Comment Letter 22 – John Watson

22

Brenes, Patricia

From: john watson <jwatusa@yahoo.com>
Sent: Thursday, September 22, 2016 4:59 PM
To: Brenes, Patricia
Subject: (External) Sycamore Canyon Business Park

Re: Warehouses planned Sycamore Canyon Business Park (Bldg. 1 and 2

Sycamore Canyon Business Park (Bldg. 1 and 2)SCH no 2015081042
My husband and I have lived at 6069 Cannich Rd.Riverside since these homes were builkt in 2000.We already hear constant back-up noises and beeps from warehouses such as Big 5 - Pepsi Plant and Ralph's warehouse. Depending on the weather - winds- etc. it is more of a problem. I recently drove the length of Sycamore Canyon Blvd. from Box Springs to Alessandro Blvd. and counted 55 warehouses. I actually could not count them all as some are built behind one facing the street! 22-A

Now we are looking at the prospect of two more sizeable warehouses right behind our houses on Cannich - as well as behind Sutherland. It will undoubtedy create more noise and pollution to our neighborhood. My husband is mostly house bound as he has suffered from Parkinsons disease for many years and being outdoors is already noisy. 22-B

Today I drove home from grocery shopping and encountered 5 big-rig trucks on Sycamore Canyon Blvd.- all headed to a freeway on ramp. This causes not only traffic problems but also increased noise and pollution. Big rig trucks are not allowed on this part of Sycamore Canyon Blvd. and are supposed to enter the freeway at Eastridge (the commercial route). With even more warehouses - more noise - pollution. Webb Eir does not address neighbor concerns. HELP- We are John and Gabrielle Watson at 6069 Cannich Rd. 22-C

Response to Comment Letter 22 – John Watson

Response to Comment 22-A:

Comment noted. The comment regarding existing noise from the warehouses such as Big 5, Pepsi, and Ralph's are noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise was monitoring. The results of this monitoring are reported in Draft Environmental Impact Report (DEIR) **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) Ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, Table 5.12-B.) These measurements consist of three 10-minute, short-term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note that, in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards.

The NIA also quantified potential noise impacts associated with construction and operation of the proposed Buildings 1 and 2. (DEIR Appendix I)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

MM NOI 1: To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division. **MM NOI 2:** To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from

the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these two residences are at a higher elevation than the Project site, the noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written

> authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the two property owners will permit, per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be located on private property, the installation of this mitigation measure is dependent on the individual property owner authorizing, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

The comment concerning wind affecting noise is noted. Meteorological effects are considered in the noise model, SoundPLAN. The model allows the user to input temperature, humidity and air pressure. The following meteorological parameters were entered: Humidity level of 49%, Average Annual Temperature 66F, Air pressure 985 mbar. Regarding meteorological conditions, precipitation, rain, snow, or fog, has an insignificant effect on sound levels although the presence of precipitation will affect humidity and may also affect wind and temperature gradients. (Sound Propagation.[1]) As sound travels through the atmosphere, it is affected by temperature, humidity, and wind currents, which can change the speed and direction of sound. Just as light bends when traveling through a prism, sound bends as a result of the varying atmospheric properties. Sound waves tend to bend toward cooler temperatures and away from warmer temperatures. For example, on a typical summer afternoon, because air temperatures generally decrease with altitude, sound generated at ground level would bend upward towards the cooler air. For a person at the same level as the sound, the sound waves are bending up and over the person listening, creating what is known as a shadow zone. When this occurs, a noise source may be visible at a distance but be perceived as quieter than expected. When the air temperature is cooler close to the ground than it is at higher altitudes, such as late at night or over calm lakes or icy surfaces, the sound waves bend closer to the ground and if the ground is reflective, the sound bounces off the ground and may propagate (travel) further than expected. (Cowan,[2] pp. 11, 19-21.) Because the effects of temperature gradients are more

[1] Sound Propagation website. (Available at https://www.sfu.ca/sonic-studio/handbook/Sound_Propagation.html, accessed November 27, 2016.)

[2] Cowan refers to the *Handbook of Environmental Acoustics*, published by John Riley & Sons, Inc., 1994.

important over long distances (Caltrans TeNS[3]), these gradients would not substantially change the results of the NIA.

Generally speaking, wind currents allow sound to travel further than expected when the sound is being emitted in the same direction as the wind (downwind) and sound will travel a shorter distance than expected when the sound is being emitted in the direction against the wind (upwind). (Cowan, p. 21.)

The NIA used SoundPLAN to model the Project's construction and operational noise. SoundPLAN allows the user to input humidity and temperature into the model. For purposes of the NIA, modeled temperature was 66 degrees Fahrenheit (66° F) and 49 percent humidity. According to Weather Underground, the average temperature for the City of Riverside is 69° F and average humidity is 49.7 percent. Between November 2015 and November 2016, the highest temperature in Riverside was 114° F and the lowest temperature was 33° F. To evaluate the effects of changes in temperature and humidity referenced in the commenter's comment, four new modeling runs were prepared assuming: (i) temperature at 33° F and 0% humidity, (ii) temperature at 33° F and 100% humidity, (iii) temperature at 114° F and 0% humidity, and (iv) temperature at 114° F and 100% humidity. The results of this analysis, which does not change or materially impact the conclusions set forth in the NIA and DEIR, is summarized in the table below.

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
1 first floor	43	42	43	41	41
1 second floor	45	44	45	43	44
2 first floor	30	30	30	30	30
2 second floor	32	32	32	32	32
3 first floor	45	45	45	44	44
3 second floor	49	48	49	48	48
4 first floor	48	47	48	47	47
4 second floor	52	51	52	51	51
5 first floor	49	49	49	49	49
5 second floor	50	49	50	49	49
6 first floor	43	43	43	43	43
6 second floor	44	43	44	43	43
7 first floor	38	38	38	38	38
7 second floor	39	39	39	39	39
8 first floor	33	33	33	33	33
8 second floor	35	35	35	35	35
9 first floor	35	35	35	34	35

[3] Caltrans TeNS refers to the Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. (Available at http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed November 27, 2016.)

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
9 second floor	37	37	37	36	36
10 first floor	39	38	39	37	38
10 second floor	41	40	41	39	40
11 first floor	33	33	33	33	33
11 second floor	35	35	35	35	35
12 first floor	31	31	32	31	32
12 second floor	34	34	34	34	34
13 first floor	30	30	30	30	30
13 second floor	32	32	32	32	32
14 first floor	31	31	31	31	31
14 second floor	33	33	33	33	33
15 first floor	32	31	32	32	32
15 second floor	34	34	34	34	34
16 first floor	31	31	31	31	31
16 second floor	34	33	34	34	34
17	30	30	30	30	30
18 first floor	44	43	44	43	43
18 second floor	45	44	45	44	44
19 first floor	43	43	43	42	42
19 second floor	43	43	43	43	43
20 first floor	31	31	31	31	31
20 second floor	37	37	37	37	37
21 first floor	34	34	34	34	34
21 second floor	39	39	39	38	38
22	36	36	36	36	36
23 first floor	36	36	36	35	36
23 second floor	37	37	38	37	37
24 first floor	33	32	33	32	32
24 second floor	35	34	35	34	34
25 first floor	31	30	31	30	31
25 second floor	34	34	34	34	34
26 first floor	29	29	29	29	29
26 second floor	32	32	32	32	32
27 first floor	32	32	32	32	32
27 second floor	34	33	33	33	33
28 first floor	31	31	31	31	31
28 second floor	34	34	34	34	34
29 first floor	30	30	30	30	30
29 second floor	33	33	33	33	33
30 first floor	31	31	31	31	32
30 second floor	35	35	35	34	35

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
31	48	48	48	48	48
32	47	47	47	47	47
33	38	38	38	37	37
34	55	54	54	54	54

The amplification of the effects of meteorological conditions on sound does not constitute significant new information that would require recirculation of the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 22-B:

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP), and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14)

The proposed Project is consistent with the planned use at the site in both the GP 2025 and SCBPSP. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Noise: Refer to Response to Comment 22-A above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25.** (DEIR, p. 5.3-27.) (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40.)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (i.e., the barrier between conditioned and unconditioned spaces). This includes installation of insulation to minimize heat transfer and thermal bridging and to limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the FEIR as shown below.[4]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to three~~five~~ minutes or less which is shorter than required under~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

[4] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (example text).

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below

.**MM AQ 22**: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall 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. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

SCAQMD has also developed localized significance thresholds (LSTs), which represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. Based on the air quality analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors, such as the residences, within the Project vicinity for any criteria pollutants. (DEIR, p. 5.3-29) The amount of pollution that would be released from the outside of the walls would be negligible.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 22-C:

Comment noted. Traffic: Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, freeway facilities are under the jurisdiction of Caltrans and there is no mechanism for the City or Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, p. 5.16-52.) Although this impact is significant and unavoidable, with feasible mitigation incorporated, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is

based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is, DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**

Segment of Sycamore Canyon Boulevard		Existing Condition (ADTs) by Vehicle Type					Project Trips Only (ADTs) by Vehicle Type				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State *CEQA Guidelines* Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff. (DEIR, Figure 5.16-9) This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

With regard to any existing condition of trucks using residential streets, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive (except to turn onto Sycamore Canyon Boulevard), Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

Noise: Refer to Response to Comment 22-A above.

Air Quality: Refer to Response to Comment 22-B above.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 23 – Noah M. Holznecht

23

Brenes, Patricia

From: Noah <nmholz000@hotmail.com>
Sent: Thursday, September 22, 2016 6:09 PM
To: Brenes, Patricia
Cc: alecgerry@sbcglobal.net; maureenclemens@att.net
Subject: [External] Response to DEIR for SC No.2015081042

Noah M. Holzknecht

1481 Sutherland Drive

Riverside, California 92509

City of Riverside

Community & Economic Development

Department, Planning Division

3900 Main Street, 3rd Floor

Riverside, California 92522

Attn: Patricia Brenes, Principal Planner

I am the homeowner in the Sycamore Highlands community and an educator within the county of Riverside, I am writing to express my opposition and concerns regarding the proposed project of the Sycamore Canyon Business Park Buildings 1 and 2, State Clearinghouse (SC) No. 2015081042. The Project will significantly impact the quality of life and overall well being of myself and residents within the proposed area of effect. Accordingly, the Project cannot feasibly mitigate the significant environmental impacts to Air Quality, Noise, and Transportation/Traffic as each of these issues will have a significant and unavoidable impact creating irreparable damage to residents' and our community. I urge you to reconsider and reject the proposal and address the disregard you have enacted to the City of Riverside's adaptation of the Good Neighbor Guidelines Resolution No. 21734, and recommendations made by the Draft Environmental Impact Report (DEIR) for alternatives. 23-A

According to the Good Neighbor Guidelines adopted in 2008, by the City of Riverside, the proposed SC No. 2015081042, breaches the following guidelines that your committee has failed to uphold. Especially, I call your attention to: 23-B

1. Helping to minimize the impacts of diesel emissions associated with distribution centers greater than 400,000 square feet
2. Not completing a health risk assessment

1

As outlined in the DEIR, there is a significant impact on Air Quality associated with diesel emissions and the greater increase in Transportation and Traffic. "Diesel exhaust is responsible for about 70 percent of the total cancer risk from air pollution" (City of Riverside, 2008, p. 2). This is further supported by "30 years of extensive evidence linking air pollution to mortality and respiratory morbidity in humans" (Sapkota et al., 2012, p. 369). Following the empirically supported evidence presented in various meta analyses (Bergé et al., 2013; Guxens et al., 2012; Sapkota et al., 2012; Lee & Dong, 2011) and the city of Riverside's Resolution No. 21734, there is a failure in completing a health risk assessment. A DEIR is not a health risk assessment. Outlined as part of Goal 1, within Resolution No. 21734, "A health risk assessment is required when the truck traffic areas of an industrial project are located within 1,000 feet of sensitive receptors" (City of Riverside, 2008, p. 5). SC No. 2015081042 is within a 100 square feet of residential housing. Considering this grossly overlooked aspect, you have neglected your responsibilities and duties to myself and residents potentially impacted if the proposed Project receives approval. As Resolution No. 21734 are suggested guidelines adopted by the City of Riverside, the adverse health risks and affects associated of SC No. 2015081042 are not. The adverse health risks and affects are not guidelines for you to ignore, instead, are grounded in scientific evidence indicating there will be detrimental effects on the health and well-being of residents. 23-C

As I urge you to refuse the adoption of a Statement of Overriding Considerations for SC No. 2015081042, instead, I propose you review, again, the alternative sites for SC No. 2015081042 that you have previously rejected. The following are acceptable mitigations: 23-D

1. Alternative Location 1: Palmyrita Avenue/Michigan Avenue or Alternative Location 2: Meridian Business Park, Phase 3
2. 8.5.1 Alternative 1: No Project, No Build

In reading the grounds for your objections to Alternative Location 1 and 2, as outlined in the DEIR, you determined that both would "cause greater transportation impacts" (City of Riverside Community Development Department Planning Division, 2016, p. 704). In noting this, I strongly recommend you review the significant impact SC No. 2015081042 will have on Transportation/Traffic if the proposed Project is approved. I suggest you reconsider your oppositions for either of these alternative sites as both sites are within industrial zoned areas not neighboring residential communities. Both sites would not impose as significant of an impact as the current proposed SC No. 2015081042 is on the community of Sycamore Highlands. 23-E

I also urge you to consider 8.5.1 Alternative 1: No Project, No Build for SC No. 2015081042. If the city proposed residential zoning or Commercial properties, such as restaurants, retail locations, or grocery stores, this would be an acceptable alternative for developmental use of the property. Although Transportation/Traffic would increase, the Air pollution and adverse health impacts would not be as severe as recorded by the DEIR. The city did not include such a proposal in the DEIR. 23-F

I emphasize the importance of hearing my opposition and concerns as these are not negligible, but the city's disregard for adopted guidelines and past opposition to SC No. 2015081042 is negligent and establishes a pattern of the mistreatment and disregard of its residents' concerns. 23-G

2

Thank you for your consideration.

Noah M. Holzknecht

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3

Response to Comment Letter 23 – Noah M. Holzknecht

Response to Comment 23-A:

This comment represents an opinion, but does not provide any explanation, information, specific examples, or other support for the comment. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under the California Environmental Quality Act (CEQA), the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis." (CEQA Guidelines, §15088(c).) These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted. (CEQA Guidelines, §15088(c).) To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].)

The Draft Environmental Impact Report (DEIR) fully addresses and compares the impacts associated with the Project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, health risk assessment, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR (DEIR Appendices B-M). The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions. Nevertheless, the following additional information is provided for the commenter's convenience.

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP), and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14)

The proposed Project is consistent with the planned use at the site in both the GP 2025 and SCBPSP.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and

325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (DEIR, p. 5.3-27.). (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40.)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (i.e., the barrier between conditioned and unconditioned spaces). This includes installation of insulation to minimize heat transfer and thermal bridging and to limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the FEIR as shown below.[1]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to <u>three</u>~~five~~ minutes or less <u>which is shorter than required under</u>~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in

[1] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (<u>example text).</u>

when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall 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. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

SCAQMD has also developed localized significance thresholds (LSTs), which represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. Based on the air quality analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors, such as the residences, within the Project vicinity for any criteria pollutants. (DEIR, p. 5.3-29) The amount of pollution that would be released from the outside of the walls would be negligible.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Noise: As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. These measurements are taken to quantify the existing noise in the area so that the anticipated noise from the construction and operation of the proposed Project can be evaluated. The results of this monitoring are reported in DEIR **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song are captured in these noise measurements. (DEIR, p. 5.12-9.) The NIA also quantified potential

noise impacts associated with construction and operation of the proposed distribution center Buildings 1 and 2. (DEIR Appendix I.)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.
>
> **MM NOI 2:** To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.
>
> **MM NOI 3**: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
>
> **MM NOI 4**: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.
>
> **MM NOI 5:** All construction equipment shall be shut off and not left to idle when not in use.
>
> **MM NOI 6:** All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-

related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** (below) and **MM AQ 14** (listed above). (DEIR, p. 5.12-46.)

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum

increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these two residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high

installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner to authorize, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

Traffic: Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, freeway facilities are under the jurisdiction of Caltrans and there is no mechanism for the City or Project Applicant to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. (DEIR, p. 5.16-35.) For these reasons, Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, p. 5.16-52.) Although this impact is significant and unavoidable, the City has

the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is, DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		Existing Condition (ADTs) by Vehicle Type					Project Trips Only (ADTs) by Vehicle Type				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State CEQA Guidelines § 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff. (DEIR, Figure 5.16-9) This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

Statement of Overriding Considerations: In accordance with State CEQA Guidelines § 15093, if the lead agency determines that significant impacts cannot be reduced to less than significant, the agency must assess whether the benefits of the proposed Project outweigh the unmitigated significant environmental effects. If so, the agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting their action notwithstanding the proposed Project's significant environmental effects.

Good Neighborhood Guidelines: The City adopted *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that

deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, it recommends that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. The HRA should indicate how the project can be designed to limit health risks. The site has been designed in order to minimize impacts on the adjacent residential area, including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.* The findings of the HRA are discussed below in Response to Comment 23-B.

Alternatives: CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a). According to this section of the State CEQA Guidelines, "…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. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-B:

See Response 23-A – Good Neighbor Guidelines above. he proposed Project is consistent with the goals outlined in the City's *Good Neighbor Guidelines* and includes specific design features to help to minimize impacts of diesel emissions associated with distribution centers greater than 400,000 square feet. (DEIR, Appendix M pp. M-66 – M-72.) For example, the Project has been designed such that no parking is provided along the northern side of Building 2, nearest the residential uses, and there are no cross dock facilities on Building 2. Site access will be located away from residential uses and all driveways at the site will be limited to right turn only movements to avoid traffic headed east on Dan Kipper Drive, closest to the residential uses.

A health risk assessment (HRA) was prepared in June 2016 (included in Appendix B of the DEIR) and a revised HRA was prepared in November 2016 (found on the City's website at http://www.riversideca.gov/planning/pdf/eir/sycamorecanyon/Refined-HRA-Report-11-9-16.pdf) to evaluate cancer and non-cancer risks associated with the proposed Project. None of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the proposed Project vicinity. (DEIR, pp. 5.3-33 – 5.3-34.) Therefore, the Project will not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-C:

See Response 23-A – Good Neighbor Guidelines and Response 23-B above.

Health Risk Assessment: A HRA is required when the truck traffic areas of an industrial project are located within 1,000 feet of sensitive receptors, in accordance with SCAQMD guidelines and/or practices. Since residences will be located within 1,000 feet from the proposed Project, a HRA was prepared in June 2016 (included in Appendix B of the DEIR) and a refined HRA was prepared in November 2016 (found on the City's website at http://www.riversideca.gov/planning/pdf/eir/sycamorecanyon/Refined-HRA-Report-11-9-16.pdf) to evaluate cancer and non-cancer risks associated with the proposed Project. None of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the Project site vicinity. Therefore, the Project will not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation. (DEIR, p. 5.3-34)

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (listed in Response to Comment 23-A)**.** (DEIR, pp. 5.3-26, 5.3-27, 5.3-30, 5.3-35–5.3-40.)

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

SCAQMD has also developed localized significance thresholds (LSTs), which represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. Based on the air quality analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors, such as the residences, within the Project vicinity for any criteria pollutants. (DEIR, p. 5.3-29.) The amount of pollution that would be released from the outside of the walls would be negligible.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-D:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. (CEQA Guidelines, § 15126.6(f)(1).) As suggested by the commenter, several alternative locations were considered, but ultimately rejected, by the City for the following reasons:

Alternative Location 1: Palmyrita Avenue/Michigan Avenue

This site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Additionally, Alternative Location 1 is located further from Interstate 215 and State Route 60 which could cause greater transportation impacts in terms of the number of impacted intersections and more circuitous routes. Thus, Alternative Location 1 is not a feasible alternative to the proposed Project because the Alternative Location 1 site is not under the control of the Applicant. (DEIR, p. 8-6.) Additionally, Alternative Location 1 will not meet all of the Project objectives.

Alternative Location 2: Meridian Business Park, Phase 3

Alternative Location 2 was rejected from further analysis because this location is outside of the City's jurisdictional boundary, owned by another party, securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Thus, Alternative Location 2 is not a feasible alternative to the proposed Project because the Alternative Location 2 site is not under the control of the Applicant. (DEIR, p. 8-6.) Additionally, Alternative Location 2 will not meet all of the Project Objectives.

Alternative 1: No Project, No Build

The No Project, No Build Alternative was also considered in the DEIR, as required by *State CEQA Guidelines* Section 15126.6(e)(3)(C). While all environmental impacts would be less than significant with Alternative 1; this Alternative would greatly underutilize the site and would only meet one of the Project objectives to some degree. Section 15126.6(f)(1) of the *State CEQA Guidelines* states that among factors that may be taken into account when addressing the feasibility of alternatives are site suitability and economic vitality. Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible. (DEIR, p. 8-16.) Additionally, Alternative 1 will not meet all of the Project objectives.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-E:

Alternative Locations 1 and 2 are located further from Interstate 215 and State Route 60 which would cause greater transportation impacts in terms of the number of impacted intersections on local roadways and more circuitous routes. Regardless of the transportation impacts that may be associated with Alternative Locations 1 and 2, these alternative locations were rejected from further analysis because they are not feasible, in part because the Project Applicant cannot reasonably acquire, control, or otherwise have access to either of these alternative sites (DEIR, p. 8-6).

Although the Project will have significant impacts related to transportation, pursuant to *State* CEQA Guidelines Section 15093, the City may adopt a Statement of Overriding Considerations to move forward with the Project if specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-F:

With regards to the alternatives evaluated in the DEIR

CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a). According to this section of the State CEQA Guidelines, "…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. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's

jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives

associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

The commenter suggested residential zoning or commercial as an acceptable alternative. Residential development is not permitted within the Sycamore Canyon Business Park Specific Plan (SCBPSP). Retail uses, such as restaurants or grocery stores, would require a Conditional Use Permit (CUP.) However, retail users have specific requirements in regards to access, visibility, and market demand. A retail use would also generate a substantially greater number of vehicular trips and the associated air quality and noise impacts that accompany them than the Proposed project. Further, there are already large-scale light industrial uses, consisting of distribution centers and warehousing within the Sycamore Canyon Business Park, to the east and south of the Project site (DEIR, Figure 3-5). Finally, the suggested residential zoning or commercial uses would not meet the Project objectives.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 23-G:

Comment noted. Refer to Response to Comments 23A through 23F. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 24 – Roberto Passoni

24

Brenes, Patricia

From: robertopassoni@sbcglobal.net
Sent: Thursday, September 22, 2016 10:05 PM
To: Brenes, Patricia
Cc: Alec Gerry; Alec Gerry
Subject: [External] Sycamore Canyon warehouses

City of Riverside
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

September 21, 2016

Ms. Brenes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). The following paragraphs describe some of my serious concerns in regards to the proposed warehouses.

1. My personal experience in regards to the high-level of noise that occurs every night and throughout the night. 24-A

My address is 6071 Bannock Drive and my house faces Sycamore Canyon Park with the Ralph distribution center 800 yards away. In the past few years, it appears that there has been a significant increase in noise level, especially during the night-time hours from the industrial warehouses, including both the pre-existing warehouses and the new industrial warehouses built in the past decade.

Every night we are awoken by the noise of trucks driving around, forklifts and/or other loading/unloading machines working throughout the night, and even more pronounced is the noise that these machineries produce, which is a continuous very loud and sharp "Beep-Beep" sound. This noise goes on throughout the night from about 7 in the evening to 7 in the morning. Most importantly, this noise is impacting mine and other's quality of sleep dramatically. We have tried to block the noise out by closing our windows, wearing earplugs, using a white-noise machine, and many more alternatives. Yet, none of these techniques have been successful at reducing the noise. 24-B

If lucky, I and others in my family are able to get a total of 4 hours of sleep per night because of all the noise that the warehouses create. As a result of the noise and lack of sleep our functionality and ability to remain attentive at work or at school is significantly impaired. Likewise, our relationships with others are also compromised because our irritability increases due to the lack of sleep. This should come as no surprise as a wealth of research has demonstrated how lack of sleep is positively correlated to a poorer quality of life. 24-C

This serious issue is not only common to my family, but it is a shared experience by many other individuals in the neighborhood. We have made many complaints to city of Riverside with the hopes that they will listen to our concerns, however we have yet to hear a constructive response. When will our voices be heard regarding the severity of damage that these warehouses are causing to a part of Riverside's community? In addition, how is it conceivable that the city of Riverside is in the process of approving additional warehouses, which also happens to be placed in a closer location? 24-D

2. The unappealing aesthetic associated with the architectural design. 24-E

1

A picture is worth a thousand words. Take a look for yourself in the before and after pictures below. These are pictures of the houses on Stockport Drive (another street that faces Sycamore Canyon Park), where a warehouse was recently built very close to the houses. Literally, a large gray wall now creates a shadow over these homes and is lowering their property value.

24-E cont.

My question here is, how is it possible that the city of Riverside approved such a project? Who in their right mind, would build a wall so high and so close to the residential homes? Please hold a public meeting to explain this "brilliant" idea as I am truly unable to comprehend such reasoning. Even worse is, how is it possible that Riverside is even considering to approve additional mega warehouses to be built in so close to our backyards?

BEFORE THE LATEST WAREHOUSE WAS BUILT

AFTER THE LATEST WAREHOUSE WAS BUILT

2

24-E cont.

3. Conclusion

With the proposal of developing additional warehouses, the city of Riverside is having the residents of Sycamore Highland face numerous consequences. The warehouses are producing high noise-levels and directly affecting our quality of life. In addition, they are decreasing the value of our houses, by building unappealing buildings in such close proximity to our homes. 24-F

There is a possibility that the warehouses may bring in more jobs and revenue for the city of Riverside. However, it is unjustifiable compared to the real immediate loss of property values and even more importantly, the quality of life that we as the residents will have to suffer. 24-G

I cannot overemphasize the importance of creating an adequate buffer zone between the residential homes and industrial warehouses. More importantly, it is essential that these warehouses are far enough to not impact the lives of the people in the neighborhood. 24-H

The preexisting plan is not a justification for its execution if the plan itself is wrong.
We expect the city of Riverside to work with the residents and not against us, whether that means figuring out any legal consequences that the landowner could claim. For example, perhaps there can be a land exchange, as there are plenty of desert areas for warehouses far away from residential homes or even land which the city can rebuy. 24-I

My thoughts and concerns seem to me so clear and obvious, but perhaps I may have a misconstrued idea of what is a civil and just community. Nevertheless, I remain struck by how anyone (except perhaps the land owner) could see these industrial development as a community improvement. 24-J

I urge the city of Riverside to reconsider and stop the project of building a new mega-warehouse in the Sycamore Canyon Park, and to refund the owners of the residential homes that have already lost value and living quality within the last years. Lastly, I ask the city of Riverside to find a reasonable solution to the increased noise activity that we are currently faced with.

3

Sincerely,

Roberto Passoni
Resident of Sycamore Highlands
6071 Bannock Drive
Riverside, CA 92507
(951) 236-4048

Response to Comment Letter 24 – Roberto Passoni

Response to Comment 24-A:

Comment noted. The comment regarding existing noise from the warehouses in the area is noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. These measurements are taken to quantify the existing noise in the area so that the anticipated noise from the construction and operation of the proposed Project can be evaluated. The results of this monitoring are reported in Draft Environmental Impact Report (DEIR) **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) The NIA also quantified potential noise impacts associated with construction and operation of the proposed distribution center Buildings 1 and 2. (DEIR Appendix I)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

> **MM NOI 13:** To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.
>
> If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.
>
> **MM NOI 14:** To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.
>
> **MM NOI 15:** A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.
>
> **MM AQ 14:** Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in

when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these two residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the two property owners will permit per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM**

NOI 16 would be on private property, the installation of this mitigation measure is dependent on the individual property owner granting approval for the installation, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-B:
Comment noted. Refer to Response to Comment 24-A. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-C:
Comment noted. Refer to Response to Comment 24-A. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-D:
Comment noted. Refer to Response to Comment 24-A. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-E:
The commenter's opinion regarding the CT Sycamore Center Project is noted. The CT Sycamore Center Project on Dan Kipper Drive was constructed with a 50-foot setback from the northerly property lines, adjacent to the residential properties and the buildings range from 37-feet to 41-feet in height. The CT Sycamore Center Project is separate and independent from the proposed Project and was approved by the City after undergoing its own environmental review and public hearing process that included analysis of potential noise and other impacts. The existence of the CT Sycamore Center Project warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

The Project, as originally submitted and presented at the August 26, 2015 scoping meeting for the DEIR, proposed two buildings totaling 1.43 million square feet (SF) with the northern building (Building 2) setback 60 feet from the northerly property line. (DEIR, **Figure 8-1 – Original Project.**) As discussed on page 8-3 of the DEIR, during preparation of the DEIR, the Project Applicant received feedback from the City, encouraging additional setback and landscaping along the northern portion of the Project site and a reduction in the size of the Building 2. As a result, the proposed Project was revised by the Project Applicant so that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site. The 100-foot buffer will have 64 feet of landscaping, a 30-foot wide drive aisle (vehicles only, no trucks) and an additional 6-foot wide landscape area between Building 2 and the drive aisle. (DEIR, p. 3-35, **DEIR Figure 3-10 – Proposed Site Plan**, **DEIR Figure 3-11 – Conceptual Landscape Plan**.) This is the Project that has been reviewed in the DEIR.

The western wall of Building 2 is located approximately 138 feet from the rear property line of the residences located northwest of the site. There is an approximately 101-foot wide Mitigation Area, consisting of native landscaping materials, that provides additional screening and buffer from the residences to the northwest (DEIR, **Figure 3-10 – Proposed Site Plan** and **Figure 3-11 – Conceptual Landscape Plan**).

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-F:

Noise. The Environmental Impact Report fully disclosed the significant and unavoidable noise impacts as a result of the proposed Project. Thus, a Statement of Overriding Considerations, as allowed by State California Environmental Quality Act (CEQA) Guidelines Section 15093, will be required should the City choose to approve the Project. Also, refer to Response to Comment 24-A above.

Property Value: This comment alleges that the proposed Project may cause economic hardship or social impacts by adversely impacting property values and quality of life. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of use and effect. The focus of the analysis shall be on the physical changes.*

The CEQA Guidelines also provide that physical effects on the environment related to changes in land use, population, and growth rate induced by a project may be indirect or secondary impacts of the project and should be analyzed in the EIR only if the physical effects would be significant (CEQA Guidelines Section § 15358(a)(2)). Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment" (CEQA Guidelines, § 15064(f)(6)). The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. . . . Economic and social impacts of proposed projects, therefore, are outside CEQA's purview" (*Anderson First Coalition v. City of Anderson* [2005] 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)]. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-G:

Refer to Comment 24-F above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-H:

The Project site is within the Sycamore Canyon Business Park Specific Plan and has been planned for light industrial uses since the 1980s. The site has been designed to incorporate a 100 foot buffer between the Project and adjacent residences. To minimize impacts to the adjacent residences, there are no dock doors on the northern side of Building 2, closest to the residences, and truck traffic leaving the site is limited to making only right-turns onto Lance Drive, away from the residential areas to the north of the Project site. Also, refer to Response to Comment 24-F. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-I:

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP), and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14)

The proposed Project is consistent with the GP 2025 and permitted as a matter of right in the SCBPSP.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 24-J:

Refer to Response to Comments 24-F and 24-I.

Although there will be significant and unavoidable impacts related to air pollution and noise, even with feasible mitigation incorporated, as well as significant and unavoidable impacts related to traffic, the City has discretion to approve a Statement of Overriding Considerations and move forward with the Project, Section 15093(a) of the State *CEQA Guidelines* requires the City to balance, as applicable, the economic, legal, social, technological, or other benefits, of the proposed Project against its unavoidable environmental risks in determining whether to approve the Project. If these benefits outweigh the unavoidable adverse environmental effects, the City may consider the adverse environmental effects to be acceptable.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 25 – Richard Drury, Lozeau Drury LLP

25

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RECEIVED
SEP 27 2016
Community & Economic Development Department

September 22, 2016

Via Email and US Mail

Patricia Brenes, Principal Planner
City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd floor
Riverside, CA 92522
pbrenes@riversideca.gov

Re: Sycamore Canyon Business Park Buildings 1 and 2
Draft Environmental Impact Report (SCH No. 2015081042)

Dear Ms. Brenes:

I am writing on behalf of Laborers International Union of North America, Local Union No. 1184 and its members living in Riverside County (collectively "LIUNA" or "Commenters") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Sycamore Canyon Business Park Buildings 1 and 2 (SCH No. 2015081042) ("Project"). 25-A

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Commenters request that the City of Riverside ("City") address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

Richard Drury

Response to Comment Letter 25 – Richard Drury, Lozeau Drury LLP

Response to Comment 25-A:

Recirculation of an Environmental Impact Report (EIR) prior to certification by the lead agency is required when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR (DEIR) for public review and comment, but before the Final EIR (FEIR) is certified by the lead agency. (CEQA Guidelines, § 15088.5.) As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. 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. Recirculation of a DEIR is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. (CEQA Guidelines, § 15088.5 (a), (b).)

The commenter provides no evidence, substantial or otherwise, that the DEIR is inadequate or requires significant new information. The DEIR was prepared in accordance with the requirements of the *State CEQA Guidelines* and the City's local guidelines for implementing CEQA and contains a thorough analysis of the Project's potential environmental impacts to all of the environmental issues in Appendix G of the *State CEQA Guidelines*. The revisions to the DEIR will be identified in Section 3 – Errata to Draft EIR of the Final EIR to clarify and amplify the discussion in the DEIR.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 26 – City of Moreno Valley

26

Community Development Department
Planning Division
14177 Frederick Street
P. O. Box 88005
Moreno Valley CA 92552-0805
Telephone: 951.413-3206
FAX: 951.413-3210

RECEIVED

Community & Economic Development Department

September 22, 2016

Patricia Brenes, Principal Planner
City of Riverside
Community Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Subject: Comments on the Draft Environmental Impact Report (DEIR) for the Sycamore Canyon Business Park - Located West of Sycamore Canyon Boulevard at the Western Terminus of Don Kipper Drive and West of Lance Drive (SCH No. 2015081042).

Dear Ms. Brenes:

26-A

The City of Moreno Valley appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Sycamore Canyon Business Park located in the City of Riverside. Given the size and proximity of the project to Moreno Valley, the proposal to develop a 1,375,169 square foot industrial complex, and amendment to the Circulation Element of the City of Riverside's General Plan to modify existing roadway and circulation patterns can have adverse impacts on the City of Moreno Valley.

The City offers the following comments for your consideration:

Air Quality

- Sections 5.3 and 6.1.5 (Air Quality) - There was no mention in the DEIR of the type of diesel trucks that would be entering the site during the construction and operations phases of the project. It is recommended that the site be restricted to allow only 2010 trucks or better to further reduce NOx emissions. An example of a mitigation measure to be added to the Air Quality and Greenhouse Gas (Section 5.7) sections is as follows:

  26-B

  "All diesel trucks entering logistics sites shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Facility operators shall maintain a log of all trucks entering the facility to document that the truck usage meets these emission standards. This log shall be available for inspection by City staff at all time.

- Sections 5.3 and 6.1.5 (Air Quality) – MM AQ20 f) states that, "Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR). Clear signage shall be provided for construction workers at all access points."

  It is recommended that the mitigation modified to limit truck idling time to three (3) minutes. This mitigation level effort will be consistent with other similar projects in the area and can further lessen a significant and unavoidable air quality impact.

26-C

- Sections 5.3 and 6.1.5 (Air Quality) – MM AQ17 states, "During grading, all off-road diesel-powered construction equipment greater than 50 horsepower shall meet or exceed the United States Environmental Protection Agency (EPA) Tier 3 off-road emissions standards. Proof of compliance shall be reviewed by the City prior to issuance of a grading permit"

  It is recommended that the above mitigation measure be revised to require Tier 4 construction equipment during project construction. The EPA Tier 4 emissions standards were being phased in between 2008 to 2015 and should be available. Incorporation of a revised mitigation measure tying equipment to Tier 4 emission standards would further mitigate the projects significant and unavoidable air quality impact and would be consistent with other similar logistics projects in the area.

26-D

Transportation/Traffic

- Section 5.16 (Transportation/Traffic) – A discrepancy appears to exists in Section 5.16 regarding the environmental determination and level of impact for any Transportation/Traffic impacts. Under 5.16.6 – "Proposed Mitigation Measures", it is stated that, "implementation of the proposed Project will not result in any potentially significant impacts to transportation/traffic, and therefore, no mitigation measures are necessary". However, on Page 5.16.52 and 5.16.53 of the document, it is stated that "although the Project's intersection impacts will not be significant, its freeway segments (on and off ramps) will be significant and unavoidable until improvements are constructed".

26-E

  There were no visible mitigation measures provided in the DEIR document for Traffic/Transportation. The following explanation was given regarding the improvements and lack of mitigation provided:

26-F

  "These improvements are under the exclusive control of Caltrans and the timing and funding of these improvements are currently unknown. Neither, the City, as the lead agency, nor the Project proponent can contribute fair share payment because Caltrans has no fund established for this purpose. Fair share payment

may be paid when there is an identified fund and where it is reasonably foreseeable that the mitigation will be installed. Because Caltrans has no fund established to receive payment and the timing of these improvements are unknown, this impact is considered to be significant and unavoidable."

26-F Cont.

If the determination was identified as significant and unavoidable for freeway on and off ramp segments, any and all feasible mitigation measures should be provided to address the impact. It shall also be made clear to the reader that the final impact determination for Transportation/Traffic under Section 5.16.6 shall be significant and unavoidable and not less than significant with no mitigation required or "significant and unavoidable until improvements are constructed".

26-G

Further, the project should be conditioned to participate in some fashion with key transportation agencies in Riverside County (e.g. RCTC, Riverside County TLMA, WRCOG) to develop an appropriate transportation funding program to address freeway impacts.

26-H

We respectfully request that the City of Moreno Valley receive copies of the Final Environmental Impact Report (EIR) and associated technical studies when available. Please include the City on any future mailing lists regarding final Environmental Impact Report (EIR) documents as well as for future notification of meetings/ and public hearings associated with the environmental determination and project.

26-I

Thank you again for the opportunity to provide comments on the DEIR. We look forward to working with you as the document is being finalized. Should you have any questions or concerns, please contact Mark Gross, AICP at (951) 413-3215.

Sincerely,

Richard Sandzimier
Planning Official

c City Council
City Manager
Assistant City Manager
City Attorney
Department Heads
Michael Lloyd, Land Development Division Manager
Mark Gross, Senior Planner
Claudia Manrique, Associate Planner

Response to Comment Letter 26 – City of Moreno Valley

Response to Comment 26-A:

The City appreciates the City of Moreno Valley's review of the Draft Environmental Impact Report (DEIR).

Response to Comment 26-B:

The Project Applicant is not a trucking company or a trucking operator. As stated on page 3-43 of the DEIR, the proposed Project is being constructed as a "spec" building. The ultimate user is not known at this time; therefore, the commenter's proposed mitigation measures requiring all diesel trucks to meet or exceed 2010 engine emission standards is infeasible.

With regard to the reduction of diesel emissions, page 5.3-18 of the DEIR states:

> Under CARB's Diesel Risk Reduction Program, mobile diesel emissions have their own set of reduction programs, as opposed to stationary diesel sources (generators) which are addressed separately under the Reduction Plan. One of the incentive programs for mobile diesel sources is the Carl Moyer Program which is a clean engine incentive program. This program provides money in the form of grants to cover the incremental portion of the cost to purchase cleaner burning engines or retrofitting existing ones.
>
> Other programs include a program designed to develop and implement strategies to reduce emissions from new on-road heavy-duty diesel engines. The primary method of implementing this program will be through the development of emission control regulations and test procedures for those new engines. The California Exhaust Emission Standards and Test Procedures for 2004 and Subsequent Model Heavy-Duty Diesel Engines and Vehicles were amended in 2007 and will reduce emissions from new on-road heavy-duty diesel engines. Strategies for reducing diesel emissions from existing on-road heavy duty engines are mainly implemented through three sections of this program: retrofit assessment, heavy-duty testing and field support, and retrofit implementation. CARB staff has developed a regulation to reduce diesel particulate matter and other emissions from existing on-road heavy-duty diesel powered vehicles operating in California. These regulations were adopted by CARB in December 2008 and last amended in December 2014. Beginning January 1, 2012, the Statewide Truck and Bus rule began requiring heavier trucks to be retrofitted diesel exhaust filters, and requires older truck replacement which started in January 2015. By 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.

To make sure the future building operator takes advantage of incentives offered by the Carl Moyer Program, the Project will implement the following mitigation measure:

> **MM AQ 23**: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall 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. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded. (DEIR, p. 5.3-39.)

In addition to compliance with the above mitigation measure, the building operators will be required to comply with all applicable rules and regulations regarding vehicles that use the Project site. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-C:

The Project will comply with Title 13, Section 2485 of the California Code of Regulations and **MM AQ 13** and **AQ 22**, which limits idling time to 3 minutes. Mitigation Measures **MM AQ 13** and **MM AQ 22** were modified and new text is shown as double underlined and the text to be deleted is shown as ~~strikethrough~~. These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation.

> **MM AQ 13:** All facilities shall post signs informing users of requirements limiting idling to three~~five~~ minutes or less which is shorter than required under ~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.
>
> **MM AQ 22**: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:
>
> a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.
>
> b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-D:

Project-related short-term emissions were evaluated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2 computer program. The model evaluated emissions resulting from site preparation, grading, and construction. The default parameters within CalEEMod were used and these default values reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated construction emissions. In addition to the default values used, the following assumptions relevant to construction were used to model short-term construction emissions:

- Tier 3 grading equipment will be used during Project grading to reduce oxides of nitrogen (NO_x) and diesel particulate matter (DPM) impacts to nearby receptors as required by **MM AQ 17:**

  MM AQ 17: During grading, all off-road diesel-powered construction equipment greater than 50 horsepower shall meet or exceed United States Environmental Protection Agency (EPA) Tier 3 off-road emissions standards. Proof of compliance shall be reviewed by the City prior to issuance of a grading permit.

- Default construction equipment ratings and load factors contained in CalEEMod were applied to 40-hours per week actual engine running times except cranes at 20-hours per week.

- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control, the Project will utilize the mitigation option for watering the Project site three times daily which achieves a control efficiency of 61 percent for particulate matter 2.5 to 10 microns in diameter (PM-10) and particulate matter 2.5 microns or less in diameter (PM-2.5) emissions, as required by **MM AQ 20**:

  MM AQ 20: Pursuant to SCAQMD Rule 403 (e) – Additional Requirements for Large Operations – the Project will implement applicable dust control measures specified in Table 2 of the Rule and will implement additional measures specified in Table 3 of the Rule if performance standards cannot be met through use of Table 2 measures. The Project will submit a Large Operation Notification (Form 403 N) to the SCAQMD prior to commencing construction activities. Consistent with Rule 403, the following general-practice BMPs will be implemented as part of

the Project's construction specifications so that all construction-related emissions, including fugitive dust, would result in less than significant impacts:

a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day.

b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

d) All vehicle speeds on unpaved roads shall be limited to 15 mph.

e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR). Clear signage shall be provided for construction workers at all access points.

g) All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator if visible emissions are apparent to onsite construction staff.

h) A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

- Additional water truck trips were specifically included during grading, 200 horsepower at default load factor for slow speed operation.
- The architectural coating schedule at the end of construction was extended by one week (24 days to 30 days) to reduce daily volatile organic compound (VOC) emissions.
- The actual architectural coating surface area was recalculated from the CalEEMod defaults based on actual Project size.

Based on **Table 5.3-E – Estimated Daily Construction Emissions**, criteria pollutant emissions from construction activities will not exceed the SCAQMD regional daily thresholds during Project construction if each activity occurs separately. The construction activities that may potentially overlap include, building construction, paving, and architectural coating (painting) activities. **MM AQ 21** will be implemented to prohibit the building construction and

architectural coating (painting) activities from overlapping in order to avoid an exceedance of Volatile Organic Compounds (VOC) emissions.

> **MM AQ 21**: To reduce VOC emissions during construction, the building construction activities and architectural coating (painting) activities shall not occur concurrently.

There was a typographical error noted in Section 6.2 Significant Unavoidable Adverse Impacts in the DEIR. To clarify that there are no significant air quality impacts during construction, the first bullet point under the second paragraph under Section 6.2 Significant Unavoidable Adverse Impacts on page 6-29 of the DEIR will be revised in the Final EIR (FEIR) as follows: [1]

> The proposed Project will result in Project-specific or cumulatively significant unavoidable impacts to:
>
> - Air quality – cumulative and Project-specific impacts during~~during construction and~~ operations;
> - Noise – Project-specific impacts during construction and operation); and
> - Traffic – Project-specific and cumulative impacts to freeway level of service (LOS).

This clarification does not change the significance conclusions of the DEIR or result in the need for additional mitigation. Since Project construction will not result in significant air quality impacts with the inclusion of the mitigation measures mentioned above, the use of Tier 3 construction equipment (as noted in **MM AQ 17**) is appropriate for this Project. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-E:

The commenter's comment is noted. Section 5.16.6 of the DEIR contained a typographical error that will be addressed in the FEIR. (DEIR, p. 5.16-56.) Specifically, the following revisions will be made in the FEIR:

> An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (*CEQA Guidelines*, Section 15126.4). ~~Implementation of the proposed Project will not result in any potentially significant impacts with regard to level of service to transportation/traffic, and therefore, no mitigation measures are necessary~~ Although Project implementation will contribute to an exceedance of Level of Service (LOS) at the I-215 NB off-ramp at Eastridge-Eucalyptus during the PM peak hour and the I-215 NB on-ramp at Fair Isle-Box Springs during the AM and PM Peak hours; there are no feasible mitigation measures to reduce these impacts to less than significant because the needed freeway improvements are under the jurisdiction

[1] The new text is shown as double underlined and the text to be deleted is shown as ~~strikethrough~~. These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation.

> of Caltrans and the City has no control over when the improvements will be made. Therefore, there are no feasible mitigation measures to reduce these impacts to less than significant.

This clarification does not constitute significant new information as the Project's significant and unavoidable impact to freeway LOS is disclosed throughout the DEIR on pages 1-51, 1-56, 5.16-35, 5.16-48, 5.16-52, 5.16-53, 5.16-57, and 6-29.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-F:

This comment, which quotes the DEIR, is noted. Also, refer to Response to Comment 26-E above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-G:

See Response to Comment 26-E regarding clarification of DEIR Section 5.16.6. Also, refer to Response to Comment 26-F above. Section 5.16.6 Proposed Mitigation Measures on DEIR page 5.16-56 will be revised to clarify that impacts are significant and unavoidable as follows:

> An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (*CEQA Guidelines,* Section 15126.4). As discussed in the analysis under Threshold A, because there are no feasible mitigation measures for impacts to freeway on- and off-ramps, iImplementation of the proposed Project will result in significant and unavoidable impacts to freeway segments (on-and off-ramps) ~~impacts to transportation/traffic, and therefore, no mitigation measures are necessary~~.

Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-H:

As stated in the DEIR, there are no regional funding programs in place for freeway impacts (DEIR, p. 5.16-52). The Project will pay all applicable fees for transportation improvements in place at the time buildings permits are issued. The commenter is referred to the portion of DEIR **Table 1-B – DEIR Summary Matrix** (DEIR pages 1-51 –1-53) for an identification of Transportation/Traffic impacts. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 26-I:

Comment noted. The commenter will be included on the mailing list for this Project and will receive notification of the Final Environmental Impact Report. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 27 – Thomas Ruiz

27

Brenes, Patricia

From: Thomas Ruiz <ThomasJ.Ruiz@hotmail.com>
Sent: Friday, September 23, 2016 9:26 AM
To: Brenes, Patricia
Subject: [External] Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042)

Ms. Brenes,
I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042).

I live at 1358 Sutherland Drive, Riverside, CA. Very close to the (2) proposed Mega Warehouse projects. I am a first time homeowner and recently bought in this neighborhood for the beautiful views and quiet environment. After a few months of living here, I experienced noise from back-up signals coming from the existing warehouse in the early AM from terminal tractors. With that being said, my family's house is considerably further away from those warehouses compared to the proposed warehouses, which would be less than a football field length away. This is cause for grave concern for noise pollution, in which the EIR shows that the tests were taken in non-peak hours and after the holiday season. 27-A

In our community we have quite a few young children that play outside, including my son. If this project is to be constructed I fear that they can face health risk with the excessive increase of trucks traveling through our community and at the proposed warehouse location. I fear that the owner of the warehouse will not be able enforce any regulation on their tenants or of their sub-contractors that will deliver or pick up from this warehouse in the use of a clean air vehicle. I would propose that any such contract be approved by the city council to insure the residence that proper mitigation measures would be followed. 27-B

Also, we have a great number of trucks that either congests the roadways or parked illegally on Sycamore Canyon waiting for pick-ups or delivery. We fear that this problem will only increase do the sure size of this proposed project. I fear that in the future, the bottle neck of 215/60 interchange will cause heavier traffic. Commutes to and from work will be longer which will result in spending less time with our families. This can also cause our community to be a less desirable place to live and possibly lowering the communities home values. I truly believe that this project is not properly sited for the size. Therefore, we fear that any mitigation measures taken wouldn't be enough without affecting the quality of life of the current residence. 27-C

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate mitigation strategies (including NO development) should be considered. 27-D

Sincerely,

Thomas Ruiz
1358 Sutherland Dr.
Riverside, CA

1

Response to Comment Letter 27 – Thomas Ruiz

Response to Comment 27-A:

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. The results of this monitoring are reported in Draft Environmental Impact Report (DEIR) **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from existing adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) Ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that change in the noise levels resulting from Project implementation would be overstated. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, Table 5.12-B.) These measurements consist of three 10-minute, short-term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note that, in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Again, the purpose of the ambient noise measurements is to provide a basis for the comparison of noise with and without the Project; thus, longer term measurements are not necessary. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards.

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, (below). (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City Council of the City of Riverside, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The

barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including

providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the two property owners will permit the noise barrier wall per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the two individual property owners will authorize, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 27-B:

The City adopted *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, it recommends that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. The HRA should indicate how the project can be designed to limit health risks. The site has been designed in order to minimize impacts on the adjacent residential area including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

Health Risk Assessment (HRA): Since residences will be located within 1,000 feet from the proposed Project, a HRA was prepared in June 2016 (included in Appendix B of the DEIR) and a refined HRA was prepared in November 2016 (found on the City's website at http://www.riversideca.gov/planning/pdf/eir/sycamorecanyon/Refined-HRA-Report-11-9-16.pdf) to evaluate cancer and non-cancer risks associated with the proposed Project. The November HRA was prepared in response to comments received from SCAQMD on the DEIR regarding the June HRA, and is consistent with the requested SCAQMD guidance and methodology. In both the June HRA and November HRA, none of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for either workers or residents within the Project site and vicinity. (DEIR, p. 5.3-34)

Air Quality: There is no requirement in the DEIR that trucks visiting the site be clean air vehicles; however, pursuant to mitigation measure **MM AQ 22,** all trucks are assumed to be operating in accordance with or exceeding the most recent California regulations for trucks and that operators are keeping their trucks properly maintained. Additionally, implementation of mitigation measures **MM AQ 1** through **MM AQ 19** as well as **MM AQ 22** through **MM AQ 25** will help to minimize air quality impacts during Project operation. (DEIR, pp. 5.3-35 – 5.3-39)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (i.e., the barrier between conditioned and unconditioned spaces). This includes installation of insulation to minimize heat transfer and thermal bridging and to limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment

shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the Final Environmental Impact Report (FEIR) as shown below.[1]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to three~~five~~ minutes or less which is shorter than required under~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

[1] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (example text).

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 16: The Building Operator shall support and encourage ridesharing and transit for the construction crew and regular employees by providing information on ridesharing and transit opportunities.

MM AQ 17: During grading, all off-road diesel-powered construction equipment greater than 50 horsepower shall meet or exceed United States Environmental Protection Agency (EPA) Tier 3 off-road emissions standards. Proof of compliance shall be reviewed by the City prior to issuance of a grading permit.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's

specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall 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. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

The City is required to prepare and adopt a Mitigation Monitoring Reporting Program (MMRP) to be included in the FEIR to ensure compliance with the mitigation measures identified in the DEIR. The MMRP will clearly delineate all mitigation measures required, the parties responsible for each mitigation measure, and the timing of implementation of each measure.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 27-C:

In accordance with the City Municipal Code Section 10.52.155(a), it is unlawful to park commercial vehicles (with a gross vehicle weight of 10,000 pounds or more) and all commercial trailers or semi-trailers on any public street, highway, road or alley within the City except in specific locations designated by the City Traffic Engineer and identified by signs indicating commercial vehicle parking is allowed. The City has designated commercial vehicle parking along portions of Box Springs Boulevard near the Project site (DEIR, p. 5.16-49.) therefore, trucks may legally park along this road.

With regard to the existing condition of trucks parking illegally on Sycamore Canyon Boulevard, residents may call 311 to report the incident and the call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

With regard to Project-related trucks parking on area streets, it is anticipated that the site will operate 24/7 in which case queuing would not be an issue. However due to issues with other projects within the City, a queuing analysis was performed in the event the Project is not a 24/7 operation. If the Project does not operate as proposed, the potential for queuing would be greatest during the morning, before the site gates open. The queuing capacity for Building 1 is approximately 32 to 35 semi-truck with trailers, which is greater than the anticipated number of trucks expected to arrive during the AM peak hour. (DEIR, p. 5.16-49.) The Building 2 queuing capacity is approximately 5 to 6 semi-trucks with trailers, which is slightly less than the 9 trailer trucks anticipated to arrive during AM peak hours. (DEIR Appendix M, p. M-23.) However, as previously stated, there is designated truck parking near the Project site; thus, it is reasonable to assume Project-related trucks will park there, because, as stated above, trucks are not permitted to park on residential streets. (DEIR, p. 5.16-49.)

A Traffic Impact Analysis (TIA) was prepared for the Project to quantify Project-related impacts to roadway and freeway segments in the Project vicinity. Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, because freeway facilities are under the jurisdiction of Caltrans there is no mechanism for the City or Project Applicant to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, pp. 5.16-48, 5.16-52, 5.16-53, 6-26.) Although this impact is significant and unavoidable, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

This comment alleges that the proposed Project may cause economic hardship impacts by adversely impacting property values. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or*

> *social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

The CEQA Guidelines also provide that physical effects on the environment related to changes in land use, population, and growth rate induced by a project may be indirect or secondary impacts of the project and should be analyzed in the EIR only if the physical effects would be significant. (CEQA Guidelines §15358(a)(2).) Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment." (CEQA Guidelines, § 15064(f)(6).) The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. . . . Economic and social impacts of proposed projects, therefore, are outside CEQA's purview" (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§15126.2, 15064(d)(3)].

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 27-D:

The DEIR was prepared in accordance with the requirements of the State CEQA Guidelines and the City's local guidelines for implementing CEQA. The DEIR contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise and light and as addressed in Response to Comments 12-A through 12-C above.

CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a). According to this section of the State CEQA Guidelines, "…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. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two-building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise

have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 28 – David Cocker

28

September 23, 2016

City of Riverside

Community & Economic Development Dept., Planning Division

Attn: Patricia Brenes, Principal Planner

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To the City of Riverside:

This document provides comments and concerns related specific to the Draft EIR for Sycamore Canyon Business Park. The following concerns are noted:

Table 1-B – DEIR Impact Summary Matrix

There are a number of concerns with the summary provided on environmental impacts of the proposed project. They will be addressed by category below:

Aesthetics: Impact: Substantial adverse effect on a scenic vista

The DEIR states that this is *less than significant*. However, this is not true as a proposed 10 foot wall will be placed into the backyard of three "view lots" at the top of their slope as part of the noise mitigation effort. 28-A

1. It is unreasonable to even include as a mitigation step the construction of a 10 foot barrier that prevents homeowners from accessing a great portion of their property.
    a. There is a reason why the Riverside Municipal Code only allows 6 ft high wall boundary walls in residential areas. This is nearly double that height.
    b. Second, these are view lots with spectacular views of the Box Spring Mountains, Sycamore Canyon Wilderness Park, and Moreno Valley. Placing a 10 foot wall will at the top of their slopes will obscure this view. The builders have stated (not included to best of our knowledge in the DEIR) that this will be a transparent wall.
        i. This impacts the enjoyment of the property by reducing the natural convection in the area.
        ii. It is unclear how a property owner would keep this 10 foot barrier clean (optically transparent) over time or manage and upkeep the rest of their property with the barrier.
2. The presence of a 37 foot high wall located 100 ft from property boundaries along Northern line of properties will have extreme effects on the aesthetics of the neighborhood. This is already abundantly obvious based on the "CT" warehouses ("10" in Figure 6-1) built along the same boundary to the east of the proposed project. A photo (Figure 1) taken from 28-B

comparable wall measured 100 feet away is shown here for the expected aesthetics impact on homes on the Northern boundary of the project, especially the Easternmost homes here homes appear to be below level of warehouse.

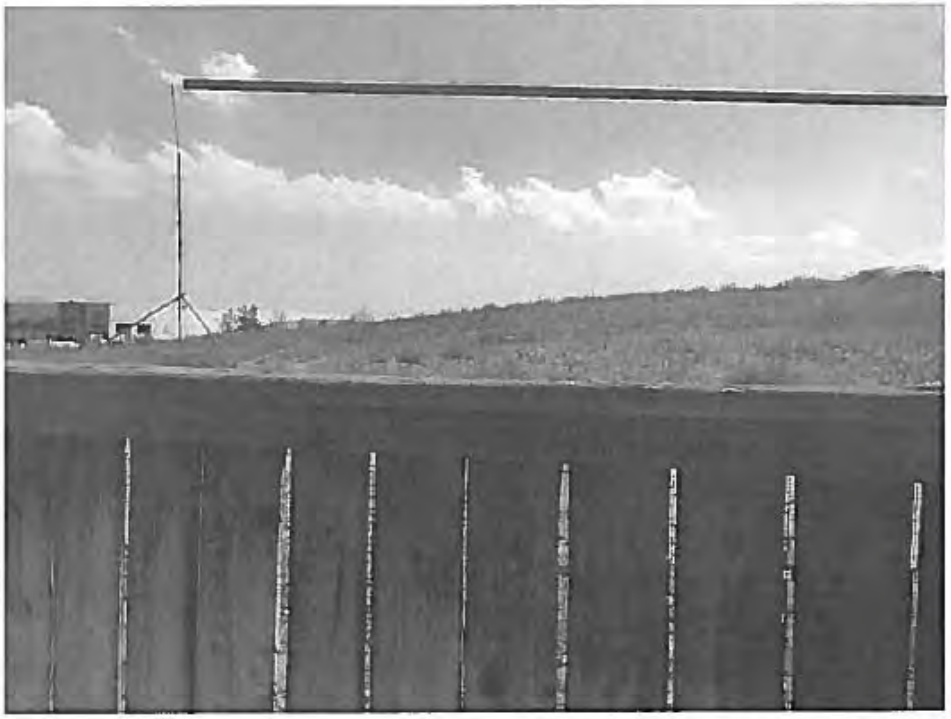
28-B Cont.

Figure 1: View of a warehouse of comparable height (CT reality, project adjacent to proposed project) taken at exactly 100 ft distance, which is the distance of proposed projects wall from residence property lines. Note extreme impact on home's view.

Figure 2: View of CT reality (comparable wall height, taken from across the street of nearest residences (approximately 170 feet distance)

3. **Further, the following sets of photographs are provided to show a more realistic impact of the proposed warehouse. The flag shown in the currently undeveloped areas are the height and location of the corner of the proposed project. While renderings in the draft EIR have attempted to make the impact appear small, one must wonder, which homes are actually shown? These photographs provided herein are actual pictures taken from homes in the neighborhood on the Northern boundary. It is imperative that for full disclosure of aesthetic impacts, homes along the entire Northern boundary, particularly to the East are considered. Given the steep slope that the current Northern boundary residents reside, the relative elevation of the distribution center to the homes varies significantly. This variation appears to be ignored in the current draft EIR. Renderings of view impacts on MOST impacted homes should be shown, not those properties with less significant impacts!. Figures 3 through 7 attempt to put a more realistic impact of the proposed project on aesthetics for residences on Northern project boundary.**

28-C



28-C
Cont.

Figure 3: View from backyard of northern residential properties. The flag represents the height of the wall and corner of proposed building nearest the northern residences. Red line added for emphasis of TOP of wall. View below will be that of large concrete wall replacing view.

Figure 4: View from backyard of home neighboring proposed project. Note height of wall that will impact aesthetics of home. Red line added for effect to show where top of wall is projected to be using flagpole set-up by developer.

28-C
Cont.

28-C
Cont.

Figure 5: view from front yard of neighbor across the street from residences bordering the proposed project. Note that the flag indicating the corner and height of the building closest to Northern residences is still visible over the roof line of the home. The wall is expected to obliterate open space view between the top of the roofline of the left home to approximately the height of the trees seen behind the home on the right. Red line added for effect to show top of wall impacting neighborhood. Line based on height of flag visible from corner of proposed building

28-C
Cont.

Figure 6: Another view of the skyline to be obliterated from a neighbor yard to the North . . The flag shown is the corner of the property at the height of the proposed wall, The wall will extend continuously to the right of the flag. Re line added for effect to identify top of wall based on height represented by flag put up by developer indicating corner of building.

Figure 7-A view from the East along the northern residences line. The wall is expected to extend from this location for about 850 feet about 100 feet from the residences shown on the left, clearly towering over the existing homes. Other corner flag to far away to be seen in this picture (850 feet)

28-C Cont.

Noise:

MM NOI 13: This is an important mitigation for on-site equipment. However, the +5 ambient is at the location of the source (noise at the source; includes noise of vehicle used) and should be noted that this is well above the expected ambient noise (with no project) for surrounding residential communities. The claim that this will not be a constant annoyance to homeowners who are located such a short distance away is not correct. It is easy to observe the noise of these on-site vehicles by going to a warehouse store (e.g., Lowes, Costco) and standing 100 feet from the forklift, similar to distance of distribution facility from nearest residential receptors.

28-D

MM NOI 15: Distance not large enough to reduce significant impacts.

28-E

MM NOI 16: Required to mitigate substantial noise at sensitive receptors. This mitigation is used to show minimal impacts of noise on receptors. While it may reduce noise levels, the mitigation is extreme and interferes with the property owner's enjoyment by obstructing the property owner's views and dividing their property and removing access to significant portions of their land. It does NOT seem reasonable to assume that such an extreme infraction onto the neighboring residences will be allowed by the sensitive receptors. Therefore, the study should emphasize noise impacts assuming the barrier is not present. 28-F

Therefore, statement "Less than significant" to "a substantial permanent increase in the project vicinity above levels existing" should not be reasonably made. Without such mitigation which includes MM NOI 16, the impacts on noise on sensitive receptors is substantial (see Appendix I). 28-G

Concerns with noise analysis:

According to 5.12-2, the noise/land-use compatibility states that a CNEL <60 is normally acceptable, a CNEL 60-65 conditionally acceptable, and a 65-70 normally unacceptable. ST1 as measured (see comments below) are already > 60. An increase of +5 would place the noise in the normally unacceptable range. It is noted below that ST1 is not necessarily the most appropriate site to look at impacts at that it is likely that the sensitive sites are already approaching the normally unacceptable range. 28-H

1. The noise impact of the proposed distribution center is performed piecemeal and does not take into account the total impacts of the developments within the Sycamore Canyon Business Park
    c. Under cumulative impacts, the DEIR and noise analysis fails to account for increases in noises due to cumulative development within the Sycamore Canyon Business Park. A significant amount of development has occurred within the Sycamore Canyon Business Park, which should be expected to further increase noises within the residential zones even further. By looking at only this project with respect to noise the DEIR fails to acknowledge and properly account for additional cumulative noise impacts. Residents have noted significant and measurable impacts from the Kroegers and Pepsi distribution centers (1 mile). Stepped and significant increases in noise levels (loading/unloading of trucks, truck noise, backup beeper noise), especially at night, noted by all residents as activities in area have increased in last couple of years. 28-I
2. DEIR only measures background noise on single day at two locations, which are not representative of worst case scenarios. A longer term study of ambient noise is needed to better understand CNEL levels already existing. Noise levels vary considerably based on meteorological conditions, easily observable by current residents. A single day in December cannot possibly account for range of background noise; additionally, significant concerns arise about the location of the two sound sites. 28-J
        i. It is easily observable the increase in noise (especially nighttime) from the Sycamore Canyon Business Park by walking down the Northwestern/Western properties in a Southerly direction. However, the location of the sound receptors were placed in the most Northerly location of the property. Further, sound impacts as modelled are expected to be 28-K

largest at the Northern locations (Bannoch and further North Cannich residences) yet these locations were not evaluated for impacts. 28-K Cont.

ii. Further, the build-out and full operational capacity of Sycamore Canyon Business Park is not complete. Further noise impacts should be anticipated as the recent build-out comes to full operation conditions. 28-L

iii. It is abundantly obvious that meteorological conditions play a major role on the transmission of noise. A single day measurement cannot possibly account for typical measurements given variability in noise transmission. This is abundantly obvious to those homes already significantly impacted by Sycamore Canyon Business Park that noise impacts (and background noise) varies strongly day-to-day. Why are the worst case scenarios not accounted for in this study as opposed to a single day (longer term noise analysis is needed, especially at most relevant locations). 28-M

3. The noise impacts of the project do not appear to account for the amphitheater effect that should be anticipated building the proposed distribution center below the neighborhood. It is not reasonable to assume the standard 6 dbA decrease per doubling of distance for noise emanating between to large concrete walls and subsequently traveling up an amphitheater-like area. The DEIR needs to more robustly account for the acoustics of the actual geography of this area. 28-N

4. The need for accurate noise assessment is particularly alarming given the 360 ft mitigation setback for use of loading docks between 11 pm and 7 am due to nighttime noise levels. The model must account for the real decrease of noise that will occur within the tunnel created by being between two very large building walls. Therefore, it would seem more reasonable to model the source as a line source as the soundwave energy will only dissipate between the two large building walls by assuming the noise will travel parallel to the walls directly toward the homes to the Northwest/Western property line, similar to the expected perpendicular propagation of energy from a line source. Given that the drop-off in noise is logarithmic as stated in the DEIR and a line source has a 3 dBA versus 6 dBA decrease per doubling of distance, this appears to have a monumental impact of noise impacts at the residential property line AND nearest residences. Therefore, the decrease modelled by the 360 ft mitigation step far underestimates the real distance necessary to mitigate noise. 28-O

5. Noise modeling should look at maximum noise expected from the proposed development. This is expected to be between the residences and their property line (on the line, the model shows benefit of wall, but what about a short distance from the wall above the height of the wall (remember, there is a slope in the yard). Impacts at the residential (property) line as city noise ordinances/violations are measured at the property line (Title 7 of Riverside Municipal Code). Using DEIR statements of 6 dBA decrease per doubling of distance, the residential property line should be at least 6 dBA higher. 28-P

6. It is an unreasonable assumption that a property owner would agree to give up most of their yard and their wonderful views from their property to accommodate the development of the proposed distribution center by placing a 10 foot wall on their property that reduces access to a major portion of their property and has major aesthetic implications (see Aesthetics below). Therefore, the DEIR should not make such outrageous mitigation 28-Q

strategies that will most likely be rejected by property owners to greatly reduce the "projected" impacts of the proposed distribution centers. 28-Q Cont.

7. Following basic engineering scaling analysis provided in the DEIR of reductions of 6 DBA per doubling of distances, it seems reasonable to assume that a development that is 9 times closer than a project that had significant impacts on residences (the Big 5 distribution center) should have far greater impacts at the property lines and at the residences. Even taking an extremely conservative estimate of 5 times closer, the loudness of this proposed development should be 2^5 or at least 32 times louder. Or, using rough engineering estimates of 10 dB reduction of sound via the distribution sound wall, the expected increase should be on the order of 5*6dBA – 10 dBA, or approximately 20 dBA. For an area already above Riverside Municipal Code levels of 45 dBA nighttime noise, as measured in the likely quietest location of the neighborhood, this means that the impacts should be far greater than stated in the noise analysis. Also note, background readings (challenged as too low in item N-2) of 53 DBA 28-R
8. Noise analysis of background does not fairly represent the short term noises of even existing noises. These are the loud "beeping", crashes and bangs associated with loading and unloading, hitching and unhitching, and short term noises associated with the vehicles (e.g., horns). These are the loud, very brief sounds, that are associated with sudden waking/sleep disturbance and prevention of sleep as opposed to the general, loud, white noise from other operations that is represented by "average" noise measurements. Therefore, the statement that the noise associated with the operations of the proposed site will not interfere with sleep are fallacious. 28-S
9. Table 5.12J is the basis that the DEIR uses for evaluating impacts of development and therefore must be carefully evaluated without MM NOI16 and included as such since it is unreasonable to show these as the impacts of the development given the unreasonableness of the proposed mitigation strategy based on unlikely neighbor agreement. Also note that ST1 and ST2 are not near the site for the anticipated greatest impacts for noise and are therefore not representative of actual noise impacts. 28-T
10. Noise model should include worst case scenario of back-up beepers as vehicles from outside the facility will likely have no "noise mitigation" ambient sensors installed. 28-U

Traffic:

Vehicles (especially large trucks) egressing from property: The DEIR for the project does not accurately reflect truck travel already occurring in the area using Sycamore Canyon to Fair Aisle or even Central. The DEIR states that the design of the streets will have large trucks exiting at a light at Sierra Ridge; however, mitigation strategies do not really prevent left turns onto Sycamore Canyon with access at Fair Isle. Trucks planning to go North cannot be reasonably anticipated to turn right on Sycamore Canyon to enter the I215 at Eastridge. The current analysis assumes only 5% of truck traffic will turn left onto Sycamore Canyon to enter the I-215 at Fair Isle. Why is this assumption made when it is a shorter distance to enter the I215 North/60 West from Fair Isle, which also lets trucks avoid the largely impacted interchange located between Eastridge and Fair Isle? It is the experience of the homeowners that vehicles originating from locations from Eastridge do enjoy the shortcut, impacting the Fair Isle intersection (and even the Central Intersection) with Sycamore Canyon Blvd. Without far greater mitigation, it is unreasonable to expect that drivers will take the long (distance and time) route to 28-V

Eastridge and head through a freeway interchange rather than bypass the interchange and access at Fair Isle when heading North back toward the Los Angeles and Long Beach Port areas. More appropriately estimating the likely truck traffic will then show even greater impacts then already stated (significant and unavoidable) and may further influence noise and air quality impacts.

28-V cont'd

Vehicles (especially large trucks) coming to property: The projected traffic patterns for inbound vehicles from the North is even more bizarre. Appendix J - Appendices to TIA Figure 4 shows projected incoming trucks avoiding the most obvious entry route from the north (I-215 exit heading Southbound named Fair Isle) only accounting for 5% of incoming truck traffic (ONLY 1/10th of Southbound trucks assumed to be smart enough to take the obvious route off Fair Isle???). This is even more ridiculous than the outgoing truck traffic as this is the most readily assessable off ramp to trucks heading Southbound on I-215. This off ramp provides simple access to the proposed warehouse allowing for avoidance of the congested interchange, providing a shorter and quicker route (AND takes the trucks close to apartments and residences.) A constant stream of truck traffic already uses the Fair Isle exit to access distribution centers further to the South of the proposed project. It is also surprising that about half the incoming cars (from the North) are also expected to take the long route (through interchange to Eastridge and then turn back North on Sycamore Canyon to get to the distribution facility) instead of the direct route to the facility. The traffic flow of the area should be evaluated for trucks currently accessing the Northside of the Sycamore Canyon Business Park and the traffic impact reevaluated with more relevant trip distributions.

28-W

It appears that only projected numbers are used to identify level of service (LOS) for intersections and roadway segments as opposed to measured values. If the model is assuming patterns very different from observed traffic patterns by residents, then all traffic calculations may be very wrong. A traffic count and truck count study is needed to evaluate existing levels of demand and current use patterns, especially during peak morning and afternoon hours if the EIR is to project community environmental impacts. This is particularly true when one looks at the local impacts (cumulative analysis), which somehow ignore the local distribution centers. (Appendix J-Webb, 4-12). Why is the vast majority of Sycamore Canyon Business Park (including 10 largest distribution centers) ignored in the cumulative analysis for trip generation as opposed to naming lots/projects/areas far away from Sycamore Canyon Business Park that are then immediately discarded from consideration due to distance? This is extremely relevant if actual vehicle counts are not being used in the analysis as well as for the cumulative impacts listed below.

28-X

Cumulative Impacts: Section 6.1.4

Cumulative impacts of the Sycamore Canyon Business Park on sensitive receptors does not appear to be reasonably estimated but rather takes a piecemeal approach (this single project only raises impacts below threshold values, yet the entire baseline is already raised to unreasonable levels). First, only a small fraction of existing distribution centers/warehousing impacts are accounted for; rather, impacts of banks and donut ships further away appear to be the focus (Table 6-A). Noise from the CP

28-Y

facility (not operating yet) is not discussed or evaluated (number 10 on Figure 6-1) despite their close proximity. There have been over 20,000,000 ft2 of distribution centers/warehouse construction (discussion with councilman Melendrez) built into the Sycamore Canyon Business Park and their cumulative impacts on noise appear to be glossed over. A simple look at Figure 6-1 in the DEIR shows how few of the distribution centers and other operations were even considered for noise (including Big 5, Ralphs, and Pepsi) next to the sensitive receptors. Instead, the focus was on properties much further from the receptor sites. As noted in the DEIR, distance is important when assessing noise. The noise of the existing and projected projects must be fairly considered. Even existing measures of traffic and noise cannot adequately reflect their impact as many properties remain vacant or have not been brought up to full capacity. Cumulative impacts on noise and traffic of the Sycamore Canyon Business Park needs to be carefully and not anecdotally accounted for in the DEIR (requested at time of NOP) to accurately reflect impacts on sensitive neighboring properties. Cumulative impacts of both the adjacent Sycamore Canyon Business Park and the approved Moreno Valley logistics center must be accounted for with respect to cumulative air quality and traffic impacts. 28-Y cont

The argument made in the DEIR demonstrates the lack of understanding of the general canyon effects by sampling stating the 0.5 mile is too far to have a cumulative impact on noise. Prior to build-out that has already occurred, significant noise, especially at nighttime was heard from the Kroeger (1.0 miles to nearest residence) and Pepsi distribution centers (>1.0 miles). Noises, more noticeable at night, included horns in the middle of the night, bangs from loading and unloading, and incessant backup beeper noises. Therefore, all noise generating sources within a minimum of 1.0 miles should be considered in this analysis and not simply discounted including the Pepsi distribution center, the Kroeger distribution center, the Big 5 distribution center complex, and other major properties between marker 5 and the residential neighborhoods. This DEIR for this project needs to account for the largest warehouses already present or planned in the area. ***As noted in discussion on noise, the noise abatement proposed on the private property is unreasonable and should be assumed to not occur. Further, the single day measure of noise away from the most impacted properties does not provide the cumulative background noises.*** Therefore, estimates of the CNEL for the properties to Western border must be provided and should be provided for worst case scenarios. Simple statements that single projects have minimal sound impacts are insufficient and misleading as the entirety of this build-out (cumulative effects) must be considered when evaluating the new project. 28-Z

Other details: Good neighbor policies. A number of entities raised concern about good neighbor policies and how this project could be built in light of them (specifically the ARB landuse handbook and Riverside Good Neighbor Policies (City of Riverside, City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities, October 14, 2008 (Available at https://www.riversideca.gov/planning/pdf/good-neighbor-guidelines.pdf, accessed October 23, 2015))) and the California Air Resource Boards "AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE", April 2005. The reader is referred to section 5.10 and Appendix M. Section 5.10 refers reader to Appendix M. Therefore, the next portion of this will list concerns associated with Appendix M. 28-AA

LU-7.1 and LU-7.2-Are noise levels (+10 db) in MSCHP acceptable and therefore "consistent" as stated in DEIR Appendix M. The noise impacts are described in MSCHP section 6.1.4 stating "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, 28-BB

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." The noise standards for residential (45 db) are already apparently exceeded based on DEIR analysis (>50 db); increase of 10 db nighttime noise would be gross exceedance of residential noise standards. Therefore, the project is inconsistent with LU-7.1 and LU-7.2. 28-BB cont

LU-9.7. "Protect residentially designated areas from encroachment of incompatible land-uses...." The DEIR claims this is consistent, yet building mega-warehouses within 100 ft of residential areas is clearly incompatible due to noise, traffic, air quality, and aesthetics. Riverside Good Neighbor Policies (City of Riverside, City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities, October 14, 2008 (Available at https://www.riversideca.gov/planning/pdf/good-neighbor-guidelines.pdf, accessed October 23, 2015))) and the California Air Resource Boards "AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE", April 2005 designate distribution centers of this size as incompatible with residential neighborhoods. The logic provided in DEIR is that mitigation methods being used—however, as noted previously above, MM-NOI16 is not reasonable yet is required for the industrial project to be compatible in such close proximity to the residential neighborhood. Therefore, the project is inconsistent with LU-9.7. 28-CC

LU-30.3. "Ensure that the distinct character of each of Riverside's neighborhoods is respected and reflected in all new development, especially infill development". This is infill development and the presence of such large buildings in close proximity to residential neighborhoods destroys the aesthetics of the neighborhood as witnessed with the CP buildings directly to the East of the currently proposed project. Further, high sound walls at the property line will unduly enclose the residential neighborhood (the height of the wall exceeds that typically allowed in residential areas). Finally, addition of noise to neighborhood, especially at nighttime, will destroy the livability of the area and its distinct character. Therefore, the project is inconsistent with LU-30.3. 28-DD

LU-79.2. DEIR states as consistent yet impacts of noise will be significant based on MSCHP section 6.1.4 for noise to meet the residential standards. The standards will not be met for operation of the facility based on modeling provided as part of the DEIR. Noise is already higher than residential nighttime standards and +10 db expected based on noise modeling. Therefore, the project is inconsistent with LU-79.2. 28-EE

LU-80.3. "Minimize any adverse land use conflicts between industrial uses and the residential and open space properties that abut specific plan areas." Stated as consistent. However, analysis only discusses abutment of northern residences and ignores residences to the west of the property, which are the ones most impacted by noise. Further, claims consistent with MSCHP section 6.1.4, yet as noted above, the noise does not meet residential nighttime standards. Therefore, the project is inconsistent with LU-80.3. 28-FF

LU-80.6. "Promote the development of Sycamore Canyon to achieve economic success defined by a diverse and compatible industrial base that provides economic opportunities for all its citizens. The City preferred outcome is to promote light industrial/flex space to maximize employment opportunities and utilization of the limited land supply. To achieve this goal, the City must first overcome complex infrastructure issues that limit development in the area. ***Large "big box" distribution or warehouse*** 28-GG

facilities will be necessary on a limited basis to create the critical mass required to solve some of these infrastructure issues." DEIR states this is consistent. However, there are numerous (nearly entirety of build-out), not limited, "Large "big box" distribution or warehouse facilities" already built in Sycamore Canyon Business Park. Addition of yet another such facility is not consistent with "limited basis". Therefore, the project is inconsistent with LU-80.6. 28-GG cont

Policy CCM-2.2-2.4 already acknowledged as significant and unavoidable. The DEIR states "The majority of passenger cars and truck traffic is expected to use Sierra Ridge Drive to Sycamore Canyon Drive to Eastridge Avenue which will provide on/off-ramp access to I-215." This is not consistent with expectations of residences based on observed behaviors. For access to I-215 North, travel on Sycamore Canyon Drive in the opposite direction to Fair Isle is expected as it is shorter, takes less time, AND allows the cars and trucks to bypass congested interchange. Therefore, the project is inconsistent with CCM-2.2-2.4 for reasons noted in DEIR plus that noted here. 28-HH

Policy CCM-2.7-2.8 stated as consistent, yet no mention or evaluation of likely left turn onto Sycamore Canyon heading toward Fair Isle is discussed. Heavy truck traffic already impacts this roadway from build-out of warehouses further away. Therefore, the project is inconsistent with CCM2.7-2.8. 28-II

Policy CCM-12.2 The neighborhood and public streets are already experiencing heavy parking on public streets. Therefore, simply stating that it is not permitted means very little. Therefore, the project is inconsistent with CCM-12.2 as it is reasonable to expect trucks accessing this new facility will act like other trucks accessing the Sycamore Canyon Business Park. Therefore, the project is inconsistent with CCM-12.2. 28-JJ

Policy CCM-12.4 stated as consistent. As noted numerous times above, it is unreasonable to expect that trucks leaving this facility will make right turns on Sycamore Canyon to enter I215 at Eastridge as left turns on Sycamore Canyon will take trucks to Fair Isle onramp to enter I215 allowing trucks to not backtrack and also bypass major congested intersection. Further, it is unreasonable to expect trucks nearest to residential areas to act differently than those already accessing Sycamore Canyon Business Park and follow rules stated in DEIR that are simply not currently followed or enforced. Therefore, the project is inconsistent with CCM-12.4. 28-KK

Policy OS-6.4 "Continue with efforts to establish a wildlife movement corridor between Sycamore Canyon Wilderness Park and the Box Springs Mountain Regional Park as shown on the MSHCP. New developments in this area shall be conditioned to provide for the corridor and Caltrans shall be encouraged to provide an underpass at the 60/215 Freeway" stated as consistent. However, this project further impedes the establishment of a wildlife movement corridor between the Parks. Therefore, the project is inconsistent with OS-6.4. 28-LL

Policy N-1.1 "Continue to enforce noise abatement and control measures particularly within residential neighborhoods" stated as consistent. However, this is only possible with implementation of MM NOI 16, already noted for its impracticability throughout this document due to severe intrusion on private 28-MM

property. Without MM NOI16, significant noise impacts are expected (although not clearly stated in DEIR-DEIR must provide CNEL estimates without MM NOI16. Therefore, the project is inconsistent with N-1.1. 28-MM cont

Policy N-1.2 "Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code" stated as consistent. MM-AES-1 requires the building of a very high boundary wall (8 foot) typically not allowed in residential areas due to aesthetics. Noise/Land use compatibility criteria may not be met once CNEL estimates provided without MM NOI16. Therefore, the project is inconsistent with N-1.2. 28-NN

Policy N-1.3 "Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized "stated as both "consistent" and "significant and unavoidable". For impacts to be "consistent", MM NOI16 is required, which does not appear to be reasonable given impacts to property. Therefore, the project is inconsistent with N-1.3. 28-OO

Policy N-1.4 "Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas" stated as consistent. The residential neighborhood to the west is not considered unless unreasonable MM NOI16 is implemented. Therefore, the project is inconsistent with N-1.4. 28-PP

Policy N-1.5 "Avoid locating noise sensitive land uses in existing and anticipated noise-impacted areas" stated as consistent. Logic provided is "project is not a noise-sensitive land use and is consistent with surrounding logistics/distribution noise sources that primarily affect the Project.". However, sensitive land-uses (residential) area adjacent to this project and are already noise-impacted. Addition of significant noise (unless unreasonable MM NOI16 is employed) is projected. Therefore, the project is inconsistent with N-1.5. 28-QQ

Policy N-1.8 "Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects" stated as consistent. Document states that MM NOI16 will be implemented to achieve this, yet there is no guarantee that homeowners will allow for such intrusive measures to be placed on their private properties. Therefore, operational noises expected to be significant. Therefore, the project is inconsistent with N-1.8. 28-RR

Air Quality:

A key component of the EIR is the health risk assessment (HRA) for diesel emissions from trucks coming to, operating on, and leaving the proposed project. A look at the air quality analysis raises several concerns. At the time of the NOP of an EIR, the community requested that localized emissions in close proximity to the most sensitive receptors be carefully investigated accounting for local topographical effects, vehicle idling, and various chemicals present in diesel exhaust (PM, NO2 (assuming all NO converts to NO2 in our ozone rich environment)) and consideration of both acute effects and longterm impacts that included cancer risk, respiratory impacts, and other health impacts due to diesel exhaust. Given that NO2 is an asthmatic trigger, what are the projected peak levels of NO2 at the residences to the West (and North) of the project. Further, it was expected that the project HRA would be modeled 28-SS

following protocols set forth by SCAQMD, our world class air quality management district that encompasses our area. Instead, it appears that a CalEE model was used (good for vehicle emissions from freeways). The entire project appears to have been treated as a single box with emissions from the center of the box, which does not account for the actual proximity of warehouse operations to the residences AND their appears to be no evidence of calculations that include idling emissions, which may be the dominant source from the warehouse. A more accurate representation of the impacts of diesel emissions on sensitive receptors in close proximity to sensitive receptors close to the project is necessary for full disclosure of the environmental impacts of the proposed project. Please also refer to the comment letter posted by AQMD for their assessment of the air quality modeling conducted for this project. Also, impacts should have been calculated both assuming flat terrain and assuming receptors are at elevated heights with worst case of two scenarios reported.

28-SS

In summary, the draft EIR fails to provide full disclosure or an accurate depiction of the environmental impacts of the project including, but not limited to aesthetics, noise, health-risk assessment, traffic, and impact on the Sycamore Canyon Wilderness Park and its MSCHP. The EIR must be reevaluated appropriately taking into consideration many of the concerns initially raised at the time of the NOP at the meeting at Platt College and of which are reiterated within this document (acoustics of canyon, current noise impacts from 1 mile away, cumulative impacts of Sycamore Canyon Business Park, impacts of diesel exhaust in close proximity to residents, aesthetics/obstruction of views) as well as new concerns raised when evaluating the draft EIR (unrealistic traffic patterns, failure to account for most existing projects in Sycamore Canyon Business Park including 10 largest distribution centers within it, failure to model emissions from the edge of the property where trucks will travel, failure to reasonably estimate emission rates for trucks on the property, failure to disclose CNEL levels assuming private homeowners unwilling to give up private property and views (MM16), failure to measure current noise at most impacted locations (identified by residents at scoping meeting at Platt College), failure to obtain noise measurements that cover range of meteorological conditions to identify worst case noise scenarios, failure to model and account for acoustics and dispersion of diesel emissions within the canyon, failure to account for acoustics of noise and noise propagation for impulse noises originating between two concrete walls (two buildings), failure to show renderings of views of warehouse from homes most impacted (those at lower elevations), and other concerns raised in this document.

28-TT

Sincerely,

David Cocker

Resident, Sycamore Highlands

Response to Comment Letter 28 – David Cocker

Response to Comment 28-A:

The noise barrier described in mitigation measure **MM NOI 16** would only be installed at two residences (6063 Bannock Drive and 6066 Cannich Road) to reduce nighttime noise impacts to those residences. Installation of this noise barrier (wall) is under the discretion of the two property owners, and the property owners will have the opportunity to work with the Project Applicant and City Planning staff to determine the design and materials of this proposed barrier (wall). **MM NOI 16** includes specific design specifications the wall must meet to attenuate noise from the proposed Project including a list of possible materials, including glass or other transparent materials. (DEIR, p. 5.12-47.) Therefore, the specific design of this wall has not yet been determined at this time, but the wall could include transparent materials so long as they meet the noise reductions requirement from the mitigation measure.

> **MM NOI 16:** Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.
>
> Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate. (DEIR, p. 5.12-47.)

Views of Box Springs Mountains, Sycamore Canyon Wilderness Park, and Moreno Valley are partially obscured by accessory structures and existing walls at the top of the slope (the rear property line is essentially at the toe of the slope) of the private residences. If the 10-foot wall is placed at the top of slope of the two residences mentioned above, which are at an

approximately 1,650-foot elevation, partial views of the Box Springs Mountains would remain visible from both the first-story and second-story homes given the approximate 3,100 feet elevation of the Box Springs Mountains (Google Earth 2016). Since Sycamore Canyon Wilderness Park is situated at a lower elevation and some parts of Moreno Valley are situated at a lower elevation and in the distant viewscape, the existing block walls at the rear property line of the residence may already substantially block these views from the first floor. However, even if a 10-foot wall is in place along the top of slope of the above-mentioned residences, views of Sycamore Wilderness Park and Moreno Valley would remain visible, at a minimum, from the second story of the homes.

The City is requiring the Project Applicant to install an 8-foot tall decorative (on both sides) block wall along the Project site's northern property line and that portion of the Project's westerly property line adjacent to existing residential uses (it would be at the toe of the slope for the residential properties to the northwest). The purpose of this 8-foot wall is to create a better visual appearance and to help cut down noise attenuation. (DEIR, p. 5.1-8). To ensure that compliance is enforceable by the City, this requirement is also a mitigation measure in the DEIR, **MM AES 1**. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report (DEIR).

> **MM AES 1:** To provide separation between the Project site and the adjacent residential uses and to be consistent with the wall constructed on the project located east of the Project site and north of Dan Kipper Drive, the developer shall install an 8-foot tall wall constructed of two-sided decorative masonry material along the Project site's northern property line and that portion of the Project's westerly property line adjacent to existing residential uses. As part of the Design Review process and prior to the issuance of a grading permit, the Project developer shall submit a revised site plan showing the 8-foot tall wall and the proposed materials and decorative treatment for such wall to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

Response to Comment 28-B:

The commenter's opinion regarding the CT Sycamore Center Project is noted. The CT Sycamore Center Project on Dan Kipper Drive, was constructed with a fifty-foot setback from the northerly property lines, adjacent to the residential properties and the buildings range from 37-feet to 41-feet in height. The CT Sycamore Center Project warehouses referenced in this comment are separate and independent from the proposed Project and was approved by the City after undergoing their own environmental review and public hearing process, including analysis of impacts related to aesthetics and building heights. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic and cumulative impacts sections of the DEIR.

It is assumed that the commenter's reference to a "37-foot high wall" is meant to refer to building height. The topography of the Project site limits views of Building 2, the building closest to the residences. The City of Riverside General Plan 2025 (GP 2025) designates the Project site as Business/Office Park (B/OP) and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan (SCBPSP) Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) The City of Riverside Municipal Code Chapter 19.130, established development standards for the BMP-SP and limits building heights to a maximum of 45 feet in height. (DEIR, p. 5.1-11.) The proposed Project complies with the height restriction of the BMP-SP. Building 1 is proposed to be approximately 41 feet in height and Building 2 will be approximately 37 feet in height. Further, the elevation and building height differences between Building 1 and Building 2 will minimize the view of these buildings from the adjacent neighborhood. Building 1 is located downslope from and south of Building 2 and is not expected to be visible from the residences north of the Project site. Additionally, Building 1 is setback approximately 256 feet from the Sycamore Canyon Wilderness Park and views of the building from the park will be softened by on-site landscaping and the Conservation Area. Lastly, the proposed Project has increased the building setback for Building 2. Building 2 is setback 100 feet from the property line abutting the residential lots north of the Project site. Within the 100-foot setback, the Project proposes 64 feet of landscaping, a 30-foot wide drive aisle (vehicles only, no trucks) and a 6-foot wide landscape planter adjacent to Building 2. This enlarged setback and enhanced landscaping will provide screening between Building 2 and the residences to the north. (DEIR, p. 3-35, **DEIR Figure 3-10 – Proposed Site Plan**, **DEIR Figure 3-11 – Conceptual Landscape Plan**.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-C:

Refer to Response to Comment 28-B regarding height and landscape screening. Exhibits were not prepared for each individual residence; but rather exhibits were prepared to serve as an example of the four different extremes in the topographical variations between Building 2 and the residences as described below.

Cross sectional line of sight exhibits were prepared for four locations to represent the view from four representative residential locations adjacent to the Project site. (DEIR, **Figures 3-10 – Proposed Site Plan and 3-13a – Line of Sight Exhibit,** Sections A-A (6050 Cannich Road), B-B (1443 Sutherland Drive), C-C (1465 Sutherland Drive), and D-D (6071 Kendrick Drive).) As discussed in the DEIR and shown on DEIR **Figure 3-13a**, Section A-A (6050 Cannich Road) is the line of sight of the northwestern portion of the Project site from the vicinity of 6050 Cannich Road, which is west of the Project site. All the residences along Cannich Road are at a higher elevation than the Project site. (DEIR, pp. 5.1-14–5.1-15.)

Sections B-B (1443 Sutherland Drive), C-C (1465 Sutherland Drive), and D-D (6071 Kendrick Drive), as shown on DEIR **Figure 3-13a – Line of Sight Exhibit**, are from residences to the north. As discussed in the DEIR and shown on **Figure 3-13a**, the rear yards of these

residences are either below or at grade with the Project site in the post-Project condition (i.e., after grading).

Section B-B (1443 Sutherland Drive) as shown on DEIR **Figure 3-13a**, is from the vicinity of 1443 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section B-B depicts the line of sight from a residences and rear yards that are at approximately the same finished grade as the Project site. (DEIR, pp. 5.1-15–5.1-16.) Section C-C (1465 Sutherland Drive) as shown on DEIR **Figure 3-13a**, is from1465 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section C-C depicts the line of sight from residences and rear yards that are slightly below the Project site's finished grade. (DEIR, pp. 5.1-15–5.1-16.) Section D-D (6071 Kendrick Drive), as shown on DEIR **Figure 3-13a** is from the vicinity of 6071 Kendrick Drive (where Stockport Drive turns north). As discussed in the DEIR and shown on **Figure 3-13a**, the residence and flat portion of the rear yard in Section D-D are located downslope from the finished grade at the Project site and proposed buildings.

It is also important to note that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site. Within this 100-foot setback, there will be 64 feet of landscaping adjacent to the property line, a 30-foot-wide drive aisle and a 6-foot-wide landscape area adjacent to Building 2. (see DEIR, **Figure 3-10 – Proposed Site Plan**). As shown on DEIR **Figure 3-13a, Line of Sight Exhibit**, the line of sight for Sections B-B through Section D-D shows that the trees (once matured) within the proposed 64-foot landscape buffer would screen the views of the proposed Building 2 from the ground level as well as from second stories.

In addition to these Line of Sight Exhibits, the DEIR Aesthetics Section includes photo simulations for line of sight locations A-A, B-B and C-C (DEIR **Figures 5.1-2a thru 5.1-2c**). These photo simulations show the view from the second story windows of the residences and shows the decrease in size, due to the increased setback and shielding as a result of the landscaped buffer.

The photographs in Comment 28-C Figures 3 through 7 are misleading in that they imply Building 2 will have solid, flat (no articulation) walls and do not take any of the proposed landscaping along the northern and western boundaries of the Project site into consideration. DEIR **Figure 3-11 – Conceptual Landscape Plan** and the cross-sectional line of sight exhibits shown on DEIR **Figures 3-13a and 3-13b – Line of Sight Exhibit** and the Photo Simulations shown on DEIR **Figures 5.12-2a through 5.12-2c** indicate that once the Project is constructed (which includes installation of landscaping) and landscaping is mature, portions of Building 2 will be screened from view. (DEIR, pp. 5.1-14, 5.1-16–5.1-17.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-D:

Mitigation measure **MM NOI 13** is intended to reduce the noise associated with backup alarms on equipment used at the Project site by requiring use of either self-adjusting or manually-

adjusting backup alarms to produce a tone that is readily noticeable over the ambient noise levels at a minimum increment of 5 decibels or through the use of a guide and flagging system. (DEIR, p. 5.12-46.)

> **MM NOI 13:** To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjustiing backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient-sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.
>
> If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

Although it is true that noise from the Project site will be greater than without the Project, the volume differential created by the back-up alarms is necessary to ensure compliance with safety laws and the safety of individuals working at the site.

The Project site has been designed to minimize noise impacts on residences by eliminating dock doors on the north side of Building 2 and not including cross-dock facilities on this building. Thus, there are no truck or trailer activities and no loading and unloading between building 2 and the residences thus significantly reducing noise sources near the residences. Nonetheless, backup alarms are necessary for the safety of workers at the Project site, and these potentially significant noise impacts have been fully disclosed and analyzed in the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-E:

The commenter's opinion regarding the distance specified in mitigation measure **MM NOI 15** is noted. It is also noted that this comment represents an opinion, but does not provide any explanation, information, specific examples, or other support for the comment. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Nonetheless, as discussed on DEIR pages 5.12-24–5.12-34, Project operational noise impacts were modeled using the SoundPLAN model. (DEIR, p. 5.12-24.) Mitigation measure **MM NOI 15** would prohibit the use of the loading and trailer parking area that is on the south side of Building 2 and within 360 feet of the western property line between the nighttime hours of 10:00 PM and 7:00 AM.

> **MM NOI 15:** A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**. (DEIR, p. 5.12-46.)

The distance identified in mitigation measure **MM NOI 15** was determined by the SoundPLAN model to be sufficient to reduce Project operational noise levels to all residences adjacent to the Project site, except for two (see Response to Comment 28-F, below), to less than the City's maximum interior noise standard of 35 dBA L_{eq}. (DEIR, p. 5.12-34.) As discussed in Response to Comment 28-F (below) with implementation of mitigation measures **MM NOI 15** and **MM NOI 16** (see Response to Comment 28-A above), the City's maximum interior noise standards will not be exceeded. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-F:

The noise barrier described in mitigation measure **MM NOI 16** would only be installed at two residences (6063 Bannock Drive and 6066 Cannich Road) to reduce nighttime noise impacts to those residences. Installation of this noise barrier (wall) is under the discretion of the two property owners, and the property owners will have the opportunity to work with the Project Applicant and City Planning staff to determine the design and materials of this proposed wall. **MM NOI 16** includes specific design specifications the wall must meet to attenuate noise from the proposed Project including a list of possible materials, including glass or other transparent materials. (DEIR, p. 5.12-47.) Therefore, the specific design of this wall has not yet been determined at this time, but the wall could include transparent materials so long as they meet the noise reductions requirement from the mitigation measure.

Because installation of this barrier (wall) would have to be agreed upon between the property owners and Project Applicant, the conclusion contained in the DEIR assumes that this wall is not in place. For this reason, noise impacts associated with the Project are significant and unavoidable. However, with implementation of mitigation measures **MM NOI 1** through **MM NOI 16** as well as **MM AQ 14** and **MM HAZ 3,** Project-related noise would be reduced to an acceptable level.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division. (DEIR, p. 5.12-45.)

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary. (DEIR, p. 5.12-45.)

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. (DEIR, p. 5.12-45.)

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west. (DEIR, p. 5.12-45.)

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use. (DEIR, p. 5.12-45.)

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west. (DEIR, p. 5.12-45.)

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction. (DEIR, p. 5.12-45.)

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment. (DEIR, p. 5.12-45.)

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible. (DEIR, p. 5.12-46.)

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west. (DEIR, p. 5.12-46.)

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents A sign shall be posted at the Project site with the contact phone number. (DEIR, p. 5.12-46.)

MM NOI 12: No blasting shall take place on the Project site. (DEIR, p. 5.12-46.)

> **MM NOI 14:** To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling. (DEIR, p. 5.12-45.)

Refer to Responses to Comments 28-A, 28-D, and 28-E for mitigation measures **MM NOI 16, MM NOI 13**. and **MM NOI 15**, respectively.

> **MM AQ 14:** Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language. ((DEIR, p. 5.12-47.)

> **MM HAZ 3:** The following deed notice and disclosure text shall be provided to all potential purchasers of the Project site property and tenants of the buildings:
>
> > NOTICE OF AIRPORT IN VICINITY. This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Professions Code Section 11010 (b) (13)(A). (DEIR, pp. 5.12-47–5.12-48.)

Regarding the comment that the "…study should emphasize noise impacts assuming the barrier is not in place" both the NIA and DEIR disclose construction and operational noise levels without mitigation. As stated in the DEIR:

> Because of the topographical differences between the Project site and the location of sensitive receptors, the SoundPLAN Noise Model[1] was used to calculate a worst-case construction noise scenario. The scenario modeled assumes the use of a grader, a rubber tired dozer, a D10 dozer, two water trucks (modeled as dump trucks), two loaders, and 10 scrapers all operating between 40 and 444 feet from the nearest sensitive receptors. Because the Project site contains large rocks, an active rock crusher was also modeled in the southeastern corner of the Project site. (KA, [2] p. 18) As shown on **Figure 5.12-3 – Worst Case Construction Noise Scenario (L_{eq}) with No Temporary Barrier**,

[1]The SoundPLAN Noise Model was used for this analysis as this model can consider differences in topography between a noise source and a receptor.

[2] KA refers to the *Noise Impact Analysis for the Sycamore Canyon Business Park Warehouse*, August 1, 2016. Prepared by Kunzman Associates, Inc. and included as Appendix I to the DEIR.

unmitigated noise levels may reach up to 80 dBA L_{eq} at the nearest single-family detached residential dwelling units north of the Project site. According to Table 7.25.010A (**Table 5.12-E – Riverside Municipal Code Exterior Nuisance Sound Level Limits)**, the daytime exterior noise standard for residential property is 55 dBA. Because construction noise will exceed 55 dBA at the property lines of the residential units adjacent to the Project site, this impact is considered **significant** and feasible mitigation is required. (DEIR, p. 5.12-22.)

The Sycamore Canyon Wilderness Park is located west of the Project site and as such will be exposed to construction noise. According to Riverside Municipal Code Table 7.25.010A (**Table 5.12-E)**, the exterior noise standard for public recreation facilities is 65 dBA. Since the construction equipment will be in use throughout the entire Project site, unmitigated construction noise levels at the property line between the Park and the Project site may also reach up to 80 dBA L_{eq}. This impact is considered significant and feasible mitigation is required. (DEIR p., 5.12-22.)

As further discussed in the DEIR:

Mitigation measure **MM NOI 1** requires the installation of a 12-foot high temporary noise barrier at the Project site's northern and western boundaries. As shown on **Figure 5.12-4 – Worst Case Construction Noise Scenario (L_{eq}) with 12-Foot High Temporary Barrier**, construction noise levels at the residential property lines at the northern and western boundaries of the Project site are not expected to exceed 70 dBA. (KA, pp. 18, 29 (Figure 5), 30 (Figure 6)) Because some of these noise levels exceed 55 dBA, additional mitigation is required to further reduce construction noise. Thus, the Project will implement mitigation measures **MM NOI 2** through **MM NOI 12**. These measures require: the use of heavy grade rubber mats within the bed of trucks; properly operating mufflers on all construction equipment; placement of stationary construction equipment away from the residential uses; no idling of equipment when not in use; staging of equipment at the greatest distance feasible from the sensitive receptors; prohibition of music or amplified sound on the Project site during construction; limiting haul truck deliveries to the same hours for construction equipment; limiting the use of heavy equipment, vibratory roller, and soil compressors to the greatest degree possible, shielding of jackhammers, pneumatic equipment, and all other portable stationary noise sources to direct noise away from sensitive receptors. Signage will also be placed on the project site with a contact phone number for complaints. Implementation of **MM NOI 1** through **MM NOI 12** is expected to yield up to an additional 10 dBA in noise reduction to minimize maximum noise events (KA, p. 18). Even with implementation of feasible mitigation measures, temporary impacts from construction noise on the adjacent residences and Sycamore Canyon Wilderness Park will be significant and unavoidable. (DEIR, p. 5.12-24.)

Regarding the noise resulting from Project operations, the DEIR contains a thorough analysis of the noise resulting from the following operational sources: semi-trucks (tractor-trailers) entering and exiting the Project site and accessing dock areas, removal and hook-up of trailers, idling trucks, loading and unloading activities, occasional truck air brakes, vehicle movements within the proposed parking areas, trash compactors, and rooftop HVAC systems. (DEIR, p. 5-12-26.) The DEIR concluded that, although unmitigated operational noise will not exceed the City's daytime noise standard of 55 dBA L_{eq}, it will exceed the nighttime noise standard of 45 dBA L_{eq} along the western project boundary and at certain residences adjacent to the northwest corner of the Project site. Thus, the Project is required to implement mitigation measures **MM NOI 13** through **MM NOI 16** (see Response to Comments 28-A, 28-D, and 28-F) to reduce operational noise impacts. However, as discussed in Response to Comment 28-F, because the noise barrier outlined in **MM NOI 16** would be on private properties and neither the City nor Project Applicant has control over construction of the noise barrier, the DEIR concluded operational noise impacts are significant even with incorporation of feasible mitigation. (DEIR, pp. 5.12-24–5.12-34.)

For the reasons discussed above, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-G:

The commenter's opinion regarding the DEIR's conclusion that there will be a less than significant impact regarding a substantial permanent increase in the Project vicinity above existing levels is not reasonable, is noted. It is also noted that this comment represents an opinion, but does not provide any explanation, information, specific examples, or other support for the comment. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under California Environmental Quality Act (CEQA), the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis." (CEQA Guidelines, §15088(c).) These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted. (CEQA Guidelines, §15088(c).) To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].)

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-H:

Refer to Response to Comments 28-I through 28-U. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-I:

The comment that the noise impact analysis was performed in a piecemeal fashion is noted. The DEIR appropriately and fully analyzed the totality of the proposed Project in accordance with CEQA, including the whole of the reasonably foreseeable actions associated with the Project, and does not segment the analysis into smaller pieces. With regard to the approach to the cumulative noise analysis, State *CEQA Guidelines* Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either 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 method"); or 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 ("summary of projections method"). (DEIR, pp. 6-1–6-2.)

Because the proposed Project is not growth inducing, the DEIR utilized the "list method" approach in the cumulative analysis and focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the Project area that have the potential to contribute to cumulatively considerable impacts. Based on discussions with City staff, a list of projects that may have the potential to contribute to cumulative effects was identified and included in DEIR **Table 6-A – Cumulative Development Projects** shown below. (DEIR, p. 6-2.)

Table 6-A – Cumulative Development Projects

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
Projects within the City of Riverside				
1	Auto Parts Store in Mission Plaza P07-1181/P07-0593 381 Alessandro Blvd	Auto parts store	1,500 SF	Approved (5/6/2008) Not constructed
2	Proposed bank in Canyon Crossings Shopping Center P08-274/P08-0275 2570 Canyon Springs Pkwy	Commercial bank with drive-thru lane	2,746 SF	Approved (9/9/08) Not constructed
3	ARCO and *ampm* Market P10-0090/P10-0091 6287 Day Street	Gasoline station with convenience market	2,700 SF	Approved (6/8/2010) Open
4	Chase Bank (P12-0419/P12-0557/ P12-0558/P12-0559) 360 Alessandro Boulevard	Bank with two-lane drive-thru	3,100 SF	Approved (5/7/2013) Not constructed
5	Health and Fitness Center (P14-0457) 6465 Sycamore Canyon Boulevard	Interior remodel for a health and fitness center within existing 92,410 SF two-story office building	4,000 SF	Approved (6/30/2014) Constructed
6	Steak and Shake (P14-0536/P14-0537) Northwesterly corner of Valley Springs Parkway and Corporate Center Drive	Fast food restaurant with drive-thru restaurant	3,750 SF	Application submitted
7	Tract Map 32180 (P07-1073) North of the intersection of Moss Road and Pear Street	Nine lot subdivision for single family residences	9 DU	Approved (6/5/2008) Construction has not started
8	Alessandro Business Center (P07-1028/P06-0416/ P06-0418/P06-0419/ P06-0421/P07-0102) Northwest corner of Alessandro Boulevard and San Gorgonio Drive	Four industrial/ manufacturing buildings.	662,018 SF	Approved (3/9/2010) Construction complete
9	Tract Map 36641 (P13-0665) Southwest corner of Wood Road and Moss Street	Eight lot subdivision for single family residences	8 DU	Approved (4/17/2014) Construction has not started

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
10	CT Sycamore Center (P14-1053/P14-1054) Northwest corner of Dan Kipper Drive and Sycamore Canyon Boulevard	Five buildings with warehouse and office space in each building.	230,420 SF total (205,4720 SF warehouse and 25,000 SF office)	Approved (4/30/2015) Construction complete
11	Sycamore Canyon Apartments (P13-0553/P13-0554/ P13-0583/P14-0065) 5940 – 5980 Sycamore Canyon Boulevard (Between Raceway Ford and Raceway Nissan)	Multi-family residential	275 DU	Approved (10/9/2014) Construction has not started
12	Mt. Baldy Drive/San Gorgonio Drive Industrial Project (P14-0600/P14-0601/ P14-0602/P15-0044) Southeast corner of Mt. Baldy Drive and San Gorgonio Drive	Multiple-tenant industrial building	121,390 SF	Approved (6/9/2015) Under construction
13	Street Vacation for an Apartment Project (P12-0309) Monte Vista Drive and Pollard Street	Apartment building	88 DU	Construction of apartment project has not started
14	Sycamore Canyon Industrial Warehouse Development (P13-0607/P13-0608/ P13-0609/P13-0854) 6150 Sycamore Canyon Boulevard	Industrial building	171,616 SF	Approved (5/13/2014) Construction complete
15	Annexation 118 (P14-0246/P14-1059/ P14-0901) Northwest corner of Sycamore Canyon Boulevard and Central Ave.	Annexation, GPA, and Pre-Zoning for a retail commercial shopping center	102,000 SF	Approved (7/28/2015) Construction has not started
16	Quail Run Apartments (P14-0683/P14-0684'P14-0685/P15-1080/P15-1081/P15-1082) Northwest corner of Quail Run Road and Central Avenue)	Multi-family residential	216 DU	Approved (07/26/16)

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
Projects within the City of Moreno Valley				
17	Status Nightclub and Lounge Canyon Springs Plaza	Nightclub	11,000 SF	Open for business
18	O'Reilly Automotive 23334 Sunnymead Boulevard	Auto parts store	7,500 SF	Open for business
19	Available Restaurant Space Plaza Del Sol Shopping Center 23060 Alessandro Boulevard	Restaurant	9,000 SF	Available
20	Rivals Sports Bar & Grill TownGate Promenade	Sports bar & grill	6,452 SF	In plan check
21	Aldi Market 12630 Day Street (TownGate Promenade)	Grocery market	20,300 SF	Open for business
22	Yum Yum Donut Shop Northwest corner of Day Street and Alessandro Boulevard	Donut shop and convenience store	4,351 SF	In planning
23	Hawthorn Inn & Suites Cactus Commerce Center Cactus Avenue	Four-story Hotel	79 guest rooms	Approved Not constructed
24	Sleep Inn Suites Olivewood Plaza Sunnymead Boulevard	Three-story Hotel	66 guest rooms	Approved Not constructed
25	Moreno Valley Professional Center Alessandro Boulevard east of Ellsworth Street	Four Office buildings	84,000 SF	Approved
26	Gateway Business Park South of Alessandro Boulevard west of Day Street	34 Industrial condominiums between 5,000 and 10,000 SF	184,000 SF	Approved
27	Veterans Way Logistics Center	Distribution facility	366,698 SF	Under construction
28	World Logistics Center	Corporate park specific plan	41 million SF total	Approved (8/26/2015) Construction has not started

The location of the cumulative development projects in relation to the Project site is shown on DEIR **Figure 6-1 – Cumulative Development Location Map**. The cumulative development projects located nearest the proposed Project site are No. 5 – Health and Fitness Center, No. 10 – CT Sycamore Center, No. 11 – Sycamore Canyon Apartments, and No. 14 – the Sycamore Canyon Industrial Warehouse Development. (DEIR, pp. 6-2–6-5.)

In evaluating cumulative impacts, the geographic scope (or cumulative impact area) used for each environmental issue (i.e., air quality, biological resources, cultural resources, noise, etc.) is different depending upon the potential area of effect. For example, the geographic scope for air quality would be the South Coast Air Basin (Basin), while the geographic scope for cumulative aesthetics impacts would be the viewshed, and the geographic scope for traffic/circulation would be the intersections in the Project vicinity that could be affected by the cumulative projects. (DEIR, p. 6-5.)

The DEIR discusses cumulative noise impacts from: (i) construction of the proposed Project plus applicable cumulative development projects, (ii) operation of the proposed Project plus applicable cumulative development projects, and (iii) traffic from the cumulative development projects. Each of these will be discussed below.

Construction Noise

Potential impacts from Project-related construction will be significant, even with implementation of feasible mitigation measures. Additional potential cumulative impacts from construction noise could result if construction of the proposed Project and one or more of the three cumulative development projects within 0.5 miles of the Project site occurred simultaneously. Because project Nos. 10 and 14 have already been constructed (**Table 6-A – Cumulative Development Projects**), project No. 11 – Sycamore Canyon Apartments (SCA) is the only project with the potential to be constructed at the same time as the proposed Project. As shown on DEIR **Figure 6-1**, project No. 11 is located east of Sycamore Canyon Boulevard and there are intervening structures between this site and the Project site, which would block some of the noise from this site. Further, the Draft Mitigated Negative Declaration (MND) for the Sycamore Canyon Apartments Project concluded that construction noise impacts from this project would be less than significant with regard to direct, indirect and cumulative impacts. (SCA Draft MND, pp. 32, 40–41.) Nonetheless, because the Project's construction noise impacts are significant even with incorporation of feasible mitigation measures, the Project's contribution to short-term noise is considerable and cumulative impacts from construction noise are considered significant and unavoidable. (DEIR, p. 6-19.)

As a matter of information, on August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays from the standards of the Noise Code.

Operational Noise

Because noise, by definition, is a localized phenomenon and drastically reduces in magnitude as the distance from the noise sources increases, the geographic scope for noise impacts

associated with Project operations are the sensitive receptors adjacent to the Project site. For this reason, only cumulative development projects within the immediate vicinity of the Project site are likely to contribute to cumulative operational noise impacts. There are only three cumulative development Projects within one-half mile of the Project site: CT Realty Sycamore Center (No. 10 as shown on **DEIR Figure 6-1**), Sycamore Canyon Apartments (No. 11 as shown on **DEIR Figure 6-1**, and Sycamore Canyon Industrial Warehouse Development (No. 14 as shown on **DEIR Figure 6-1**). (DEIR, p. 6-18.) Because of the intervening structures between the Sycamore Canyon Apartments and the Sycamore Canyon Industrial Warehouse Development, only the CT Realty Sycamore Center would be anticipated to contribute to cumulative noise impacts at certain sensitive receptors.

With regard to noise from existing development within the Sycamore Canyon Business Park (SCBP), noise sourced from existing operations, including the Big 5 Distribution Center, Ralph's Distribution Center, and the Pepsi Bottling Group facility would be reflected in the ambient noise measurements taken in December 2015. Since in the current condition there are no intervening structures between the Big 5 and Ralph's facilities and the residences adjacent to the Project site, it is not unexpected that residents hear noise from these operations. It is important to note that CEQA does not require a Project to mitigate for pre-existing impacts and conditions. That is, the proposed Project need not account for and/or mitigate non-Project related noise that may exceed current standards.

As discussed in the DEIR, unmitigated operational noise will not exceed the daytime noise standards of 55 dBA L_{eq}. However, the exterior nighttime standard of 45 dBA L_{eq} will be exceeded at two single-family detached residential dwelling units adjacent to the northwest corner of the site. To mitigate nighttime Project operational noise levels to the nighttime standard of 45 dBA L_{eq} at affected sensitive receptors (i.e., receptor nos. 3 and 4 as shown on DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**) a ten-foot noise barrier is required along the perimeter of the outdoor use areas per mitigation measure **MM NOI 16** (See Response to Comment 28-A above). In addition to the noise barrier wall, the use of the western portion of the dock doors and trailer parking area for Building 2 as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation** will be limited as indicated in mitigation measure **MM NOI 14** (See Response to Comment 28-F above). The ten-foot tall noise barriers are required at the eastern edge of the residential lots (i.e., private property) and not at the property line at the bottom of the slope (i.e. the Project site). The noise barrier required under **MM NOI 16** would be installed on private property and is therefore dependent on the individual property owners authorizing the installation of the barrier wall. As such, neither the City nor the Project Applicant has control over the barrier wall will ultimately be constructed and **MM NOI 16** is considered infeasible. Because mitigation measure **MM NOI 16** is considered infeasible, Project-specific impacts are significant. However, because noise is such a localized phenomenon, the Project's operational noise contribution to cumulative noise impacts is not considerable; therefore, cumulative impacts with regard to operational noise are not significant. (DEIR, p. 6-20.)

The geographic scope for noise impacts associated with Project-generated vehicular noise is the roadways that will be used by Project-generated traffic in combination with traffic from the cumulative development projects. As shown in DEIR **Table 5.12-M – Change in Future Noise Levels at 50 Feet from Centerline (Existing Plus Ambient Plus Project Condition)**, the Project's contribution to future noise levels on area roadways is less than 1 dBA for all roadway segments except for Sierra Ridge Drive west of Sycamore Canyon Boulevard, where Project-related noise is expected to result in a 2.6 dBA increase. Because the City considers a 5 dBA increase to be substantial this is not considered a substantial increase and the Project's contribution to cumulative traffic noise is not considerable Thus, cumulative impacts with regard to traffic noise are not significant. (DEIR, pp. 5.12-40–5.12-44, 6-19.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-J:

CEQA Guidelines Section 15151 provides that an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences.

Ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the Noise Impact Analysis (NIA) and DEIR are too low, the result would be that change in the noise levels resulting from Project implementation would be overstated. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, Table 5.12-B.) These measurements consist of three 10-minute, short-term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note, that in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Again, the purpose of the ambient noise measurements is to provide a basis for the comparison of noise with and without the Project; thus, longer term measurements are not necessary. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards.

Regarding meteorological conditions, precipitation, rain, snow, or fog, has an insignificant effect on sound levels although the presence of precipitation will affect humidity and may also affect wind and temperature gradients. (Sound Propagation.[3]) As sound travels through the atmosphere, it is affected by temperature, humidity, and wind currents, which can change the

[3] Sound Propagation website. (Available at https://www.sfu.ca/sonic-studio/handbook/Sound_Propagation.html, accessed November 27, 2016.)

speed and direction of sound. Just as light bends when traveling through a prism, sound bends as a result of the varying atmospheric properties. Sound waves tend to bend toward cooler temperatures and away from warmer temperatures. For example, on a typical summer afternoon, because air temperatures generally decrease with altitude, sound generated at ground level would bend upward towards the cooler air. For a person at the same level as the sound, the sound waves are bending up and over the person listening, creating what is known as a shadow zone. When this occurs, a noise source may be visible at a distance but be perceived as quieter than expected. When the air temperature is cooler close to the ground than it is at higher altitudes, such as late at night or over calm lakes or icy surfaces, the sound waves bend closer to the ground and if the ground is reflective, the sound bounces off the ground and may propagate (travel) further than expected. (Cowan,[4] pp. 11, 19-21.) Because the effects of temperature gradients are more important over long distances (Caltrans TeNS[5]), these gradients would not substantially change the results of the NIA.

Generally speaking, wind currents allow sound to travel further than expected when the sound is being emitted in the same direction as the wind (downwind) and sound will travel a shorter distance than expected when the sound is being emitted in the direction against the wind (upwind). (Cowan, p. 21.)

The NIA used SoundPLAN to model the Project's construction and operational noise. SoundPLAN allows the user to input humidity and temperature into the model. For purposes of the NIA, modeled temperature was 66 degrees Fahrenheit (66° F) and 49 percent humidity. According to Weather Underground, the average temperature for the City of Riverside is 69° F and average humidity is 49.7 percent. Between November 2015 and November 2016, the highest temperature in Riverside was 114° F and the lowest temperature was 33° F. To evaluate the effects of changes in temperature and humidity referenced in the commenter's comment, four new modeling runs were prepared assuming: (i) temperature at 33° F and 0% humidity, (ii) temperature at 33° F and 100% humidity, (iii) temperature at 114° F and 0% humidity, and (iv) temperature at 114° F and 100% humidity. The results of this analysis, which does not change or materially impact the conclusions set forth in the NIA and DEIR, is summarized in the table below and shown on the attached figures.

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
1 first floor	43	42	43	41	41
1 second floor	45	44	45	43	44
2 first floor	30	30	30	30	30

[4] Cowan refers to the *Handbook of Environmental Acoustics*, published by John Riley & Sons, Inc., 1994.

[5] Caltrans TeNS refers to the Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. (Available at http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed November 27, 2016.)

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
2 second floor	32	32	32	32	32
3 first floor	45	45	45	44	44
3 second floor	49	48	49	48	48
4 first floor	48	47	48	47	47
4 second floor	52	51	52	51	51
5 first floor	49	49	49	49	49
5 second floor	50	49	50	49	49
6 first floor	43	43	43	43	43
6 second floor	44	43	44	43	43
7 first floor	38	38	38	38	38
7 second floor	39	39	39	39	39
8 first floor	33	33	33	33	33
8 second floor	35	35	35	35	35
9 first floor	35	35	35	34	35
9 second floor	37	37	37	36	36
10 first floor	39	38	39	37	38
10 second floor	41	40	41	39	40
11 first floor	33	33	33	33	33
11 second floor	35	35	35	35	35
12 first floor	31	31	32	31	32
12 second floor	34	34	34	34	34
13 first floor	30	30	30	30	30
13 second floor	32	32	32	32	32
14 first floor	31	31	31	31	31
14 second floor	33	33	33	33	33
15 first floor	32	31	32	32	32
15 second floor	34	34	34	34	34
16 first floor	31	31	31	31	31
16 second floor	34	33	34	34	34
17	30	30	30	30	30
18 first floor	44	43	44	43	43
18 second floor	45	44	45	44	44
19 first floor	43	43	43	42	42
19 second floor	43	43	43	43	43
20 first floor	31	31	31	31	31
20 second floor	37	37	37	37	37
21 first floor	34	34	34	34	34
21 second floor	39	39	39	38	38
22	36	36	36	36	36
23 first floor	36	36	36	35	36

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
23 second floor	37	37	38	37	37
24 first floor	33	32	33	32	32
24 second floor	35	34	35	34	34
25 first floor	31	30	31	30	31
25 second floor	34	34	34	34	34
26 first floor	29	29	29	29	29
26 second floor	32	32	32	32	32
27 first floor	32	32	32	32	32
27 second floor	34	33	33	33	33
28 first floor	31	31	31	31	31
28 second floor	34	34	34	34	34
29 first floor	30	30	30	30	30
29 second floor	33	33	33	33	33
30 first floor	31	31	31	31	32
30 second floor	35	35	35	34	35
31	48	48	48	48	48
32	47	47	47	47	47
33	38	38	38	37	37
34	55	54	54	54	54

The amplification of the effects of meteorological conditions on sound does not constitute significant new information that would require recirculation of the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-K:

Noise impacts due to Project operation are anticipated to be the greatest for two residences located at 6063 Bannock Drive and 6066 Cannich Road. Although noise measurements were not taken specifically at these residences to quantify existing ambient noise, the NIA modeled 30 receptors to thoroughly evaluate the proposed Project's operational noise impacts on the surrounding residences. Of the 30 receptors modeled only two residences will be impacted by Project-generated noise during Project operation. (DEIR, Figure 5.12-5.) The NIA and DEIR included noise mitigation to reduce noise impacts. As previously discussed in Responses to Comments 28A and 28F above, if all the noise mitigation measures are implemented, the noise impacts would be less than significant; however, because installation of the 10-foot noise barrier mitigation under **MM NOI 16** is subject to the approval of the two property owners on whose land the proposed barrier will be installed, and such approval may or may not be provided, the noise impact is considered significant and unavoidable. (DEIR, pp. 5.12-34, 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-L:

Comment noted. See Response to Comment 28-I above regarding the future development considered in the cumulative analysis. Of the 15 cumulative development projects within the City identified in DEIR **Table 6-A** (see Response to Comment 28-1 above), the following five projects are within the SCBPSP: No. 5 – Health and Fitness Center, No. 8 – Alessandro Business Center, No. 10 – CT Sycamore Center, No. 12 – Mt. Baldy Drive/San Gorgonio Drive Industrial Project, and No. 14 – Sycamore Canyon Industrial Warehouse Development. With regard to including buildout of the entire SCBPSP in the cumulative noise analysis, DEIR **Figure 8-4 – Alternative Location 3** identifies the location of all vacant property within the SCBPSP area. With regard to including buildout of the entire SCBPSP in the cumulative noise analysis, DEIR **Figure 8-4 – Alternative Location 3** identifies the location of all vacant property within the SCBPSP area. It would be speculative to assume what future uses will ultimately be approved and constructed in these areas, including the nature and extent of noise impacts produced by such potential future uses. For this reason, the DEIR does not consider the anticipated noise impacts associated with the future build-out of the SCBP.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-M:

Comment noted. Refer to Response to Comment 28-J above for a discussion regarding the effect of meteorological conditions on noise. As stated in Response to Comment 28-J, ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that change in the noise levels resulting from Project implementation would be overstated. That is, if ambient noise measurements were taken under conditions that would result in a higher ambient noise level, the change in noise levels resulting from Project-related noise, when compared to the ambient noise levels would be lower. Thus, the NIA and DEIR present a conservative analysis.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-N:

As stated on page DEIR, 5.12-22, because of the topographical differences between the Project site and the location of sensitive receptors (i.e., adjacent residences), the SoundPLAN Noise Model was used to model construction and operational noise generated on the Project site. The modeling included existing and proposed elevation lines and points within the Project site and adjacent residential uses to account for the effects of topography on noise levels as a

result of the proposed Project. (DEIR, p. 5.12-24.) The noise modeling and anticipated noise impacts reflect the acoustics and geography of the area. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-O:

The commenter suggests that the noise assessment in the NIA and DEIR is inaccurate and implies that the 360-foot distance for a restriction of nighttime use will not effectively mitigate the Project's operational noise. As stated in Response to Comment 28-G above, a comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis." (CEQA Guidelines, §15088(c).) These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted. (CEQA Guidelines, §15088(c).) To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].) Nonetheless, according to the United States Department of Transportation, a line source consists of "multiple point sources moving in one direction radiating sound cylindrically."[6] Therefore, although the space between the buildings will create a "line," analysis of noise generated between these two buildings as a "line source" would not be appropriate. The SoundPLAN Noise Model was used to analyze noise impacts from the Project operations to consider the topography of the site and adjacent properties; therefore, the nighttime use restrictions identified in mitigation measure **MM NOI 15** (See Response to Comment 28-E above)**,** (see Response to Comment 28-E above), would contribute to a reduction in the noise impacts on the adjacent residences. (DEIR, pp. 5.12-28, 5.12-34.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-P:

Comment noted. The noisiest hour on-site Project operational noise was modeled using the SoundPLAN model. To evaluate the proposed Project's operational noise impacts on the surrounding residences, the NIA modeled a total of 30 residential receptors and included the anticipated noise levels on both the first and second floors of each receptor in addition to at the property line (shown as receptor nos. 31, 32, and 33 on DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation** and DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**). (DEIR, p. 5.12-26.) Therefore, the noise modeling quantified maximum expected noise from the proposed development both above and below the proposed 8-foot wall between the Project site and residences to the north as well as above and below the 10-foot noise barrier proposed at two residences to the northwest of the Project site as part of

[6] U.S. DOT, *Terminology*, http://www.fhwa.dot.gov/environment/noise/measurement/mhrn02.cfm, accessed October 13, 2016.

mitigation measure **MM NOI 16** (See Response to Comment 28-A above). Refer to DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigatio**n and **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation** for the location of the modeled receptors and the modeled noise levels.

Assuming noisiest conditions, noise levels at the first floor and second floor of all the receptors to the north and northwest of the Project site are below the City's daytime exterior noise standard of 55 dBA (see DEIR **Figure 5.12-5**). Without any restriction on nighttime use, as required by mitigation measure **MM NOI 15** (See Response to Comment 28-E above), Project-generated operational nighttime noise will exceed the City's nighttime exterior noise standard of 45 dBA at three residences: receptor locations 3, 4, and 5 as shown on DEIR **Figures 5.12-5 and 5.12-6**. With implementation of mitigation measure **MM NOI 15**, Project-generated operational noise will exceed the City's nighttime exterior noise standard at the second floor of two residences to the northwest of the Project site (shown as receptor nos. 3 and 4 on DEIR **Figures 5.12-5 and 5.12-6**). Thus, additional mitigation is required to reduce Project-generated operational noise at these locations. Implementation of mitigation measure **MM NOI 16**, which entails the installation of a noise barrier at the top of the slope of these receptor locations, would reduce operational noise levels to below the City's nighttime standard of 45 dBA (see DEIR **Figure 5.12-6**). However, as stated in the DEIR, installation of the noise barrier requires approval from the two property owners on whose land the proposed noise barrier will be installed and such approval to construct the barrier wall may not be provided by these property owners. Therefore, because neither the City nor the Project Applicant has the authority to implement mitigation measure **MM NOI 16**, the Project's operational nighttime noise impacts will remain significant and unavoidable. (DEIR, pp. 5.12-26 – 5.12-28, 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-Q:

The analysis and conclusion contained in the DEIR does not assume that the two property owners (receptor locations 3 and 4 as shown on DEIR **Figures 5.12-5 and 5.12-6**) will allow for installation of the 10-foot noise barrier required in mitigation measure **MM NOI 16** (See Response to Comment 28-A above). For this reason, the DEIR concluded that the Project's operational nighttime noise impacts would be significant and unavoidable. (DEIR, pp. 5.12-28, 5.12-34, 5.12-48.) Pursuant to mitigation measure **MM NOI 16**, these property owners have the discretion whether to allow the Project Applicant to install the proposed 10-foot noise barrier and reduce nighttime noise levels to comply with City standards, or, alternatively, to not install the noise barrier. As previously discussed **MM NOI 16**prescribes specific standards that the noise barrier must meet and includes a list of materials, including transparent materials, that may be used if the noise attenuation requirements of **MM NOI 16** are satisfied. (DEIR, p. 5.12-47.)

Implementation of mitigation measure **MM NOI 16** as well as implementation of mitigation measures **MM NOI 13** through **MM NOI 16** and **MM AQ 14** (See Responses to Comment 28-

D, 28-F, 28-E, 28-A and 28-F above, respectively), will reduce the noise impacts from operation of the Project to below the City's nighttime noise standards; however, because implementation of **MM NOI 16** is dependent on the consent of private property owners, this mitigation measure is not feasible and operational noise impacts must remain significant and unavoidable. (DEIR, pp. 5.12-28, 5.12-34, 5.12-48.) Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Please refer to Response to Comment 28-A for a discussion regarding the aesthetic implications of mitigation measure **MM NOI 16**.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-R:

Comment noted. Please refer to Response to Comments 28-J and 28-P for discussion regarding the NIA's and DEIR's analysis of the Project's operational noise impacts.

The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes, including analysis of impacts related to noise. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-S:

The 24-hour noise measurements analyze the existing noise environment in the Project vicinity at the time the measurements were taken. This would include any loud beeping, crashes, and bangs associated with operations at nearby warehouses or distribution centers that may have occurred during the measurement period. These noise events are reflected in the L_{max} column of DEIR **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. (DEIR, p.p. 5.12-8–5.12-9.) Regarding the existing ambient noise exceeding the City's daytime and nighttime standards, the DEIR states:

> For location LT1 (the northeast corner of the Project site), the results of the 24-hour ambient noise measurements (**Table 5.12-C**), indicate that daytime (7:00 a.m. to 10 p.m.) noise levels ranged between 42.4 dBA L_{eq} (at 3:00 p.m.) and 60.5 dBA L_{eq} (at 10:00 a.m.). The daytime residential standard of 55 dBA was exceeded at 8:00 a.m., 10:00 a.m., and 11:00 a.m. Nighttime (10:00 p.m. to 7:00 .m.) noise levels measured at location LT1 ranged from 51.0 dBA to 58.1 dBA and exceeded the nighttime residential standard of 45 dBA for all hours. Based on the 24-hour ambient measurements taken at this location the CNEL is 60

> dBA. It is important to note that there is an existing wooden fence along the residential property line at location LT1 and the noise meter was placed on the Project side of the property line; thus, the noise level on the residential side may be lower. (DEIR, pp. 5.12-9-5.12-10.)
>
> For location LT2 (the northwest corner of the Project site), the results of the 24-hour ambient noise measurements (**Table 5.12-C**), indicate that daytime noise levels ranged between 38.8 dBA L_{eq} (at 1:00 p.m.) and 51.9 dBA L_{eq} (at 8:00 a.m. and 9:00 a.m.). Measured nighttime noise levels at location LT2 ranged from 39.8 dBA to 50.5 dBA. The nighttime residential standard of 45 dBA was exceeded at 10:00 p.m. and from 4:00 a.m. – 7:00 a.m. Based on the 24-hour ambient measurements taken at this location the CNEL is 52 dBA. There are no fences or barriers between the Project site and the residential lots to the west. (DEIR, pp. 5.12-10.)

Thus, the DEIR discloses that noise in the Project area exceeds the City's daytime and nighttime noise standards. However, as stated in Response to Comment 28-I, CEQA does not require a Project to mitigate for pre-existing impacts and conditions. Thus, the focus of the analysis and mitigation in the DEIR is to reduce Project-generated noise.

The commenter does not provide a source for the statement: "Therefore, the statement that the noise associated with the operations of the proposed site will not interfere with sleep are (sic) fallacious." It is assumed this comment is in reference to the discussion on pages 20 and 21 of the NIA. Project operational noise is not expected to result in sleep disturbance because, as discussed on DEIR pages 5.12-31, the Project will not exceed the City's maximum nighttime interior noise standards of 45 dBA L_{max}. Specifically, the DEIR states:

> Assuming 10 dB of noise reduction with windows open, the noise levels from back-up beepers at the interior of adjacent residences will be approximately 44 dBA L_{max}, which will not exceed the City's maximum daytime or nighttime interior noise standards of 55 dBA L_{max} and 45 dBA L_{max}, respectively, as set forth in Section 7.35.010 A.5.[7] Nonetheless, in order to minimize noise associated with use of back-up beepers at the Project site, the Project will implement mitigation measure **MM NOI 13,** which requires the use of ambient-sensitive self–adjusting or manually-adjustable back up alarms. (DEIR, p. 5.12-31.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

[7] Per Section 7.35.010 A.5 of the Riverside Municipal Code, the maximum noise event shall not exceed the standard for the applicable land use plus 10 dBA. The daytime and nighttime interior residential standards per Table 5.30.015A are 45 dBA and 35 dBA, respectively. Thus the maximum daytime and nighttime standards are 55 DBA and 45 dBA respectively.

Response to Comment 28-T:

As stated in Response to Comment 28-J, ambient noise monitoring locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to operational noise. The purpose of the ambient noise measurements is to provide a basis for the comparison of noise impacts with and without the Project. **DEIR Table 5.12-J – Pre- and Post-Project Noise Levels (in CNEL)** compares the Community Noise Equivalent Level (CNEL) of the monitored ambient noise calculated from the 24-hour noise measurements set forth in DEIR **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity** with the mitigated operational noise levels in CNEL assuming a uniform L_{eq} for a 24-hour operation,

The CNEL is a 24-hour weighted average measure of community noise. To account for increased human sensitivity at night, the CNEL scale includes a 5 dB weighting penalty on noise occurring during the 7:00 p.m. to 10:00 p.m. time period, and a 10 dB weighting penalty on noise occurring during the 10:00 p.m. to 7:00 a.m. time period. (DEIR, p. 5.12-3.) The CNEL values reported in DEIR **Table 5.12-J**, were calculated using the Ldn, Lden, CNEL Community Noise Calculators, available at https://www.noisemeters.com/apps/ldn-calculator.asp.

If, as the comment states, the 24-hour ambient noise measurements taken at Monitoring Locations ST1 and ST2 (as shown on DEIR **Figure 5.12-1 – Noise Measurement Locations**) are lower than the existing ambient noise as asserted by the commenter, the calculated CNEL would be higher than what is reported in DEIR **Table 5.12-J**. Consequently, this would mean that the difference between the Project's operational noise CNEL and the ambient noise levels, shown in the column entitled "Difference in dBA", would be less than what is reported in DEIR **Table 5.12-J**. To the extent that the difference reported in DEIR **Table 5.12-J** is greater than what the commenter asserts, the DEIR constitutes a conservative analysis.

With regard to the comparing the pre- and post-Project CNEL without implementation of mitigation measure **MM NOI 16**, this would only change the results for receptor nos. 3 and 4 as shown in the table below because implementation of mitigation measure **MM NOI 15** is within the control of the City and the Project Applicant. The mitigated operational noise levels for receptor nos. 3 and 4 with mitigation measure **MM NOI 15** only (i.e., no noise barrier as required by **MM NOI 16**) is shown in Figure E, which is attached to this response.

Monitored Location[a]	Measured Noise Level (CNEL[b]) In dBA	Receptor No.[c]	Mitigated Operational Noise Level (with MM NOI 15 only) (CNEL) In dBA	Difference In dBA	Substantial Increase?	Mitigated Operational Noise Level (includes MM NOI 15 and MM NOI 16) (CNEL) In dBA	Difference In dBA	Substantial Increase?
ST2/LT2	52	4 (1st floor)	52	0	No	46	-6	No
		4 (2nd floor)	54	2	No	51	-1	No

Monitored Location[a]	Measured Noise Level (CNEL[b]) In dBA	Receptor No.[c]	Mitigated Operational Noise Level (with MM NOI 15 only) (CNEL) In dBA	Difference In dBA	Substantial Increase?	Mitigated Operational Noise Level (includes MM NOI 15 and MM NOI 16) (CNEL) In dBA	Difference In dBA	Substantial Increase?
		3 (1st floor)	51	-1	No	46	-6	No
		3 (2nd floor)	54	2	No	50	-2	No

Thus, as indicated in the above table, even if the noise barrier identified in mitigation measure **MM NOI 16** is not constructed, with implementation of mitigation measure **MM NOI 15**, there will be a less than substantial increase (i.e., less than 5 dBA) from the Project's operational noise on receptor nos. 3 and 4.

This amplification of the noise analysis to exclude implementation of mitigation measure **MM NOI 16** on two receptors does not constitute significant new information that would require recirculation of the DEIR. (CEQA Guidelines, § 15088.5.) Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-U:

With regard to the commenter's assertion that the background noise measurements are not representative of a worst-case scenario, CEQA does not require an EIR to evaluate the worst-case scenario but rather to evaluate the reasonably foreseeable impacts associated with a project. (CEQA Guidelines § 15151.) Regardless, the modeling used in the NIA accounts for back-up alarms on the trucks. As a result of this modeling, the DEIR includes mitigation measure **MM NOI 13** (see Response to Comment 28-D above) that requires back-up alarms be adjusted to "a tone that is readily noticeable over ambient noise levels." (DEIR 5.12-16.)

Please refer to Response to Comments 28-J, 28-P and 28-S for discussion regarding the NIA's and DEIR's analysis of the Project's operational noise impacts. The Project Applicant has no authority to regulate any potential back-up beepers from vehicles not visiting the Project site. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-V:

The commenter provides no explanation, evidence, or specific example to support to support the assertion that the DEIR does not accurately reflect truck traffic travel already occurring in the area. As stated in Response to Comment 28-G above, a comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis." (CEQA Guidelines,

§15088(c).) These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted. (CEQA Guidelines, §15088(c).) To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].) Nonetheless, a response is provided below.

As part of the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA), which is, DEIR Appendix J, traffic counts by vehicle type (i.e., passenger car, 2 axle truck, 3 axle truck, and 4+ axle trucks) were conducted for Fair Isle Drive-Box Springs Road from Sycamore Canyon Boulevard to the I-215 Northbound Ramps, Sycamore Canyon Boulevard, from Fair Isle Drive to Eastride Avenue, and Eastride Avenue from Sycamore Canyon Boulevard to Box Springs Boulevard. (**DEIR Figure 5.16-1 – Study Area**.) The results of these counts for are included in Appendix C of the TIA. The table below presents the existing condition for the portion of Sycamore Canyon Boulevard within the study area of the TIA and the trips generated by the proposed Project.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA. This table is included as Attachment 28.1 to this response.

The commenter does not provide a reference for the assertion that "The DEIR states that the design of the streets will have large trucks exiting at a light at Sierra Ridge…" Project Design Features are discussed in DEIR Section 5.16.4, which states:

> The proposed Project has been designed to facilitate traffic in an efficient manner using the existing roadway network. The majority of passenger cars

> and truck traffic is expected to use Sierra Ridge Drive to Sycamore Canyon Drive to Eastridge Avenue which will provide on-/off-ramp access to I-215. (DEIR, p. 5.16-26,)
>
> Building 1 will have two driveways along Lance Drive and Building 2 will have one driveway along Lance Drive. Building 1 and Building 2 will have full ingress and partial right-out only egress at each of their individual project driveways. (DEIR, p. 5.16-26,)
>
> The Project will limit passenger car and truck egress onto Dan Kipper Drive by posting signs at all Project driveways that indicate only right turns onto Lance Drive are permitted. In addition to signage, small barriers will be placed at the all three driveways which will aid in limiting left-out turns onto Lance Drive. This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. Partial width improvement on the westerly side of that portion of Lance Drive that is currently in place will be constructed by the Project at its ultimate cross-section. The Project will construct the full-width improvements to the remaining portion of Lance Drive to Dan Kipper Road. The Project proposes a slight realignment to that portion of Lance Drive shown as Lot A on TPM 36879. (**Figure 3-8 – Tentative Parcel Map**.) Per the *Sycamore Business Park Specific Plan*, existing Lance Drive is designated as a 2-lane 74 foot Collector Street. (DEIR, p. 5.16-26,)

As part of the TIA scoping process, a preliminary analysis was done in regard to the proposed Project using Dan Kipper Drive as a point of egress for passenger cars and/or trucks. Based on future nearby development of the area, the existing and future geometry of the intersection and nearby intersections, the City determined that traffic leaving the Project site would have a right-out-only egress onto Lance Drive. (DEIR, pp. 5.16-10, 5-16-26.)

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the TIA, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as “pork chops”) at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e.

leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle Drive/Box Springs Road interchange. Thus, it is reasonable to expect that outbound cars and trucks will use the Eastridge Avenue-Eucalyptus Avenue interchange.

About the existing condition of trucks using Fair Isle Drive for any reason other than to turn onto Sycamore Canyon Boulevard, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

With regard to the existing traffic flow of the area, as discussed in Response to Comment 28-V, traffic counts by vehicle type were taken and disclosed in Appendix C of the TIA. (DEIR Appendix J.)

The DEIR fully discloses that traffic impacts will be significant and unavoidable until Caltrans funds and constructs the necessary freeway improvements. The identification of new conditions of approval does not constitute significant new information that would require recirculation of the DEIR information. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-W:

See Response to Comment 28-V regarding trip distribution. These trip distribution assumptions are supported by the traffic counts taken for the TIA, which indicate 5% of the vehicles using the Fair Isle Drive-Box Springs Road/I-215 interchange are trucks and that 9% of the vehicles using the Eucalyptus Avenue-Eastridge Avenue/I-215 interchange are trucks. That is, nearly twice the number of trucks using the Eucalyptus Avenue-Eastridge Avenue/I-215 interchange as the Fair Isle Drive-Box Springs Road/Interchange. (Detailed AM and PM classification intersection counts taken for the TIA can be found in the Appendix C of the TIA, which is part of DEIR Appendix J.)

Although southbound cars and trucks will reach the Fair Isle Drive-Box Springs Road interchange from southbound Interstate 215 (I-215) first, the Eastridge Avenue-Eucalyptus Avenue interchange is closer to the Project site and would involve less driving on surface streets.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-X:

The existing levels of service (LOS) in the TIA (TIA Table 5-1 – Intersection Levels of Service – Existing Plus Project Conditions (2015) and DEIR (DEIR **Table 5.16-C – Intersection LOS, Existing Conditions (2015)**) were based on AM and PM peak period intersection turning movement counts conducted in July 2015. (DEIR, p. 5.16-17.) These counts are included in Appendix C to the TIA. The counts were increased per agreement with the City since counts were taken during the off-school period of July 2015. (DEIR, p. 5.16-17; DEIR Appendix J, p. 3-2.) The following are the edits to the counts listed by intersection number. The counts used in the TIA were increased (based on older counts taken when school was in session) to simulate vehicles travelling through the intersections from residential neighborhoods to nearby schools. To account for ambient growth in the Project area, a two percent per year ambient growth rate was applied to existing traffic volumes to account for area-wide growth that is not reflected by cumulative development project.[8] Ambient growth was added to daily and peak hour traffic volumes on surrounding roadways in addition to traffic generated by the Project. (DEIR, pp. 5.16-9, 5.16-29.)

With regard to the projects used for the cumulative analysis, as discussed in Response to Comment 28-L, of the 15 cumulative development projects within the City identified in DEIR Table 6-A (see Response to Comment 28-I), the following five projects are within the SCBPSP: No. 5 – Health and Fitness Center, No. 8 – Alessandro Business Center, No. 10 – CT Sycamore Center, No. 12 – Mt. Baldy Drive/San Gorgonio Drive Industrial Project, and No. 14 – Sycamore Canyon Industrial Warehouse Development. Existing warehouses in the SCBP were not included on the cumulative development project list because traffic from those uses would already be accounted for in the traffic counts taken for the TIA and the existing levels of service for the TIA study area intersections and freeway segments shown in DIER **Table 5.16-C – Intersection LOS, Existing Condition (2015**) and DEIR **Table 5.16-D – Freeway Segment LOS, Existing Conditions (2015)**. (DEIR, pp. 5.16-17, 5.16-19.)

With regard to including buildout of the entire SCBPSP in the cumulative traffic analysis, this traffic would be accounted for in the Buildout per the General Plan 2025. As discussed on page 5.16-48 of the DEIR:

> Buildout per the General Plan 2025
> Cumulative impacts to transportation/traffic could be significant if the addition of Project-related traffic combined with the traffic expected at buildout per the GP 2025 results in any study area intersection operating at LOS E or F, except at some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges,

[8] A two percent per year ambient growth rate is considered the industry standard for estimating growth in the region and was agreed upon during the traffic study scoping process. (DEIR, p. 5.16-33.)

> LOS E may be acceptable as determined on a case-by-case basis (GP 2025, p. CCM-11). Sycamore Canyon Boulevard between Central Avenue and Box Springs/Fair Isle is one of the streets identified to operate at LOS E or F at buildout of the GP 2025 as a result of regional cut-through traffic. With regard to these streets, the GP 2025 FPEIR states that a decision was made (following discussion of the Circulation Element components at the Citizens Advisory Committee, Planning Commission, and City Council) not to build larger roadways for the purpose of accommodating regional cut-through traffic. As part of this decision, it was determined that LOS E or F would be acceptable for these roadways. (GP 2025 FPEIR, p. 5.15-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-Y:

Regarding cumulative noise impacts, refer to Response to Comments 28-I and 28-J.

Regarding cumulative traffic impacts, refer to Response to Comment 28-X. The anticipated traffic from the cumulative development projects is identified in DEIR **Table 5.16-M – Cumulative Development Project Trip Generation** (DEIR, pp. 5.16-39–5.16-43), shown below.

Table 5.16-M – Cumulative Development Trip Generation[a]

No. on Figure 5.16-9	Project (Case Number) Project Location	Land Use	Quantity	Status	Net Trips[b]		
					AM Peak Hour	PM Peak Hour	Daily
Projects within the City of Riverside							
1	Auto Parts Store in Mission Plaza P07-1181/P07-0593 381 Alessandro Blvd	Auto parts store	1.5 TSF	Approved (5/6/2008) Not constructed	33	67	407
2	Proposed bank in Canyon Crossings Shopping Center P08-274/P08-0275 2570 Canyon Springs Pkwy	Commercial bank with drive-thru lane	2,746 SF	Approved (9/9/08) Not constructed	23	43	373
3	ARCO and *ampm* Market P10-0090/P10-0091 6287 Day Street	Gasoline station with convenience market	2,700 SF	Approved (6/8/2010) Open	8	12	299

No. on Figure 5.16-9	Project (Case Number) Project Location	Land Use	Quantity	Status	Net Trips[b]		
					AM Peak Hour	PM Peak Hour	Daily
4	Chase Bank (P12-0419/P12-0557/ P12-0558/P12-0559) 360 Alessandro Boulevard	Bank with two-lane drive-thru	3,100 SF	Approved (5/7/2013) Not constructed	33	62	526
5	Health and Fitness Center (P14-0457) 6465 Sycamore Canyon Boulevard	Interior remodel for a health and fitness center within existing 92,410 SF two-story office building	4,000 SF	Approved (6/30/2014) Constructed	6	14	132
6	Steak and Shake (P14-0536/P14-0537) Northwesterly corner of Valley Springs Parkway and Corporate Center Drive	Fast food restaurant with drive-thru restaurant	3,750 SF	Application submitted	86	60	1,714
7	Tract Map 32180 (P07-1073) North of the intersection of Moss Road and Pear Street	Nine lot subdivision for single family residences	9 DU	Approved (6/5/2008) Construction has not started	7	9	86
8	Alessandro Business Center (P07-1028/P06-0416/ P06-0418/P06-0419/ P06-0421/P07-0102) Northwest corner of Alessandro Boulevard and San Gorgonio Drive	Four industrial/ manufacturing buildings.	662,018 SF	Approved (3/9/2010) Construction complete	105	120	1,714
9	Tract Map 36641 (P13-0665) Southwest corner of Wood Road and Moss Street	Eight lot subdivision for single family residences	8 DU	Approved (4/17/2014) Construction has not started	6	8	76
10	CT Sycamore Center (P14-1053/P14-1054) Northwest corner of Dan Kipper Drive and Sycamore Canyon Boulevard	Five buildings with warehouse and office space in each building.	230,420 SF total (205,4720 SF warehouse and 25,000 SF office)	Approved (4/30/2015) Construction complete	42	50	703

No. on Figure 5.16-9	Project (Case Number) Project Location	Land Use	Quantity	Status	Net Trips[b]		
					AM Peak Hour	PM Peak Hour	Daily
11	Sycamore Canyon Apartments (P13-0553/P13-0554/ P13-0583/P14-0065) 5940 – 5980 Sycamore Canyon Boulevard (Between Raceway Ford and Raceway Nissan)	Multi-family residential	275 DU	Approved (10/9/2014) Construction has not started	140	171	1,829
12	Mt. Baldy Drive/San Gorgonio Drive Industrial Project (P14-0600/P14-0601/ P14-0602/P15-0044) Southeast corner of Mt. Baldy Drive and San Gorgonio Drive	Multiple-tenant industrial building	121,390 SF	Approved (6/9/2015) Under construction	189	181	1,339
13	Street Vacation for an Apartment Project (P12-0309) Monte Vista Drive and Pollard Street	Apartment building	88 DU	Construction of apartment project has not started	45	55	585
14	Sycamore Canyon Industrial Warehouse Development (P13-0607/P13-0608/ P13-0609/P13-0854) 6150 Sycamore Canyon Boulevard	Industrial building	171,616 SF	Approved (5/13/2014) Construction complete	367	283	2,710
15	Annexation 118 (P14-0246/P14-1059/ P14-0901) Northwest corner of Sycamore Canyon Boulevard and Central Ave.	Annexation, GPA, and Pre-Zoning for a retail commercial shopping center	102,000 SF	Approved (7/28/2015) Construction has not started	98	251	4,242
16	Quail Run Apartments (P14-0683/P14-0684'P14-0685/P15-1080/P15-1081/P15-1082) Northwest corner of Quail Run Road and Central Avenue)	Multi-family residential	216 DU	Approved (07/26/16	112	136	1,463
Projects within the City of Moreno Valley							
17	Status Nightclub and Lounge Canyon Springs Plaza	Nightclub	11,000 SF	Open for business	0	72	936

No. on Figure 5.16-9	Project (Case Number) Project Location	Land Use	Quantity	Status	Net Trips[b]		
					AM Peak Hour	PM Peak Hour	Daily
18	O'Reilly Automotive 23334 Sunnymead Boulevard	Auto parts store	7,500 SF	Open for business	17	26	445
19	Available Restaurant Space Plaza Del Sol Shopping Center 23060 Alessandro Boulevard	Restaurant	9,000 SF	Available	97	51	1,106
20	Rivals Sports Bar & Grill TownGate Promenade	Sports bar & grill	6,452 SF	In plan check	70	51	807
21	Aldi Market 12630 Day Street (TownGate Promenade)	Grocery market	20,300 SF	Open for business	51	169	1,844
22	Yum Yum Donut Shop Northwest corner of Day Street and Alessandro Boulevard	Donut shop and convenience store	4,351 SF	In planning	306	122	3,562
23	Hawthorn Inn & Suites Cactus Commerce Center Cactus Avenue	Four-story Hotel	79 guest rooms	Approved Not constructed	42	47	645
24	Sleep Inn Suites Olivewood Plaza Sunnymead Boulevard	Three-story Hotel	66 guest rooms	Approved Not constructed	35	40	539
25	Moreno Valley Professional Center Alessandro Boulevard east of Ellsworth Street	Four Office buildings	84,000 SF	Approved	131	125	927
26	Gateway Business Park South of Alessandro Boulevard west of Day Street	34 Industrial condominiums between 5,000 and 10,000 SF	184,000 SF	Approved	395	303	2,906
27	Veterans Way Logistics Center	Distribution facility	366,698 SF	Under construction	58	67	973

No. on Figure 5.16-9	Project (Case Number) Project Location	Land Use	Quantity	Status	Net Trips[b]		
					AM Peak Hour	PM Peak Hour	Daily
28	World Logistics Center	Corporate park specific plan	41 million SF total	Approved (8/26/2015) Construction has not started	3,925	4,287	50,753
Total (in PCE)					**6,397**	**6,820**	**83,365**

Notes

a Source: TIA, Table 4-4– Cumulative Projects within the Study Area, Appendix J

b Net trips are total trips less pass-by trips.

With regard to cumulative air quality impacts, because the South Coast Air Quality Management District (SCAQMD) considers thresholds for project-specific impacts and cumulative impacts to be the same, the Project will result in significant and unavoidable impacts to air quality. (DEIR, p. 6-10.) Although cumulative impacts to local traffic and buildout per the City's General Plan 2025 are not significant, impacts to freeway level of service are significant with the addition of traffic due to ambient growth and cumulative development projects, without the proposed Project until necessary improvements are funded and constructed by Caltrans. (DEIR, pp. 5.16-48, 5.16-52, 5.16-53, 6-26.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-Z:

Regarding the DEIR noise analysis, refer to Responses to Comments 28-I through 28-U.

Regarding the distance between Kroger (assumed to be the Ralph's Distribution Center located south of the Project site) and Pepsi (assumed to be the Pepsi Bottling Group located at the southeast corner of Eastridge Avenue/Sycamore Canyon Boulevard) the distances between these facilities and the residences stated in this comment is incorrect. As measured from Google Earth, the northern boundary of the Big 5 Sporting Goods Distribution Center is less than 0.10 miles south of the residences to the north and approximately 0.3 miles east of the residences to the west. As measured from Google Earth, the northern boundary of the Ralphs Distribution Facility is approximately 0.3 miles from the rear lot line of nearest residential property on Bannock Drive and less than one-half mile from the residences to the north, not 1 mile as asserted in this comment. As measured from Google Earth, the northern boundary of the Pepsi Bottling Group is approximately 0.8 miles south of the nearest residences (the Sycamore Canyon Apartments) and the same distance from the northwest corner of the Pepsi facility to the nearest residential property on Bannock Drive; not greater than 1 mile as asserted in this comment.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-AA:

Comment noted. The City adopted *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72.) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, it recommends that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. The HRA should indicate how the project can be designed to limit health risks. The site has been designed in order to minimize impacts on the adjacent residential area including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

Consistent with the *Good Neighbor Guidelines*, because there are residences located within 1,000 feet from the proposed Project, a Screening HRA was prepared in June 2016 (included in Appendix B of the DEIR) and a refined HRA was prepared in November 2016 (included as Attachment A in the Final EIR) to evaluate cancer and non-cancer risks associated with the proposed Project. The November HRA was prepared in response to comments received from the SCAQMD. In both the June HRA and the November HRA, none of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project operation for both workers and residents within the Project site vicinity. (DEIR, p. 5.3-34.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-BB:

Although Project-related construction activities will result in temporary and periodic exposure of the Sycamore Canyon Wilderness Park to noise levels in excess of standards established in the Riverside Municipal Code, these impacts are short-term in nature and will not result in long-term impacts to the Sycamore Canyon Wilderness Park. According to page 5.12-26 and as shown on **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation** of the DEIR, the operational noise level at the property line between the Project site and the Sycamore Canyon Wilderness Park is 55 dBA L_{eq}, which is below the Municipal Code noise standard for public recreational facilities (65 dBA L_{eq}).Consequently, the proposed setback and fencing between the Project buildings and the Sycamore Canyon Wilderness Park is sufficient because the noise level is below the City Municipal Code noise standard for public recreational facilities. Thus, the Project is consistent with GP 2025 Polices LU-7.1 and LU 7.2.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-CC:

Land Use: The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP) and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14.)

The proposed Project is consistent with the planned land use for the site in both the GP 2025 and SCBPSP. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

With regard to the Good Neighbor Guidelines refer to Response to Comment 28-AA.

With regard to air quality: he South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25.** (DEIR, pp. 5.3-26, 5.3-27, 5.3-30, 5.3-35–5.3-40.)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made

exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (i.e., the barrier between conditioned and unconditioned spaces). This includes installation of insulation to minimize heat transfer and thermal bridging and to limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measures **MM AQ 13** will be revised in the FEIR as shown below.[9]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to <u>three</u>~~five~~ minutes or less <u>in excess of</u> ~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

[9] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (<u>example text</u>).

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measures **MM AQ 22** will be revised in the FEIR as shown below.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall 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. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment. (DEIR, pp. 5.3-35–5.3-39.)

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

SCAQMD has also developed localized significance thresholds (LSTs), which represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. Based on the air quality analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors, such as the residences, within the Project vicinity for any criteria pollutants. (DEIR, p. 5.3-29.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

With regard to aesthetics although a 1,000-foot buffer has not been included in the Project, certain features of the site design and location do minimize aesthetic impacts. The site has been designed to incorporate a 100-foot buffer, including 64 feet of landscaping between the northern wall of Building 2 and the north property line adjacent the residences. This increased buffer zone, enhanced landscaping and that Building 2 was designed with no loading docks or parking located on its north side (between Building 2 and the residences to the north, all work to minimize impacts to these residents.

The proposed Project, as originally submitted and presented at the August 26, 2015 scoping meeting for the DEIR, proposed two buildings totaling 1.43 million square feet (SF) with the northern building (Building 2) setback 60 feet from the northerly property line. (DEIR, **Figure 8-1 – Original Project.**) As discussed on page 8-3 of the DEIR, during preparation of the DEIR, the Project applicant received feedback from the City, encouraging additional setback and landscaping along the northern portion of the Project site and a reduction in the size of the Building 2. As a result, the proposed Project was revised by the Project applicant so that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site.

As discussed above, the 100-foot setback between Building 2 and the northern property line will encompass 64 feet of landscaping, a 30-foot wide drive aisle (vehicles only, no trucks) and a 6-foot wide landscape planter adjacent to Building 2. (DEIR, p. 3-35, **DEIR Figure 3-10 – Proposed Site Plan**, **DEIR Figure 3-11 – Conceptual Landscape Plan**.) Additionally, there

are no dock doors or parking on the northern side of Building 2, closest to the residences to the north.

The western wall of Building 2 is located approximately 138 feet from the rear property line of the residences located northwest of the site. There is an approximately 101-foot wide Mitigation Area, consisting of native landscaping materials, that provides additional screening and buffer from the residences to the northwest (DEIR, **Figure 3-10 – Proposed Site Plan** and **Figure 3-11 – Conceptual Landscape Plan**).

Building 1 is located downslope from and south of Building 2 and is not expected to be visible from the residential neighborhood to the north (DEIR, p. 5.1-8). The Project will also, implement mitigation measures **MM AES 1** which states: (DEIR, pp. 5.12-19, 5.12-31–5.12-33.)

> **MM AES 1:** To provide separation between the Project site and the adjacent residential uses and to be consistent with the wall constructed on the project located east of the Project site and north of Dan Kipper Drive, the developer shall install an 8-foot tall wall constructed of two-sided decorative masonry material along the Project site's northern property line and that portion of the Project's westerly property line adjacent to existing residential uses. As part of the Design Review process and prior to the issuance of a grading permit, the Project developer shall submit a revised site plan showing the 8-foot tall wall and the proposed materials and decorative treatment for such wall to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

Furthermore, as discussed in Response to Comment 28-CC, mitigation measures **MM AQ 13** and **MM AQ 22** will be revised in the FEIR to limit truck idling at the Project site to three minutes or less, which exceeds the requirements of the California Air Resources Board (CARB).

The Project includes additional City Design Review and will implement mitigation measure **MM AES 9** to ensure that the buildings are designed in accordance with this measure. (DEIR, p. 5.1-35)

> **MM AES 9**: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.
>
> b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and

shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow.

Aesthetic impacts of the Project were found to be less than significant in the DEIR through the incorporation of Project design features and mitigation measures. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

With regard to noise refer to Responses to Comments 28-T through 28-U. Additionally, as discussed in Response to Comment 28-T, with implementation of mitigation measure **MM NOI 15**, which is within the control of the City and the Project Applicant, noise from Project operations would only exceed the City's nighttime noise standard at receptor nos. 3 and 4, which would not result in the Project being inconsistent with GP 2025 Policy LU-9.7.

With regard to traffic: as discussed in Response to Comment 28-V, a TIA was prepared for the Project to quantify Project-related impacts to roadway and freeway segments in the Project vicinity. Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, freeway facilities are under the jurisdiction of Caltrans and there is no mechanism for the City or Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, p. 5.16-52.) Although this impact is significant and unavoidable, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action. Based on the above discussion, the Project will be consistent with the City's GP 2025 Policy LU-9.7.

The revision to mitigation measures **MM AQ 13** and **AQ 22** to change the idling time from five minutes to three minutes does not constitute significant new information that would require recirculation of the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-DD:

With regard to aesthetics, refer to Response to Comment 28-CC. Additionally, the Project approval process involves an additional City Design Review component to ensure that new building designs, wall designs, site design, landscaping and irrigation plans, lighting plans, parking plans, open space areas, and pedestrian areas are reviewed to confirm compliance

with the DEIR and City codes and to avoid monotonous repetition, but allowing, when feasible, for originality of design. (DEIR, p. 3-26.)

With regard to the aesthetic implication of the noise barriers in mitigation measure **MM NOI 16** refer to **Responses to Comments 28-A and 28-F**.

With regard to Project-generated noise, refer to Response to Comments 28-H through 28-U.

Based on the above discussion, the Project will be consistent with the City's GP 2025 Policy LU-30.3.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-EE:

With regard to noise, refer to Response to Comments 28-I through 28-U. Although Project-generated noise impacts during construction will be significant to the Sycamore Canyon Wilderness Park, the Project has been designed to be screened from and not disrupt the Sycamore Canyon Wilderness Park in accordance with GP 2025 Policy LU-79.2. This includes installation of a temporary noise barrier during Project construction as well as fencing and landscaping to create a buffer between the Project site and adjacent Park area. The DIER analyzed and concluded operational noise impacts to the Sycamore Canyon Wilderness Park are less than significant because Project-generated noise will be below the City's noise standard for regional parks. The Urban/Wildlife Interface Guidelines set forth in MSCHP Section 6.1.4 state MSHCP Conservation Areas *should* (emphasis added) not be subject to noise that would exceed residential noise standards. That is a guideline, not a requirement. As shown on DEIR Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation, noise at the property line between the Project site and the Sycamore Canyon Wilderness Park (receptor no. 34) will be 55 dBA. Based on the above discussion, the Project will be consistent with the City's GP 2025

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-FF:

With regard to noise refer to Response to Comments 28-I through 28-U, 28-CC, and 28-DD. The Project's proposed fencing and landscaping will minimize aesthetic and noise impacts to the adjacent residences and the Sycamore Canyon Wilderness Park. The Project has been designed to incorporate several design features and mitigation measures intended to minimize adverse land use conflicts between industrial uses and the residential and open space properties that abut the specific plan area, consistent with General Plan 2025 Policy LU-80.3. The following design features are discussed on DEIR page 5.10-9:

> Design features refer to ways in which the proposed Project will avoid or minimize potential impacts through the design of the Project. The proposed Project has been designed with sensitivity to the adjacent land uses, particularly

Sycamore Canyon Wilderness Park to the west, and the existing residential neighborhoods to the north and northwest.

With regard to the Sycamore Canyon Wilderness Park, the Project includes a Mitigation Area and landscaping along its westerly boundary (**Figure 3-11 – Conceptual Landscape Plan**) to transition from the docks and trailer parking area to the Wilderness Park. The Project also includes a trail to provide controlled access for pedestrians and bicyclists to the park and a Fire Access/Parks Maintenance Road so emergency and maintenance vehicles can access the park when needed.

With regard to the adjacent residential neighborhood, the Project proposes a 64-foot wide landscaped buffer between Building 2 and the residences to the north and a minimum of 100-feet of landscaping along the western boundary adjacent to the residences (**Figure 3-11 and Figure 3-10 – Proposed Site Plan**). Additionally Building 2 does not propose any dock doors or parking on the north side of the building, so as to locate those activities away from the Sycamore Highlands residential neighborhood. As shown on Figure 3-10 all of Building 2's docks and trailer parking are south of the building. Vehicular parking is located on the east and south of Building 2.

The discussion under Policy GP LU 80.3 on DEIR page M-16 and M-17 will be amplified in the FEIR as shown below.

Policy LU-80.3	Minimize any adverse land use conflicts between industrial uses and the residential and open space properties that abut specific plan areas.	The proposed Project is located within the Sycamore Canyon Business Park Specific Plan and abuts residential land uses to the north and northwest and the Sycamore Canyon Wilderness Park to the west. Project design will ensure that the residential neighborhood located to the north and northwest will be protected from development of the proposed Project. As a result, the Project Proponent did not propose parking along the northern side of Building 2, has designed Building 2 with no cross dock facilities, and has set the building back 100-feet from the nearest residential property line. Additionally, the Project proposes an on-site trail easement which will provide connectivity for recreational users of the Sycamore Canyon Wilderness Park and a parking lot for the users to safely park and access the trail. Fencing, the Mitigation Area, and on-site landscaping will provide visual appeal,

		functionality, and will act as a buffer which will shield the Project site from the surrounding land uses. Finally, the Project is required to comply with MSHCP Section 6.1.4 (Urban/Wildlands Interface) which will reduce land use conflicts between the proposed Project operations and the park.

The amplification of the discussion in Appendix M does not constitute significant new information that would require recirculation of the DEIR. For the reasons set forth above, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-GG:

The proposed logistics center at the Project site will contribute to the economic success of the Sycamore Canyon Business Park by constructing a project that is allowed by the zoning and turning a the vacant site into a Project that will create jobs for residents of the City. The Project site is already served by water, sewer, regional stormwater, telephone lines, cable lines, and natural gas service and as such is completing the development plan of the SCBPSP in this portion of the Plan Area. (DEIR, p. 3-40.) Further, the DEIR analyzed and concluded that Project-generated traffic will not have a significant impact on local roadways. (DEIR, pp. 5.16-56 – 5.16-57.)

Therefore, the Project is consistent with the GP 2025 Policy LU-80.6 and this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-HH:

With regard to the traffic distribution in the TIA, refer to Response to Comment 28-V. Because outbound traffic from the Project site will be limited to right-turns on Lance Drive (see discussion under Response to Comment 28-V), traffic will be funneled to Sycamore Canyon Boulevard and then have the option to go right or left on this roadway. (DEIR, p. 5.16-26.) Due to the traffic controls placed on all traffic exiting the site, the Eastridge Avenue-Eucalyptus Avenue freeway entry point is closer than the Fair Isle Drive – Box Spring Road freeway entry point, and will reduce the number of outbound trips using Fair Isle Drive. Further, as discussed in Response to Comment 28-V, a condition of approval will be placed in the Project to require signal timing improvements at key intersections to further encourage the use of the Eastridge Avenue-Eucalyptus Avenue interchange.

Therefore, the Project is consistent with the GP 2025 Policies CCM 2.2, CCM 2.3, and CCM 2.4 and this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-II:

The intersection of Sycamore Canyon Boulevard and Sierra Ridge Drive was included as one of the study intersections in the TIA prepared to analyze Project-related impacts to roadways in the Project vicinity (Study Intersection No 6 (DEIR **Figure 5.16-1** and DEIR page 5.16-4). This intersection will operate at acceptable level of service with the existing plus ambient growth plus Project plus cumulative conditions without any improvements to the intersection. (DEIR, p. 5.16-57). The Project does not propose any driveway or local road access to Sycamore Canyon Boulevard. Further, as the main north-south roadway through the SCBPSP, Sycamore Canyon Boulevard was designed as a 4-lane north/south divided roadway in the Project area between Fair Isle Drive and Eucalyptus Avenue. Sycamore Canyon Boulevard is designated as an Arterial Street (4-lanes divided, 110-foot right-of-way) in the GP 2025 Circulation and Community Mobility Element. (DEIR, p. 5.16-3.) Thus, it was intended to be used by trucks servicing the warehouses within the SCBPSP. Also, refer to Response to Comment 28-HH.

Therefore, the Project is consistent with the GP 2025 Policies CCM-2.7 and CCM-2.8. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-JJ:

It is anticipated that the site will operate 24/7 in which case queuing would not be an issue. However due to issues with other projects within the City, a queuing analysis was performed in the event the Project is not a 24/7 operation. If the Project does not operate as proposed, the potential for queuing would be greatest during the morning, before the site gates open. The queuing capacity for Building 1 is approximately 32 to 35 semi-truck with trailers, which is greater than the anticipated number of trucks expected to arrive during the AM peak hour. The Building 2 queuing capacity is approximately 5 to 6 semi-trucks with trailers, which is slightly less than the 9 trailer trucks anticipated to arrive during AM peak hours. (DEIR Appendix M, p. M-23.)

It is unlawful to park commercial trailers or semi-trailers on any public street, highway, road, or alley within the City except at specific designated locations, such as the designated commercial vehicle parking located on Box Springs Boulevard near the Project site. (DEIR, p. 5.16-49).

It can be reasonably assumed that trucks visiting the Project site would follow these regulations and not park on neighborhood streets. However, if trucks are observed parking illegally, residents may call 311 to report the incident and the call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

Therefore, the Project is consistent with the GP 2025 Policy CCM-12.4.

The DEIR indicates that commercial vehicle parking is permitted on Sycamore Canyon Boulevard. Commercial vehicle parking is no longer allowed on Sycamore Canyon Boulevard. Therefore the third paragraph on DEIR page 5.16-49 will be revised in the Final EIR as follows:

> The queuing capacity for Building 2 is approximately five to six trailer trucks, which is less than the anticipated number of trucks expected to arrive at Building 2 during AM Peak Hours (9 trailer trucks). Although it is possible that during the AM Peak Hours the queuing capacity for Building 2 will be exceeded by three to four trailer trucks, this should not result in trucks queuing or parking on the residential streets in proximity to the Project site because there is designated commercial vehicle parking on ~~Sycamore Canyon Boulevard and~~ portions of Box Springs Boulevard. Per Riverside Municipal Code 10.52.155(a), it is unlawful to park commercial vehicles (with a gross vehicle weight of 10,000 pounds or more) and all commercial trailers or semi-trailers on any public street, highway, road or alley within the City except in specific locations designated by the City Traffic Engineer and identified by signs indicating commercial vehicle parking is allowed. There are only <u>five</u> ~~six~~ streets in the City were commercial vehicle, commercial trailers, and semi-trailers may be parked: Atlanta Avenue, Box Springs Boulevard, Marlborough Avenue, Northgate Street, <u>and</u> Palmyrita Avenue~~, and Sycamore Canyon Boulevard~~. Parking on Lance Drive and Sierra Ridge Drive is not permitted.

This clarification regarding the location of parking for commercial vehicles does not change the findings of the DEIR and does not constitute significant new information that would require recirculation of the DEIR. (CEQA Guidelines, § 15088.5.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-KK:

Comment noted. Refer to Response to Comments 28-HH and 28-II. In addition to posting signs at all Project driveways indicating that only right turns are permitted onto Lance Drive, small barriers (commonly known as “pork chops”) will be installed at all three driveways to prevent vehicle exiting the Project from turning left onto Lance Drive. This will force outbound passenger cars and trucks to turn south on Lance Drive towards Sierra Ridge Drive. (DEIR, p. 5.16-26.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-LL:

The Multiple Species Habitat Conservation Plan (MSHCP) identifies Criteria Cell areas to be set aside for conservation, including providing linkages between habitat areas. Because the Project site is not within an identified MSHCP Criteria Cell, it is not intended to be a part of the habitat linkage between the Sycamore Canyon Wilderness Park and the Box Springs Mountain. (DEIR, p. 5.4-22.) Therefore, development of the Project site will not conflict with efforts to establish a wildlife movement corridor between Sycamore Canyon Wilderness Park and the Box Springs Mountain Regional Park as shown on the MSHCP and as a result of this the Project is consistent with the GP 2025 Policy OS-6.4. Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-MM:

Refer to Response to Comment 28-T. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-NN:

The Project is consistent with General Plan Policy N-1.2 because it has been designed to include noise-reducing design features, to the extent feasible, consistent with Figure N-10 of Title 24 of the California Code of Regulations to reduce noise impacts including barriers, and site design to locate noise-generating activities at the Project site away from the residences.

Refer to Response to Comment 28-T. Nonetheless, pursuant to *State CEQA Guidelines* Section 15093, the City can adopt a Statement of Overriding Considerations if the benefits of the Project outweigh the unavoidable adverse environmental impacts. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-OO:

Refer to Response to Comment 28-T regarding noise impacts. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-PP:

Parking at the Project site will not be provided along the northern edge of the site and there are no dock doors on the northern edge of Building 2, the side of the building closest to the residences. Additionally, Building 2 will be set-back 100-feet from the residences, including 64-feet of landscaping to further reduce noise impacts. Likewise, refuse collection areas are not located near the northern or northwestern edges of the Project site and have been placed in locations further from the residences. Egress from the Project site will be limited to right-turns only from all the Project driveways in order to direct truck and passenger vehicle traffic away from the residences. Although noise impacts will remain significant and unavoidable, the Project is consistent with General Plan Policy N-1.4 because the Project been designed to include noise-reducing design features, to the extent feasible, consistent with Figure N-10 of Title 24 of the California Code of Regulations to reduce noise impacts including barriers, and site design to locate noise-generating activities at the Project site away from the residences. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-QQ:

General Plan Policy N-1.5 requires consideration when siting *noise sensitive land uses* to ensure that they are not placed in noise-impacted areas. However, the Project itself involves construction and operation of a logistics center which is not a noise sensitive land use. Therefore, the Project is consistent with Policy N-1.5. Refer to Response to Comments 28-T and 28-CC regarding noise attenuation and Project siting away from sensitive land uses to the extent feasible. Thus, the Project is consistent with the GP 2025 Policy N-1.5 and this

comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-RR:

The Project includes various noise-reducing design features to minimize noise impacts, to the extent feasible, from construction, operation, and Project-related traffic. Refer to Response to Comments 28-I through 28-U regarding noise impacts. Pursuant to *State CEQA Guidelines* Section 15093, the City can adopt a Statement of Overriding Considerations if findings can be made that the benefits of the Project outweigh the unavoidable adverse environmental impacts. Thus, the Project is consistent with the GP 2025 Policy N-1.8. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-SS:

Contrary to the comment, the DEIR's Air Quality (AQ) Analysis (included in Appendix B of the DEIR) evaluated the Project's criteria pollutant emissions (including particulate matter and oxides of nitrogen (NO_X) resulting from short-term construction and long-term operation. The AQ analysis completed both a regional criteria pollutant analysis and a localized analysis in accordance with SCAQMD methodology (DEIR, pp. 5.3-23-30). The analysis showed that the short-term construction did not exceed applicable SCAQMD thresholds on a regional or localized level, but that Project operation would exceed SCAQMD regional thresholds for NO_X. (DEIR, p. 5.3-30.) In regards to the commenters question of the maximum NO_X emissions at the nearest residential receptors, DEIR **Table 5.3-G – LST Results for Construction Emissions** and **Table 5.3-H – LST Results for Operation Emissions** show that the maximum NO_X emissions at the nearest residences are 86 and 12 pounds per day, respectively, which is lower than the SCAQMD localized threshold of 270 pounds per day. (DEIR, p. 5.3-28.)

The DEIR also contained a Screening HRA that evaluated the cancer and non-cancer (acute and long-term) risks associated with construction and operation of the proposed Project. (DEIR, pp. 5.3-31-34.) The Screening HRA concluded that none of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of either Project construction or Project operation for both workers and residents within the Project site vicinity. (DEIR, p. 5.3-34.)

A refined HRA was prepared in November 2016 to address specific comments from SCAQMD (included in the Final EIR as Response to Comment Letter 36). The refined HRA is included as Attachment A of the Final EIR. The refined HRA is consistent with the requested SCAQMD guidance and methodology and individually modeled the on-site roadways, loading bays, and truck travel on off-site roadways leading to and from the Project site and freeways. The refined HRA also incorporated the terrain and receptor height as required by SCAQMD. According to the refined HRA, none of the cancer or non-cancer thresholds will be exceeded as a result of Project operation for workers or residents within the Project vicinity. In fact, the estimated maximum cancer risk reduced from 5.3 in one million (DEIR, Table 5.3-J) to 1.64 in one million at the nearest residential receptor.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 28-TT:

Please see Response to Comment 28-A through Response to Comment 28-SS, above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

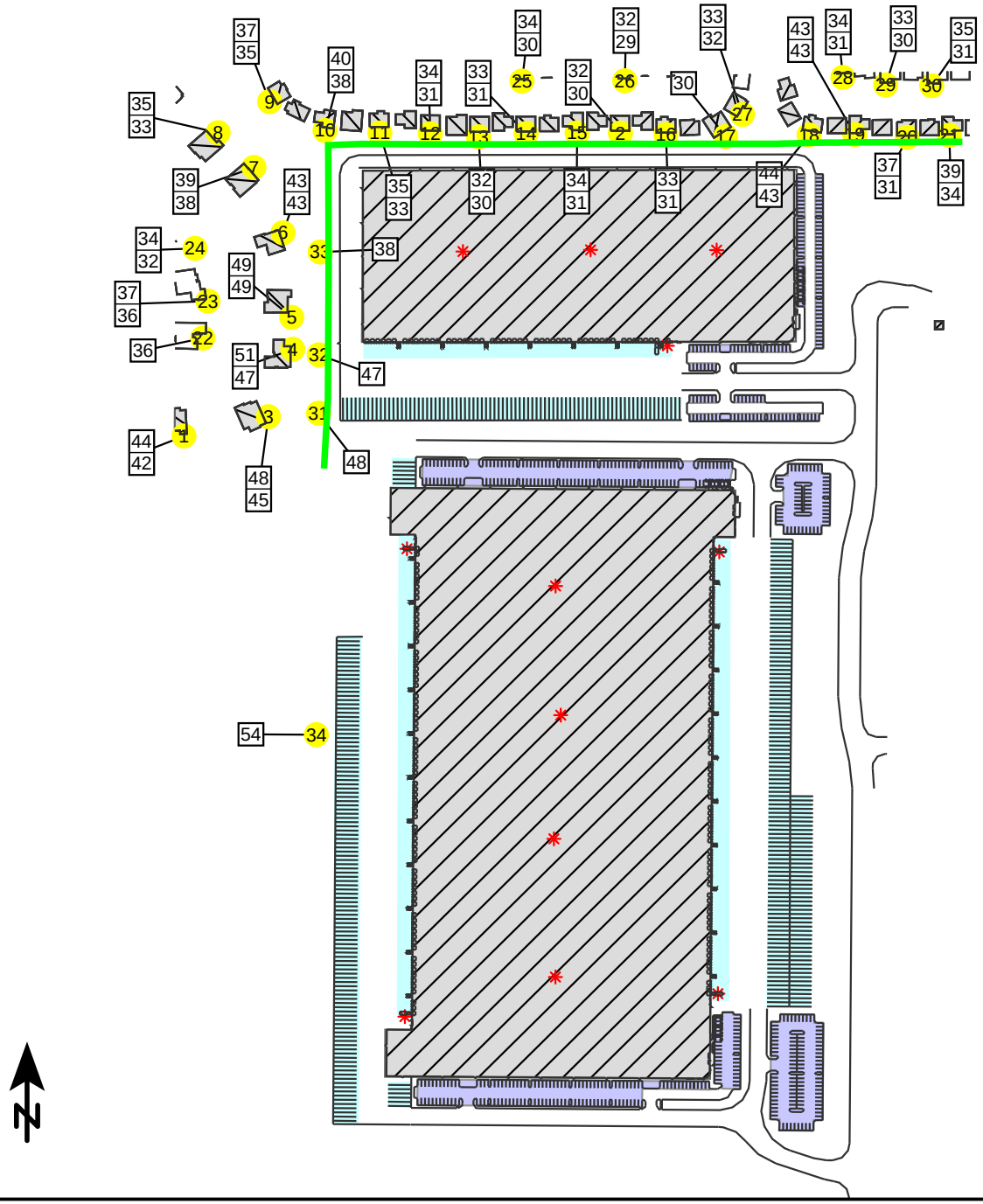


Figure A
Operational Noise Levels (Leq)
No Mitigation
33 degrees F 0% Humidity

Signs and symbols

- Perimeter Wall
- Receiver
- HVAC & Trash Compactors
- Loading/Unloading Areas Trailer Parking
- Parking Lots - Peak Hour Traffic

Level tables

- Noise Levels (Leq) 1st Fl and 2nd Fl

1 : 4786

0 25 50 100 150 200 m

KUNZMAN ASSOCIATES, INC.
OVER 40 YEARS OF EXCELLENT SERVICE

ATTACHMENT 3

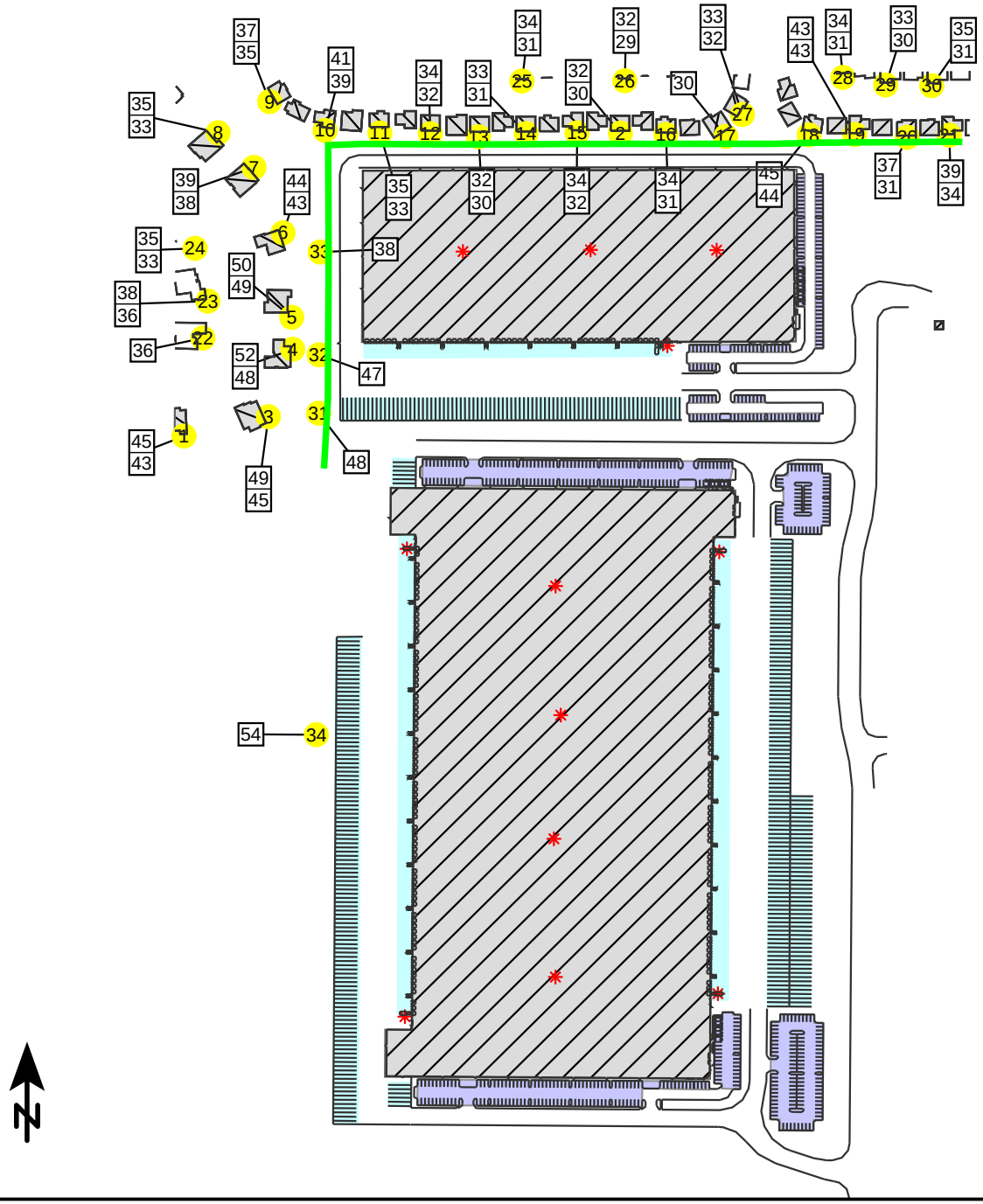


Figure B
Operational Noise Levels (Leq)
No Mitigation
33 degrees F 100% Humidity

Signs and symbols

- Perimeter Wall
- Receiver
- HVAC & Trash Compactors
- Loading/Unloading Areas Trailer Parking
- Parking Lots - Peak Hour Traffic

Level tables

- Noise Levels (Leq) 1st Fl and 2nd Fl

1 : 4786

0 25 50 100 150 200 m

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OVER 40 YEARS OF EXCELLENT SERVICE

ATTACHMENT 3

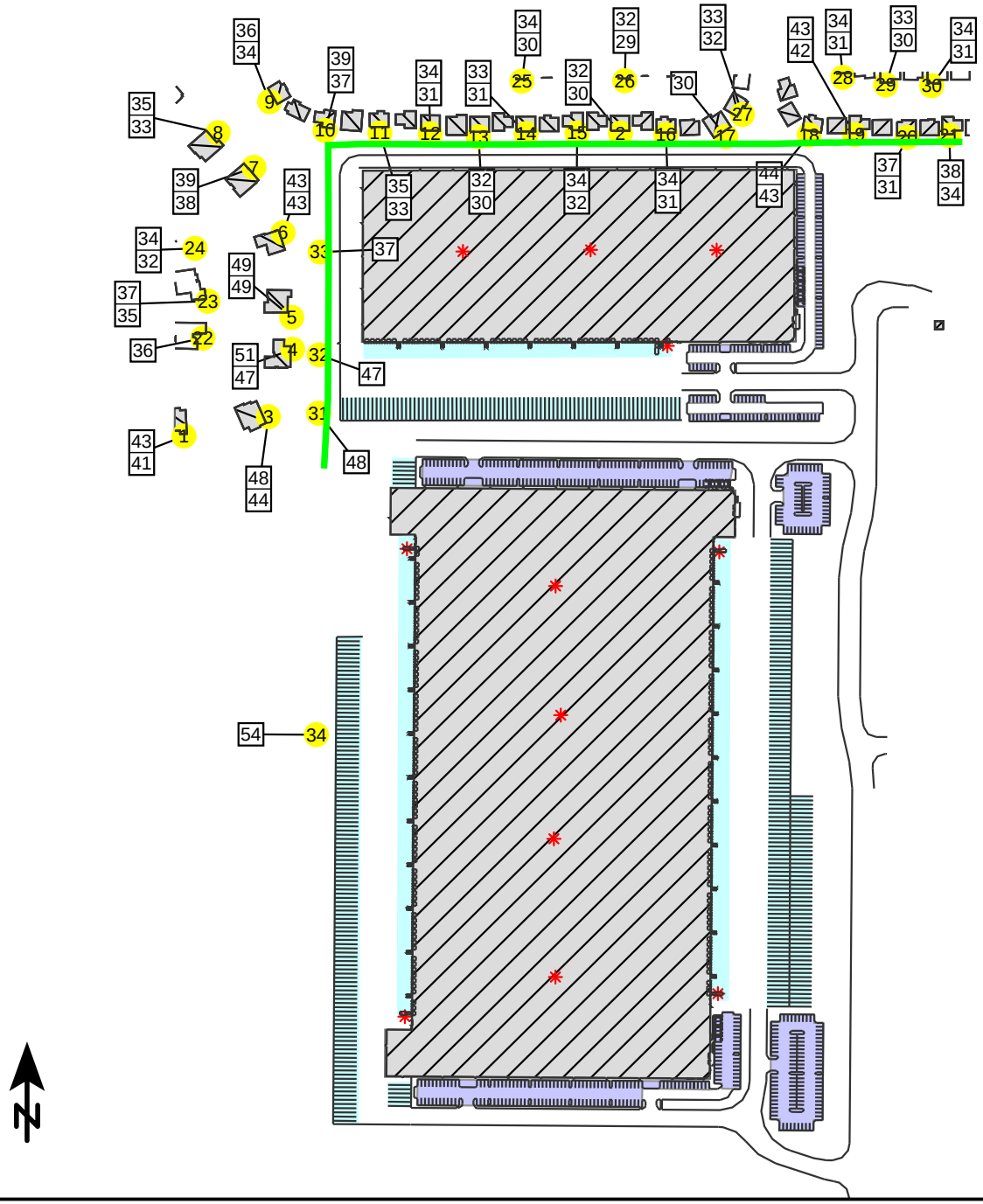

Figure C
Operational Noise Levels (Leq)
No Mitigation
114 degrees F 0% Humidity

Signs and symbols

- Perimeter Wall
- Receiver
- HVAC & Trash Compactors
- Loading/Unloading Areas Trailer Parking
- Parking Lots - Peak Hour Traffic

Level tables

- Noise Levels (Leq) 1st Fl and 2nd Fl

1 : 4786

0 25 50 100 150 200 m

KUNZMAN ASSOCIATES, INC.
OVER 40 YEARS OF EXCELLENT SERVICE

ATTACHMENT 3

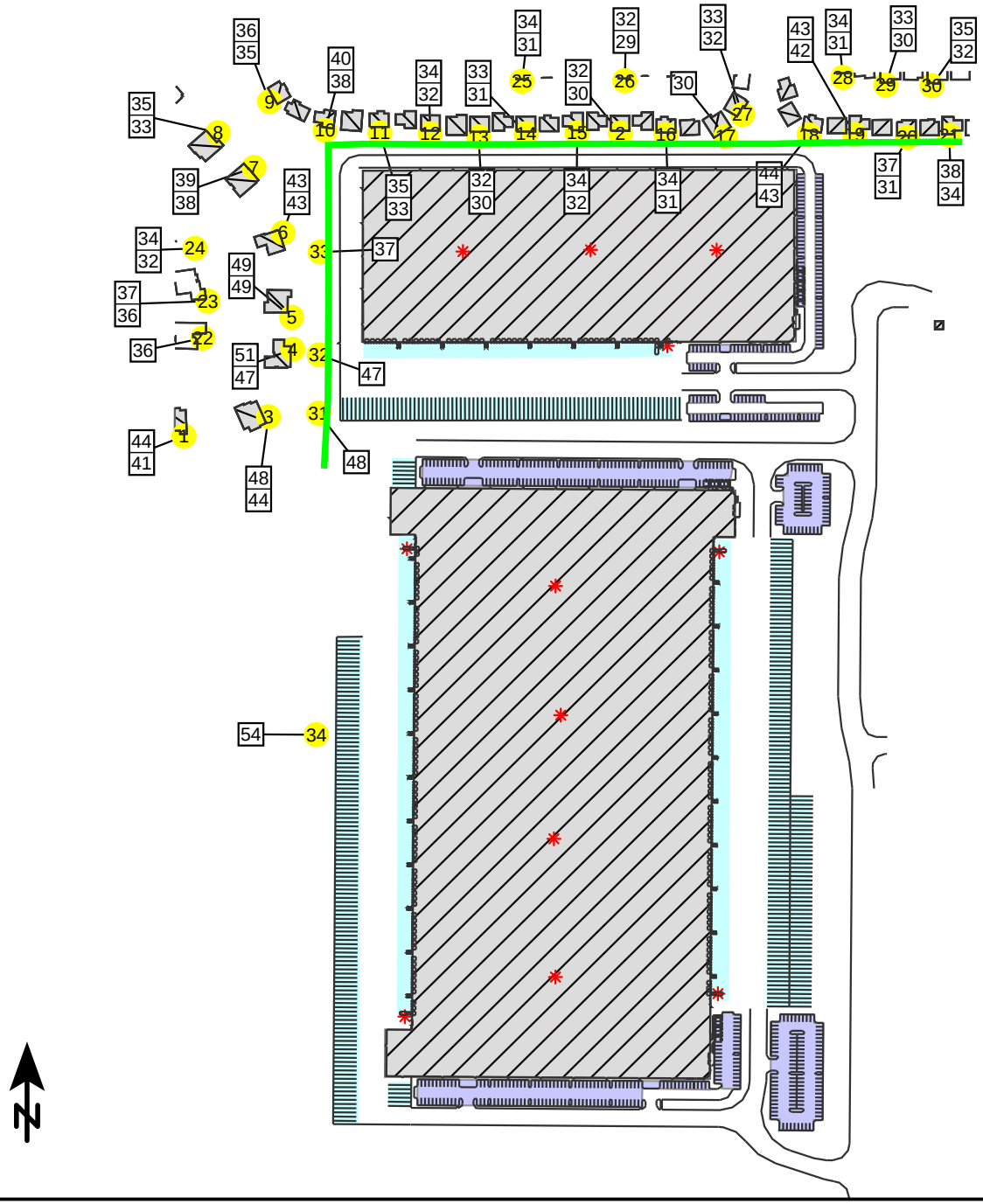

Figure D
Operational Noise Levels (Leq)
No Mitigation
114 degrees 100% Humidity

Signs and symbols

- Perimeter Wall
- Receiver
- HVAC & Trash Compactors
- Loading/Unloading Areas Trailer Parking
- Parking Lots - Peak Hour Traffic

Level tables

- Noise Levels (Leq) 1st Fl and 2nd Fl

1 : 4786

0 25 50 100 150 200 m

KUNZMAN ASSOCIATES, INC.
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ATTACHMENT 3

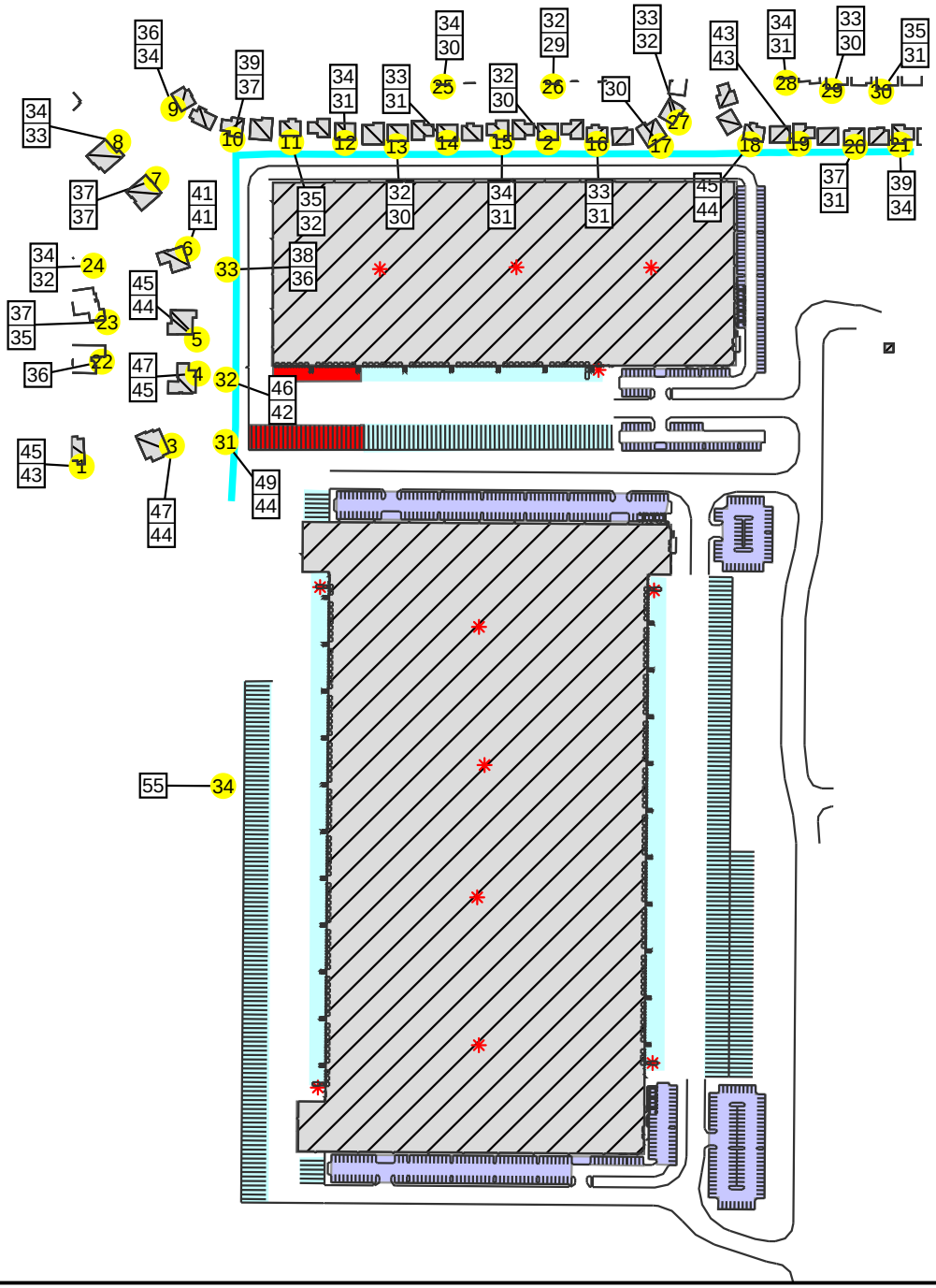

Figure E
Operational Noise Levels (Leq)
No Mitigation

Use Restriction of Western
Loading Areas Between
10:00 PM - 7:00 AM

Signs and symbols

- 10-Foot Barrier
  Top of Slope to the West
- 8-Foot Barrier
  Western Property Line
- Restricted Area
- Receiver
- HVAC &
  Trash Compactors
- Loading/Unloading Areas
  Trailer Parking
- Parking Lots - Peak Hour Traffic

Level tables

- Noise Levels (Leq) 1st Fl and 2nd Fl

1 : 4786

0 25 50 100 150 200 m

KUNZMAN ASSOCIATES, INC.
OVER 40 YEARS OF EXCELLENT SERVICE

ATTACHMENT 3

Comment Letter 29 – Johnson & Sedlack

Brenes, Patricia 29

From: Abigail A. Smith <abby@socalceqa.com>
Sent: Friday, September 23, 2016 10:04 AM
To: Brenes, Patricia
Subject: [External] Re: Sycamore Canyon Business Park DEIR - Extension of Comment Period

Ms. Brenes,
My apologies for the phone tag. On behalf of the community, thank you for the extension and your courtesy. 29-A
Abby Smith

On Sep 23, 2016, at 9:10 AM, Brenes, Patricia <PBrenes@riversideca.gov> wrote:

> Good morning Ms. Smith – We have not had much luck connecting and apologize in advance for my horrible schedule that has not allowed me to be available when you have called. The City has considered your request to extend the comment period and has agreed to extend it to Friday, October 7, 2016. The City's website will be updated today to include a note next to the project letting the public know about the extension of the comment period. You will also receive a letter in response to your request. The City appreciates your time and looks forward to your comments.
>
> Thank you,
>
> **Patricia Brenes**
> Principal Planner
> Community & Economic Development Department
> Planning Division
> 3900 Main Street, Third Floor
> Riverside, CA 92522
> Tel: 951-826-2307
> pbrenes@riversideca.gov
>
> <image4da62b.JPG>

Response to Comment Letter 29 – Johnson & Sedlack

Response to Comment 29-A:

Comment noted. The public comment period on the Draft Environmental Impact Report (DEIR) was extended from September 23, 2016 to October 7, 2016. The technical appendices to the DEIR were available on the City's website, at the City of Riverside Community & Development Department, and at the Main and Orange Terrace libraries on August 10, 2016.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 30 – Brian Fountain

From: Brian Fountain [mailto:brian.rsd894@gmail.com]
Sent: Friday, September 23, 2016 11:48 AM
To: Wilczynski, Tracie
Subject: [External] Re: Please send an email to the Riverside Planning Department about the two proposed MEGA warehouses

TO: City of Riverside Planning Department

FROM: Brian Fountain
ADDRESS: 1612 Stockport Drive Riverside, CA 92507

As most of you well know, CT Realty Investors recently constructed five mid-sized warehouses to the rear (south/east) of our homes on Stockport Drive in the Sycamore Highlands neighborhood. On one occasion prior to the groundbreaking, the developer (David Ball), his planning consultant and our city councilman Andy Melendrez visited my home to discuss the project. We went upstairs to my master bedroom and looked out the rear window to see the open field and the Big 5 distribution center. The developer and his consultant both said "the top of these buildings will be about eye-level upon completion and we would still have a partial view." Mr. Ball also said the wall of his buildings "will have three colors of paint and will be very attractive." He also said he will build an eight foot tall beige slumpstone wall about to to three feet from our property line, and after completion of the wall, if we so chose, we could take down our existing wooden fence and add some depth to our property. 30-A

Simply put, we were lied to. Now when we look out our window, we see nothing but a big tall white wall. we have to look up to just to see the sky. We have to look down over the newly built brick wall to see any color on the wall which is only inches from the original property line.

And now we have two unforeseen additional problems. First, because the majority (upper portion) of the building wall is white, it reflects the sun directly into our home's walls and windows. I asked Mr. Ball if he would paint one or two panels of the upper wall one of the matching darker tones because of the solar reflection. He emailed me back and said, "You request has been denied." 30-B

Secondly, because of these new walls, the sound from Sycamore Canyon and moreso, the sound of the freeways (60 & 215) echos directly into our homes. We now hear the roar of the freeways, especially the large trucks and vehicles/motorcycles with modified exhaust. This is especially bad during peak traffic hours and even on the weekend nights. I have installed top of the line energy efficient windows that are suppose to help deaden outside sound. Aside that we have to keep the windows shut all the time now, unless we want to hear the freeway roar, they really don't help much at all. Even when they're closed. 30-C

In closing, my neighbors and I are 100% against the construction of any warehouses or distribution centers behind our homes. What the City forgets is these types of facilities are usually twenty-four hour, seven days a 30-D

1

week operations, We do not want Dan Kipper to become a through street! We bought our homes well before this industrial development. We do not want to hear more trucks, tractors, forklifts and back-up alarms. We do not want to breath anymore diesel exhaust than we already do. 30-D cont

Our neighborhood is very blended. We have children and seniors, various religions and races, students, workers, housewives and retirees. All we want is our peace. I know this must sound corny to you, But I guarantee you, you wouldn't want these buildings anywhere near your neighborhoods. 30-E

Thank you for your anticipated reply, 30-F

Brian Fountain

On Thu, Sep 22, 2016 at 8:10 AM, Donald Britt <drvb38@earthlink.net> wrote:

Lol

Sent via the Samsung Galaxy Tab® 4, an AT&T 4G LTE tablet

-------- Original message --------
From: Sycamore Highlands Action Group <sycamorehighlands@yahoo.com>
Date: 9/21/2016 10:59 PM (GMT-08:00)
To: Clarence Dolores Tiffany Romero <tromero951@yahoo.com>, Gary and Kathy Martin <teachurs@pacbell.net>, Christopher and Tammi Tosti <acttosti@sbcglobal.net>, Carla Garcia <car_bern@hotmail.com>, Jaime Becerra <jaimeb@remaxallstars.net>, Julietta Echeverria <vjulieta81@aol.com>, Alec Gerry <alecgerry@sbcglobal.net>, Jaime Hurtado <jchurtado@rcbos.org>, Debra Ladd <djvrah@sbcglobal.net>, Joe Villacorta <jv_homes2000@yahoo.com>, John and Gail Watson <jwatusa@yahoo.com>, Jennifer Heldoorn <mheldoorn@sbcglobal.net>, Dennis Reilich <dennis@drwoodworking.com>, Brenda Flowers <bflowers@riversideca.gov>, flebcattern <flebcattern@earthlink.net>, Jeannie Campbell <jmom2006@gmail.com>, Eileen Fry-Bowers <efrybowers@gmail.com>, Analia Schuh <anabrau@hotmail.com>, Andrew Tardie <blueschist@att.net>, Jonathan Hyams <jonathan.hyams@gettyimages.com>, Heather Hodges <fluteheather2002@aol.com>, Carlos Puma <photo@pumaimages.com>, Daniel Fell <dsofaraway@yahoo.com>, Cynthia Karimi <cgarcia2424@yahoo.com>, daniellheureux@rocketmail.com, Earl Straw <earlstraw@gmail.com>, Donald Britt <drvb38@earthlink.net>, David Pollitt <superdave2010@yahoo.com>, Elke Schuster <elkeschuster@hotmail.com>, Emily Symmes <walterthelizard@hotmail.com>, Historic Wood Streets <woodstreets@aol.com>, Cindy & Chris Jensen <chrisjen28@sbcglobal.net>, Cheryl Gerry <cherylgerry@sbcglobal.net>, breanne houston <breanne@strollerstrides.net>, Alica Kofford <alicakofford@hotmail.com>, Bonnie Thorne <bonniethorne@sbcglobal.net>, dcastillo487@gmail.com, Jerry and Regina Romiti <romitij@sbcglobal.net>, Amy Marie <edenvegan@yahoo.com>, jscottcoe@earthlink.net, Alec Gerry <alec.gerry@ucr.edu>, G Khalsa <gckhalsa@charter.net>, Everett and Edna Wright <rc4hire@gmail.com>, "Jorge A. Martinez" <jorge@pclandscapedesign.com>, Brian Fountain <brian.rsd894@gmail.com>, Frank and Sharvonne <maidenfair4u@aol.com>, Jeff and Karen Hamblin <mxwife@aol.com>, Eve Ferguson <dxtreker@aol.com>, Chris Renteria <tvrenter@sbcglobal.net>, Maureen Clemens <maureenclemens@att.net>
Subject: Please send an email to the Riverside Planning Department about the two proposed MEGA warehouses

Neighbors,

30-F cont

Please send an email to the City of Riverside Planning Department by Thursday evening describing the negative impacts on you and your family as a result of the current warehouses in the Sycamore Canyon Business Park, and describe why you expect these impacts to increase if the two new MEGA warehouses are built. You can use the following as a template for your email to the City. Replace the section in italics with your own words.

We need these letters to be sent to the City on Thursday of this week so that they are included in the community responses to the environmental impact report. This is your chance to let the City know about how the warehouses have impacted you and how these impacts have increased as new warehouses continue to be added to the Sycamore Canyon Business Park area.

City of
Riverside September
21, 2016
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Ms. Brenes,
I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042).

Include in this paragraph a few sentences regarding your personal experiences and direct negative impacts of noise nuisance, traffic issues, aesthetic concerns, or air quality for the ALREADY existing warehouses and then state why you believe these impacts will increase with the development of the two mega warehouses.

- *If you discuss noise, please state whether you already suffer nuisance from warehouse or truck noise and what conditions make the noise worse (time of night, wind direction, environmental conditions such as cloudy or humid nights). Also, if you know which warehouses are currently creating the noise that you hear, state this.*
- *If you discuss traffic, state your observations of truck traffic using freeway exits and entrances near Fair Isle Drive, and discuss any negative experiences you have had with trucks parking illegally, trucks traveling on residential streets, and trucks blocking traffic on Sycamore Canyon Ave.*
- *If you discuss aesthetics, describe your concerns about the height of the warehouse buildings relative to your home and point out that the Developer drawings appear to represent the view from one of the westernmost homes on Sutherland which would be least impacted by warehouse height rather than representing homes on the eastern side of Sutherland which will be most impacted aesthetically by the height difference between the home and the warehouse.*
- *If you discuss air quality, state why you or your family might be particularly at risk (young child, elderly, asthma or other breathing difficulty) and why the location of these buildings so close to residential homes is of great concern to you.*

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate mitigation strategies (including NO development) should be considered.

Sincerely,

3

30-F cont

Your Name Here

Sycamore Highlands Community Action Group
6012 Abernathy Dr.
Riverside, CA 92507
(951) 369-3510
http://www.facebook.com/sycamorehighlands

4

3

Response to Comment Letter 30 – Brian Fountain

Response to Comment 30-A:
The commenter's opinion regarding the CT Sycamore Center Project is noted. The CT Sycamore Center Project on Dan Kipper Drive was constructed with a fifty-foot setback from the northerly property lines, adjacent to the residential properties and the buildings range from 37-feet to 41-feet in height. These warehouse buildings referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 30-B:
Comment noted. See Response 30-A above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 30-C:
Comment noted. See Response 30-A above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR**.**

Response to Comment 30-D:
Comment noted. The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP) and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14.)

The Project does not propose to make Dan Kipper Drive a through-street. Truck traffic approaching the site will be routed from the south via Eastridge Avenue. Traffic exiting the site will only be able to turn left (south) onto Lance Drive due to traffic delineators (pork chops) in the driveway, thereby limiting the amount of traffic on Dan Kipper Drive.

The proposed Project and intended use is consistent with both the GP 2025 and permitted as a matter of right in the SCBPSP.

The Project site is designated as Industrial in the SCBPSP as described in the DEIR and discussed above. Although Project operation will result in significant and unavoidable long-term air quality and noise impacts, the City has the discretion to adopt a Statement of

Overriding Considerations pursuant to *State CEQA Guidelines* Section 15093, in order to move forward with the Project even though the Project will result in significant and unavoidable impacts (air and noise). This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 30-E:
Comment noted. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 30-F:
Comment noted. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 31 – Twenty-Nine Palms Band of Mission Indians

31

TWENTY-NINE PALMS BAND OF MISSION INDIANS
46-200 Harrison Place . Coachella, California . 92236 . Ph. 760.863.2444 . Fax: 760.863.2449

RECEIVED
[illegible] 3 2016
Community & Economic Development Department

September 29, 2016

Kyle Smith, Senior Planner
City of Riverside
Community & Economic Development Department
3900 Main Street
Riverside, CA 92522

Re: SYCAMORE CANYON BUSINESS PARK BUILDINGS 1 & 2 ENVIRONMENTAL IMPACT REPORT (EIR)

Dear Mr. Smith:

In regards to consultation in compliance with Senate Bill 18 (California Government Code § 65352.3, 65352.4, 65562, and 65560) for the Sycamore Canyon Business Park Buildings Project, the Tribal Historic Preservation Office (THPO), is not aware of any archaeological/cultural sites or properties that pertain to the Twenty-Nine Palms Band of Mission Indians. We currently have no interest in the project. If there are inadvertent discoveries of archaeological remains or resources, construction should stop immediately and the appropriate agency and tribe(s) should be notified. 31-A

Please do not hesitate to contact the THPO at (760) 775-3259 or by email: TNPConsultation@29palmsbomi-nsn.gov.

Sincerely,

Anthony Madrigal, Jr.
Tribal Historic Preservation Officer

cc: Darrell Mike, Twenty-Nine Palms Tribal Chairman
Sarah Bliss, Twenty-Nine Palms Tribal Cultural Specialist

Response to Comment Letter 31 – Twenty-Nine Band of Mission Indians

Response to Comment 31-A:

The City appreciates the Twenty-Nine Palms Band of Mission Indians' review of the Draft Environmental Impact Report (DEIR). As part of the tribal consultation process required under Senate Bill 18, the City attempted to contact the Twenty-Nine Palms Band of Mission Indians on December 11, 2015, and January 19, 2016. A final letter was sent by the City on February 23, 2016, seeking to consult with the Tribe regarding the proposed Project; however, no response was received from the Twenty-Nine Palms Band of Mission Indians.

Although the City's efforts to consult with the Twenty-Nine Palms Band of Mission Indians were unsuccessful, tribal consultation did occur with the Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians, and Soboba Band of Luiseño Indians. As a result of the consultation process, the following mitigation measures will be implemented to reduce impacts to tribal cultural resources to less than significant. (DEIR, p. 5.5-31 - 5.5-33.)

> **MM CR 1:** Prior to grading permit issuance: If there are any changes to project site design and/or proposed grades, the Applicant shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant and interested tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The Applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the project site if the site design and/or proposed grades should be revised in consult with the City. In specific circumstances where existing and/or new resources are determined to be unavoidable and/or unable to be preserved in place despite all feasible alternatives, the Applicant shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject to any future development, erosion or flooding.
>
> **MM CR 2:** Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.
>
> 1. The Project Archaeologist, in consultation with interested tribes, the Applicant and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include:
>
>   a. Project grading and development scheduling;

b. The development of a rotating or simultaneous schedule in coordination with the Applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists;

c. Plan for the controlled grading within 50 feet of the boundaries of CA-RIV-8750, CA-RIV-8751 and CA-RIV-8752. Grading within 50-feet of these sites shall be conducted using controlled grading techniques. Large indiscriminate grading equipment shall not be used, and the controlled grading technique shall be reviewed by the Project Archaeologist, in consultation with interested tribes, the Applicant and the City. The Project Archaeologist and Native Tribal Monitors shall ensure that the grading efforts in these areas are conducted in a manner that allows for the identification of subsurface cultural resources. Any resources observed shall be addressed in accordance with Mitigation Measure CR 3;

d. The determination by the Project Archaeologist, Applicant, City and Native American Tribal Monitors as to which features of sites CA-RIV-8750, CA-RIV-8751 and CA-RIV-8752 can be successfully relocated to locations onsite that will be mutually agreed upon. The relocated features will be placed in an area that will be preserved in perpetuity, so that no future disturbances will occur;

e. The protocols and stipulations that the Applicant, City, Tribes and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;

f. The 3D modeling on all the sites located within the Project site, specifically in Areas 1 (CA-RIV-8750), 2 (CA-RIV-8751), and 3 (CA-RIV-8752), as delineated on the Site Plan attached to the Archaeological Monitoring Plan shall take into account the potential impacts to undiscovered buried archaeological and cultural resources and procedures to protect in place and/or mitigate such impacts;

g. The location of the Cottonwood Tree requested by the Morongo Band of Mission Indians for their tribal requirements shall be noted on the Archaeological Monitoring Plan. The Monitoring Plan shall address the timing of the removal of the tree by the Morongo Band of Mission Indians and transfer of the tree to them; and

h. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure CR 4.

MM CR 3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and
2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
    a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
    b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
    c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and.
    d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the

impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes:

i. Information on the location of, up to, 13 protein residue tests on the site and one or more control sites, will be provided in the final report. (DEIR, pp. 5.5-34–5.5-35.)

MM CR 4: Cultural Sensitivity Training: The County Certified Archaeologist and Native American Monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report. (DEIR, pp. 5-33–5-36.)**.**

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 32 – Sycamore Highlands Action Group

32

SYCAMORE HIGHLANDS ACTION GROUP

Contact Information:
6012 Abernathy Drive
Riverside, CA 92507-8407
Tel: (951) 369-3510
email: www.sycamorehighlands.com

September 19, 2016

City of Riverside
Community Development Department Planning Division
3900 Main Street, 3rd Floor
Riverside, California 92522
Contact: Ms. Patricia Brenes, Principal Planner

32-A

The Sycamore Highlands Community Action Group and residents of the Sycamore Highlands Community have reviewed the draft EIR prepared by Albert WEBB Associates for the proposed Sycamore Canyon Business Park Buildings 1 and 2 (SCH NO. 2015081042). We find there are a number of errors in the methods utilized to acquire data, in the modeling performed to interpret data, and in the analysis of the data acquired. These errors are discussed below:

Noise Nuisance

1. Noise measurements were taken at only two locations at the northern edge of the proposed warehouse development adjacent to residential homes. Noise measurements should have additionally been taken behind the homes more to the south near the corner of Bannock Street and Cannich Road, as these homes are closest to existing industrial noise sources and currently have the highest levels of nuisance noise. Modeling noise based upon the two northernmost locations provides an artificially lowered assessment of existing noise.

32-B

2. Noise measurements were taken during only one 24-hour period at each of the two locations (on December 28th-29th and 29th-30th!) and are not likely to be representative of the expected highest noise level experienced by residents given that measurements were taken during the post-Christmas holiday week and only on one day at each location. The choice of sampling dates alone is grossly suspect [who selected these dates?] and noise measurement methods cannot be expected to hold up as "good sampling practice". Even with these limitations, noise at the two locations sampled exceeded outdoor noise limits allowed in residential areas during nighttime hours (45 dB).

1

a. Noise levels should be resampled with monitors placed at homes closest to existing noise sources (including behind the southernmost home on Cannich Road) for at least several workdays during a period when warehouses are expected to be more active. 32-C

3. Noise was determined to be at a CNEL of 60dBA or 52dBA at the two locations measured. This is averaged noise, but the nighttime noise actually exceeds daytime noise due to existing warehouse activities and the Lmax (maximum per period noise) is considerably greater. Nevertheless, even using the averaged noise, the 10dBA penalty for nighttime noise puts this project in the "normally unacceptable" category. Had noise been measured at the home closest to the existing warehouses, and if the noise was weighted to nighttime noise and for impulse noise associated with warehouse vehicle back-up alarms, then we expect noise would be clearly placed into the "normally unacceptable" category. 32-D

   a. The DEIR inappropriately focuses on acceptable noise levels for "industrial and manufacturing" areas, but at issue here is not the noise levels within the Sycamore Canyon Business Park, it is the noise that penetrates into the residential community. Thus noise resulting from this project (and the existing developments combined) must not exceed the nighttime noise limits at the nearby residential homes. 32-E

   b. The DEIR fails to include the 10dBA penalty for nighttime noise in a residential area when suggesting that the "normally acceptable" noise ranges up to 60dBA. With the penalty applied, the "normally acceptable" CNEL ranges only up to 50dBA which is exceeded at this site already without the new warehouses even being included! 32-F

4. Impulse noise was not determined or modeled. This was a primary concern raised by residents during the scoping meeting held by WEBB Associates, yet this concern appears to have been ignored with noise instead averaged over time diminishing the impact of the impulse noise resulting primarily from truck horns, vehicle back-up alarms, and off-loading of trucks. City ordinance restricts noise in residential areas at night to 45 dB but allows for impulse noise of up to 65dB. We expect that existing warehouse noise already exceeds this level of impulse noise, but this was not measured and reported in the DEIR. 32-G

   a. Impulse noise during nighttime hours should be determined over several nights to appropriately determine current impulse noise associated with warehousing activities already occurring at distances much greater from residential homes than the proposed mega warehouses would be.

5. Modeling of current noise levels into the nearby residential community is flawed. Environmental and meteorological effects are not considered. The DEIR states that conditions were typical at the site, but does not state what the environmental and meteorological conditions were. Thus it is impossible to accurately evaluate how these might impact noise models. Further, it is not the typical night that should be modeled, but the nights that are conducive to highest noise penetration of the residential neighborhood that should be modeled. For example, sound travels farther and noise level is attenuated more slowly under conditions of high humidity and inversion; noise should be modeled on the worst case scenario when these meteorological conditions exist. 32-H

a. The geology of the Sycamore Canyon Business Park and surrounding residential homes creates an amphitheater effect focusing sounds upward into the residential community as directed by the sloping ground. This effect does not appear to have been modeled though it was brought up as a concern of residents at the scoping meeting with WEBB Associates. 32-I

6. Noise mitigation measures suggested in the DEIR are unenforceable or place the burden of mitigation on residential homeowners rather than on the developer. No homeowner will accept a 10 ft tall wall or earthen berm to be placed on his property, removing any view he might have had simply to mitigate noise that he is not responsible for creating!! This is a ridiculous recommendation that would greatly negatively affect the value of any home where such a wall is constructed. In effect, the developer is "taking" the residential property for their own use. And forcing residents to agree to placement of a wall on their property within 60 days of the developer giving notice is simply unjust. 32-J

   a. Noise must be modeled in the residential community in the absence of the "mitigation" wall. What noise levels can be expected at these homes should they elect not to ruin their home and their views by constructing a wall in their backyard. 32-K

   b. Ambient-sensitive backup alarms are a useful mitigation measure for noise, but can only be enforced for vehicles own by the developer. Trucks visiting the site will not be equipped with these devices and future tenants of the building will not be required to comply with this mitigation measure. Thus, while well-meaning, this mitigation measure appears to be unenforceable. 32-L

   c. The restriction of nighttime use for some bays of building 2 is helpful but does not address use of the northwestern bays of building 1 which would similarly be expected to create noise nuisance for nearby residents during nighttime hours. Further, how will these restrictions be enforced when the developer sells the property to a new owner? Noise should be modeled at nearby residences with the assumption that these bays will be utilized during nighttime hours. And with the position of the two building resulting in reflection of sound waves toward homes to the west, these homes will receive more noise than is currently modeled. 32-M

7. Noise expect for the Sycamore Canyon Wilderness does not appear to be modeled at all, but presumably will be well above the noise threshold allowed for the Wilderness area which is restricted to the same noise threshold as residential areas. There appear to be no mitigation measures currently recommended to reduce the noise burden on the Wilderness Area west of building 1. 32-N

   a. The west side of building 1 should have NO truck bays, similar to the north side of building 2. This would reduce noise moving west and northwest considerably.

Traffic Circulation

1. The Sycamore Canyon Business Park Specific Plan indicates that truck traffic is to access the freeway system via Eastridge Ave. The City apparently continues to believe 32-O

that truck traffic follows this intended route to freeway access. However, as traffic continues to worsen (due in great part to increasing truck traffic as a result of overdevelopment of warehousing in the region!) particularly at the Moreno Valley Interchange [215/60 interchange]), trucks are increasingly abandoning the City circulation policies for the Sycamore Canyon Business Park and instead accessing the 60/215 freeway by driving north in Sycamore Canyon Blvd to access the freeway at Box Springs or even at Central Ave. 32-O cont

a. The draft EIR fails to account for the existing truck traffic on surrounding streets. It appears that no attempt was made to assess the true proportion of truck traffic already ignoring the intended traffic circulation routes. Truck traffic already greatly impacts residents who live in the nearby community and we are seeing increasing traffic on community streets as vehicles attempt to avoid truck-congested Sycamore Canyon Blvd. This will only increase with additional truck traffic to the proposed mega warehouses. 32-P

2. The DEIR identifies Sycamore Canyon Blvd as a 4 lane road, but this street has only a single lane on the northbound side between the Sycamore Canyon Business Park and Fair Isle Drive to the north. 32-Q

a. Trucks also regularly ignore signage on Sycamore Canyon and illegally park on the side of the road between the freeway exit and Fair Isle Drive – this is exceptionally dangerous as vehicles on Sycamore Canyon and those entering Sycamore Canyon from the freeway exit and driveways cannot see around trucks and are at great risk of accidents. These impacts are not modeled at all in the DEIR. 32-R

3. The published trip distribution maps show an appalling lack of experience with the actual traffic patterns in this area. Residents know that 75% of passenger cars and 95% of trucks do NOT move to/from the current warehouses from/to the south. Due to heavy traffic at the 60/215 Moreno Valley interchange, the majority of cars and trucks travel north on Sycamore Canyon Blvd to exit/enter the freeway system at Box Springs or even at Central Ave. 32-S

a. Actual circulation measurements should be required to evaluate the inaccuracy of the traffic models used in this DEIR. 32-T

b. Due to the heavy traffic at the Moreno Valley interchange, vehicle traffic on Sycamore Canyon Blvd is extremely heavy particularly during early morning and early evening hours, with traffic often essentially barely moving, thus leaving higher-polluting trucks from the warehouses to idle on streets nearby residential homes and apartments along with the rest of traffic. 32-U

i. No mitigation measures to improve traffic flow on Sycamore Canyon are provided. 32-V

ii. Vehicles should be prevented by physical structures from making a left turn onto Sycamore Canyon Blvd as they exit Sierra Ridge or Dan Kipper. Left turns from Dan Kipper are especially dangerous and cause traffic issues. 32-W

4

Air Quality

1. Mitigation measures for reducing air quality impacts that are proposed in the EIR are weak and generally unenforceable. 32-X
    a. Warehouse operators cannot limit access of older and more polluting trucks, and "informational efforts" such as posting signs and encouraging ride sharing are simply window dressing and not worth their space in the EIR.
        i. How are these measures enforced for future building tenants?
    b. Loading docks and parking stalls for both proposed buildings will be well within the range for significant impacts to adjacent residential homes due to vehicle exhaust, fuel spills, or other noxious releases from large trucks and other vehicles used in warehousing. 32-Y
2. Air quality for area residents is already poor (as indicated in Table 5.3-B,C of the DEIR). Placing these mega warehouses adjacent to sensitive receptors in residential homes can only make local air quality worse as trucks idle in the near vicinity of homes. 32-Z
    a. There is no effective mitigation offered for these impacts, particularly for a reduction in NOx to levels that will not result in significant adverse impacts.
    b. However, a possible mitigation that should be recommended is to reduce building size and number of truck bays, and to move truck bays to the eastern and southern side of these buildings to put them furthest from residential homes. 32-AA
    c. Increasing buffer distances between warehouse buildings and residential homes would also be an effective mitigation measure that was not provided in the DEIR. 32-BB
3. The proposed development is counter to the City of Riverside General Plan 2025 objective to "adopt land use policies that site polluting facilities away from sensitive receptors" and counter to the City of Riverside Good Neighbor Guidelines strategy 1b to "locate driveways, loading docks and internal circulation routes away from residential uses or sensitive receptors". 32-CC
    a. The Developers have adjusted building 2 in an attempt to comply with the City of Riverside Good Neighbor Guidelines strategy, but building 1 has numerous truck bays on the side of the building closest to several residential homes. 32-DD
    b. Mitigation measures were not offered in the DEIR to address these City of Riverside development objectives. 32-EE

Aesthetics and Acoustics

1. Building 2 is set at too high an elevation relative to all other industrial buildings in the Business Park, negatively affecting aesthetics particularly relative to the much lower residential homes to the northeast. Even with the increased setback of the proposed 32-FF

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ATTACHMENT 3

warehouse relative to the monstrously poorly planned CT Realty warehouse, residents will be looking out home windows at a monolithic building wall surface that will substantially degrade the aesthetics of the community. 32-FF cont.

a. Mitigation measures should include lowering the base (floor) of building 2 to reduce the visual impact of the building on residential homes to the north and the west. Also, current mitigation measures proposed to improve aesthetics of walls (articulation of walls) is insufficient to reduce the monolithic feel of the building particularly in comparison to the adjacent (and substantially dwarfed) residential homes to the north. 32-GG

b. Lowering the grade of building 2 will also help substantially to reduce noise nuisance issues and light pollution at nearby residential homes. 32-HH

2. The DEIR does not indicate which homes the "line of sight" analysis depicts. The photo simulations from location C-C are likely to be from the northwestern most homes on Sutherland Drive where homes are at much higher elevation and will be less impacted visually by building 2. 32-II

a. Photo simulations should be provided for houses at the eastern side of Sutherland Dr. near the intersection with Matheson Drive with views depicted from both ground level and second story level windows to provide a more accurate representation of what residents can expect to see when they look south. 32-JJ

3. The DEIR failed to address acoustical impacts of the building walls. Sound will reflect off the monolithic building walls as is already noted by residents for the nearby CT Realty warehouses, thus causing additional noise burden for residents. Articulation of building walls alone will not be sufficient to mitigate the aesthetic and acoustic impacts on adjacent residences. 32-KK

a. Acoustic mitigations should be proposed. Noise capture using plantings on walls (vertical vines), rough wall surfaces, or other sound absorbing strategies are some obvious mitigations that should have been offered. 32-LL

4. The degree to which buildings will be articulated is not specified in the DEIR, thus how can this mitigation measure be evaluated? With building expanses of 978 ft (building 2) and 1,394 ft (building 1), numerous articulations, coloring, and textures are needed to avoid a monolithic feel to the building. 32-MM

Sincerely,

Sycamore Highlands Community Action Group
Residents of Sycamore Highlands (Signatures recorded on attached sheets)

Attachments: Signature pages

6

ATTACHMENT 3

By my signature below, I indicate agreement with and support for the Sycamore Highlands Community Action Group letter of response to the draft EIR prepared by Albert WEBB Associates for the proposed Sycamore Canyon Business Park Buildings 1 and 2 (SCH NO. 2015081042).

Printed Name	Signature	Home Address
Suba Naamo		5880 Fair Isle Dr. Riverside, CA 92506
Lina Omary		5880 Fair Isle Dr. Riverside, CA 92507
Linda Scott		5563 Applecross Dr. Riverside, CA 92507
Mark Newhall		6040 Cannich Rd Riverside, CA 92507
Reno Barry		6031 Kendrick Dr. Riverside CA 92507
Nilo Olivan		6012 matheson Dr
Jesus GALVAN		1540 Moor Ct Riv
David Cocker		6023 Cannich Rd Riverside CA 92507
Manuel Encinas		5707 Applecross Dr. 92507
Casey Finfrock		5408 Kirkmichael Cir 92507

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Printed Name	Signature	Home Address
Alec Gerry		6017 Cannich Road 92507
Luciana Ciarciulli		1660 Stockport Dr. 92507
America Giordano		1660 Stockport Dr. 92507
Regina Romiti		6039 Cannich Rd Riverside CA 92507
Everett Wright		6018 Cannich RD 92507
Jeff Gobb		1438 Abernathy Dr 92507
RAMINDER SEHTIA		5880 Lochmoor Dr #61 RSCA 92507
Caitlin McDermott		6017 Cannich Rd 92507
Roberto PASSON		6071 BANNOCK DR 92507
Juan Silva		5970 Abernathy Dr. 92507

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Printed Name	Signature	Home Address
Melissa Mitchell		1378 Celtic Court Riverside, CA 92507
Michael Smith		1389 Celtic Court Riverside, CA 92507
Eric Wiesman		1368 Celtic Court Riverside CA 92507
DUANE WINCHELL		1377 CELTIC CT. RIVERSIDE, CA 92507
Andrew Madrigal		5880 Fairisle Dr Riverside Ca 92507
Kateri Madrigal		130 Alverstone st Hemet CA, 92543
IRIS Bruce		6002 Hyannoth PK Riverside CA 92507
Carolina Lara		5923 Matheson Dr. Riverside, CA 92507
JEFF WEBNER		6055 Speyside Dr Riv Ca 92507
RICK WADE		6058 Cannich Rd Riverside 92507

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Printed Name	Signature	Home Address
Yang Li		1459 Sutherland Dr.
Nancy Mellen		1427 Sutherland Dr.
Jessica Alfonso		1419 Sutherland
Nick Minkler		1387 Sutherland
Carol Finazzo		1367 Sutherland Dr.
Shelley Morris		1337 Sutherland Dr
Victor Morris		1337 Sutherland Dr.
Monica Ward		1317 Sutherland
Matt Reid		1338 Sutherland Dr.
Jonathan Cheung		1348 Sutherland Dr.

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Printed Name	Signature	Home Address
Lois Robinson	Lois Robinson	5644 Applecross Dr, Riverside 92507
CYNTHIA DANIEL	Cynthia Daniel	1491 Allendale Dr. Riverside 92507
RAJ DANIEL	Raj Daniel	1491 Allendale Dr. Riverside 92507
LISA Newhall	Lisa Newhall	6040 Cannich Rd. Riverside, CA 92507
Thomas Seylaz	Thomas Seylaz	1387 Celtic Ct. Riv. Ca. 92507
Kathy Seylaz	Kathy Seylaz	1387 Celtic Ct Riv. Ca. 92507
Heather Hodges	Heather Hodges	1441 Murdock Ct 92507
DENNIS HODGES	Dennis Hodges	1441 MURDOCK CT. RIVERSIDE, CA 92507
Kristina Peterson	Kristina Peterson	6041 Kendrick Dr Riverside, CA 92507
Nicholas Peterson	Nick Peterson	6041 Kendrick Dr Riverside CA 92507

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Printed Name	Signature	Home Address
MAUREEN CLEMENS	Maureen Clemens	6012 ABERNATHY DR. 92507
Jeannie Campbell	Jeannie Campbell	6023 Kohlberry Ct. 92507
Gabrielle Watson	Gabrielle Watson	6069 Cannich Rd 92507
LaTonya Alspaugh	LaTonya Alspaugh	1458 Stonehaven Ct 92507
Mark Alspaugh	Mark Alspaugh	1458 Stonehaven Ct 92507
Florin Salca	Salca	6041 Matheson Dr CA 92507
Thomas Jones	Thomas Jones	1302 Kirkmichael Circle CA 92507
Teresa Denham	Teresa Denham	1347 Sutherland Dr. 92507
John Denham	John Denham	1347 Sutherland Dr. 92507
Joe Campbell	Joe Campbell	6023 Kohlberry Ct. 92507

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Printed Name	Signature	Home Address
RITA V. BOYD	Rita V. Boyd	1418 Sutherland Dr. Riv 92507
Stephen Vorhees	Steph Vorhees	6040 Boswell ct. Riv. 92507
Jamie Coleman	Jamie Coleman	1434 sutherland Dr RIV. 92507
Luz Dillon	Luz Dillon	1444 Sutherland Dr Riv 92507
Matthew Dillon	Matthew Dillon	1444 Sutherland dr Riv 92507
Jalicza De La Herran	Jalicza De La Herran	1454 Sutherland Dr. Riv. CA 92507.
JOSE DELA HERRAN	Jose De La Herran	1454 Sutherland Dr Rive 92507
Janiece Chatman	Janiece Chatman	6062 Matheson Dr. Riverside, CA. 92507
BILL CHATMAN	Bill Chatman	6062 Matheson Dr. Riverside, CA. 92507
Amanda McClure	Amanda McClure	1465 Sutherland Drive 92507

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Printed Name	Signature	Home Address
THOMAS RUIZ		1358 SUTHERLAND DR
Jimmy Marks		1378 Sutherland DR
Christina Lee	Christina Lee	1378 Sutherland DR
Tommy Lee	Tommy Lee	1378 Sutherland DR
Leah Lee	Leah Lee	1378 Sutherland DR
Richard Shaust		1379 Sutherland Dr.
Kathleen Parker	K. Parker	1368 Sutherland Dr.

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Printed Name	Signature	Home Address
E. MICHAEL D'AGOSTINO		5726 ALLENDALE DR RIVERSIDE, CA 92507
Deborah McDonald	Deborah McDonald	1604 Stonegate Dr. Riverside, CA 92507
Noah Holzknecht		1481 Sutherland Drive Riverside, CA 92507

Response to Comment Letter 32 – Sycamore Highlands Action Group

Response to Comment 32-A:

Although noise measurements were only taken at two locations along the northern edge of the Project site, the ambient noise measurements were taken near sensitive receptors adjacent to the Project site as these are the most likely to be affected by project noise. The noise model, SoundPLAN, is a three-dimensional noise model that takes into consideration the acoustic effects of existing and proposed topography as well as existing and proposed buildings. So, any sound reflection associated with the topography and the proposed buildings was taken into consideration. It is also important to understand that existing ambient noise levels were taken to document existing ambient noise levels and were not taken as representative noise measurements to be utilized in the noise model. The SoundPLAN noise model has an expansive library with a variety of construction, industrial and recreational noise reference levels. Appropriate assumptions were entered for Project operations, including back-up beeper noise, trailer drop noise, HVAC noise etc. Meteorological effects were taken into account in the noise model. SoundPLAN allows the user to input temperature, humidity and air pressure. The following meteorological parameters, representative of the average weather in Riverside were entered: humidity 49%, average annual temperature 66°F, air pressure 985 mbar. Please see Response to Comment 32-H for a discussion regarding the effects of meteorological conditions on sound.

Please see Response to Comment 32-B for a discussion regarding the ambient noise measurements and how they were used in the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (DEIR Appendix I) and the Draft Environmental Impact Report (DEIR)

Noise events that occur within the line of sight of the homes on the ridge west of the Project site are expected to be more audible than those events that may be closer in distance but not within a direct line of sight.

Project-related noise impacts will be significant and unavoidable as disclosed in the DEIR. (DEIR, pp. 5.12-34, 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report (DEIR).

Response to Comment 32-B:

The comment expresses concern over the methodology of ambient noise measurements. Ambient noise measurements were taken during preparation of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (the NIA) to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that the change in the noise levels resulting from Project implementation would be overstated. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, Table 5.12-B.) These measurements consist of three 10-minute, short-

term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note, that in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Again, the purpose of the ambient noise measurements is to provide a basis for the comparison of noise with and without the Project; thus, longer term measurements are not necessary. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards. It is also important to understand that the ambient noise measurements were not input into the SoundPLAN model to determine the Project's construction and operational noise levels.

The DEIR discloses that the measured ambient noise exceeded the City's daytime and nighttime residential standards on pages 5.12-9–5.12-10, which state:

> For location LT1 (the northeast corner of the Project site), the results of the 24-hour ambient noise measurements (**Table 5.12-C**), indicate that daytime (7:00 a.m. to 10 p.m.) noise levels ranged between 42.4 dBA L_{eq} (at 3:00 p.m.) and 60.5 dBA L_{eq} (at 10:00 a.m.). The daytime residential standard of 55 dBA was exceeded at 8:00 a.m., 10:00 a.m., and 11:00 a.m. Nighttime (10:00 p.m. to 7:00 a.m.) noise levels measured at location LT1 ranged from 51.0 dBA to 58.1 dBA and exceeded the nighttime residential standard of 45 dBA for all hours. Based on the 24-hour ambient measurements taken at this location the CNEL is 60 dBA. It is important to note that there is an existing wooden fence along the residential property line at location LT1 and the noise meter was placed on the Project side of the property line; thus, the noise level on the residential side may be lower.
>
> For location LT2 (the northwest corner of the Project site), the results of the 24-hour ambient noise measurements (**Table 5.12-C**), indicate that daytime noise levels ranged between 38.8 dBA L_{eq} (at 1:00 p.m.) and 51.9 dBA L_{eq} (at 8:00 a.m. and 9:00 a.m.). Measured nighttime noise levels at location LT2 ranged from 39.8 dBA to 50.5 dBA. The nighttime residential standard of 45 dBA was exceeded at 10:00 p.m. and from 4:00 a.m. – 7:00 a.m. Based on the 24-hour ambient measurements taken at this location the CNEL is 52 dBA. There are no fences or barriers between the Project site and the residential lots to the west.

As described in the NIA and DEIR, measured noise sources included residential noise, dogs barking, and construction activity. Vehicular noise from the I-215 Freeway was audible but not dominant. Occasional aircraft noise, rustling of leaves, and bird song were also audible. (DEIR Appendix I, p. 9 and DEIR p., 5.12-5.) The ambient noise measured captured all of the expected sources of noise for the surrounding area.

Although these measurements were taken during the post-Christmas holiday week, many of the existing warehouses and distribution centers operate 24-7, and it is not anticipated that they would slow operations enough to significantly impact the noise, analysis. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-C:

Comment noted. Please see Response to Comment 32-B, above.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-D:

The Community Noise Level Equivalent (CNEL) is a weighted measure of the 24-hour noise environment. The CNEL is calculated based on the L_{eq}, which is the average noise over a one-hour period. A maximum noise level (L_{max}) is not a factor in calculating the CNEL.[1] 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 PM and 10:00 PM and a 10-decibel penalty on noise between 10:00 PM and 7:00 AM the next day. (DEIR, Figure 5.12-2.) The "penalties" for nighttime noise are part of the weighted average calculation used to determine CNEL. Thus, "the 10-dBA penalty for nighttime noise" referenced by the commenter was applied during development of the City's CNEL standard, and not (i) applied as a "penalty" on top of the measured noise levels or (ii) subtracted from the City's standard. Therefore, the calculated CNEL of 60 dBA or 52 dBA, which is based on the ambient noise measurements, at the two locations is within the "normally acceptable" range for single family residential property for the City. (DEIR, **Figure 5.12-2 – Noise/Land Use Compatibility Criteria**.)

As stated in Response to Comment 32-B, ambient noise measurements are used to document the existing conditions of the site in order to provide a basis against which Project-generated noise is compared. Even if the existing noise environment were to be placed into the "normally unacceptable" range, as the commenter suggests, this would simply mean that when Project-generated noise is compared to the ambient noise, the difference between the two noise levels would be less. Even so, Project-related noise impacts would be still significant and unavoidable as disclosed in the DEIR. (DEIR, pp. 5.12-24, 5.12-34, 5.12-44, 5.12-48, 6-19.) Nonetheless, the City has the authority to adopt a Statement of Overriding Considerations and move forward with the Project if findings can be made that the potential benefits of the Project outweigh the potential costs. (CEQA Guidelines, § 15093.) Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

[1] As a measurement of the 24-hour noise environment, CNEL represents the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. (DEIR **Figure 5.12-2 – Noise /Land Use Compatibility**.)

Response to Comment 32-E:

The DEIR does not inappropriately focus on the acceptable noise levels for industrial and manufacturing areas as suggested by the commenter. As stated on page 5.12-13 of the DEIR:

> **General Plan 2025 Noise Element**
> In compliance with California Government Code Section 65302, the GP 2025 Noise Element identifies noise and land use compatibility criteria that identifies "Normally Acceptable," "Conditionally Acceptable," "Normally Unacceptable," and "Conditionally Unacceptable" noise exposure ranges for various land uses as shown in **Figure 5.12-2 – Noise/Land Use Compatibility Criteria** (Figure N-10 of the GP 2025).
>
> These standards are primarily used for planning purposes such as determining a project's compatibility with a proposed site with regard to existing and future acoustical impacts upon a project site sourced from the surrounding environment. In other words, the noise impacts *from* existing surrounding land uses *to* a proposed project.

Because the proposed Project falls within the "Industrial, Manufacturing, Utilities, Agriculture" category on **Figure 5.12-2**, this is the appropriate compatibility criteria to use for evaluating impacts *to* the Project. (DEIR, p. 5.12-20.)

The analysis in the DEIR evaluates noise impacts *to* the Project and noise impacts *from* the Project. Impacts *from* the Project consist of construction noise and operational noise. (DEIR, p. 5.12-20.) The DEIR analyzes both construction and operational impacts from the Project on the sensitive receptors, the residences, to the north and northwest of the Project site. The DEIR appropriately concluded that noise impacts will be significant and unavoidable during Project construction because construction noise will exceed 55 dBA at the property lines of the residential units adjacent to the Project site. (DEIR, p. 5.12-24.)

The DEIR analyzed construction noise per the City's Noise Code standards that were in effect at the time of the Notice of Preparation for DEIR. On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City Council of the City of Riverside, amending the Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code. Under these new provisions, construction noise would be less than significant.

Operational impacts will be significant and unavoidable for two residences located northwest of the Project site without implementation of mitigation measure **MM NOI 16**, which recommends installation of a 10-foot noise barrier, subject to homeowner permission, to reduce noise levels to an acceptable level. However, as stated in the DEIR, installation of the noise barrier requires approval from the two property owners on whose land the proposed noise barrier will be installed and such approval to construct the barrier wall may not be provided by these property owners. Therefore, because neither the City nor the Project

Applicant has the authority to implement mitigation measure **MM NOI 16** (listed below); the Project's operational nighttime noise impacts will remain significant and unavoidable. (DEIR, pp. 5.12-26 – 5.12-28, 5.12-48.)

> **MM NOI 16:** Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block, stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.
>
> Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

Although the City's nighttime noise standards would be exceeded at two residences (assuming the noise barrier in **MM NOI 16** is not installed), pursuant to State CEQA Guidelines Section 15093, the City has the authority to adopt a Statement of Overriding Considerations to move forward with the Project if benefits of the Project outweigh the costs. (CEQA Guidelines, § 15093.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-F:

Please see Response to Comment 32-B. As discussed in that response, the 10-dBA adjustment for nighttime noise was used by the City in setting the CNEL standards. Thus, it is not appropriate to subtract 10 dBA from the City's Noise/Land Use Compatibility. Because the 10-dBA adjustment is a function of the CNEL calculation it is not appropriate to add it to individual measured noise levels. The commenter's assertion that the DEIR fails to account for the 10-dBA penalty for nighttime noise is not true. The CNEL values reported on DEIR pages

5.12-95.12-10 and in the column titled "Measured Noise Level (CNEL) in dBA in DEIR **Table 5.12-J – Pre-and Post-Project**, were calculated by inputting the hourly monitored ambient noise level in L_{eq} reported in **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity** into the "Ldn, Lden, CNEL Community Noise Calculators" (available at https://www.noisemeters.com/apps/ldn-calculator.asp.) The "Ldn, Lden, CNEL Community Noise Calculators" uses an algorithm that incorporates the 5-decibel penalty on noise between 7:00 PM and 10:00 PM and a 10-decibel penalty on noise between 10:00 PM and 7:00 AM. Thus, the CNEL is accurately reported in the DEIR and the existing ambient noise is within the City's normally acceptable single family residential CNEL. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-G:

Existing impulse noise is reported in **Table 5.12-C** in the L_{max} column under the column titled "Monitored Ambient Noise Level (dBA). (DEIR, pp. 5.12-8.) As discussed in Response to Comment 32-B, the purpose of ambient noise measurements is to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that the change in the noise levels resulting from Project implementation would be overstated. Thus, additional or extended ambient noise monitoring is not necessary.

It is assumed that the comment "…with noise instead averaged over time…" is referring reporting noise impacts as L_{eq}. L_{eq} is used in the NIA and DEIR because that is the basis of the City's daytime and nighttime noise standards. Noise impacts projected onto adjacent properties from the Project are regulated by Sections 7.25.010 and 7.35.010 of the Riverside Municipal Code. Section 7.25.010 and 7.35.010 of the Riverside Municipal code provide general regulations with regard to noise that is produced and projected onto surrounding land uses. **Table 5.12-E – Riverside Municipal Code Exterior Nuisance Sound Level Limits** from the DEIR, reproduced below, clearly defines the City's noise level limits for applicable land uses in the Project vicinity. (DEIR, pp. 5.12-15–5.12-16.)

Table 5.12-E – Riverside Municipal Code Exterior Nuisance Sound Level Limits[a]

Land Use Category	Time Period	Noise Level Limit
Residential	Night (10 p.m. to 7 a.m.)	45 dBA
	Day (7 a.m. to 10 p.m.)	55 dBA
Office/Commercial	Any Time	65 dBA

Land Use Category	Time Period	Noise Level Limit
Industrial	Any Time	70 dBA
Public Recreation Facility	Any Time	65 dBA

Notes:
[a] Source: City of Riverside, Riverside Municipal Code, Title 7 Noise Control, Table 7.25.010A

Section 7.25.010 of the City's Municipal Code also provides criteria that apply to any exceedance of the limits and outlines parameters by which a noise exceedance would be evaluated. (DEIR, p. 5.12-16.)

The Project's operational noise levels shown on DEIR **Figure 5.12-5 – Project Operational Noise Levels (Leq) No Mitigation** and **Figure 5.12-6 – Project Operational Noise Levels (Leq) with Mitigation** includes all noise associated with Project operations including: vehicles arriving, trucks and trailers moving around the Project site, back-up beepers, hitching and unhitching of trailers, and the movement of trailers into the loading docks averaged over a one hour period. During any given one hour period, there will be a maximum noise level (L_{max}). The L_{max}, generally results from an impulsive noise event, which is why the City's Municipal Code places time limits for noise events exceeding the exterior noise standard as discussed below.

Section 7.25.010 of the Riverside Municipal Code outlines exterior and interior nuisance sound level limits and provides criteria that apply to any exceedance of the codified noise nuisance limits (DEIR, **Table 5.12-E – Riverside Municipal Code Exterior Noise Sound Level Limits** and **Table 5.12-F – Riverside Municipal Code Interior Noise Sound Level Limits**). These criteria are primarily used for the purposes of code enforcement, but are provided below to outline the parameters by which a noise exceedance would be evaluated. (DEIR, p. 5.12-15–5.12-16.) The applicable exterior noise criteria state:

A. Unless a variance has been granted as provided in this chapter, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:

   1. The exterior noise standard of the applicable land use category, up to 5 decibels, for a cumulative period of more than 30 minutes in any hour; or
   2. The exterior noise standard of the applicable land use category, plus 5 decibels, for a cumulative period of more than 15 minutes in any hour; or
   3. The exterior noise standard of the applicable land use category, plus 10 decibels, for a cumulative period of more than 5 minutes in any hour; or
   4. The exterior noise standard of the applicable land use category, plus 15 decibels, for the cumulative period of more than 1 minute in any hour; or

5. The exterior noise standard for the applicable land use category, plus 20 decibels or the maximum measured ambient noise level, for any period of time.

B. If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each category, as appropriate, to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

C. If possible, the ambient noise level shall be measured at the same location along the property line with the alleged offending noise source inoperative. If for any reason the alleged offending noise source cannot be shut down, then the ambient noise must be estimated by performing a measurement in the same general area of the source but at a sufficient distance that the offending noise is inaudible. If the measurement location is on the boundary between two different districts, the noise shall be the arithmetic mean of the two districts. (DEIR, pp. 5.12-16–5.12-17.)

The noise levels disclosed on page 5.12-31 of the DEIR for back-up beepers and trash compactors are the maximum noise, the L_{max}, not the L_{eq}, because refrigeration units, back-up warning beepers, and trash compactors would not be in use continuously at the Project site, noises associated with these activities would be subject to the short-term decibel exceedance limits outlined in Section 7.25.010 of the City's Municipal Code. For instance, if a trash compactor were to operate for one-half hour within any hour, noise associated with operation could be up to 5 decibels greater than the City's exterior noise standard without being in violation of the City's Noise Code.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-H:

Regarding meteorological conditions, precipitation, rain, snow, or fog, has an insignificant effect on sound levels although the presence of precipitation will affect humidity and may also affect wind and temperature gradients. (Sound Propagation.[2]) As sound travels through the atmosphere, it is affected by temperature, humidity, and wind currents, which can change the speed and direction of sound. Just as light bends when traveling through a prism, sound bends as a result of the varying atmospheric properties. Sound waves tend to bend toward cooler temperatures and away from warmer temperatures. For example, on a typical summer afternoon, because air temperatures generally decrease with altitude, sound generated at ground level would bend upward towards the cooler air. For a person at the same level as the

[2] Sound Propagation website. (Available at https://www.sfu.ca/sonic-studio/handbook/Sound_Propagation.html, accessed November 27, 2016.)

sound, the sound waves are bending up and over the person listening, creating what is known as a shadow zone. When this occurs, a noise source may be visible at a distance but be perceived as quieter than expected. When the air temperature is cooler close to the ground than it is at higher altitudes, such as late at night or over calm lakes or icy surfaces, the sound waves bend closer to the ground and if the ground is reflective, the sound bounces off the ground and may propagate (travel) further than expected. (Cowan,[3] pp. 11, 19-21.) Because the effects of temperature gradients are more important over long distances (Caltrans TeNS[4]), these gradients would not substantially change the results of the NIA.

Generally speaking, wind currents allow sound to travel further than expected when the sound is being emitted in the same direction as the wind (downwind) and sound will travel a shorter distance than expected when the sound is being emitted in the direction against the wind (upwind). (Cowan, p. 21.)

The NIA used SoundPLAN to model the Project's construction and operational noise. SoundPLAN allows the user to input humidity and temperature into the model. For purposes of the NIA, modeled temperature was 66 degrees Fahrenheit (66° F) and 49 percent humidity. According to Weather Underground, the average temperature for the City of Riverside is 69° F and average humidity is 49.7 percent. Between November 2015 and November 2016, the highest temperature in Riverside was 114° F and the lowest temperature was 33° F. To evaluate the effects of changes in temperature and humidity referenced in the commenter's comment, four new modeling runs were prepared assuming: (i) temperature at 33° F and 0% humidity, (ii) temperature at 33° F and 100% humidity, (iii) temperature at 114° F and 0% humidity, and (iv) temperature at 114° F and 100% humidity. The results of this analysis, which does not change or materially impact the conclusions set forth in the NIA and DEIR, is summarized in the table below.

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
1 first floor	43	42	43	41	41
1 second floor	45	44	45	43	44
2 first floor	30	30	30	30	30
2 second floor	32	32	32	32	32
3 first floor	45	45	45	44	44
3 second floor	49	48	49	48	48
4 first floor	48	47	48	47	47
4 second floor	52	51	52	51	51
5 first floor	49	49	49	49	49
5 second floor	50	49	50	49	49

[3] Cowan refers to the *Handbook of Environmental Acoustics*, published by John Riley & Sons, Inc., 1994.

[4] Caltrans TeNS refers to the Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. (Available at http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed November 27, 2016.)

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
6 first floor	43	43	43	43	43
6 second floor	44	43	44	43	43
7 first floor	38	38	38	38	38
7 second floor	39	39	39	39	39
8 first floor	33	33	33	33	33
8 second floor	35	35	35	35	35
9 first floor	35	35	35	34	35
9 second floor	37	37	37	36	36
10 first floor	39	38	39	37	38
10 second floor	41	40	41	39	40
11 first floor	33	33	33	33	33
11 second floor	35	35	35	35	35
12 first floor	31	31	32	31	32
12 second floor	34	34	34	34	34
13 first floor	30	30	30	30	30
13 second floor	32	32	32	32	32
14 first floor	31	31	31	31	31
14 second floor	33	33	33	33	33
15 first floor	32	31	32	32	32
15 second floor	34	34	34	34	34
16 first floor	31	31	31	31	31
16 second floor	34	33	34	34	34
17	30	30	30	30	30
18 first floor	44	43	44	43	43
18 second floor	45	44	45	44	44
19 first floor	43	43	43	42	42
19 second floor	43	43	43	43	43
20 first floor	31	31	31	31	31
20 second floor	37	37	37	37	37
21 first floor	34	34	34	34	34
21 second floor	39	39	39	38	38
22	36	36	36	36	36
23 first floor	36	36	36	35	36
23 second floor	37	37	38	37	37
24 first floor	33	32	33	32	32
24 second floor	35	34	35	34	34
25 first floor	31	30	31	30	31
25 second floor	34	34	34	34	34
26 first floor	29	29	29	29	29
26 second floor	32	32	32	32	32
27 first floor	32	32	32	32	32

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity	Noise Level at 33° F and 100% humidity	Noise Level at 114° F and 0% humidity	Noise Level at 114° F and 100% humidity
27 second floor	34	33	33	33	33
28 first floor	31	31	31	31	31
28 second floor	34	34	34	34	34
29 first floor	30	30	30	30	30
29 second floor	33	33	33	33	33
30 first floor	31	31	31	31	32
30 second floor	35	35	35	34	35
31	48	48	48	48	48
32	47	47	47	47	47
33	38	38	38	37	37
34	55	54	54	54	54

The amplification of the effects of meteorological conditions on sound does not constitute significant new information that would require recirculation of the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-I:

Because of comments raised at the Scoping meeting, in order to account for the topographical differences between the Project site and the location of sensitive receptors, the SoundPLAN Noise Model[5] was used to model Project construction and operational noise. Existing and proposed elevation lines, points on the Project site and adjacent residential uses, and existing and proposed structures were uploaded into the model in order to take into account the effects of topography. (DEIR, pp. 5.12-22, 5.12-24.) To account for the topographical differences between adjacent residences and the Project site a total of 30 sensitive receptor locations were input into SoundPLAN in addition to locations representing the western property line, which is at a lower elevation than the residences west of the Project site. As shown on DEIR **Figure 5.12-5** through **Figure 5.12-8** and NIA Figure 7a through Figure 11b, SoundPLAN modeled and reported expected noise levels for a variety of Project-generated operations for all of the sensitive receptors adjacent to the Project site.

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-J:

Assuming noisiest conditions, noise levels at the first floor and second floor of all the receptors to the north and northwest of the Project site are below the City's daytime exterior noise standard of 55 dBA (see DEIR **Figure 5.12-5**). Without any restriction on nighttime use, as

[5]The SoundPLAN Noise Model was used for this analysis as this model can consider differences in topography between a noise source and a receptor.

required by mitigation measure **MM NOI 15** (see below), Project-generated operational nighttime noise will exceed the City's nighttime exterior noise standard of 45 dBA at three residences: receptor locations 3, 4, and 5 as shown on DEIR **Figures 5.12-5 and 5.12-6**. With implementation of mitigation measure **MM NOI 15**, Project-generated operational noise will exceed the City's nighttime exterior noise standard at the second floor of two residences to the northwest of the Project site (shown as receptor nos. 3 and 4 on DEIR **Figures 5.12-5 and 5.12-6**). Thus, additional mitigation is required to reduce Project-generated operational noise at these locations. Implementation of mitigation measure **MM NOI 16** (see Response to Comment 32-E, above), which entails the installation of a noise barrier at the top of the slope of these receptor locations, would reduce operational noise levels to below the City's nighttime standard of 45 dBA (see DEIR **Figure 5.12-6**). However, as stated in the DEIR, installation of the noise barrier requires approval from the two property owners on whose land the proposed noise barrier will be installed and such approval to construct the barrier wall may not be provided by these property owners. Therefore, because neither the City nor the Project Applicant has the authority to implement mitigation measure **MM NOI 16**, the Project's operational nighttime noise impacts will remain significant and unavoidable. (DEIR, pp. 5.12-26 – 5.12-28, 5.12-48.)

> **MM NOI 15:** A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**. (DEIR, p. 5.12-46.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-K:

Because the implementation of mitigation measure **MM NOI 16** is uncertain, post-Project CNEL was determined for receptor nos. 3 and 4 as shown in the table below. The mitigated operational noise levels for receptor nos. 3 and 4 with mitigation measure **MM NOI 15** (listed below) only (i.e., no noise barrier as required by **MM NOI 16**) is shown in the column titled "Mitigated Operation Noise Level with **MM NOI 15** only."

Monitored Location	Measured Noise Level (CNEL) In dBA	Receptor No.	Mitigated Operational Noise Level (with MM NOI 15 only) (CNEL) In dBA	Difference In dBA	Substantial Increase?	Mitigated Operational Noise Level (includes MM NOI 15 and MM NOI 16) (CNEL) In dBA	Difference In dBA	Substantial Increase?
ST2/LT2	52	4 (1st floor)	52	0	No	46	-6	No
		4 (2nd floor)	54	2	No	51	-1	No

Monitored Location	Measured Noise Level (CNEL) In dBA	Receptor No.	Mitigated Operational Noise Level (with MM NOI 15 only) (CNEL) In dBA	Difference In dBA	Substantial Increase?	Mitigated Operational Noise Level (includes MM NOI 15 and MM NOI 16) (CNEL) In dBA	Difference In dBA	Substantial Increase?
		3 (1st floor)	51	-1	No	46	-6	No
		3 (2nd floor)	54	2	No	50	-2	No

As shown in the above table, noise impacts at receptor locations without the proposed 10-foot will be greater than 45 dBA L_{eq} at these affected sensitive receptors.

This amplification of the noise analysis to exclude implementation of mitigation measure **MM NOI 16** on two receptors does not constitute significant new information that would require recirculation of the DEIR. (CEQA Guidelines, § 15088.5.) Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-L:

Mitigation measure **MM NOI 13** (listed below) will reduce noise impacts resulting from the use of back-up beepers on the Project site.

> **MM NOI 13:** To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient-sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.
>
> If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

Pursuant to State CEQA Guidelines Section 15097, a Mitigation Monitoring Reporting Program (MMRP) will be prepared for the Project and adopted by the City. The MMRP is a written

monitoring and reporting program that will be used by the City to verify implementation of adopted mitigation measures. The MMRP identifies the timing for each mitigation measure, i.e. when the measure will be implemented, the responsible monitoring party or parties, and the monitoring/reporting method that will be use to ensure implementation of the mitigation measures identified in the DEIR. All of the Project's mitigation measures are fully enforceable as required by CEQA. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-M:

Noise impacts at the Project site were modeled assuming 24-7 operations and no restrictions and the results are shown on DEIR Figure 5.12-5 –Operational Noise Levels (Leq) No Mitigation. Because 24-7 operations would result in operational noise in excess of the City's nighttime noise standard, noise impacts at the Project site were modeled assuming 24-7 operations, with the exception of the 10:00 PM to 7:00 AM restriction for a portion of the loading area and trailer parking located just south of Building 2. Therefore, with implementation of mitigation measure **MM NOI 15** (listed under Response to Comment 32-J), impacts associated with operation of Building 1 and operation of Building 2 would meet the City's noise standard for all adjacent residences except for two residences (receptor locations 3 and 4.) The Project's operational noise impacts to the residences at receptor locations 3 and 4 will be mitigated to the City's nighttime standard with installation of the 10-foot tall noise barrier for per mitigation measure **MM NOI 16** (listed under Response to Comment 32-E).

With regard to the reflection of sound between Building 1 and Building 2, as discussed in Response to Comment 32-I, existing and proposed elevation lines, points on the Project site and adjacent residential uses, and existing and proposed structures were uploaded into the SoundPLAN model. Thus, the NIA and DEIR have considered not only the effects of topography on noise but also the effects of the Project's Building 1 and Building 2.

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-N:

Both construction and operational noise impacts from the Project on the Sycamore Canyon Wilderness Park were analyzed in the DEIR. Project-related noise impacts will have a significant impact on the Park during Project construction, even with implementation of mitigation measures. (DEIR, p. 5.12-24.) Nonetheless, the City may adopt a Statement of Overriding Considerations if Project benefits outweigh the cost of the significant and unavoidable impacts. (CEQA Guidelines, § 15093.)

Operational noise will have a less than significant impact on the Sycamore Canyon Wilderness Park because the noise level will still be below the Municipal Code noise standard for public recreational facilities. (DEIR, p. 5.12-26.) Because operational noise impacts to the Park will be less than significant, it is unnecessary for the west side of Building 1 to have no truck bays to reduce noise impacts to the Park. Thus, the DEIR adequately analyzed Project noise impacts

to the Sycamore Canyon Wilderness Park, and this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-O:

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the TIA, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the TIA scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Thus, it is reasonable to expect that outbound cars and trucks will use the Eastridge-Eucalyptus interchange.

With regard to the existing condition of trucks using Fair Isle Drive for any reason other than to turn onto Sycamore Canyon Road, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations restrictions are in place may call 311 and will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

With regard to the existing traffic flow of the area, as discussed in Response to Comment 28-V, traffic counts by vehicle type were taken and disclosed in Appendix C of the TIA. (DEIR Appendix J.)

The DEIR fully discloses that traffic impacts will be significant and unavoidable until Caltrans funds and constructs the necessary freeway improvements. The identification of new conditions of approval does not constitute significant new information that would require recirculation of the DEIR. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-P:

As part of the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA), which is, DEIR Appendix J, traffic counts by vehicle type (i.e., passenger car, 2 axle truck, 3 axle truck, and 4+ axle trucks) were conducted for Fair Drive-Box Springs Road from Sycamore Canyon Boulevard to the I-215 Northbound Ramps, Sycamore Canyon Boulevard, from Fair Isle Drive to Eastride Avenue, and Eastride Avenue from Sycamore Canyon Boulevard to Box Springs Boulevard. (**DEIR Figure 5.16-1 – Study Area**.) The results of these counts for are included in Appendix C of the TIA. The table below presents the existing condition for the portion of Sycamore Canyon Boulevard within the study area of the TIA and the trips generated by the proposed Project.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

As noted in the response to Comment 32-0, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations restrictions are in place may call 311 and will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

This comment does not any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-Q:

Sycamore Canyon Boulevard is generally a 4-lane divided road and individual intersections are analyzed based on the individual geometrics of each intersection. This means that the TIA

takes into account traffic impacts as a result of areas where there is only one lane, such as northbound Dan Kipper Drive and the approximately 1,300-foot-long single segment along Sycamore Canyon Boulevard between Dan Kipper Drive and Lochmoor Drive. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-R:

Although trucks visiting existing warehouses and distribution centers in the Sycamore Canyon Business Park may illegally park on the side of the road between the freeway exit and Fair Isle Drive, this is not germane to the proposed Project because operations at the Project site will be independent of these other operators.

Per Riverside Municipal Code Section 10.52.155(a), it is unlawful to park commercial vehicles (with a gross vehicle weight of 10,000 pounds or more) and all commercial trailers or semi-trailers on any public street, highway, road or alley within the City except in specific locations designated by the City Traffic Engineer and identified by signs indicating commercial vehicle parking is allowed. There are only five streets in the City were commercial vehicle, commercial trailers, and semi-trailers may be parked: Atlanta Avenue, Box Springs Boulevard, Marlborough Avenue, Northgate Street, and Palmyrita Avenue; Box Springs Boulevard is within the Sycamore Canyon Business Park. Parking on Sycamore Canyon Boulevard, Lance Drive, and Sierra Ridge Drive is not permitted. (DEIR, p. 5.16-49.) Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight that are illegally parked may call 311 and will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-S:

Comment noted. Please see Response to Comment 32-O. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-T:

Comment noted. Please see Response to Comment 32-P. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-U:

Comment noted. Please see Response to Comment 32-O. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-V:

Comment noted. Please see Response to Comment 32-U. All study area intersections along Sycamore Canyon Boulevard, with the exception of the Sycamore Canyon Boulevard/Dan

Kipper Drive intersection, will operate at an acceptable level of service when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects. With regard to the Sycamore Canyon Boulevard/Dan Kipper Drive intersection, this intersection is expected to operate at LOS F as a result of traffic from cumulative development projects. When Project traffic is added to the existing traffic, traffic from ambient growth and cumulative development project traffic, the delay at this intersection will increase by 0.9 seconds. Because this delay is increased by less than one second, this impact is considered not significant. (DEIR, p. 5.16-52.)

Therefore, no mitigation measures are required to improve traffic flow on Sycamore Canyon Boulevard. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-W:

Comment noted. Please see Response to Comment 32-O. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-X:

The mitigation measures referenced by the commenter will not result in quantifiable reductions in greenhouse gas emissions; however, by sharing information on best management practices, these mitigation measures will contribute incrementally to emissions reductions and air quality improvements. The DEIR utilized a conservative approach by not claiming credit for any potential reductions from these non-quantifiable mitigation measures.

Additionally, a Mitigation Monitoring or Reporting Program (MMRP) will be prepared for the Project and adopted by the City, as required by State CEQA Guidelines Section 15097. The purpose of the MMRP is to ensure that all mitigation measures contained in the DEIR, including mitigation measures related to air quality, are implemented. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-Y:

The proposed Project does not involve refueling operations at the Project site; therefore, the likelihood that residences could be impacted from a fuel spill is highly unlikely.

Although the Project site includes several design features and mitigation measures aimed at reducing air quality impacts, NO_x emissions will have a significant and unavoidable impact to the adjacent residences during Project operation, as disclosed in the DEIR. (DEIR, p. 5.3-40.) However, the City has the authority to adopt a Statement of Overriding Conditions if there is evidence that the benefits of the Project may outweigh the significant and unavoidable impacts. (CEQA Guidelines, § 15093.) Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-Z:

Long-term operational emissions are anticipated to exceed the South Coast Air Quality Management District (SCAQMD) regional significance threshold for NO_X, even after implementation of mitigation; therefore, long-term operational impacts are considered significant and unavoidable. (DEIR, p. 5.3-40.) Although there is no realistic, effective mitigation that would reduce NOx to levels that would not result in significant adverse impacts, the City has the authority to adopt a Statement of Overriding Considerations to move forward with the Project, if there is evidence that the benefits of the Project may outweigh the significant and unavoidable impacts. (CEQA Guidelines, § 15093.) Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-AA:

Alternative 3 – Reduced Density Alternative, which would scale down building floor area by 30 percent of that proposed in the original 1.43 million square foot project, was one of the alternatives to the proposed Project considered in the DEIR. However, this alternative would meet the Project objectives to a lesser degree and due to the scarcity of sites of this size, the attendant land costs of sites of this size, and the low Inland Empire market lease rates for products of this type, the rate of return from the lease would be too low to justify the cost and risk of investment under the reduced density alternative. Further, this alternative would also result in significant and unavoidable impacts to air quality, noise, and transportation/traffic. (DEIR, p. 8-26 – 8-30.)

Thus, because a reduction in the number of truck bays and building size was considered in the DEIR as Alternative 3 and rejected as infeasible, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-BB:

The Project will not result in significant localized air quality impacts based on the South Coast Air Quality Management District's Localized Significance Thresholds and the Refined Health Risk Assessment analysis prepared for the Project. (DEIR, p. 5.3-40.) The Project will result in significant and unavoidable regional air quality impacts related to NO_x; however, an increased buffer between the sensitive receptors and the buildings at the Project site would not change the significance of this regional impact.

The Project as originally submitted and presented at the August 26, 2015, scoping meeting for the DEIR, proposed two buildings totaling 1.43 million square feet (SF) with the northern building (Building 2) setback 60 feet from the northerly property line. (DEIR, **Figure 8-1 – Original Project.**) As discussed on page 8-3 of the DEIR, during preparation of the DEIR, the Project applicant received feedback from the community and the City encouraging additional setback and landscaping along the northern portion of the Project site and a reduction in the size of the Building 2. As a result, the proposed Project was revised by the Project Applicant so that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site. The Project as proposed has 64 feet of landscaping, a 30-foot wide drive aisle

(vehicles only, no trucks) and an additional 6-foot wide landscape area between Building 2 and the northern property line of the Project site. (DEIR, p. 3-35, **DEIR Figure 3-10 – Proposed Site Plan**, **DEIR Figure 3-11 – Conceptual Landscape Plan**.)

It is not feasible to increase the buffer distances between Buildings 1 and 2 and the residents without reducing the size of the buildings; however, the reduced density alternative was rejected as infeasible (see Response to Comment 32-AA). Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-CC:

The commenter is referring to Air Quality objective AQ-1 and its associated policies. The proposed Project is consistent with this objective as stated in Appendix M. (DEIR, Appendix M.) The Project is consistent with the existing land use designations for the site in both the City's General Plan 2025 and the Sycamore Canyon Business Park Specific Plan. The Project site has several features to minimize impacts to the residences, including: loading dock doors and internal circulation routes located away from the residences, and right-only egress onto Dan Kipper Drive from all Project driveways to direct truck and passenger car traffic away from the residential areas adjacent to the north and northwest of the Project site. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-DD:

The City adopted *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72.) Although Building 1 has several truck bays on the side of the building closest to the residences, it is important to note that the residences are not directly adjacent to these dock doors. Overall, the site has been designed to minimize impacts to the residents and sensitive receptors in the Project vicinity in accordance with the *Good Neighbor Guidelines*.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-EE:

The Project is consistent with the policies contained in the City's General Plan 2025 and the *Good Neighbor Guidelines*; therefore, no mitigation is required to address these City development objectives. (DEIR, p. 5.3-16; Appendix M, pp. M-66–M-72.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-FF:

Building 1 is proposed to be 41-feet high from a pad elevation that ranges from 1,561-feet at the south end of the building to 1,568-feet at the north end of the building (above Mean Sea Level (MSL)). Building 2 is proposed to be 37-feet high from a pad elevation that ranges from 1,594-feet at the northwest corner to an elevation of 1,590-feet at the northeast corner (above MSL). With regard to the commenter's request to lower the pads, there is a consistent elevation change of roughly 50 feet from the north end (the higher end) of the Project site to the south end (the lower end). To lower the pads, a large amount of soil would have to be exported to level the site. Due to the existing granite material that lays a few feet beneath the existing terrain, a major blasting operation would be needed to remove the granite material to place the buildings at a lower elevation. This would necessitate a greater number of truck trips during construction to haul the exported soil off site in addition to creating noise and vibration impacts associated with the blasting operation. Blasting is prohibited by mitigation measure **MM NOI 12.** (DEIR, p. 5.12-46.)

> **MM NOI 12:** No blasting shall take place on the Project site.

The buildings have been designed to incorporate design features, such as building articulation, to minimize the long expanses of views of the building. With incorporation of design features and mitigation measures, aesthetic impacts of the Project will be less than significant. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-GG:

Regarding the commenter's suggestion to further lower Building 2, please see Response to Comment 32-FF.

Additionally, articulation of walls will substantially reduce the monolithic feel of the buildings from the residences. In particular, mitigation measure **MM AES 9** requires that the west elevation of Building 1 and the north elevation of Building 2 include some of the same elements used on the front elevation to offset the long expanse of wall surface. These design features will be reviewed and approved by City Design Review staff prior to Grading Permit issuance.

> **MM AES 9:** To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> **a.** The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.

b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow.

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-HH:

Comment noted. Please see Responses to Comment 32-FF and 32-GG. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-II:

Cross sectional line of sight exhibits were prepared for four locations to represent the view from four representative residential locations adjacent to the Project site. (DEIR, **Figures 3-10 – Proposed Site Plan and 3-13a – Line of Sight Exhibit,** Sections A-A (6050 Cannich Road), B-B (1443 Sutherland Drive), C-C (1465 Sutherland Drive), and D-D (6071 Kendrick Drive).) As discussed in the DEIR and shown on DEIR **Figure 3-13a**, Section A-A is the line of sight of the northwestern portion of the Project site from the vicinity of 6050 Cannich Road, which is west of the Project site. All of the residences along Cannich Road are at a higher elevation than the Project site. (DEIR, pp. 5.1-14–5.1-15.)

Sections B-B, C-C, and D-D, as shown on DEIR **Figure 3-13a – Line of Sight Exhibit**, are from residences to the north. As discussed in the DEIR and shown on **Figure 3-13a**, the rear yards of these residences are either below or at grade with the Project site in the post-Project condition (i.e., after grading). Cross sections were prepared at locations in proximity to the following residences:

- A-A: 6050 Cannich Road
- B-B: 1443 Sutherland Drive
- C-C: 1465 Sutherland Drive
- D-D: 6071 Kendrick Drive

Section B-B as shown on DEIR **Figure 3-13a** ,is from the vicinity of 1443 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section B-B depicts the line of sight from a residences and rear yards that are at approximately the same finished grade as the Project site. (DEIR, pp. 5.1-15–5.1-16.) Section C-C as shown on DEIR **Figure 3-13a**, is from1465 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section C-C depicts the line of sight from residences and rear yards that are slightly below the Project site's finished grade. (DEIR, pp. 5.1-15–5.1-16.) Section D-D, as shown on DEIR **Figure 3-13a** is from the vicinity of 6071 Kendrick Drive (where Stockport Drive turns north). As discussed in

the DEIR and shown on **Figure 3-13a**, the residence and flat portion of the rear yard in Section D-D are located downslope from the finished grade at the Project site and proposed buildings.

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-JJ:

The topography of the site at Cross Section C-C (1465 Sutherland Drive) and the houses at the eastern side of Sutherland Drive near the intersection with Matheson Drive is similar; thus, Cross Section C-C can be used as an approximation of the views from homes referenced by the commenter in Comment 32-JJ. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-KK:

Comment noted. Acoustical modeling prepared to quantify Project-related impacts to the nearby residences accounts for the buildings and the operation of the buildings onsite. Nonetheless, noise impacts will be significant and unavoidable because installation of the noise barrier wall proposed in mitigation measure **MM NOI 16** (listed in Response to Comment 32-E) requires permission from private landowners and cannot be forced by the City or the Project Applicant. (DEIR, pp. 5.12-28, 5.12-34, 5.12-48.)

Pursuant to mitigation measures **MM AES 9** and **MM AES 11**, articulation of building walls will be approved by the City Design Review staff to ensure that aesthetic impacts of development of the Project site will be less than significant.

> **MM AES 9**: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.
>
> b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow. (DEIR, p. 5.1-35.)
>
> **MM AES 11:** In order to avoid the appearance of a flat wall, as part of the Design Review process prior to the issuance of a grading permit, revised plans showing the incorporation of design features such as articulation and the use of color on the 14-

feet-tall wall proposed along the east side of the truck parking and loading docks east of Building 1 shall be submitted for review and approval by Design Review staff. (DEIR, p. 5.1-35.)

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-LL:

With mitigation currently identified in the DEIR as well as construction of the noise barrier described in mitigation measure **MM NOI 16**, (listed in Response to Comment 32-E) noise impacts as a result of the Project would be within the City's daytime and nighttime standards. Without the noise barrier proposed in **MM NOI 16**, the City's daytime standards would be met at all receptor locations modeled in *the Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (the NIA). Project-generated noise would be within the City's nighttime standards at all receptor locations except for receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) (as shown on DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation.** The noise barrier wall proposed in **MM NOI 16** can only be installed on these residents' private property with the residents' permission; neither the Project Applicant nor the City can require actual installation of **MM NOI 16**. Therefore, impacts will remain significant and unavoidable. (DEIR, pp. 5.12-28, 5.12-34, 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 32-MM:

The Project has been subject to the City's Design Review process under this DEIR. The Project incorporates a variety of features, including but not limited to articulation, coloring, and textures, to avoid a monolithic feel to the building, pursuant to mitigation measures **MM AES 9** and **MM AES 11.** Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 33 – Scott Morgan, State Clearinghouse

33

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

RECEIVED
SEP 28 2016
Community & Economic Development Department

September 26, 2016

Patricia Brenes
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

Subject: Sycamore Canyon Business Park Buildings 1 and 2
SCH#: 2015081042

Dear Patricia Brenes:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 23, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 33-A

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Response to Comment Letter 33 – Scott Morgan, State Clearinghouse

Response to Comment 33-A:

This comment is a response from the State Clearinghouse stating that the agency has forwarded the Draft Environmental Impact Report (DEIR) to state agencies for review. This comment also notes the review period ended on September 23, 2016, and that no state agencies had commented. The comment notes that the Project complies with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Based on a number of requests to extend the review period, the public comment period for the Project was extended from September 23, 2016, to October 7, 2016.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.