 239A1 Table 4-2, *Prohibited Plant Species*) shall be removed except for species approved by the fire marshal. This zone would be planted with drought-tolerant, less flammable plants. The Proposed Project's plant palette will be approved by the fire department. A permanent, automatic irrigation system will be installed in Zone 1 to maintain hydrated plants. Zone 1 would include the following components:
  - All trees shall be planted and maintained at a minimum of 10 feet from the tree's drip line to any combustible structure
  - Tree spacing of a minimum 10 feet between canopies
  - Mature trees shall be limbed to eight feet or 3x the height of understory plants to prevent ladder fuels, whichever is greater. No tree limb encroachment within 10 feet of a structure or chimney, including outside barbecues or fireplaces
  - Tree maintenance includes limbing-up (canopy raising) 6 feet or one-third the height of the tree
  - Maintenance including ongoing removal and/or thinning of undesirable combustible vegetation, replacement of dead/dying plantings, maintenance of the programming and functionality of the irrigation system, regular trimming to prevent ladder fuels<sup>1</sup>.
  - A minimum of 36 inches wide pathway with unobstructed vertical clearance around the exterior of each structure (360°) provided for firefighter access (2016 CFC, Section 503.1.1). Within this clearance area, landscape such as low ground covers and shrubs are permitted so long as their placement and mature height do not impede firefighter access, consistent with purpose of this guideline.
  - Trees and tree form shrub species that naturally grow to heights that exceed 2 feet shall be vertically pruned to prevent ladder fuels.
  - Grasses shall be cut to 4 inches in height. Native grasses can be cut after going to seed.

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<sup>1</sup> Plant material that can carry a fire burning in low-growing vegetation to taller vegetation is called ladder fuel. Examples of ladder fuels include low-lying tree branches and shrubs, climbing vines, and tree-form shrubs underneath the canopy of a large tree.



- Ground covers within first 3 feet from structure restricted to non-flammable materials, including stone, rock, concrete, bare soil, or other. Combustible ground covers, such as mulch or wood chips, are prohibited adjacent to structures with an exterior stucco wall and weep screed.
- **FMZ Zone 2** would measure 50 feet in width extending from the edge of FMZ 1, and would consist of a thinning zone to reduce the fuel load of wildland areas adjacent to FMZ Zone 1 in order to reduce heat and ember production from wildland fires; slow fire spread; and reduce fire intensity. Zone 2 would include the following key components where thinning of native vegetation is required:
  - Zone 2 requires a minimum of 50% thinning or removal of plants (50% no fuel) focusing on removal of dead and dying plants and highly flammable species.
  - Fuel continuity should be interrupted so that groupings of shrubs are separated from adjacent groupings.
  - Maintenance including ongoing removal and thinning of dead/dying planting, and regular trimming to prevent ladder fuels.
  - Trees and tree-form shrub species that naturally grow to heights that exceed 4 feet shall be vertically pruned to prevent ladder fuels.
  - Grasses shall be cut to 4 inches in height. Native grasses can be cut after going to seed.
  - Single specimen native shrubs, exclusive of chamise and sage, may be retained, on 20-foot centers.
  - No vegetation found on the Prohibited Plant List, which is included in SP 239A1 as Table 4-2, *Prohibited Plant Species*, shall remain in Zone 2.

Required FMZ zones would be managed by the Project Applicant during interim conditions when the Project is in the process of being built out, and ultimately would be managed by future developers or a property owners association. The following maintenance activities would be required as part of the Project's Conditions of Approval:

- Regular maintenance of dedicated Open Space.
- Removal or thinning of undesirable combustible vegetation and replacement of dead or dying landscaping.
- Maintaining ground cover at a height not to exceed 18 inches. Annual grasses and weeds shall be maintained at a height not to exceed three inches.
- Removing accumulated plant litter and dead wood. Debris and trimmings produced by thinning and pruning should be removed from the site or chipped and evenly dispersed in the same area to a maximum depth of four-inches.
- Maintaining manual and automatic irrigation systems for operational integrity and programming.
- Effectiveness should be regularly evaluated to avoid over or under-watering.
- Complying with these FPP requirements on a year-round basis. Annual inspections are conducted following the natural drying of grasses and fine fuels, between the months of May and June, depending on precipitation during the winter and spring months.



Although the above-described requirements for FMZ Zones 1 and 2 would apply to most future buildings within the Project site, some of the future buildings likely would protrude into the 100-foot FMZ along the western boundary. Based on a preliminary site plan prepared by the Project Applicant, it is estimated that future buildings abutting fire hazard areas on and off site may be constrained to providing only between 20 and 77 feet of achievable on-site fuel modification between the western and eastern boundary lines. In addition, future buildings in Planning Area 3 would be located adjacent to Open Space in proposed Planning Area 10, and would be constrained to providing approximately 70 feet of achievable on-site fuel modification. (Dudek, 2019, p. 29)

For future buildings abutting natural open space areas in certain portions of the site, a reduced FMZ zone is allowed by SP 239A1 where necessary, based on the recommendations of the Project-specific FPP (*Technical Appendix N*). Such buildings would be subject to the applicable Fire and Building codes, including structure ignition resistance requirements and requirements for interior fire sprinkler systems, which would enable the structures to withstand the type of wildfire that may occur in the fuels outside areas proposed for development as part of the Project. As concluded by the Project's FPP, the combination of the above-described fire prevention measures would provide a functional safety equivalent to a 100-foot fuel modification zone. In addition to the above-mentioned design features, the following additional fire protection enhancement measures would be required by SP 239A1 to provide further justification for the reduced FMZ in areas where a 100-foot wide FMZ cannot be accommodated:

- Structures that have walls facing open space areas that would not meet the minimum 100-foot fuel modification requirement shall include enhanced exterior wall construction. Walls shall be a minimum one-hour rated construction (or greater rating), with no openings (windows or doors), unless openings are approved by the Riverside County Fire Department (RCFD). If exterior openings are provided in the walls abutting open space areas where a 100-foot FMZ cannot be accommodated, exterior fire sprinklers would be required.

The above-listed requirements would be enforced by the County as part of the Project's Conditions of Approval and through the County's future review of implementing developments, which would include a review for consistency with the requirements of SP 239A1. As concluded by the Project's FPP, implementation of the SP 239A1 requirements for fire abatement, including the provision of FMZs and additional measures where a 100-foot FMZ cannot be accommodated, as well as site design features (i.e., asphalt roads, parking areas, irrigated landscaping, etc.), would reduce the risk of wildfire hazards occurring on site to acceptable levels (Dudek, 2019, p. 37). Thus, with compliance with the fire abatement requirements of SP 239A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

***Threshold c.: 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 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?*

The on-site hill form along the western boundary in the southern portions of the Project site, as well as areas immediately abutting the hill form on site, are within a State Responsibility Area (SRA), and lands located off site to the west and north also are within an SRA. Although the Project site is not classified as a “Very High” fire hazard severity zone, areas to the north of the Project site are classified as having a “Very High” fire hazard severity zone. (RCIT, n.d.; CAL FIRE, 2019)

As described under the analysis of Threshold b., the Project would accommodate 100-foot wide FMZ from future buildings where feasible, and would include additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. The proposed fire abatement measures would reduce the risk of fire in the local area as compared to existing conditions. While FMZ zones would be required throughout the proposed development, areas subject to fuel modification would occur in areas already planned for impact as part of the Project. Thus, impacts to areas requiring FMZ zones have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources, etc.), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.

***Threshold d.: 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 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?***

Areas in the western portion of the Project site are within a State Responsibility Area (SRA), and lands located off site to the west and north also are within an SRA. Although the Project site is not classified as a “Very High” fire hazard severity zone, areas to the north of the Project site are classified as having a “Very High” fire hazard severity zone. (RCIT, n.d.; CAL FIRE, 2019)

As discussed under the analysis of Threshold b., pursuant to SP 239A1 the Project would accommodate 100-foot wide FMZ from future buildings where feasible, and would include additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. Implementation of the measures detailed in proposed SP 239A1 would reduce the risk of wildfire at this site and would improve the ability of firefighters to fight fires on the properties and protect property and neighboring resources, irrespective of the cause or location of ignition (Dudek, 2019, p. 37). Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements required by SP 239A1 would reduce the site's vulnerability to wildfire to less-than-significant levels.



Based on the site's hydrologic conditions, the Project site would not be subject to flood hazards associated with fire events, and with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. While fires on the hills in and adjacent to the western portions of the Project site would eliminate the existing vegetative cover, these hills have a very shallow depth to bedrock, and thus would not be subject to mass wasting (landslides) in the event of a wildfire (LGC, 2021, p. 7). Refer also to EIR Subsection 4.7, *Geology and Soils*. Therefore, 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, and impacts would be less than significant.

#### 4.21.5 CUMULATIVE IMPACT ANALYSIS

The cumulative study area for the issue of wildfire includes areas within a five-mile radius of the Project site. This study area is appropriate for analysis because fire events located more than five miles from the Project site are unlikely to affect the Project, and any fires starting in the Project area likely would not affect lands located more than five miles away. This study area also is consistent with the Project's FPP, which evaluates historic fire events within approximately five miles of the Project site.

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route, and the Project would not serve as an evacuation route under long-term conditions. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Other cumulative developments similarly would be required to accommodate emergency access and facilities. As such, cumulatively-considerable impacts would be less than significant.

As indicated under the discussion of Thresholds b. and e., future development on site would be required to comply with the fire abatement requirements specified by proposed SP 239A1, which includes the provision of Fuel Modification Zones (FMZs), and special building requirements for future buildings that cannot accommodate a full 100-foot wide FMZ. Compliance with the requirements of SP 239A1 would ensure that the Project does not exacerbate wildfire hazards or expose people or structures to a significant risk of loss, injury, or death involving wildland fire hazards. Other developments within the cumulative study area would similarly be required to address fire hazards as appropriate and to provide measures to avoid or reduce the potential risk of wildfire in the region. As such, Project impacts due to wildfire hazards would be less-than-cumulatively considerable.

As discussed under the analysis of Threshold c., although the Project would require FMZs, areas requiring fuel modification occur in areas already planned for impact as part of site development. Thus, cumulatively-considerable impacts to areas requiring FMZ zones have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources, etc.), and where impacts are identified mitigation measures are identified to reduce cumulative impacts to the extent feasible. Other future developments in the cumulative study area that contain fire protection infrastructure similarly would be required to identify and mitigate any physical impacts to the environment resulting from fire protection measures. Thus, with the mitigation measures presented throughout this EIR to address cumulatively-



considerable impacts, the Project's cumulatively-considerable impacts due to the installation or maintenance of fire protection infrastructure would be less than significant.

As indicated under the discussion of Threshold d., with implementation of the Project the risk of wildfire hazards occurring on the Project site would be substantially reduced. Additionally, Project-related runoff, including runoff following fire events, would be controlled by the Project's proposed drainage system, which includes water quality/detention basins to preclude a substantial increase in the rate of runoff. There are no components of the Project that would result in increased potential for landslides, including during fire events. Thus, cumulatively-considerable impacts due to the exposure of 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, would be less than significant.

#### 4.21.6 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a.: Less-than-Significant Impact. The Project site and surrounding areas are not identified as evacuation routes, and there are no adopted emergency response plans or emergency evacuation plans applicable to the Project area. During construction and at Project build-out, the proposed Project would be required to maintain adequate access for emergency vehicles. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

Thresholds b. and e.: Less-than-Significant Impact. The Project would be subject to the fire abatement requirements specified by SP 239A1, which includes requirements for the provision of a 100-foot wide FMZ around all buildings, and specifies additional fire protection measures for buildings where the 100-foot wide FMZ cannot be achieved. With mandatory compliance with the fire abatement requirements of SP 239A1, the Project would not exacerbate wildfire risks, and would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires with implementation of the Project's proposed fire protection measures, and the Project would accommodate adequate circulation facilities to allow for evacuation of the site in the event of wildfires in the area. Impacts would be less than significant.

Threshold c.: Less-than-Significant Impact. Impacts to areas requiring FMZ zones have been evaluated throughout this EIR under the appropriate subject heading (e.g., biological resources, cultural resources, etc.), and where impacts are identified mitigation measures are identified to reduce impacts to the extent feasible. There are no components of the proposed FMZs that would result in impacts not already addressed by this EIR. Accordingly, the Project would not exacerbate fire risk, and would not result in temporary or ongoing impacts to the environment beyond what is already evaluated and disclosed by this EIR. Impacts would be less than significant.

Threshold d.: Less-than-Significant Impact. Although during extreme fire conditions there still would remain a potential for wildland fires to affect future buildings on site, implementation of the required enhanced construction features provided by the applicable codes and the fuel modification requirements required by SP





239A1 would reduce the site's vulnerability to wildfire to less-than-significant levels. Additionally, with development of the site runoff on the site would be controlled by the Project's proposed drainage system, thereby precluding fire-related flooding impacts downstream. In addition, the Project site would not cause or be affected by fire-induced landslides. Therefore, 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, and impacts would be less than significant.

#### **4.21.7 COUNTY REGULATIONS, DESIGN REQUIREMENTS, AND MITIGATION**

##### ***Applicable County Regulations and Design Requirements***

The following are applicable regulations and design requirements within Riverside County. Although these requirements technically do not meet CEQA's definition for mitigation, they are imposed herein to ensure Project compliance with applicable County regulations and design requirements.

- Future implementing developments within the Project site (e.g., plot plans, building permits, etc.) shall be reviewed by Riverside County for compliance with the fire protection measures included in Section 2.8, *Fire Protection Plan*, of SP 239A1.

##### ***Mitigation***

Impacts would be less than significant; therefore, mitigation measures are not required.



## 5.0 OTHER CEQA CONSIDERATIONS

### 5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

The State CEQA Guidelines require that an EIR disclose the significant environmental effects of a project which cannot be avoided if the proposed project is implemented (State CEQA Guidelines § 15126[b]). As described in detail in Section 4.0 of this EIR, the proposed Project is anticipated to result in several impacts to the environment that cannot be reduced to below a level of significance after the implementation of relevant standard conditions of approval, compliance with applicable laws and regulations, and application of feasible mitigation measures. The significant environmental effects of the proposed Project that cannot be feasibly mitigated are as follows:

- Aesthetics: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project vicinity exhibits a rural and agricultural character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Although the Project would be required to comply with the design guidelines and development standards of proposed SP 239A1, the SP 239A1 zoning ordinance, and all other applicable requirements of the Riverside County Municipal Code, which would serve to ensure that the Project site is developed in a manner that is not visually offensive, mitigation measures are not available to address the Project's significant impacts due to substantial changes to the existing visual character and quality of public views of the site and its surroundings. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis.
- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO<sub>x</sub>, VOCs, and CO that exceed the SCAQMD Regional Thresholds. Even with implementation of mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB for O<sub>3</sub>. In addition, regarding VOCs, it is important to note that approximately 43% of the total operational VOC emissions are derived from consumer products. As such, the Project Applicant cannot meaningfully control the use of consumer products by future building users via mitigation. Similarly, the predominance of the Project's operational-source emissions (approximately 41% of VOC emissions, 83% of NO<sub>x</sub> emissions, and 61% of CO emissions by weight) would be generated by passenger cars and trucks accessing the Project site. Neither the Project Applicant nor the County have regulatory authority to control tailpipe or consumer product emissions, and no feasible mitigation measures beyond the measures identified herein exist that would reduce Project operational-source VOC, NO<sub>x</sub>, and CO emissions to levels that are less than significant. Therefore, for both the Primary Land Use Plan and Alternative Land Use Plan, the proposed Project's operational emissions of VOC, NO<sub>x</sub>, and CO would



represent a significant and unavoidable impact for which additional mitigation is not available. Due to the level of the Project's regional emissions that would exceed the SCAQMD regional thresholds for VOCs, NO<sub>x</sub>, and CO, and because the Project's land uses are not consistent with the land use inputs utilized in the SCAQMD 2022 AQMP, the Project also would result in significant and unavoidable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP.

- Noise: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of Alternative Truck Routes 1 or 2 would result in significant and unavoidable traffic-related noise impacts to the following roadway segments under each of the identified study scenarios:
  - Alternative Truck Route 1:
    - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - Alternative Truck Route 2:
    - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Feasible mitigation measures are not available to reduce the Project's significant traffic-related noise impacts that would occur with implementation of Alternative Truck Routes 1 and 2. For example, rubberized asphalt was considered to reduce traffic noise levels at the noise source; however, rubberized asphalt is only effective for in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce primary truck-related noise sources (e.g., truck engine noise and exhaust



stack noise) due to the height of noise-generating sources associated with heavy trucks. Since the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not a feasible mitigation measure for the Project's traffic-related noise impacts. In addition, off-site noise barriers were considered as a potential measure to reduce the Project's traffic-related noise impacts. While noise barriers are commonly used to reduce the potential traffic noise levels from nearby transportation noise source activities, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance. It would not be practical to construct 11.5 foot-high barriers at off-site locations along the Study Area roadways. Additionally, arguably such barriers would block views from area land uses and would result in aesthetic and visual impacts affecting passersby that would off-set any noise attenuation benefits that may result from such walls. According to FHWA guidance, outdoor living areas are generally limited to outdoor living areas of frequent human use (e.g., backyards of single-family homes). Therefore, front and side yards of residences adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Lastly, the Applicant cannot autonomously unilaterally construct off-site walls or other features at properties owned or controlled by others. As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project, because such barriers are not feasible mitigation for the Project's traffic-related impacts. Accordingly, because mitigation is not available to reduce Project-related traffic noise impacts, the Project's off-site traffic-related noise level increases at adjacent land uses along the above-listed segments for Alternative Truck Routes 1 and 2 would remain significant and unavoidable prior to construction of the MCP and implementation of Alternative Truck Route 6.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of either the Primary Land Use Plan (without MCP) or Alternative Land Use Plan (with MCP) would exceed the County's threshold of significance for Project work VMT per employee by 26.1%. In addition, under most scenarios, the Project's commercial retail land uses would result in a net increase in VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although not required pursuant to the County Guidelines, the analysis of the Project's total VMT indicates that the Project's total VMT per SP would exceed the County's threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). Additionally, the cumulative analysis of the Project's impacts to VMT demonstrates that the Project, when considered in the context of cumulative development, would result in a net increase in total VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-1 and MM 4.18-2, the future tenants of the proposed Project are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those identified by Mitigation Measures MM 4.18-1 and MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. The inclusion of VMT reduction measures in areas that



are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings also is noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. Accordingly, Project impacts due to VMT would be significant and unavoidable on both a direct and cumulatively-considerable basis.

## **5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED**

The State CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (State CEQA Guidelines § 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources in the form of construction materials and energy resources would be used in the construction of the proposed Project, but development of the Project site as proposed would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., fossil fuels). Construction and operation of the proposed Project would not involve the use of large sums or sources of non-renewable energy. Additionally, the Project is required by law to comply with the California Building Standards Code (CALGreen), compliance with which reduces a building operation's energy volume that is produced by fossil fuels. The Project would be subject to regulations to reduce the Project's reliance on non-renewable energy sources. The Project also would be subject to the Energy Independence and Security Act of 2007, which contains provisions designed to increase energy efficiency and availability of renewable energy. The Project also would be subject to California Energy Code, or Title 24, which contains measures to reduce natural gas and electrical demand, thus requiring less non-renewable energy resources. The Project would avoid the inefficient, wasteful, and unnecessary consumption of energy during Project construction, operation, maintenance, and/or removal. With mandatory compliance to the energy efficiency regulations and mitigation measures, the Project would not involve the use of large sums or sources of non-renewable energy.

EIR Subsection 4.9, *Hazards and Hazardous Materials*, provides an analysis of the proposed Project's potential to transport or handle hazardous materials which, if released into the environment, could result in irreversible damage. As concluded in the analysis, compliance with federal, State, and local regulation related to hazardous materials would be required of all contractors working on the property during the Project's construction and of all the future occupants of the Project's buildings. As such, construction and long-term



operation of the proposed Project would not have the potential to cause significant irreversible damage to the environment, including damage that may result from upset or accident conditions.

### 5.3 GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA requires a discussion of the ways in which the proposed Project would be growth inducing. The State CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (State CEQA Guidelines § 15126.2(d)). New employees and new residential developments represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and including additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. Economic growth would likely take place as a result of the proposed Project's operation as a light industrial, business park, and commercial retail development. The Project's construction- and operational-related employees would purchase goods and services in the region, but any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. Therefore, while the Project would create economic opportunities caused by introducing new job opportunities to the Project site, this change would not induce substantial new growth in the region.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as SCAG. Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The area surrounding the Project site is primarily characterized by residential, agricultural, open space uses, and undeveloped land within unincorporated Riverside County. Development of the Project site with light industrial, business park, and commercial retail land uses would not directly induce surrounding properties to develop, because areas surrounding the Project site are already developed with residential uses, or are otherwise planned for urban development by the Riverside County General Plan. Furthermore, roadway and utility improvements proposed as part of the Project have been designed to serve the proposed Project, and would not remove infrastructure-related obstacles to development of other off-site properties. Additionally, with improvements, fee payments, and fair-share monetary contributions as identified by the Project's Traffic Analysis (EIR *Technical Appendix L3*) and in the analysis in EIR Subsection 4.20, *Utilities and Service*



*Systems*, all roadways that would serve the Project would have the capacity to accommodate Project and cumulative traffic, and the Project would be adequately served by water service, sewer service, drainage facilities, and other utilizes and service systems. Accordingly, the growth-inducing impacts of the Project would be less than significant. The Project is not expected to induce growth of land uses changes on the other parcels in the vicinity, as other lands surrounding the site are either already developed or planned to be developed consistent with their General Plan land use designations.

Furthermore, the proposed Project's improvements to the public infrastructure, including roads, drainage infrastructure, and other utility improvements are consistent with Riverside County's General Plan and would not indirectly induce substantial and unplanned population growth in the local area.

#### **5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING THE INITIAL STUDY PROCESS**

An Initial Study was not prepared and was not required for the Project. In accordance with CEQA requirements, this Program EIR evaluates all of the environmental topics contained in Appendix G to the State CEQA Guidelines, as well as the supplemental topics and thresholds of significance included in Riverside County's Environmental Assessment Checklist.



## 6.0 ALTERNATIVES

State CEQA Guidelines § 15126.6(a) describes the scope of analysis that is required when evaluating alternatives to proposed projects, as follows:

*“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”*

### 6.1 SIGNIFICANT AND UNAVOIDABLE PROJECT IMPACTS

As discussed in EIR Section 4.0, *Environmental Analysis*, the proposed Project would result in significant adverse environmental effects that cannot be mitigated to below levels of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures. The unavoidable significant impacts are:

- Aesthetics: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. The Project vicinity exhibits a rural and undeveloped character, and the development of the Project site with light industrial, business park, and commercial retail land uses would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. Although the Project would be required to comply with the design guidelines and development standards of proposed SP 239A1, the SP 239A1 zoning ordinance, and all other applicable requirements of the Riverside County Municipal Code, which would serve to ensure that the Project site is developed in a manner that is not visually offensive, mitigation measures are not available to address the Project’s significant impacts due to substantial changes to the existing visual character and quality of public views of the site and its surroundings. Impacts would be significant and unavoidable on both a direct and cumulatively-considerable basis.
- Air Quality: Significant and Unavoidable Direct and Cumulatively-Considerable Impacts. Long-term operations of the proposed Project would result in daily emissions of NO<sub>x</sub>, VOCs, and CO that exceed the SCAQMD Regional Thresholds. Even with implementation of mitigation measures and with compliance with the anticipated regulations implemented by the EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the proposed Project still would exceed the SCAQMD’s regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB for O<sub>3</sub>. In addition, regarding





VOCs, it is important to note that approximately 43% of the total operational VOC emissions are derived from consumer products. As such, the Project Applicant cannot meaningfully control the use of consumer products by future building users via mitigation. Similarly, the predominance of the Project's operational-source emissions (approximately 41% of VOC emissions, 83% of NO<sub>x</sub> emissions, and 61% of CO emissions by weight) would be generated by passenger cars and trucks accessing the Project site. Neither the Project Applicant nor the County have regulatory authority to control tailpipe or consumer product emissions, and no feasible mitigation measures beyond the measures identified herein exist that would reduce Project operational-source VOC, NO<sub>x</sub>, and CO emissions to levels that are less than significant. Therefore, for both the Primary Land Use Plan and Alternative Land Use Plan, the proposed Project's operational emissions of VOC, NO<sub>x</sub>, and CO would represent a significant and unavoidable impact for which additional mitigation is not available. Due to the level of the Project's regional emissions that would exceed the SCAQMD regional thresholds for VOCs, NO<sub>x</sub>, and CO, and because the Project's land uses are not consistent with the land use inputs utilized in the SCAQMD 2022 AQMP, the Project also would result in significant and unavoidable impacts due to a conflict with or obstruction of the SCAQMD 2022 AQMP.

- Noise: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of Alternative Truck Routes 1 or 2 would result in significant and unavoidable traffic-related noise impacts to the following roadway segments under each of the identified study scenarios:
  - Alternative Truck Route 1:
    - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portion of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Nuevo Road west of Antelope Road (Segment #16) – Impacts to future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - Dunlap Drive north of San Jacinto Avenue (Segment #17) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
    - San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
  - Alternative Truck Route 2:
    - Antelope Road north of Nuevo Road (Segment #4) – Impacts to future residential receptors along the off-site portions of this roadway segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.



- Menifee Road south of Nuevo Road (Segment #5) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.
- San Jacinto Avenue west of Dunlap Drive (Segment #18) – Impacts to existing and future residential receptors along this segment under the Primary Land Use Plan for EAC (2030) conditions and Primary Land Use Plan for HY (2040) conditions.

Feasible mitigation measures are not available to reduce the Project's significant traffic-related noise impacts that would occur with implementation of Alternative Truck Routes 1 and 2. For example, rubberized asphalt was considered to reduce traffic noise levels at the noise source; however, rubberized asphalt is only effective for in the reduction of tire-on-pavement noise at higher speeds and would not materially reduce primary truck-related noise sources (e.g., truck engine noise and exhaust stack noise) due to the height of noise-generating sources associated with heavy trucks. Since the use of rubberized asphalt would not materially lower off-site traffic noise levels at potentially affected receptors, rubberized asphalt is not a feasible mitigation measure for the Project's traffic-related noise impacts. In addition, off-site noise barriers were considered as a potential measure to reduce the Project's traffic-related noise impacts. While noise barriers are commonly used to reduce the potential traffic noise levels from nearby transportation noise source activities, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance. It would not be practical to construct 11.5 foot-high barriers at off-site locations along the Study Area roadways. Additionally, arguably such barriers would block views from area land uses and would result in aesthetic and visual impacts affecting passersby that would off-set any noise attenuation benefits that may result from such walls. According to FHWA guidance, outdoor living areas are generally limited to outdoor living areas of frequent human use (e.g., backyards of single-family homes). Therefore, front and side yards of residences adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Lastly, the Applicant cannot autonomously unilaterally construct off-site walls or other features at properties owned or controlled by others. As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project, because such barriers are not feasible mitigation for the Project's traffic-related impacts. Accordingly, because mitigation is not available to reduce Project-related traffic noise impacts, the Project's off-site traffic-related noise level increases at adjacent land uses along the above-listed segments for Alternative Truck Routes 1 and 2 would remain significant and unavoidable prior to construction of the MCP and implementation of Alternative Truck Route 6.

- Transportation: Significant and Unavoidable Direct and Cumulatively-Considerable Impact. Implementation of either the Primary Land Use Plan (without MCP) or Alternative Land Use Plan (with MCP) would exceed the County's threshold of significance for Project work VMT per employee by 26.1%. In addition, under most scenarios, the Project's commercial retail land uses would result in



a net increase in VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although not required pursuant to the County Guidelines, the analysis of the Project's total VMT indicates that the Project's total VMT per SP would exceed the County's threshold of significance by 2.4% with implementation of the Primary Land Use Plan (without MCP) and by 4.8% with implementation of the Alternative Land Use Plan (with MCP). Additionally, the cumulative analysis of the Project's impacts to VMT demonstrates that the Project, when considered in the context of cumulative development, would result in a net increase in total VMT within Riverside County as a whole and within a 10-mile radius of the Project site. Although the Project would be subject to compliance with Mitigation Measures MM 4.18-1 and MM 4.18-2, the future tenants of the proposed Project are unknown at this time. As such, the effectiveness of commute trip reduction measures such as those identified by Mitigation Measures MM 4.18-1 and MM 4.18-2 cannot be guaranteed to reduce Project VMT to a level of less than significant. The inclusion of VMT reduction measures in areas that are characteristically suburban in context are limited to a maximum VMT reduction of 15%. This maximum reduction for cross-category transportation-related mitigation measures of 15% for suburban settings also is noted in the County Guidelines. Therefore, even with the implementation of all feasible VMT reduction measures, Project-generated VMT cannot be reduced to a level of less than significant. Accordingly, Project impacts due to VMT would be significant and unavoidable on both a direct and cumulatively-considerable basis.

## **6.2 ALTERNATIVES UNDER CONSIDERATION**

State CEQA Guidelines § 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the property in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "no project" alternative). For development projects that include a revision to an existing land use plan, the "no project" alternative is considered to be the continuation of the existing land use plan into the future. For projects other than a land use plan (for example, a development project on an identifiable property), the "no project" alternative is considered to be a circumstance under which the project does not proceed (State CEQA Guidelines § 15126.6(e)(3)(A-B)). For the alternatives analysis in this EIR, the potential scenario where the Project site remains in its current undeveloped condition is considered to be the "No Development Alternative (NDA)," while the potential scenario where the existing General Plan land use plan is implemented is considered to be the "No Project (Existing General Plan) Alternative."

The following scenarios are identified by the County of Riverside as potential alternatives to implementation of the proposed Project. The Reduced Project Alternative is considered the Environmentally Superior Alternative pursuant to State CEQA Guidelines § 15126.6.

### **6.2.1 NO DEVELOPMENT ALTERNATIVE**

The No Development Alternative (NDA) considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 582.6 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was



selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

### 6.2.2 NO PROJECT (EXISTING GENERAL PLAN) ALTERNATIVE

The No Project (Existing General Plan) Alternative (NPA), assumes development of the 582.6-acre property in accordance with the site's existing General Plan and Specific Plan land uses. Figure 2-5 in EIR Subsection 2.0 depicts the site's existing Specific Plan land use designations. Thus, under this alternative, and consistent with the adopted Stoneridge Specific Plan No. 239 (SP 239) for the portions of the adopted SP 239 that occur within the Project site, the Project site would be developed with approximately 671 "Medium Residential (2-5 du/ac)" dwelling units on approximately 172.9 acres; approximately 903 "Medium-High Residential (5-8 du/ac)" dwelling units on approximately 185.0 acres; approximately 446 "Very High Residential (14-20 du/ac)" dwelling units on approximately 30.0 acres; "Commercial" uses on approximately 68.1 acres, which also would allow for up to 153 dwelling units in Planning Area 1; "Parks" on approximately 33.7 acres; "Open Space – Natural" on approximately 20.8 acres; "Open Space – Recreational" on approximately 8.6 acres; three planning areas designated for "Schools" on approximately 27.0 acres; and approximately 36.5 acres of major circulation facilities. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site's existing General Plan and SP 239 land use designations.

### 6.2.3 REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative (RPA) considers development of the Project site with similar uses as the proposed Project, but at a much lower intensity. Specifically, under the proposed Project, Light Industrial land uses are restricted to a maximum of 7,350,000 s.f. of building area, Business Park land uses may be developed at an FAR up to 0.50, while Commercial Retail land uses can be developed at a FAR up to 0.35. Under the RPA, Light Industrial Uses would be restricted to a maximum of 5,145,000 s.f. of building area, Business Park land uses would be restricted to a maximum FAR of 0.35, while development in the Commercial Retail portions of the site would be limited to a maximum FAR of 0.25. For purposes of evaluation of the RPA, it is assumed that the MCP would not be in place under long-term conditions, thereby allowing for more development on site than would occur if the MCP were to be implemented through the northern portions of the Project site. As summarized in Table 6-1, *Reduced Project Alternative Land Use Summary*, the RPA would allow for a maximum of 5,145,000 s.f. of light industrial building area, 748,579 s.f. of business park building area, and 87,120 s.f. of commercial retail building area. Thus, implementation of the RPA would result in a reduction of building area allowed on site by approximately 30% as compared to the proposed Project. Under the RPA, it is assumed that all areas proposed for grading and development both on and off site would be the same as for the proposed Project. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project's significant and unavoidable impacts to aesthetics, air quality, noise, and transportation.

## 6.3 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by State CEQA Guidelines § 15126.6 in determining whether to



exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, State CEQA Guidelines § 15126.6(f)(1) notes:

*“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan*

**Table 6-1 Reduced Project Alternative Land Use Summary**

PA	Land Use Designation	Acres	Maximum Building Square Footage
1	LI	37.8	500,595
2	LI	114.0	1,509,730
3	LI	195.2	2,585,081
4	LI	37.8	500,595
5	LI	3.7	49,000
6	BP	34.4	524,462
7	BP	14.7	224,116
8A	CR	6.8	74,052
8B	CR	1.2	13,068
9	OS-C	18.1	--
10	OS-CH	47.0	--
11	OS-CH	34.6	--
--	Circulation	37.3	--
<b>Total:</b>		<b>582.6</b>	<b>5,980,699</b>

Notes: PA = Planning Area; LI = Light Industrial; BP = Business Park; CR = Commercial Retail; OS-C = Open Space – Conservation; OS-CH = Open Space – Conservation Habitat.

*consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...”*

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have resulted in a reduction of significant adverse environmental impacts, and/or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

**6.3.2 ALTERNATIVE SITES**

CEQA does not require that 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 making the decision to include or exclude analysis of an alternative site, the *“key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would*



avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR” (State CEQA Guidelines § 15126.6(f) (2)).

Based on a review of aerial photography, the Riverside County General Plan land use map and a list of approved/pending development proposals within Riverside County and nearby jurisdictions, there are no other available, undeveloped properties of similar size (i.e., approximately 582.6 acres) that are zoned for and adjacent to other properties designated for urban development and that would reduce or avoid the Project’s significant and unavoidable impacts. For example, development of the Project at an alternative site location would not reduce or avoid the Project’s significant and unavoidable air quality impacts due to operational-related NO<sub>x</sub> and ROG emissions, as it would not be possible to develop 388.5 acres of Light Industrial land uses, 49.1 acres of Business Park land uses, 8.0 acres of Commercial Retail land uses without exceeding the SCAQMD Regional Thresholds for these pollutants under long-term operational conditions. Additionally, developing the Project at a different location may not avoid the Project’s significant and unavoidable impacts due to transportation-related noise, as the amount of traffic generated by the Project’s proposed land uses likely would result in significant unavoidable traffic-related noise impacts regardless as to where the Project is constructed. In addition, a different site location would merely shift the Project’s unavoidable impacts due to VMTs to a different location, and it is likely that similar or more severe near-term impacts could occur at off-site locations if the Project were instead to be developed in an area with a more balanced ratio of jobs and housing. For these reasons, Riverside County finds that evaluation of an alternative site location is not required for the Project because alternative site locations would not reduce or avoid the Project’s significant environmental effects.

## **6.4 ALTERNATIVE ANALYSIS**

The following discussion compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Project, as detailed in EIR Subsection 4.0, *Environmental Analysis*. A conclusion is provided for each impact as to whether the alternative results in one of the following (1) reduction or elimination of the proposed Project’s impact, (2) a greater impact than would occur under the proposed Project, (3) the same impact as the proposed Project, or (4) a new impact in addition to the proposed Project’s impacts. Table 6-2, *Alternatives to the Proposed Project – Comparison of Environmental Impacts*, located at the end of this Section, compares the environmental hazard and resource impacts of the alternatives with those of the proposed Project and identifies the ability of the alternative to meet the basic objectives of the Project. As described in EIR Subsection 3.1, the underlying purpose of the proposed Project is to accomplish the orderly development of light industrial, business park, and commercial retail land uses to increase employment opportunities in a housing rich portion of unincorporated Riverside County. The specific objectives of the proposed Project are:

- A. To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses in an area predominately composed of housing.
- B. To assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire.



- C. To attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment.
- D. To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.
- E. To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.
- F. To anticipate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.
- G. To develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.
- H. To develop a property that has access to available infrastructure, including roads and utilities.

#### 6.4.1 NO DEVELOPMENT ALTERNATIVE

The NDA considers no development/disturbance on the Project site beyond that which occurs under existing conditions. As such, the Project site would continue to consist of 582.6 acres of vacant and undeveloped land. Under the NDA, no improvements would be made to the Project site and none of the Project's roadway, utility, or other infrastructure improvements would occur. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would leave the Project site in its existing condition.

##### A. *Aesthetics*

The NDA considers no development or disturbance on the Project site beyond that which occurs under existing conditions. As such, the 582.6-acre site would remain vacant and undeveloped. Thus, the Project's less-than-significant impacts to scenic vistas would be avoided under this Alternative. The Project site is not visible from any designated or eligible scenic highways; thus, impacts to scenic highways would be less than significant and similar to the proposed Project. However, because implementation of the NDA would retain the site's existing visual character, the Project's significant and unavoidable impacts due to a substantial change to the visual character and quality of public views in the Project area would be avoided with implementation of the NDA. Although the Project would be subject to compliance with Riverside County Ordinance No. 655 and would result in less-than-significant light and glare impacts, no new lighting sources



or sources of potential glare would occur on site under the NDA; thus, impacts associated with light and glare would be reduced in comparison to the proposed Project.

**B. Agriculture and Forestry Resources**

Under the NDA, no new development would occur on site. Thus, implementation of the NDA would avoid the Project's less-than-significant impacts due the conversion of approximately 482.9 acres Farmland of Local Importance and Grazing Land, neither of which comprise "Farmland," as more fully documented by the Project's LESA Analysis (*Technical Appendix S*). Neither the Project nor the NDA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. However, the NDA would avoid the Project's less-than-significant impacts due to a conflict with existing agricultural uses. Both the Project and the NDA would be subject to Riverside County Ordinance No. 625, which requires that when lands are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future land buyers must be notified of any agricultural operations that are on-going in the area, and mandates that such agricultural uses shall not be the subject of nuisance complaints. Thus, no conflicts with existing agricultural land uses would occur under the Project or the NDA, and impacts would be similar and less than significant. There are no other components of the Project that could result in the conversion of Farmland to non-agricultural use; however, because the NDA would allow for agricultural operations on site, the Project's less-than-significant impacts would be reduced. Neither the Project nor the NDA would result in impacts due to the conversion of forest land to non-forest uses, and the level of impact would be the same.

**C. Air Quality**

Under the NDA, there would be no new construction or development on the Project site. Although construction-related emissions under the proposed Project would be mitigated to below a level of significance, implementation of the NDA would not result in any construction-related emissions and the Project's less-than-significant construction-related air quality impacts would therefore be reduced. Additionally, because the NDA would not involve any new development on site, implementation of the NDA would not result in any new air quality emissions and implementation of the NDA would avoid the Project's significant and unavoidable impacts due to operational-related emissions of NO<sub>x</sub>, VOCs, and CO. Furthermore, implementation of the NDA would avoid the Project's significant and unavoidable impacts due to a conflict with the 2022 SCAQMD AQMP. Although implementation of the proposed Project would result in less-than-significant impacts due to the exposure of sensitive receptors to substantial pollution concentrations (following the implementation of mitigation), these less-than-significant impacts would be avoided under the NDA. Similarly, the Project's less-than-significant impacts due to construction- or operational-related odor emissions would be avoided under the NDA.

**D. Biological Resources**

With implementation of the NDA, there would be no new construction or development on the Project site. As such, the NDA would avoid all of the Project's significant but mitigable impacts to biological resources. Specifically, the NDA would avoid the Project's potential conflict with the MSHCP (prior to mitigation). The





NDA also would not result in any construction-related impacts to nesting birds or burrowing owls. The NDA also would avoid the Project's significant but mitigable impacts to 0.31-acre of Southern Riparian Scrub and 1.37 acres of WoS (2,133 linear feet) that are regulated by the CDFW and MSHCP, and would avoid impacts to the 0.29-acre of USACE-defined jurisdictional areas that would be impacted by the Project and that are subject to regulation by the USACE and RWQCB. Additionally, the NDA would avoid the Project's impacts related to the need to amend the Project's HANS 269 approval. The NDA also would avoid the Project's significant but mitigable lighting and noise impacts affecting the on-site MSHCP open space areas.

***E. Cultural Resources***

Under the NDA, no new development would occur on site. Although the Project would not result in impacts to any known historical resources, the NDA would nonetheless avoid the Project's less-than-significant impacts (following mitigation) to subsurface historical resources that may be encountered during grading activities. Similarly, although there are no known archaeological resources on site, the NDA would avoid the Project's less-than-significant (with mitigation) impacts to subsurface archaeological resources that may be impacted during site grading operations. Additionally, because there would be no new grading on site, the NDA would avoid the Project's less-than-significant impacts (with mitigation) to buried human remains that may be uncovered during site grading activities. Thus, impacts to cultural resources would be reduced under the NDA in comparison to the Project.

***F. Energy***

Under the NDA, there would be no increase in demand from the Project site for energy resources. As such, the NDA would avoid the Project's less-than-significant impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources. Neither the Project nor the NDA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NDA in comparison to the Project because the NDA would not result in an increase in use of energy resources.

***G. Geology and Soils***

Under the NDA, there would be no new development on site. There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the NDA. However, because the Project would involve a substantial increase in the number of employees on site, the Project's less-than-significant impacts due to strong seismic ground shaking would be reduced under the NDA. Because no new development would occur, the NDA would result in reduced impacts as compared to the Project's less-than-significant impacts (with mitigation) due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard. The Project's less-than-significant impacts (with mitigation) due to ground subsidence also would be reduced under the NDA. Neither the Project nor the NDA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Because there would be no new development on site, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to cut or fill slopes greater than 2:1 or higher than 10 feet. Neither the Project nor the NDA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the NDA would require septic tanks or



alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NDA and proposed Project. During construction of the proposed Project vegetative cover would be removed, increasing the potential for erosion as compared to the site's existing conditions; thus, the NDA would avoid the Project's less-than-significant erosion impacts during construction. However, for the proposed Project under long-term conditions, the Project site's potential for erosion would be substantially reduced as compared to existing conditions due to the introduction of impervious surfaces and landscaped areas on site; thus, impacts under long-term conditions due to erosion would be increased under the NDA as compared to long-term operations associated with the Project. Lastly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) due to expansive soils.

#### ***H. Greenhouse Gas Emissions***

Under the NDA, there would be no new development or construction activities on site. As such, the NDA would completely avoid the Project's less-than-significant impacts (after mitigation) due to GHG emissions. Similarly, the Project's less-than-significant impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs also would be avoided with implementation of the NDA.

#### ***I. Hazards and Hazardous Materials***

Under the NDA, there would be no new development on site. As such, there would be no requirement under the NDA to remediate soil contamination due to pesticides on site; thus, impacts due to existing hazardous site conditions would be increased under the NDA as compared to the Project, although impacts still would remain below a level of significance because the site would not include any residential or other sensitive land uses under the NDA. There would be no construction activities or changes to operational conditions on site under the NDA; thus, the NDA would result in reduced impacts in comparison to the Project's less-than-significant construction and operational impacts due to hazardous materials. Neither the Project nor the NDA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NDA and proposed Project would be less than significant and the level of impact would be similar. Although neither the Project nor the NDA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because there would be no change in the site's existing conditions impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or NDA, and the level of impact would be similar. Although the Project was found to be consistent with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP), because the NDA would not introduce any new residents or workers on site impacts due to airport-related hazards would be reduced under the NDA in comparison to the proposed Project. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards and the level of impact would be the same.



***J. Hydrology and Water Quality***

With respect to water quality, the NDA would not involve any new development on site. With exception of erosion potential, the NDA would result in reduced impacts to water quality as compared to the proposed Project's less-than-significant water quality impacts. While the risk of erosion would increase during construction of the proposed Project, under long-term operating conditions the Project would result in the introduction of impervious surfaces and landscaped areas; thus, long-term operational erosion impacts would be increased under the NDA due to the lack of vegetative cover on portions of the Project site. While the Project would result in less-than-significant impacts due to groundwater recharge, impacts to groundwater recharge would be reduced under the NDA because there would be no new impervious surfaces on site. Although the Project would result in less-than-significant impacts to the site's existing drainage pattern, because there would be no changes to the site's drainage patterns under the NDA impacts would be reduced in comparison to the proposed Project. Similarly, although the Project would not exceed the capacity of any existing or planned stormwater drainage systems, because there would be no changes to site drainage under the NDA impacts would be reduced in comparison to the Project. A small portion of the Project site proposed for development as part of the Project is subject to flood hazards, requiring mitigation in the form of a CLOMR and LOMR from FEMA to remove these portions of the Project site from the mapped floodplain; thus, the Project's less-than-significant impacts due to flood hazards (after mitigation) would be avoided under the NDA. The Project site is not subject to inundation from tsunamis or seiches; thus, impacts would be less than significant and would be similar under the Project and NDA.

***K. Land Use and Planning***

The NDA would not be consistent with the land use designations applied to the property by the Riverside County General Plan, LNAP, and SP 239. However, implementation of the NDA would avoid the Project's less-than-significant impacts (with mitigation) due to land use compatibility. Neither the Project nor the NDA would conflict with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Riverside County General Plan, LNAP, or the County's "Good Neighbor" Policy for Logistics and Warehouse/Distribution Uses. Additionally, neither the Project nor the NDA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

***L. Mineral Resources***

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NDA, and the level of impact would be similar. Additionally, neither the Project nor the NDA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NDA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.



***M. Noise***

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NDA. The NDA would avoid the Project's less-than-significant impacts (after mitigation) due to construction-related and operational noise levels and would avoid the Project's significant and unavoidable impact due to traffic-related noise increases along the roadway segments previously described above in Subsection 6.1. Additionally, the NDA would avoid the Project's less-than-significant impacts (with mitigation) due to blasting-related vibration, and also would avoid the Project's less-than-significant impacts due to operational-related vibration.

***N. Paleontological Resources***

Under the NDA, there would be no new construction or development on site. Therefore, the NDA would avoid the Project's less-than-significant construction-related impacts (after mitigation) to paleontological resources that may be buried beneath the site's surface.

***O. Population and Housing***

Neither the Project nor the NDA would eliminate any residents or housing or generate any demand for additional housing. Thus, impacts due to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, would be less than significant under both the Project and the NDA, although the level of impact would be slightly increased under the Project due to the generation of employees and associated potential indirect demand for new housing. Although the Project would result in less-than-significant impacts due to substantial unplanned population growth, the NDA would not result in any new development on site; thus, impacts under the NDA would be reduced in comparison to the proposed Project.

***P. Public Services***

There would be no new development on site under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to fire protection, police protection, school services, library services, and health services.

***Q. Recreation***

The Project does not propose any residential uses or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Likewise, the NDA would not result in any new development on site and thus would not generate any increase in demand for recreational resources, nor would any recreational resources be constructed on site under the NDA. Therefore, impacts to recreation would be similar under the Project and the NDA, although impacts due to the construction of recreational facilities (i.e., trails) would be reduced under the NDA as compared to the proposed Project.



**R. Transportation**

Under the NDA, there would be no new development on site and thus there would be no increase in traffic generated by the site. As such, the NDA would avoid the Project's less-than-significant impacts due to a conflict with applicable General Plan Circulation Element and LNAP policies related to the circulation system, transit, roadway, bicycle, and/or pedestrian facilities, although it should be noted that General Plan Circulation Element roadways within the Project site would not be improved as part of the NDA. Because the NDA would not generate any new traffic, the NDA would avoid the Project's significant and unavoidable impacts due to VMT. Additionally, due to the lack of improvements, the NDA would avoid the Project's less-than-significant impacts due to increased hazards due to a geometric design feature or incompatible uses. The NDA also would avoid the Project's less-than-significant impacts due to the need for new or altered maintenance of roads. The NDA would not involve a construction phase, and thus would avoid the Project's less-than-significant (after mitigation) impacts to circulation during construction activities on site. The NDA would not result in any impacts due to emergency access or access to nearby uses; thus, the NDA would avoid the Project's less-than-significant (after mitigation) impacts to emergency access during construction activities. No new bike lanes or trails would be constructed under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts due to bike lane and trail construction.

**S. Tribal Cultural Resources**

There would be no new development on site under the NDA. Accordingly, the NDA would avoid the Project's less-than-significant impacts (after mitigation) to tribal cultural resources.

**T. Utilities and Service Systems**

Under the NDA, there would be no increased demand for water, wastewater treatment, or storm water drainage; thus, the NDA would avoid the Project's less-than-significant impacts due to the construction of such facilities and due to the provision of water or wastewater treatment services. There would be no increase in demand for water resources under the NDA; thus, the NDA would avoid the Project's less-than-significant impacts to water supply. Additionally, the NDA would avoid the Project's less-than-significant impacts due to the construction of wastewater conveyance facilities on and off site, and would avoid the Project's less-than-significant impacts to wastewater treatment capacity. There would be no increase in solid waste generated on site; thus, the NDA would avoid the Project's less-than-significant impacts due to solid waste. There are no components of the NDA or the proposed Project that would conflict with federal, State, and local management and reduction statutes and regulations related to solid wastes, including the CIWMP (County Integrated Waste Management Plan); thus, impacts would be less than significant and the level of impact would be similar. The NDA also would avoid the Project's less-than-significant impacts due to the construction of facilities for electricity, natural gas, communication systems, street lighting, or due to increased roadway maintenance.

**U. Wildfire**

Under the NDA, there would be no new development on site. Although impacts due to wildfire would be less than significant under the proposed Project, the NDA would result in reduced impacts due to wildfires in comparison to the Project because no new structures would be developed on site. Additionally, under the NDA



the Project site would remain in its existing condition, and would continue to contain natural vegetation that could serve as potential fuel for future wildfires in the local area.

## V. Conclusion

Implementation of the NDA would result in no physical environmental impacts beyond those that have historically occurred on the property. Almost all effects of the proposed Project would be avoided or lessened by the selection of this Alternative, although a few new impacts, such as sedimentation impacts, would be increased under this Alternative. The NDA would conflict with the General Plan, LNAP, and Housing Element requirements, although such conflict would not result in any significant environmental effects. Because this Alternative would avoid most of the Project's impacts, it warrants consideration as the "environmentally superior alternative." However, pursuant to State CEQA Guidelines § 15126.6(e)(2), if a no project alternative is identified as the environmentally superior alternative," then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Reduced Project Alternative, as discussed in subsection 6.4.3, is identified as the environmentally superior alternative.

The NDA would fail to meet any of the Project's objectives. Specifically, the NDA would not result in the efficient development of an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses. The NDA also would not assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire. The NDA also would not attract new businesses to Riverside County and would not provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment. Additionally, the NDA would not establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. The NDA would not establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis. Additionally, the NDA would not respond to market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County. Furthermore, the NDA would not result in the development of a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region. Finally, the NDA would not result in the development of a property that has access to available infrastructure, including roads and utilities.

### 6.4.2 NO PROJECT (EXISTING GENERAL PLAN) ALTERNATIVE ("NPA")

The NPA assumes development of the 582.6-acre property in accordance with the site's existing General Plan and Specific Plan land uses. Thus, under this alternative, and consistent with the adopted Stoneridge Specific Plan No. 239 (SP 239) for the portions of the adopted SP 239 that occur within the Project site, the Project site would be developed with approximately 671 "Medium Residential (2-5 du/ac)" dwelling units on



approximately 172.9 acres; approximately 903 “Medium-High Residential (5-8 du/ac)” dwelling units on approximately 185.0 acres; approximately 446 “Very High Residential (14-20 du/ac)” dwelling units on approximately 30.0 acres; “Commercial” uses on approximately 68.1 acres, which also would allow for up to 153 dwelling units in Planning Area 1; “Parks” on approximately 33.7 acres; “Open Space – Natural” on approximately 20.8 acres; “Open Space – Recreational” on approximately 8.6 acres; three planning areas designated for “Schools” on approximately 27.0 acres; and approximately 36.5 acres of major circulation facilities. This Alternative was selected by the Lead Agency to compare the environmental effects of the proposed Project with an alternative that would allow for buildout of the Project site in accordance with the site’s existing General Plan and SP 239 land use designations.

**A. Aesthetics**

The Project site is not located within the viewshed of any officially designated State or County scenic highways or State-Eligible scenic highways. Development under the Project and NPA would be visible from Ramona Expressway, which is designated as a County-Eligible scenic highway; however, development on site under both the Project and NPA would be required to comply with the development standards and design guidelines included in the adopted or proposed SP 239, which have been designed to ensure that the property is developed in a manner that is not aesthetically offensive. Thus, impacts to scenic corridors would be less than significant under both the Project and NPA, and the level of impact would be similar. As with the proposed Project, the NPA would not substantially damage scenic resources; obstruct any prominent scenic vista or view open to the public; result in the creation of an aesthetically offensive site open to public view; or conflict with applicable zoning and other regulations governing scenic quality. However, the Project vicinity exhibits a rural character, and the land uses proposed as part of the Project and the NPA would represent a substantial change to the existing visual character and quality of public views of the site and its surroundings. As with the proposed Project, the NPA would result in significant and unavoidable impacts to visual character and quality, although impacts under the NPA would be reduced in comparison to the Project due to the reduction in development intensity on site that would occur under the NPA as compared to the proposed Project.

**B. Agriculture and Forestry Resources**

Areas proposed for physical impact under the NPA would be similar to the proposed Project, except that under the Project the open space planned for proposed Planning Area 9 would be reduced in size from 20.8 acres under the adopted SP 239 to 18.1 acres under the proposed Project, while open space within proposed Planning Area 10 under the proposed Project would be developed with residential uses under the NPA. Although agricultural activities throughout the 582.6-acre property would be precluded under both the Project and the NPA, both the Project and the NPA would result in less-than-significant direct and indirect impacts due to the conversion of Farmland of Local Importance and Grazing Land, neither of which comprise “Farmland,” as more fully documented by the Project’s LESA Analysis (*Technical Appendix S*), and the level of impact would be the same. Neither the Project nor the NPA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. Both the Project and the NPA result in less-than-significant impacts due to a conflict with existing agricultural uses, although the level of impact under the NPA would be slightly increased due to the introduction of residential uses on site, which are more sensitive to land use compatibility impacts than the



light industrial, business park, and commercial retail land uses proposed as part of the Project. Both the Project and the NPA would be subject to Riverside County Ordinance No. 625; thus, no conflicts with existing agricultural land uses would occur under the Project or the NPA, and impacts would be similar and less than significant. There are no other components of the Project or NPA that could result in the conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the NPA would result in impacts due to the conversion of forest land to non-forest uses, and the level of impact would be the same.

### **C. Air Quality**

Based on the level of intensity allowed by the adopted SP 239, implementation of the NPA is expected to result in emissions that would exceed the SCAQMD Regional Thresholds for criteria pollutants. Although the NPA is consistent with the growth forecasts assumed by the 2022 SCAQMD AQMP, because the NPA would exceed the SCAQMD Regional Thresholds the NPA would conflict with the implementation of the air quality reductions called for by the SCAQMD AQMP. Thus, as with the Project, impacts due to a conflict with the SCAQMD 2022 AQMP would be significant and unavoidable, and the level of impact would be similar. As the level of intensity for development on site would be similar under the NPA and proposed Project, it is expected that construction-related emissions under both the NPA and the proposed Project would be less than significant. For long-term operational conditions, the NPA is projected to result in between 30,111 and 47,888 Average Daily Trips (ADT), whereas the Project is projected to generate between 23,474 and 23,680 ADT. As such, while both the Project and NPA would result in long-term operational emissions that would exceed the SCAQMD Regional Thresholds for criteria pollutants, which could contribute to the SoCAB's non-attainment status for ozone precursors and particulate matter and that could exceed the SCAQMDs regional threshold of significance for CO, vehicular-related air quality emissions (with exception of DPM emissions) under the NPA would be increased as compared to the proposed Project. Impacts would be significant and unavoidable under both the Project and NPA, with impacts being greater under the NPA as compared to the Project. With respect to localized emissions, the NPA would result in the generation of substantially fewer diesel truck trips as compared to the Project; thus, cancer risks and non-cancer health hazards would be reduced under the NPA as compared to the Project, although impacts would be below the thresholds of significance under both the Project and NPA following the implementation of mitigation measures. Neither the Project nor the NPA would result in or contribute to CO "hot spots," and impacts would be less than significant with the level of impact being similar. Both the Project and the NPA are anticipated to result in less-than-significant impacts due to odors, although odors would be slightly reduced under the NPA due to the substantial reduction in diesel truck trips.

### **D. Biological Resources**

Under the NPA, a total of 20.8 acres of the Project site would be preserved as natural open space, primarily within the southwest portion of the Project site (generally corresponding to Planning Area 9 of proposed SP 239A1), along with 8.6 acres of recreational open space within the southeast corner of the site. By comparison, under the proposed Project a total of 99.7 acres of the Project site would be preserved as natural open space. Thus, impacts to biological resources under the NPA would be increased as compared to the proposed Project, although as with the Project all impacts would be mitigated to less-than-significant levels. Specifically, the NPA would allow for development within the San Jacinto River floodplain in the eastern portion of the site





(i.e., within Planning Area 10 of proposed SP 239A1), which is proposed for long-term conservation natural open space as part of the Project. Additionally, under the NPA areas proposed for recreational open space in the southeast corner of the site would be smaller than the natural open space area proposed as part of Planning Area 11 of proposed SP 239A1. Thus, under the NPA impacts to sensitive vegetation communities would be increased, as would impacts to sensitive plant and animal species. Implementation of the NPA also would result in a substantial increase in impacts to jurisdictional waters and wetlands, the majority of which occur in areas along the San Jacinto River that would be avoided by the Project but that would be subject to development and long-term disturbance under the NPA. The Project and NPA would result in less-than-significant impacts to wildlife movement corridors, although impacts would be increased under the NPA due to the planned development along the San Jacinto River, which is a regional wildlife movement corridor. The NPA would have a greater potential to result in conflicts with the MSHCP due to the increase in areas proposed for development as compared to the proposed Project. Neither the Project nor the NPA would result in a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the level of impact would be similar.

#### ***E. Cultural Resources***

Areas proposed for physical impact under the NPA would be similar to the proposed Project, except that under the Project the open space planned for proposed Planning Area 9 would be reduced in size from 20.8 acres under the NPA to 18.1 acres under the proposed Project, while open space within proposed Planning Area 10 under the proposed Project would be developed with residential uses under the NPA. Both the Project and the NPA would result in less-than-significant impacts to previously undiscovered subsurface historical resources with the implementation of mitigation measures, although the potential impact to previously-undiscovered historical resources would be slightly increased under the NPA due to the increase in areas that would be subject to ground disturbance as compared to the Project. Similarly, both the Project and NPA would result in less-than-significant impacts to previously-undiscovered archaeological resources and human remains with the implementation of mitigation measures, although the level of impact would be slightly increased under the NPA due to the increase in areas subject to ground disturbance under the NPA as compared to the Project.

#### ***F. Energy***

Based on the rates utilized in Riverside County EIR No. 521, which was prepared to evaluate the County's 2015 General Plan Update, the NPA is projected to result in a demand for between 17.1 and 25.1 million kilowatt hours per year of electricity and between 186.6 and 197.7 million cubic feet per year of natural gas. (Riverside County, 2015, Tables 5.5-O and 5.5-P) With respect to transportation-related energy consumption, the NPA is projected to result in between 30,111 and 47,888 ADT, whereas the Project is projected to generate between 23,474 and 23,680 ADT; thus, the NPA would result in an increase in demand for transportation-related energy sources as compared to the proposed Project. However, it is estimated that Project operational-related non-vehicular energy consumption would be approximately half of what would occur under the proposed Project. Neither the Project nor the NPA would result in the inefficient, wasteful, or unnecessary consumption of energy and impacts would be less than significant. Additionally, both the Project and NPA would be required to comply with adopted State and local plans related to energy conservation; thus, impacts would be less than significant and the level of impact would be similar.



### **G. Geology and Soils**

There are no known faults on or trending towards the Project site; thus, impacts associated with rupture of a known fault would be less than significant and similar under the proposed Project and the NPA. However, the NPA is projected to result in a future residential population of between 6,484 and 6,977 and between approximately 735 and 2,077 employees, whereas the Project is anticipated to generate between 8,950 and 9,162 employees; thus, because the NPA would result in fewer people on site as compared to the Project, the Project's less-than-significant impacts due to strong seismic ground shaking would be reduced under the NPA (Riverside County, 2019a, Appendix E-1, Table E-5). Because development would occur over approximately the same area under the NPA and proposed Project, impacts due to unstable geologic units or soils that are unstable and that potentially could result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazard would be similar and would be less than significant. Impacts associated with ground subsidence also would be similar under the Project and NPA. Neither the Project nor the NPA would be subject to geologic hazards, such as seiches, mudflow, or volcanic hazards; impacts would be less than significant and the level of impact would be similar. Grading activities would be similar under the Project and NPA; thus, impacts due to cut or fill slopes greater than 2:1 or higher than 10 feet would be similar and would be less than significant. Neither the Project nor the NPA would result in grading that affects or negates subsurface sewage disposal systems, and neither the Project nor the NPA would require septic tanks or alternative waste water disposal systems on unsuitable soils; thus, impacts would be less than significant and similar under the NPA and proposed Project. Similarly, impacts due to erosion hazards during construction and long-term operation would be similar under the NPA and proposed Project and impacts would be less than significant. Both the Project and NPA would require remediation of expansive soils on site; thus, impacts associated with expansive soils would be similar and would be less than significant.

### **H. Greenhouse Gas Emissions**

Both the Project and NPA would be required through mitigation measures to achieve a minimum of 100 points per the Riverside County Climate Action Plan (CAP) Update Screening Tables (CAP Update Appendix D), which would reduce impacts due to GHG emissions to below a level of significance. The level of significance due to GHG emissions would be similar with mandatory compliance with the CAP Update Screening Tables. Neither the Project nor the NPA would conflict with applicable plans, policies, or regulations related to GHGs; thus, impacts would be less than significant and the level of impact would be similar.

### **I. Hazards and Hazardous Materials**

Soil remediation to address existing soil contamination due to pesticides would be required under both the Project and NPA; thus, impacts due to existing site hazards would be less than significant with mitigation under both the Project and NPA, and the level of impact would be similar. The potential for hazardous materials under construction activities would be similar under the Project and NPA, and impacts would be less than significant. However, under long-term operational conditions, the Project has the potential to include businesses that handle hazardous materials whereas the NPA would consist primarily of a residential community. Thus, although long-term operational impacts due to hazards and hazardous materials would be less than significant under both the Project and NPA, the level of impact would be decreased under the NPA.



Neither the Project nor the NPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, impacts under the NPA and proposed Project would be less than significant and the level of impact would be similar. Although neither the Project nor the NPA would emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because the Project would involve businesses that have the potential for storage of hazardous materials impacts to nearby schools would be reduced in comparison to the Project's less-than-significant impacts. The Project site is not identified on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the Project or NPA, and the level of impact would be similar. Both the Project and NPA would involve land uses that would be consistent with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP); thus, impacts due to airport-related hazards would be less than significant under both the Project and NPA, and the level of impact would be similar. The Project site is not located in the Airport Influence Area (AIA) of any private airports; thus, there would be no impacts due to private airport-related hazards and the level of impact would be the same.

***J. Hydrology and Water Quality***

Both the Project and the NPA would be subject to compliance with the Santa Ana Region Basin Plan, and would be required to comply with the requirements of the Santa Ana RWQCB and the County of Riverside. This includes the requirement to obtain a NPDES Municipal Stormwater Permit for construction activities, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include measures to address water pollution, including sedimentation. Additionally, both the Project and NPA would be subject to NPDES requirements for long-term operations, which would reduce potential water quality impacts (including sediments) from construction to less-than-significant levels. Due to the relatively flat nature of the portions of the Project site proposed for development, it is not expected that the Project or NPA would result in substantial changes to the existing drainage system of the Project site and area; thus, impacts would be less than significant and the level of impact would be similar. Both the Project and NPA would be subject to future implementing hydrology studies as part of future implementing development (e.g., tentative tract maps, plot plans, etc.), which would be required to demonstrate adequate capacity to handle runoff from the Project site; thus, impacts related to exceeding the capacity of existing or planned stormwater drainage facilities would be less than significant and the level of impact would be similar. A small portion of the Project site proposed for development as part of the Project and NPA is subject to flood hazards, requiring mitigation in the form of a CLOMR and LOMR from FEMA to remove these portions of the Project site from the mapped floodplain; thus, impacts due to flood hazards would be similar under the Project and NPA, and would be reduced to less-than-significant levels with the implementation of mitigation measures. The Project site is not subject to tsunamis or seiche zones, and following mitigation would not be subject to flood hazards with completion of the FEMA CLOMR and LOMR processes; thus, impacts due to pollution from inundation by floods, tsunamis, and seiches would be less than significant following mitigation, and the level of impact would be similar.



***K. Land Use and Planning***

Assuming approval of the Project's proposed General Plan Amendment, both the Project and the NPA would be fully consistent with the Riverside County General Plan and Lakeview/Nuevo Area Plan (LNAP). Thus, impacts would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and NPA also would be consistent with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and as such impacts due to a conflict would be similar and less than significant. However, the NPA would be more compatible with existing and planned land uses in the surrounding area; thus, although the Project and NPA would have less-than-significant impacts due to land use compatibility, impacts would be reduced under the NPA as compared to the proposed Project. Additionally, neither the Project nor the NPA would disrupt or divide the physical arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

***L. Mineral Resources***

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the NPA, and the level of impact would be similar. Additionally, neither the Project nor the NPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the NPA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

***M. Noise***

The Project site is located outside of areas subject to public and private airport-related noise levels exceeding 55 dBA CNEL; thus, impacts due to airport-related noise would be less than significant under both the Project and the NPA. Construction-related noise under the Project and NPA would be similar, and impacts due to construction noise would be reduced to below a level of significance under both the Project and NPA with the implementation of mitigation. Because the NPA would involve primarily residential development, noise impacts associated with long-term operations would be reduced under the NPA as compared to the Project, although Project operational impacts would be less than significant with the implementation of mitigation measures. With respect to transportation-related noise, although the NPA would generate more ADT than the proposed Project, the NPA would involve less heavy truck traffic. Thus, due to the lack of heavy truck traffic, transportation-related noise would be reduced under the NPA as compared to the proposed Project, although given the increase in traffic under the NPA it is not expected that the NPA would completely avoid the Project's significant and unavoidable impact due to traffic noise along the study area roadway segments. Construction-related vibration impacts would be similar under the Project and NPA, and impacts would be reduced to less-than-significant levels with the implementation of mitigation measures. Under long-term operations, because the NPA would involve fewer heavy trucks, operational vibration impacts would be reduced under the NPA in comparison to the Project, although impacts would be less than significant under both the Project and NPA.



***N. Paleontological Resources***

Riverside County General Plan Figure OS-8 indicates that a majority of the Project site has a “High B” potential for containing paleontological resources. Under the NPA, grading activities would occur in the northeastern portions of the Project site that are planned for open space under the proposed Project. Thus, impacts to subsurface paleontological resources would be increased under the NPA, although impacts would be less than significant under both the Project and NPA with the implementation of mitigation measures.

***O. Population and Housing***

Neither the Project nor the NPA would result in the displacement of substantial numbers of existing people or housing, necessitating the construction of housing elsewhere; thus, no impact would occur under either the Project or NPA. Although the Project is not anticipated to result in an increased demand for affordable housing, impacts under the NPA would be reduced in comparison to the Project because the NPA would accommodate approximately 446 very high density (affordable) residential units. Although the type of development on site would vary between the Project and the NPA, neither the NPA nor the Project would represent substantial unplanned population growth as the Project site is currently planned for urban land uses by the County’s General Plan. Additionally, neither the Project nor the NPA would indirectly induce growth, as infrastructure improvements would be sized to accommodate only future development on site. Impacts to population and housing would be less than significant under both the Project and NPA, and the level of impact would be similar.

***P. Public Services***

The NPA would result in a similar level of development intensity on site as the proposed Project. As such, impacts to fire services, sheriff services, and health services would be similar and less than significant with payment of mandatory Development Impact Fees (DIF) in accordance with Riverside County Ordinance No. 659. The Project would not involve any residential development and is not anticipated to increase the County’s residential population, whereas the NPA would involve the construction of up to 2,173 dwelling units; thus, impacts to recreational and library facilities would be increased under the NPA as compared to the Project, although impacts would be less than significant with payment of DIF fees and the development of up to 33.7 acres of parks under the NPA. Additionally, the NPA would result in up to 2,173 residential dwelling units while the Project does not involve any residential uses; thus, impacts to school services would be increased under the NPA as compared to the Project, although impacts would be reduced to less-than-significant levels under the NPA with mandatory payment of school impact fees pursuant to Senate Bill 50 (SB 50).

***Q. Recreation***

The Project does not entail any residential uses while the NPA would involve up to 2,173 dwelling units and would generate approximately 6,977 future residents. Thus, while the Project would not result in a measurable increase in demand for recreational resources, the NPA would generate a demand for approximately 34.9 acres of parkland, based on the County’s standard of 5.0 acres per 1,000 persons. The NPA only would accommodate 33.7 acres of parks on site. Thus, impacts to recreation would be increased under the NPA in comparison to the proposed Project, although impacts would be reduced to less-than-significant levels with



payment of in-lieu park fees. Both the Project and NPA would involve the construction of recreational facilities on site, although such impacts would be inherent to the construction phase and the level of impact would be similar.

***R. Transportation***

The NPA is projected to result in between 30,111 and 47,888 Average Daily Trips (ADT), whereas the Project is projected to generate between 23,474 and 23,680 ADT; thus, the NPA would have a greater effect on projected Level of Service (LOS) as compared to the Project, although improvements and fair-share contributions would be required under both the Project and NPA to ensure that study area facilities achieve LOS D or better. The level of impact associated with off-site traffic improvements and potential conflicts with the County General Plan's LOS standards would be increased in comparison to the Project. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the NPA, and the level of impact would be similar. Both the Project and the NPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads. Both the Project and the NPA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, and the level of impact after mitigation would be similar under the Project and NPA. Both the Project and NPA would be required to accommodate facilities for bicycles, although impacts associated with the construction of such trails have been evaluated herein, and both the Project and NPA would result in similar less-than-significant impacts due to bicycle facilities. With respect to VMT, the NPA would involve primarily the development of residential uses in a portion of the County that lacks employment opportunities. As such, it is anticipated that the NPA would result in increased VMT as compared to the proposed Project, although both the Project and NPA would result in significant and unavoidable impacts due to VMT.

***S. Tribal Cultural Resources***

Grading activities under the Project and NPA would be similar, although areas subject to grading would be slightly increased in comparison to the Project as areas in the northeast portion of the Project site that would be preserved as open space under the Project would instead be subject to development under the NPA. As such, potential impacts to tribal cultural resources would increase under the NPA as compared to the Project, although impacts would be less than significant with implementation of mitigation measures.

***T. Utilities and Service Systems***

The level of development intensity on site would be similar under both the Project and NPA. Both the Project and NPA would require the construction of water, wastewater, storm water drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be mitigated to less-than-significant levels with implementation of mitigation measures. The EMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, while the NPA is fully consistent with the growth assumptions used by EMWD for long-term planning efforts. Thus, because EMWD would be able to provide potable water to both the Project and the NPA, impacts to water supply would be less than significant and the level of impact would be similar. Similarly, EMWD would have adequate capacity to treat wastewater generated by either the Project or the NPA; thus, impacts



due to wastewater would be less than significant under both the Project and NPA, and the level of impact would be similar. Both the Project and NPA would be subject to the County's solid waste regulations, and neither the Project nor the NPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, and the level of impact would be similar under both the Project and NPA.

**U. Wildfire**

Both the Project and NPA would involve development of urban uses in adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and NPA would be required to implement a Fire Protection Plan (FPP) to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

**V. Conclusion**

As compared to the proposed Project, the NPA would have increased impacts under the issue areas of air quality (regional operational emissions), biological resources, cultural resources, paleontological resources, public services (schools and parks), recreation, transportation, and tribal cultural resources. The NPA would result in the same or similar impacts under the issue areas of air quality (construction-related emissions and AQMP consistency), agriculture/forest resources, geology/soils, greenhouse gas emissions, hydrology/water quality, mineral resources, noise (construction and traffic-related noise), population/housing, public services (fire, police, and health care), utilities/service systems, and wildfire. The NPA would result in reduced impacts as compared to the Project under the issue areas of aesthetics, air quality (localized operational emissions), energy, hazards/hazardous materials, land use/planning, and noise (operational noise).

The NPA generally would not meet the Project's objectives. Although the NPA would accommodate up to 68.1 acres of commercial retail land uses, it would not result in the establishment of a complementary mix of employment-generating land uses, including light industrial and business park land uses. The NPA would introduce primarily residential uses in an area that has a high proportion of residents to the number of available jobs; thus, the NPA would not assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire. Although the NPA would accommodate 68.1 acres of employment-generating uses (i.e., commercial retail), the NPA would be less effective than the proposed Project in achieving the objective to attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment. The NPA would be subject to the design guidelines and development standards of the adopted SP 239; thus, the NPA would meet the Project's objective to establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. Similarly, the NPA would meet the Project's objective to establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis, as the development concept is established by the adopted



SP 239. The NPA would not meet the Project’s objective to anticipate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County. The NPA similarly would not meet the Project’s objective to develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region. The NPA would, however, meet the Project’s objective to develop a property that has access to available infrastructure, including roads and utilities.

### **6.4.3 REDUCED PROJECT ALTERNATIVE**

The Reduced Project Alternative (RPA) considers development of the Project site with similar uses as the proposed Project, but at a much lower intensity. Specifically, under the proposed Project, Light Industrial land uses are restricted to a maximum of 7,350,000 s.f. of building area, Business Park land uses may be developed at an FAR up to 0.50, while Commercial Retail land uses can be developed at a FAR up to 0.35. Under the RPA, Light Industrial Uses would be restricted to a maximum of 5,145,000 s.f. of building area, Business Park land uses would be restricted to a maximum FAR of 0.35, while development in the Commercial Retail portions of the site would be limited to a maximum FAR of 0.25. For purposes of evaluation of the RPA, it is assumed that the MCP would not be in place under long-term conditions, thereby allowing for more development on site than would occur if the MCP were to be implemented through the northern portions of the Project site. As previously summarized in Table 6-1, the RPA would allow for a maximum of 5,145,000 s.f. of light industrial building area, 748,579 s.f. of business park building area, and 87,120 s.f. of commercial retail building area. Thus, implementation of the RPA would result in a reduction of building area allowed on site by approximately 30% as compared to the proposed Project. Under the RPA, it is assumed that all areas proposed for grading and development both on and off site would be the same as for the proposed Project. This alternative was selected by the Lead Agency in order to evaluate an alternative that would reduce the Project’s significant and unavoidable impacts to aesthetics, air quality, noise, and transportation.

#### **A. Aesthetics**

Under the RPA, the Project site would be developed in a manner similar to that of the proposed Project, although the amount of building area would be reduced by approximately 30% as compared to the proposed Project. As with the proposed Project, development on site would be required to comply with the development standards and design guidelines of proposed SP 239A1, in addition to all other applicable requirements of the County’s Municipal Code. Similar to the proposed Project, development under the RPA would not be visible from any State-Designated or State-Eligible scenic highways, although development under both the Project and RPA would be visible from nearby segments of Ramona Expressway, which is identified as a County-Eligible scenic highway. Although both the Project and RPA would be required to comply with the development standards of proposed SP 239A1, visual quality impacts to the Ramona Expressway would be reduced under the RPA due to the reduction in intensity of development on site impacts under the RPA. Areas planned for disturbance and development under the RPA would be similar to the proposed Project. However, because the RPA would be developed at a reduced intensity, implementation of the RPA would reduce the Project’s significant and unavoidable impacts to the existing visual character and quality of public views of





the site and its surroundings, although such impacts still would be significant and unavoidable under the RPA. Both the Project and the RPA would be subject to compliance with Riverside County Ordinance No. 655; however, because the RPA would involve less building area, potential impacts to the Mount Palomar Observatory associated with the RPA would be reduced in comparison to the Project. Similarly, although the Project and RPA would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which would ensure light and glare impacts would be less than significant, due to the reduction in building area under the RPA the RPA would result in reduced light and glare impacts as compared to the Project.

### ***B. Agriculture and Forestry Resources***

Areas proposed for physical impact and development under the RPA would be identical to the proposed Project. Although agricultural activities throughout the 582.6-acre property would be precluded under both the Project and the NPA, both the Project and the NPA would result in similar less-than-significant direct and indirect impacts due to the conversion of Farmland of Local Importance and Grazing Land, neither of which comprise “Farmland,” as more fully documented by the Project’s LESA Analysis (*Technical Appendix S*). Neither the Project nor the RPA would result in a conflict with existing agricultural zoning or land subject to a Williamson Act or Riverside County Agricultural Preserve, and impacts would be less than significant and similar. Both the Project and the RPA would result in less-than-significant impacts due to a conflict with existing agricultural uses. Both the Project and the RPA would be subject to Riverside County Ordinance No. 625; thus, no conflicts with existing agricultural land uses would occur under the Project or the RPA, and impacts would be similar and less than significant. There are no other components of the Project or RPA that could result in the conversion of Farmland to non-agricultural use; thus, impacts would be less than significant and the level of impact would be similar. Neither the Project nor the RPA would result in impacts due to the conversion of forest land to non-forest uses, and the level of impact would be the same.

### ***C. Air Quality***

The RPA would require a reduction in building area by approximately 30% as compared to the proposed Project. Thus, construction activities associated with the RPA would result in fewer emissions of criterial pollutants as compared to the Project, although neither the Project nor the RPA would exceed the SCAQMD Regional Thresholds during the construction phase and construction-relate impacts would be less than significant with mitigation. Under long-term operations, both the Project and the RPA would exceed the SCAQMD Regional Thresholds for VOCs, NO<sub>x</sub>, and CO, resulting in significant and unavoidable regional air quality impacts; however, because the total amount of building area would be reduced by 30% under the RPA as compared to the Project, the level of impacts would be substantially reduced under the RPA. With respect to the SCAQMD’s localized thresholds of significance (LSTs), neither the Project nor the RPA would exceed the SCAQMD LSTs during construction or long-term operations, although impacts under the RPA would be reduced as compared to the Project due to the reduction in building area. Neither the Project nor the RPA would expose nearby sensitive receptors to cancer or non-cancer risks exceeding the SCAQMD thresholds of significance, although the level of impact would be reduced under the RPA due to the substantial reduction in building area and attendant reduction in the amount of truck traffic generated by the site, and due to the reduction in building area that would be used for high-cube cold-storage uses. Neither the Project nor the RPA would result in CO “hot spots,” although the amount of localized CO emission under the RPA would be



reduced in comparison to the proposed Project. Although impacts due to odors would be less than significant under both the RPA and proposed Project, the level of impact would be slightly reduced under the RPA due to the reduction in proposed building area. Both the Project and the RPA would result in a significant and unavoidable impact due to a conflict with the SCAQMD AQMP, although impacts under the RPA would be reduced in comparison to the Project due to the substantial reduction in building area and associated air quality emissions.

#### **D. Biological Resources**

Areas planned for development and disturbance under the RPA would be identical to the proposed Project, although future on-site operations would be less intense than the Project due to the reduction in allowed building area. With mitigation, both the RPA and the proposed Project would be fully consistent with the MSHCP, although indirect impacts to the MSHCP Conservation Area (i.e., operational-related noise) would be reduced in comparison to the Project due to the reduction in building area. Due to off-site improvements that would be required under both the Project and RPA, both the Project and RPA would result in significant, but mitigable impacts due to the need to amend HANS 269 to account for the off-site improvements, and the level of impact would be similar. Neither the Project nor the RPA would result in impacts to sensitive plants or animal species, although both the Project and RPA would require mitigation to ensure impacts to nesting birds are reduced to less-than-significant levels. Neither the Project nor the RPA would interfere with wildlife movement corridors or native wildlife nursery sites, and the level of impact would be the same. Both the Project and RPA would result in significant but mitigable impacts to 0.31-acre of southern riparian scrub located within the off-site improvement areas, and the level of impact would be the same. In addition, both the Project and the RPA would result in impacts to 0.29-acre of USACE-defined wetlands, 0.29-acre of USACE-defined jurisdictional areas subject to regulation by the USACE and RWQCB, as well as impacts to 1.37 acres of WoS (2,133 linear feet) that are regulated by the CDFW and MSHCP, inclusive of 0.29-acre of impact to riparian areas and 1.08 acres of non-riparian ephemeral dry streambeds; however, with mitigation impacts under the Project and RPA would be reduced to less-than-significant levels, and the level of impact would be the same. Neither the Project nor the RPA would result in significant impacts due to a conflict with local policies or ordinances protecting biological resources, and the level of impact would be the same.

#### **E. Cultural Resources**

Areas planned for development and disturbance under the RPA would be identical to the proposed Project. As with the Project, the RPA would not result in any impacts to previously-identified historical resources. However, and similar to the proposed Project, potential impacts to previously-undiscovered historical resources on site or within the off-site improvement areas would be significant but would be mitigated to below a level of significance with implementation of the required mitigation. Both the Project and RPA would provide for the long-term preservation of all but one of the previously-identified archaeological sites located within the Project site. Although both the Project and RPA would result in impacts to Site SR-001, Site SR-001 was determined to not comprise a significant archaeological resource based on the criteria listed in Section 15064.5 of the State CEQA Guidelines. However, both the Project and the RPA require mitigation to reduce to less-than-significant levels potential impacts to previously-undiscovered archaeological resources that may be uncovered during construction. Additionally, both the Project and RPA have the potential to result in similar



impacts to buried human remains during construction, although impacts to human remains would be mitigated to below a level of significance through mandatory compliance with California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et. seq.

#### **F. Energy**

Construction and operational characteristics associated with the RPA would be similar to the proposed Project, except that the total amount of building area would be reduced by approximately 30% as compared to the proposed Project. Although both the Project and RPA would be subject to compliance with all applicable energy conservation requirements, such as the California Green Building Standards Code, and would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or long-term operation, due to the reduction in building area under the RPA as compared to the proposed Project the RPA would result in a reduction of the Project's less-than-significant impacts due to energy consumption. The Project and the RPA would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency; thus, no impact would occur and the level of impact would be similar.

#### **G. Geology and Soils**

Construction and development characteristics associated with the RPA are very similar to the proposed Project, except that there would be less building area under the RPA as compared to the Project. Both the Project and the RPA would require mitigation to reduce impacts due to strong seismic ground shaking to below a level of significance; however, the RPA would expose fewer people to strong seismic shaking due to the reduction in building area and associated reduction in the number of employees on site. Both the Project and RPA would require mitigation to reduce impacts associated with liquefaction to less-than-significant levels, and the level of impact would be similar. Similarly, both the Project and RPA would require mitigation to reduce to less-than-significant levels impacts associated with landslide hazards, lateral spreading, collapse hazards, rockfall hazards, and subsidence, and the level of impact would be similar. Neither the Project nor the RPA would result in impacts associated with volcanos, seiches, or mudflow hazards, and the level of impact would be similar. Both the Project and the RPA would require mitigation to reduce to less-than-significant levels potential impacts due to proposed slopes greater than 2:1 or higher than 10 feet, although the level of impact would be reduced under the RPA as there likely would be fewer manufactured slopes required due to the reduction of building intensity on site. Neither the Project nor the RPA would result in significant impacts to subsurface sewage disposal systems, and the level of impact would be the same. With mandatory compliance with a SWPPP and WQMP to address construction and long-term operations, erosion impacts would be less than significant under the Project and RPA and the level of impact would be similar. Both the Project and RPA would require mitigation to reduce potential impacts associated with expansive soils to less-than-significant levels, and the level of impact would be similar.

#### **H. Greenhouse Gas Emissions**

Under the RPA, there would be a reduction in building area on site by approximately 30% as compared to the proposed Project. As such, there would be an approximate 30% reduction in the amount of GHGs produced on site during both construction and long-term operations. While both the Project and the RPA would require



mitigation to ensure compliance with the Riverside County CAP, which would reduce GHG-related impacts to less-than-significant levels, impacts would be substantially reduced under the RPA as compared to the proposed Project. Both the Project and the RPA would be consistent with the CARB 2017 Scoping Plan, the CARB 2022 Scoping Plan, and SB 32, and both the Project and RPA would require mitigation to ensure compliance with the Riverside County CAP; thus, potential impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be reduced to less-than-significant levels under both the Project and RPA, and the level of impact would be similar.

***I. Hazards and Hazardous Materials***

Both the Project and the RPA would require mitigation to reduce to less-than-significant levels impacts associated with existing site contamination due to the past use of the site for agricultural production, and the level of impact would be similar. Neither the Project nor the RPA would impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan; thus, no impact would occur under the RPA or the proposed Project and the level of impact would be the same. Compliance with applicable federal, State, and local regulations would ensure that neither the Project nor the RPA would result in hazardous emissions or hazardous materials impacts affecting schools; thus, impacts would be less than significant, although the level of impact would be slightly reduced under the RPA due to the less intensive operations on site. The Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; thus, no impact would occur under the RPA or the proposed Project, and the level of impact would be the same. With standard conditions of approval requiring compliance with the conditions of approval issued by the ALUC, both the proposed Project and RPA would be fully consistent with the March ARB ALUCP; thus, impacts would be less than significant under both the Project and RPA, although the level of impact under the RPA would be slightly reduced due to the reduction in on-site employment as compared to the Project. There are no private airstrips or heliports within two miles of the Project site; thus, no impact from private airstrips or heliports would occur with implementation of the Project or RPA, and the level of impact would be similar.

***J. Hydrology and Water Quality***

Neither the Project nor the RPA would involve groundwater production, and thus would have no direct impacts on groundwater supplies. However, both the Project and RPA would require mitigation to ensure runoff from the site does not impair surface or groundwater quality, although the level of impact would be reduced under the RPA due to the reduced development intensity on site as compared to the Project. Both the Project and RPA would require mitigation measures to reduce to less-than-significant levels potential erosion and flood hazards downstream, although the level of impact under the RPA would be reduced due to the reduction in impervious surfaces as compared to the Project. The Project and RPA would result in less-than-significant impacts due to the release of pollutants caused by flood hazards, tsunamis, and seiches, and the level of impact would be similar.

***K. Land Use and Planning***

Assuming approval of a General Plan Amendment, both the Project and RPA would be fully consistent with the Riverside County General Plan and LNAP, and the SCAG 2020-2045 RTP/SCS; thus, impacts would be



less than significant and the level of impact would be similar. With mandatory compliance with the County's Good Neighbor Guidelines, in addition to implementation of measures to address other environmental issues (e.g., air quality, etc.), potential impacts due to land use compatibility under both the Project and RPA would remain less than significant, and the level of impact would be similar. Neither the Project nor the RPA would physically disrupt or divide the arrangement of an established community; thus, impacts would be less than significant and the level of impact would be similar.

**L. Mineral Resources**

The Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Accordingly, no impacts to mineral resources would occur under the Project or the RPA, and the level of impact would be similar. Additionally, neither the Project nor the RPA would represent an incompatible land use located adjacent to a State classified or designated area or existing surface mine, and the RPA and Project would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impacts would occur, and the level of impact would be similar.

**M. Noise**

The Project site also occurs outside of the 55 dBA CNEL contours for both the MARB Airport and Perris Valley Airport; thus, impacts due to aircraft noise would be less than significant under the Project and RPA, and the level of impact would be similar. Both the Project and the RPA would require construction of the proposed off-site water lines, and would require mitigation to reduce construction-related noise to below a level of significance. Impacts would be similar. Both the Project and the RPA would require mitigation measures to ensure long-term operational noise does not expose nearby sensitive receptors to nighttime noise levels exceeding the County's standard of 45 dBA; however, due to the less intense development on site under the RPA, impacts would be reduced under the RPA as compared to the Project. Both the Project and RPA likely would result in significant direct and cumulatively-considerable impacts due to traffic-related noise increases along study area roadway segments; however, because the RPA would produce approximately 30% less traffic than the proposed Project, the RPA would result in reduced traffic-related noise impacts as compared to the proposed Project, and likely would avoid the Project significant and unavoidable traffic-related noise impacts along some study area roadway segments. Both the Project and the RPA would require mitigation to reduce to less-than-significant levels vibration impacts due to blasting activities at the water tank site, and the level of impact would be similar.

**N. Paleontological Resources**

Although the Project site does not contain any known paleontological resources or geological features, the Project site is underlain by soils and geologic units with a "High B" potential for containing unique paleontological resources. Thus, both the Project and RPA would require mitigation, in the form of a Paleontological Resource Impact Mitigation Program (PRIMP) to reduce impacts to below a level of significance. Because areas proposed for grading and disturbance would be the same under the RPA and proposed Project, potential impacts to paleontological resources would be the same.



**O. Population and Housing**

Neither the Project nor the RPA would result in the displacement of substantial numbers of existing people or housing, necessitating the construction of housing elsewhere; thus, no impact would occur under either the Project or RPA. The RPA would result in the generation of approximately 5,896 new recurring jobs within the County, while the Project would result in between 8,950 and 9,162 jobs (refer to RDEIR Table 3-5 for employment generation factors). Thus, as compared to the Project, the RPA would result in a reduced demand for housing. However, it is anticipated that future employees under the RPA or proposed Project would be accommodated by existing residential communities and/or by future residential uses to be constructed in accordance with the General Plan Land Use Plan, and that no additional housing, including housing affordable to households earning 80% or less of the County's median income, would be required to accommodate Project-related employees. As such, impacts to housing would be less than significant under both the Project and RPA, although impacts would be slightly reduced under the RPA due to the reduction in employees. With respect to unplanned population growth, because the Project site is designated for development with urban uses by the General Plan, LMAP, and SP 239, and because both the Project and RPA would accommodate employment opportunities in a portion of Riverside County that has a relatively low ratio of jobs to housing, the Project would not directly induce substantial unplanned population growth in the area, impacts would be less than significant, and the level of impact would be similar. Similarly, because all infrastructure improvements under the RPA and proposed Project would be sized to accommodate only development on site, both the Project nor the RPA would result in less-than-significant indirect impacts due to unplanned population growth.

**P. Public Services**

Both the Project and the RPA would be subject to payment of DIF fees, which would reduce to less-than-significant levels potential impacts to fire protection and sheriff facilities. However, due to the decrease in development intensity under the RPA, impacts to fire protection and sheriff facilities would be reduced under the RPA as compared to the Project. Neither the Project nor the RPA would result in direct impacts to school or library facilities, although both the Project and the RPA have the potential to indirectly contribute to the need for new or expanded schools and/or library facilities in the area. However, there are no plans available for any new or expanded school or library facilities; thus, any analysis of potential impacts due to new or expanded school or library facilities would be speculative. Because the RPA would result in fewer employees on site as compared to the Project, the RPA would result in reduced impacts to schools and libraries, although impacts would be less than significant under both the Project and RPA. Although payment of DIF fees would reduce potential impacts to health service facilities to below a level of significance under both the Project and the RPA, because the RPA would generate fewer employees, the RPA would result in reduced impacts to health service facilities as compared to the Project.

**Q. Recreation**

Neither the Project nor the RPA would result in a direct demand for recreational resources, as no new residents would be generated; thus, neither the Project nor the RPA would result in the increased use of existing recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. Thus, impacts to existing recreational facilities would be less than significant under the Project and RPA, although impacts under the RPA would be slightly reduced due to the reduction in on-site



employment. Proposed on-site recreational resources, including the proposed community trail along Antelope Road, would be the same under both the Project and RPA. Impacts due to on-site recreational facility construction have been evaluated throughout this EIR, and there would be no impacts to the environment specifically related to the construction of proposed trails and pedestrian facilities that have not already been addressed throughout this EIR (i.e., for impacts to biological or cultural resources). Impacts due to the construction of on-site recreational facilities would be the same under the Project and RPA and would be less than significant. Neither the Project nor the RPA are located within any CSAs established for recreational resources, and the light industrial, business park, and commercial retail uses under both the Project and the RPA do not require the payment of Quimby fees pursuant to Section 10.35 of Riverside County Ordinance No. 460; thus, impacts under both the Project and RPA would be less than significant, and the level of impact would be similar.

#### ***R. Transportation***

Both the Project and the RPA would be conditioned to require construction of improvements, payment of DIF and TUMF fees, and payment of fair-share contributions towards improvements not included in any existing fee programs, which would ensure consistency with the General Plan policies related to Level of Service (LOS); thus, impacts would be less than significant under the RPA and proposed Project, although environmental effects under the RPA would be reduced due to the substantial reduction in traffic by approximately 30% as compared to the Project. The level of impact associated with off-site traffic improvements and potential conflicts with the County General Plan's LOS standards would be reduced in comparison to the Project. Impacts due to hazardous geometric design features and incompatible uses would be less than significant under both the Project and the RPA, and the level of impact would be similar. Both the Project and the RPA would result in less-than-significant impacts due to the need for new or altered maintenance of roads. Both the Project and the RPA would have the potential to result in impacts to circulation during construction, including emergency access routes, although impacts would be reduced to less-than-significant levels with mitigation, and the level of impact after mitigation would be similar under the Project and RPA. Both the Project and RPA would be required to accommodate facilities for bicycles, although impacts associated with the construction of such trails have been evaluated herein, and both the Project and RPA would result in similar less-than-significant impacts due to bicycle facilities. Because the Project and RPA would involve similar land uses, it is expected that both the Project and the RPA would result in similar significant and unavoidable impacts due to VMT. That is, because the County's methodology for assessing VMT impacts is based on a ratio between total VMT and the number of employees, and because the RPA would result in a reduction in total VMT and number of employees by approximately 30%, the ratio of VMT to Service Population (SP) would be similar under the Project and RPA. However, due to the reduced development intensity on site, the RPA would generate fewer overall VMT as compared to the Project; thus, impacts due to VMT would be reduced under the RPA.

#### ***S. Tribal Cultural Resources***

Grading activities under the Project and RPA would be the same. As such, potential impacts to tribal cultural resources would be the same under the RPA and proposed Project, and impacts would be less than significant with implementation of mitigation measures.



**T. Utilities and Service Systems**

Both the Project and RPA would require the construction of water, wastewater, storm water drainage, electric power, natural gas, and telecommunication facilities. Impacts associated with the provision of such facilities would be similar and would be mitigated to less-than-significant levels with implementation of mitigation measures. The EMWD determined that it has sufficient water resources to accommodate development proposed as part of the Project, and therefore also would have sufficient water resources to serve the RPA. However, due to the reduction in development intensity on site, the RPA would result in a substantial reduction in demand for water resources, thereby reducing the Project's less-than-significant impacts to water supply. Similarly, EMWD would have adequate capacity to treat wastewater generated by either the Project or the RPA; thus, impacts due to wastewater would be less than significant under both the Project and RPA, although the level of impact would be reduced under the RPA as the RPA would generate less wastewater requiring treatment. Both the Project and RPA would be subject to the County's solid waste regulations, and neither the Project nor the RPA would result in the generation of solid waste that could adversely affect landfill capacity. Impacts associated with solid waste would be less than significant, although the level of impact would be reduced under the RPA as compared to the Project because the RPA would generate less solid waste requiring disposal at regional landfills.

**U. Wildfire**

Both the Project and RPA would involve development of urban uses in adjacent to lands that are identified as having a high risk for wildfire hazards. Both the Project and RPA would be required to implement a Fire Protection Plan (FPP) to ensure that adequate provisions are accommodated, such as fuel management zones, to reduce the risk of wildfires. With implementation of mitigation and a FPP, impacts due to wildfires would be reduced to less-than-significant levels and the level of impact would be similar.

**V. Conclusion**

As compared to the proposed Project, the RPA would result in reduced impacts under the issues of aesthetics, air quality, energy, geology/soils, GHG emissions, hazards/hazardous materials, hydrology/water quality, noise, population/housing, public services, recreation, transportation, and utilities/service systems. Implementation of the RPA would result in similar impacts to the proposed Project under the issue areas of agriculture/forestry resources, biological resources, cultural resources, land use/planning, mineral resources, paleontological resources, tribal cultural resources, and wildfire. However, the RPA would not reduce any of the Project's significant and unavoidable impacts to a less than significant level, even with all feasible mitigation imposed. The RPA would not result in any increased impacts to the environment in comparison to the proposed Project. In accordance with State CEQA Guidelines § 15126.6(e)(2), the RPA is identified as the environmentally superior alternative.

The RPA would meet the Project's objectives, but to a significantly lesser extent. Specifically, the RPA would result in the development of an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses, although due to the reduction in building intensity on site as compared to the Project the RPA would result in a less efficient





development of the property. The RPA would assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire; however, because the RPA would generate fewer jobs, the RPA would be less effective than the proposed Project in meeting this objective. Similarly, the RPA would attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment; however, because the RPA would involve fewer jobs, the RPA would be less effective than the proposed Project in providing for a more equal jobs-housing balance in the local area. The RPA would meet the Project's objective to establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses. Additionally, the RPA would meet the Project's objective to establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis. The RPA would accommodate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County; however, due to the reduction in building intensity on site, the RPA would be less effective at meeting this objective. The RPA would meet the Project's objectives to develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region, and to develop a property that has access to available infrastructure, including roads and utilities.



**Table 6-2 Alternatives to the Proposed Project – Comparison of Environmental Impacts**

Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives		
		No Project/No Development Alternative (NDA)	No Project Alternative (Existing General Plan) (NPA)	Reduced Project Alternative (RPA)
<b>Aesthetics</b>	Significant and Unavoidable Direct and Cumulatively-Considerable Impact	Reduced to Less-than-Significant Levels	Reduced	Reduced
<b>Agriculture and Forestry Resources</b>	Less than Significant	Reduced	Similar	Similar
<b>Air Quality</b>	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than-Significant Levels	Increased	Reduced
<b>Biological Resources</b>	Less than Significant	Reduced	Increased	Indirect Impacts: Reduced Direct Impacts: Similar
<b>Cultural Resources</b>	Less than Significant	Reduced	Increased	Similar
<b>Energy</b>	Less than Significant	Reduced	Construction: Similar Vehicular Operational Energy: Increased Facility Operational Energy: Reduced	Reduced
<b>Geology and Soils</b>	Less than Significant	Reduced	Similar	Reduced
<b>Greenhouse Gas Emissions</b>	Less than Significant	Reduced	Similar	Reduced
<b>Hazards and Hazardous Materials</b>	Less than Significant	Most Issues: Reduced Contaminated Soils: Increased	Reduced	Reduced
<b>Hydrology and Water Quality</b>	Less than Significant	Most Issues: Reduced Erosion/Siltation: Increased	Similar	Similar
<b>Land Use and Planning</b>	Less than Significant	Similar	Reduced	Similar
<b>Mineral Resources</b>	Less than Significant	Similar	Similar	Similar
<b>Noise</b>	Significant and Unavoidable Cumulatively-Considerable Impact (traffic-related noise only)	Avoided	Construction: Similar Long-Term Operations: Reduced Vehicular-Related Noise: Reduced	Reduced
<b>Paleontological Resources</b>	Less than Significant	Reduced	Increased	Similar
<b>Population and Housing</b>	Less than Significant	Reduced	Similar	Reduced
<b>Public Services</b>	Less than Significant	Reduced	Police/Fire/Health: Similar Schools/Libraries: Increased	Reduced
<b>Recreation</b>	Less than Significant	Similar	Increased	Reduced
<b>Transportation</b>	Significant and Unavoidable Direct and Cumulatively-Considerable Impacts	Reduced to Less-than-Significant Levels	Increased	Reduced
<b>Tribal Cultural Resources</b>	Less than Significant	Reduced	Increased	Similar
<b>Utilities and Service Systems</b>	Less than Significant	Reduced	Similar	Most Issues: Similar Water Supply: Reduced
<b>Wildfire</b>	Less-than-Significant	Mixed (No new structures, but flammable vegetation would remain on site)	Similar	Similar



Environmental Topic	Proposed Project Significance of Impacts After Mitigation	Level of Impact Compared to the Proposed Project/Compliance with Project Objectives		
		No Project/No Development Alternative (NDA)	No Project Alternative (Existing General Plan) (NPA)	Reduced Project Alternative (RPA)
<b>Objective A:</b> To efficiently develop an underutilized property with a complementary mix of employment-generating land uses, including light industrial, business park, and commercial retail land uses.		No	No	Yes, but less effectively
<b>Objective B:</b> To assist the SCAG region in attempting to achieve jobs/housing balance region-wide and the local area by providing additional job opportunities in a housing rich area of the Inland Empire.		No	No	Yes, but less effectively
<b>Objective C:</b> To attract new businesses to Riverside County and thereby provide a more equal jobs-housing balance in the Inland Empire region that will reduce the need for members of the local workforce to commute outside the area for employment.		No	No	Yes, but less effectively
<b>Objective D:</b> To establish development standards and design guidelines to ensure future development on site complements other existing and planned uses in the immediate vicinity and minimizes conflicts with other nearby land uses.		No	Yes	Yes
<b>Objective E:</b> To establish a unified thematic concept for future development through design elements such as architecture, monumentation, theme walls, and landscaping using a long-range comprehensive planning approach that cannot be accomplished on a parcel-by-parcel basis.		No	Yes	Yes
<b>Objective F:</b> To anticipate market demand by providing a mixture of light industrial, business park, and commercial retail land uses in a master-planned commerce center that would be marketable within the evolving economic profile of western Riverside County.		No	No	Yes, but less effectively
<b>Objective G:</b> To develop a mix of light industrial, business park, and commercial retail uses in unincorporated Riverside County that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar uses in the local area and region.		No	No	Yes, but less effectively
<b>Objective H:</b> To develop a property that has access to available infrastructure, including roads and utilities		No	Yes	Yes



## 7.0 REFERENCES

### 7.1 PERSONS INVOLVED IN THE PREPARATION OF THIS EIR

#### 7.1.1 COUNTY OF RIVERSIDE PLANNING DIVISION

Russell Brady, Project Planner

#### 7.1.2 T&B PLANNING, INC.

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### 7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing the Stoneridge Commerce Center SPA 1 EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, CA 92502.

Appendix A: Initial Study for Stoneridge Commerce Center SPA 1, Notice of Preparation, and Written Comments

Appendix B1: Urban Crossroads, Inc. (Urban Crossroads), 2023a. *Stoneridge Commerce Center Specific Plan Air Quality Impact Analysis*. June 28, 2023.

Appendix B2: Urban Crossroads, Inc. (Urban Crossroads), 2023b. *Stoneridge Commerce Center Specific Plan Mobile Source Health Risk Assessment*. July 28, 2023.

Appendix C: Noreas, 2023a. *Biological Technical Report for the Stoneridge Commerce Center Project*. August 2023.

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- Appendix D3: Brian F. Smith and Associates, Inc. (BFSA), 2020. *A Phase II Cultural Resources Significance Evaluation Program for the Stoneridge Commerce Center Project*. August 6, 2020.
- Appendix D4: Brian F. Smith and Associates, Inc. (BFSA), 2021. *Archaeological Site Inventory of Planning Area 9 of the Stoneridge Commerce Center Project (GPA190008; CZ1900024; SP239A1)*, County of Riverside, California. June 14, 2021.
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- Appendix E: Urban Crossroads, Inc., 2023c. *Stoneridge Commerce Center Energy Analysis*. July 28, 2023.
- Appendix F: LGC Geotechnical, Inc. (LGC), 2021. *Updated Geotechnical Evaluation, Proposed "Stoneridge" Industrial and Mixed-Use Development, Tentative Tract Map No. 32372, Unincorporated Area of Riverside County, California*. August 18, 2021.
- Appendix G: Hillmann Consulting, 2019. *Phase I Environmental Site Assessment*. April 10, 2019.
- Appendix H1: Hunsaker & Associates (Hunsaker), 2021a. *Preliminary Hydrology Analysis TTM 32372 – 'Stoneridge Industrial*. August 2021.
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- Appendix I: T&B Planning, Inc., 2023b. *General Plan Consistency Analysis for Amendment No. 1 to the Stoneridge Commerce Center Specific Plan No. 239*. August 17, 2023.
- Appendix J: Urban Crossroads, Inc., 2023d. *Stoneridge Commerce Center Specific Plan Noise and Vibration Analysis*. June 12, 2023.
- Appendix K: ECORP Consulting, Inc. (ECORP), 2019b. *Paleontological Resources Assessment Stoneridge Project*. July 31, 2019.
- Appendix L1: Urban Crossroads, Inc. (Urban Crossroads), 2022a. *Stoneridge Commerce Center Specific Plan (SP No. 239 A1) Vehicle Miles Traveled (VMT) Analysis*. December 16, 2022.



- Appendix L2: Urban Crossroads, Inc. (Urban Crossroads), 2022b. *Stoneridge Commerce Center Specific Plan No. 239A1 Supplemental VMT Analysis*. December 16, 2022.
- Appendix L3: Urban Crossroads, Inc. (Urban Crossroads), 2023e. *Stoneridge Commerce Center Specific Plan (SP No. 239, A1) Traffic Impact Analysis*. August 16, 2023.
- Appendix M: Eastern Municipal Water District (EMWD), 2020. *Water Supply Assessment Report Stoneridge Commerce Center SP 239, Amendment #1*. June 11, 2020.
- Appendix N: Dudek, 2019. *Fire Protection Plan Stoneridge Commerce Center County of Riverside*. November 2019.
- Appendix O: Project Application Materials
- Appendix P: Riverside County Airport Land Use Commission (ALUC), 2021. *Airport Land Use Commission (ALUC) Development Review – Director’s Determination; SPA239 A1 (Specific Plan Amendment), GPA 190008 (General Plan Amendment), CZ1900024*. May 5, 2021.
- Appendix Q: T&B Planning, Inc., 2023a. *Draft Specific Plan No. 239, Amendment No. 1*. July 2023.
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### 7.3 DOCUMENTS INCORPORATED BY REFERENCE IN THIS EIR

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