EXHIBIT "A"

Exhibit "A"

CEQA Findings of Fact and Statement of Overriding Considerations for the Sycamore Canyon Business Park Buildings 1 and 2 Project

1.0 PROJECT BACKGROUND

The Sycamore Canyon Business Park Buildings 1 and 2 Project (hereinafter referred to as the "Project") was proposed by the City of Riverside ("City") for development of approximately 1.4 million square feet of logistics use and office space within two buildings. (DEIR, p. 3-26.) The Project site is located approximately 0.4 miles west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive and north and west of Lance Drive in the City of Riverside, California along with its associated street and utility improvements. The Project site is within the City's Sycamore Canyon Business Park Specific Plan (SCBPSP). (DEIR, p. 3-26.)

Implementation of the proposed Project would also require the approval of the following land use cases by the City of Riverside City Council:

1. General Plan Amendment (P16-0101) to amend the Circulation Element of the General Plan to: (i) delete the north/south street known as River Ridge (60-foot Local) that traverses the site; (ii) delete the no name east/west street (that has been known as Kangaroo Court) that traverses the Project site, southerly of River Ridge (60-foot Local); and (iii) amend the Circulation Element to reflect these changes by showing Dan Kipper Drive ending at Lance Drive.

2. Specific Plan Amendment (P16-0101) to amend the Circulation Plan of the SCBPSP to: (i) delete the portion of Dan Kipper Drive (proposed 74-foot Collector) that traverses the Project site; (ii) delete the north/south street known as River Ridge (60-foot Local) that traverses the site; (iii) delete the no name east/west street (that has been known as Kangaroo Court) that traverses the site, southerly of River Ridge (60-foot Local); (iv) delete the portion of Sierra Ridge Drive (74-foot Collector) that traverses the site; and (iv) amend the Circulation Plan to reflect these changes by showing Dan Kipper Drive ending at Lance Drive.

3. Tentative Parcel Map No. 36879 to combine the 17 existing parcels into two parcels and three lettered lots.

4. Minor Conditional Use Permit (P14-1082) to allow for warehouses greater than 400,000 square feet pursuant to City of Riverside Municipal Code, Title 19, Zoning Code, Chapter 19.150, Base Zones Permitted Land Uses.

5. Grading Exceptions (P16-0103) to implement the proposed Project's grading plan the following exceptions will be required:
    a. To permit a five-foot bench, approximately 550-feet long at the western property line boundary and a 2:1 and 3:1 slope between 20-feet and 35-feet in height, with a ten-foot wide bench between the 2:1 and 3:1 slopes approximately 1,550-feet long along the westerly property line adjacent to Sycamore Canyon Wilderness Park;
    b. To permit a 3-1 slope between 20-feet and 34-feet in height and approximately 220-feet long adjacent to the proposed on-site park trail along the southerly property boundary; and
    c. To permit a 2:1 slope between 20-feet and 24-feet in height and approximately 250-feet long adjacent to the proposed driveway at the knuckle of Lance Drive and Dan Kipper Drive.

6. Variance (P16-0103) to permit Parcel 1.Building 1 to provide 446 stalls where 1.043 stalls are required and to permit Parcel 2/Building 2 to provide 143 stalls where 393 stalls are required.

7. Design Review (P14-1081): of the project plans to review the proposed building elevations, site design, conceptual landscape plans, lighting plans, parking plans, open space areas, and pedestrians areas for harmonious relationships with existing and proposed adjoining developments, avoiding monotonous repetition, but allowing, when feasible, for similarity of style or originality of design. (DEIR, pp. 3-17 – 3-23.)

Pursuant to the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) ("CEQA"), specifically Public Resources Code section 21067, and the State CEQA Guidelines (Cal. Code Regs., § 15000 et seq.), specifically State CEQA Guidelines section 15367; the City is the lead agency for the Project. Pursuant to CEQA and the State CEQA Guidelines, the City determined that an EIR should be prepared in order to analyze all potential adverse environmental impacts of the Project and reasonable alternatives to the Project.

The City issued the initial Notice of Preparation ("NOP") of a Draft EIR for the Project on August 18, 2015 and circulated the NOP for a 30-day public review period, ending September 16, 2015. In the NOP, the City solicited comments from various public agencies, other entities, and members of the public. A neighborhood meeting was held on August 26, 2015 at 6465 Sycamore Canyon Boulevard, Riverside CA to solicit comments from members of the public and other interested parties.

The City then prepared a Draft Environmental Impact Report ("DEIR") and on August 10, 2016 initiated a 45-day public review and comment period on the DEIR (April 10, 2016 through September 23, 2016), and released the DEIR to the public. At the request of the community, the public review period was extended an additional 14 days until October 7, 2016.

The DEIR considered three alternative project scenarios:

- Alternative 1, No Project/No Build: describes the circumstance under which the proposed Project does not proceed and the site is left in its existing condition;

- Alternative 2, No Project/Specific Plan Build: projects what would reasonably be expected to occur in the foreseeable future if the proposed Project was not approved; and,

- Alternative 3, Reduced Density Alternative: describes scaled down development of the site by reducing the building floor area by 30 percent of that proposed in the original 1.43 million square foot project.

The Draft EIR was available for review at the City of Riverside Planning Division, located at 3900 Main Street, Riverside, California 92522, as well as the Downtown Main Library and the Orange Terrace Branch Library, in addition to being posted on the City's website at http://www.riversideca.gov/planning/eir.asp. Written comments that were received both during and after the public review period were from a variety of public agencies, organizations, and individuals. The Final EIR contains copies of the comments and provides responses to those comments.

During the public review and comment period, the City received 37 comment letters. In addition, the City received 19 comment letters following the close of the public comment period.

Following the close of public review and comment, the City prepared a Final EIR ("FEIR"), consisting of the comments received, written responses to those comments, and revisions to the DEIR. Although not required by CEQA, the City included the late public comment letters, and responses to those comment letters, in the FEIR.

On February 14, 2017, the City Council held a public hearing to consider the FEIR associated with the Project.

2.0 INCORPORATED DOCUMENTS/RECORDS OF PROCEEDINGS

The following information is incorporated by reference and made part of the record supporting these findings:

- All Project plans and materials including supportive technical reports for the Project;
- The Draft EIR and appendices and Final EIR and all documents relied upon or incorporated by reference;
- All documents and materials making up the City Planning Commission staff report for this project heard on December 15, 2016.
- The mitigation monitoring and reporting program prepared for the Project;
- City of Riverside General Plan 2025;
- Final Environmental Impact Report (FEIR) for the City of Riverside General Plan 2025 (State Clearinghouse Number 2004021108; certified by the City in November 2007) (General Plan 2025 Final EIR);
- Findings and Statement of Overriding Considerations (SOCs) for the General Plan 2025 Final EIR;
- Addendum to the General Plan 2025 FEIR;
- Second Addendum to the General Plan 2025 FEIR;
- Third Addendum to the General Plan 2025 FEIR;
- Fourth Addendum to the General Plan 2025 FEIR;
- Fifth Addendum to the General Plan 2025 FEIR;
- Title 19 of the Riverside Municipal Code;
- Title 18 of the Riverside Municipal Code;
- Title 20 of the Riverside Municipal Code;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits letter, synopses of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in the these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (c).

Pursuant to CEQA Guidelines Section 15091(e) the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the

Planning Division of the Community & Economic Development Department. The City Clerk is the custodian of records for all matters before the City Council.

3.0 INDEPENDENT JUDGEMENT FINDING

The City selected and retained Albert A. Webb Associates (WEBB) to prepare the EIR. WEBB prepared the EIR under the supervision and direction of the City's planning staff.

Finding: The EIR for the Project reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in the preparation of the EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

4.0 ENVIRONMENTAL IMPACT FINDINGS

The following findings of fact are based on information contained within the DEIR and FEIR, which have been deemed adequate and consistent with CEQA, and include information received during the public review process. This section provides a summary of the significant environmental effects of the Project that are discussed in the EIR, and provides written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

City staff reports, the EIR, written and oral testimony at public meetings or hearings, these facts and findings and other information in the administrative record, serve as the basis for the City's environmental determination. These findings are supported by substantial evidence in the record of proceedings before the City as summarized below. Further explanation of these environmental findings and conclusions can be found in the DEIR and FEIR and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the FEIR's determinations regarding mitigation measures and the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City ratifies, adopts and incorporates in these findings the determinations and conclusions of the Draft EIR and FEIR relating to environmental impacts and mitigation measures except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

These findings are for the Project as defined in the DEIR. As evaluated in the DEIR, the Project includes construction and operation of two buildings (Building 1 and Building 2) within the Sycamore Canyon Business Park including on- and off-site improvements. These buildings are proposed to operate as a distribution center and will encompass up to 1.4 million square feet, collectively. Alternatives 1, 2, and 3 are considered alternatives that were considered in the DEIR and FEIR, and rejected by the City Council as set forth in Section 5.0, below, of these Findings.

On February 14, 2017, the City Council determined that, based on all of the evidence presented, including but not limited to the DEIR and FEIR (together, "the EIR"), written and oral testimony given at hearings and meetings, and submission of testimony from the public, organizations, and public agencies, the following environmental impacts of the Project are: (1) less than significant and do not require mitigation; (2) potentially significant but will be avoided or reduced to a level of insignificance through the identified Mitigation Measures; or (3) significant and unavoidable and cannot be mitigated to a level of less than significant.

4.1 Findings Regarding Less Than Significant Impacts Not Requiring Mitigation

Consistent with Public Resources Code section 21001.2 and section 15128 of the State CEQA Guidelines, the EIR focused its analysis on potentially significant impacts and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental effects. State

CEQA Guidelines section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or as a "less than significant impact." Nevertheless, the City Council hereby finds that the Project would have either no impact or a less than significant impact to the following resource areas:

A. AESTHETICS

1. Scenic Resources

Threshold: Would the project have a substantial adverse effect on a scenic vista?

Finding: Less than significant impact. (DEIR, pp. 5.1-10 – 5.1-12.)

Explanation: The Project site itself does not constitute a scenic vista because the Project site is currently vacant and surrounded by large-scale warehousing and light industrial uses to the east and south, the Sycamore Canyon Wilderness Park to the west, and single-family residential uses to the north and northwest, and so views of the Project site are generally obstructed by development. (DEIR, p. 5.1-11.)

The Project does not entail any improvements or grading within the Sycamore Canyon Wilderness Park and will not result in any changes to the visual character of the park. Additionally, because the Project is located west of existing industrial development and south of the majority of the residences adjacent to the Project site, as well as the height of the Box Springs Mountains, views of the Box Springs Mountains will not be obstructed as a result of Project construction. (DEIR, p. 5.1-11.)

Further, the proposed Project is within an area designated and zoned for industrial uses and the proposed structures will be contiguous with views of the existing large-scale warehouse and light industrial development to the east and south of the Project site. Therefore, as the Project's proposed structures will not substantially impact the scenic vistas created of the Sycamore Canyon Wilderness Park or Box Springs Mountains and as the proposed Project does not represent a significant change in the viewshed from what currently exists in the area, impacts will be less than significant. (DEIR, p. 5.1-11.)

Threshold: Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: Less than significant impact. (DEIR p. 5.1-12)

Explanation: There are no designated or eligible state scenic highways in the City, thus, no impacts will occur in this regard. Additionally the Project site is vacant, except for a concrete V-ditch and earthen check dam, and so no impacts to historical buildings will occur. The Project site contains rounded bedrock outcrops in scattered areas throughout the site, these are not considered a scenic resource as they occur in comparatively low concentrations, are not as prominent as the outcrops within the Sycamore Canyon Wilderness Park, and do not provide a unique focal point visible by the general public. Likewise, the trees located along the drainage area at the Project site are not considered a significant scenic resource because they are typical of riparian vegetation and not unique to the area. Therefore, impacts will be less than significant without mitigation. (DEIR, p. 5.1-12.)

B. AGRICULTURAL AND FORESTRY RESOURCES

1. Farmland Conversion

Threshold: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No Impact. (DEIR, p. 5.2-7.)

Explanation: The Project would not convert any Prime, Unique, or Farmland of Statewide Importance because there are no such designated lands within the Project site or its immediate vicinity. While implementation of the proposed Project would result in conversion of approximately 68 acres of Farmland of Local Importance to a non-agricultural use, it should be noted that from a CEQA perspective, impacts to designated Farmland of Local Importance are not considered significant and do not require mitigation. (DEIR, p. 5.2-7.)

Threshold: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Finding: No impact. (DEIR, pp. 5.2-9.)

Explanation: The site is generally surrounded by urban and built-up land, and "other land." Further, implementation of the proposed Project is consistent with the Sycamore Canyon Business Park Specific Plan and will not involve other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or forest land to a non-forest use. (DEIR, p. 5.2-8.)

2. Agricultural Zoning

Threshold: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No impact. (DEIR, p. 5.2-8.)

Explanation: There are no existing agricultural uses on or in the vicinity of the Project site. The Project site is zoned BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones, which is one of four industrial land use zones in the City's Zoning Ordinance. The Project site and surrounding properties are not under any Williamson Act contracts and are not zoned for agricultural use, thus, there would be no impact. (DEIR, p. 5.2-8.)

3. Forestland Zoning and Loss of Forest Land

Threshold: Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

Finding: No impact. (DEIR, p. 5.2-8.)

Explanation: The Project site is zoned BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. Because the Project site and surrounding areas are not zoned as forest land, timberland, or Timberland Production lands, Project implementation will not conflict with such zoning. (DEIR, p. 5.2-8.)

Threshold: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact. (DEIR, p. 5.2-8.)

Explanation: There are no existing or designated forest lands on or near the Project site; thus, implementation of the proposed Project will not result in loss or conversion of forest land. No impact to zoning of forest land or loss of forest land will occur as a result of Project implementation. (DEIR, p. 5.2-8.)

C. AIR QUALITY

1. Applicable Air Quality Plans

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Finding: Less than significant impact. (DEIR, p. 5.3-22 – 5.3-23.)

Explanation: The Project is located within the South Coast Air Basin ("the Basin") and air quality is regulated by the South Coast Air Quality Management District (SCAQMD), through implementation of the Basin's Air Quality Management Plan (AQMP). Control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed. (DEIR, p. 5.3-22.)

The Project is consistent with both the existing land use designation for the site in the City's GP 2025 and SCBPSP. Although the Project does propose both a General Plan Amendment and a Specific Plan Amendment, these modifications to each respective plan would remove planned roadways from within the Project site and would not alter the Project's consistency with the AQMP because the land use evaluated in the AQMP is unchanged and the land use does not generate population growth. Therefore, the Project will not conflict with or obstruct implementation of the applicable air quality plan and impacts are less than significant. (DEIR, p. 5.3-23.)

2. Sensitive Receptors

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant impact. (DEIR, p. 5.3-31 – 5.3-34, Appendix B, FEIR Attachment A.1, FEIR Attachment A.2.)

Explanation: The SCAQMD Localized Significance Threshold (LST) analysis was conducted to determine if emissions associated with the Project could result in significant localized air quality impacts to sensitive receptors in the immediate Project vicinity. The closest sensitive receptors to the Project site are the residences located adjacent to the northwest and northern area of the Project site. Based on this analysis, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors within the Project vicinity for any criteria pollutants. Likewise, the CO hot spot analysis contained in the DEIR determined that Project operation will not create a CO hotspot. (DEIR, pp. 5.3-31 – 5.3-34.)

Since the Project involves construction of a logistics center approximately 30 meters from the property line of the nearest sensitive receptor, a Screening Health Risk Assessment (HRA) was prepared for the Project in June 2016 (included as Appendix B to the DEIR) and a Refined HRA per SCAQMD comments was prepared in November 2016 (included as Attachment A.1 of the FEIR.) to estimate the cancer and non-cancer health risks to the surrounding community. Subsequently, on December 23, 2016, SCAQMD prepared a letter requesting updated modeling (hereinafter referred to as the "New Modeling"). The New Modeling was prepared following the SCAQMD guidance and the results documented in a January 9, 2017 letter responding to the December 23, 2016 SCAQMD letter (included as Attachment A.2 to the FEIR). The results of the June Screening HRA, the November Refined HRA, and the New Modeling demonstrate that none of the cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the proposed Project vicinity. On January 18, 2017, the City received correspondence from the SCAQMD that it had no further comment on the Refined HRA, including the New Modeling. Therefore, the Project will not result in exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation and impacts are considered less than significant. (DEIR, p. 5.3-34; FEIR, Attachment A.1; FEIR, Attachment A.2.)

3. Odors

Threshold: Would the project create objectionable odors affecting a substantial number of people?

Finding: Less than significant impact. (DEIR, p. 5.3-34 – 5.3-35.)

Explanation: The proposed Project does not contain land uses typically associated with emitting objectionable odors and is therefore not anticipated to create any objectionable odors during Project operation. Additionally, truck idling times will be limited to a maximum of five minutes at the Project site as required by the California airborne toxics control measure Title 13, Section 2485 of CCR. Potential odor sources associated with implementation of the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. Recognizing the short-term duration and quantity of construction emissions in the Project area and the limited outdoor exposure of persons to outdoor odors, the Project will not expose substantial numbers of people to objectionable odors. (DEIR, p. 5.3-35.)

D. BIOLOGICAL RESOURCES

1. Wetlands

Threshold: Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: No impact. (DEIR, pp. 5.4-21 – 5.4-22.)

Explanation: A jurisdictional delineation was prepared by Amec Foster Wheeler Environment and Infrastructure, Inc. (AMEC) for the Project site to determine the extent and location of jurisdictional features, including waters of the U.S. regulated by USACE pursuant to Section 404 of the Clean Water Act (CWA). Although the Project site contains three jurisdictional features, two ephemeral drainages, and a small isolated ponded area; none of these features are defined as "wetlands" per Section 404. Therefore, because no wetlands as defined by Section 404 of the CWA occur on-site, no impacts will occur. (DEIR, p. 5.4-22.)

2. Wildlife Movement

Threshold: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?

Finding: Less than significant impact. (DEIR, p. 5.4-22.)

Explanation: The Project site is not located within a Criteria Cell of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Because the Project site was not contemplated for conservation by the MSHCP, it is not intended to serve as a link between the Sycamore Canyon Wilderness Park and the Box Springs Mountains. Further, AMEC did not identify any significant wildlife movement, corridor areas, or native nursery sites at the proposed Project site during the biological resources assessment conducted at the site. Therefore, impacts are considered less than significant and no mitigation is required. (DEIR, p. 5.4-22.)

3. Local Policies or Ordinances

Threshold: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant impact. (DEIR, pp. 5.4-22 – 5.4-23.)

Explanation: The Project site is adjacent to the Sycamore Canyon Wilderness Park, which is a designated Core Reserve Area for the SKR-HCP and within the boundary of the MSHCP. As the City is a permittee to the MSHCP, the Project is required to be compliant with all MSHCP policies. Additionally, development of the Project site is subject to the edge treatment and other provisions of the *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan.* MSHCP Core Linkage D, Sycamore Canyon Wilderness Park, is located directly west of the proposed Project site; however, the Project has been designed to minimize impacts to this linkage through incorporation of a Mitigation Area along the western boundary of the Project site. The Project site is within an Additional Survey Area for burrowing owl, and appropriate surveys have been conducted. (DEIR, p. 5.4-23.)

The City has also adopted an *Urban Forestry Policy Manual* to establish guidelines for planting, pruning, preservation, and removal of all trees in City rights-of-ways; however, the Project does not propose the removal of any existing trees within public rights-of-way. Therefore, with regard to conflicts with local ordinances to protect biological resources, impacts will be less than significant. (DEIR, p. 5.4-23.)

E. CULTURAL/PALEONTOLOGICAL RESOURCES

1. Historical Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines § 15064.5?

Finding: No impact. (DEIR, p. 5.5-24.)

Explanation: A review of the National Register of Historic Places (NRHP), Archaeological Determination of Eligibility (ADOE), Historic Property Data File (HPD), and databases of the California Historic Landmarks and California Points of Historical Interest indicates no historic properties or landmarks have been recorded or listed within, or immediately adjacent to, the Project area. Therefore, because there are no significant historical resources at the Project site, implementation of the proposed Project will not result in a substantial adverse change in the significance of a historical resource and no impact will occur. (DEIR, p. 5.5-24.)

2. Paleontological Resources

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant impact. (DEIR, pp. 5.5-29 – 5.5-30.)

Explanation: Paleontological sensitivity of a project site is determined based in part on an assessment of the characteristics of the geologic units underlying a project site. The tonalite of the Val Verde Pluton that the Project is located upon is determined to have no paleontological resource potential because plutonic igneous rocks do not contain fossils due to the high heat of formation. Accordingly, further paleontological resource management is not recommended because the proposed Project development will not extend off site into the sensitive Pleistocene-age alluvial deposits approximately 250 feet southeast of the Project site. Therefore, impacts will be less than significant. (DEIR, p. 5.5-30.)

3. Human Remains

Threshold: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Finding: Less than significant impact. (DEIR, p. 5.5-31.)

Explanation: Surveys, investigations, and studies conducted on the Project site and within the Project area have not identified prehistoric (or historic) human remains. In the event of discovery of human remains, the

Project shall comply with the City's standard condition related to notification of the County Coroner and Native American Heritage Commission in accordance with California Public Resources Code 5097.98. Therefore, through compliance with this standard condition of approval, impacts with respect to disturbing human remains will be less than significant. (DEIR, p. 5.5-31.)

F. GEOLOGY AND SOILS

1. Geology-Related Hazards

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; and/or (iv) landslides?

Finding: Less than significant impact. (DEIR Section 5.6 Geology and Soils, pp. 5.2-11, 5.6-12, 5.2-13.)

Explanation: The Project site does not lie within or adjacent to an Alquist-Priolo Earthquake Fault Zone and no evidence for active faulting on the site was observed during the geologic field reconnaissance or the aerial photographs review; therefore, potential hazards associated with fault rupture are considered less than significant. Nevertheless, because the Project is located within the seismically active region of Southern California, it may be subject to ground-shaking events. Thus, the Project will be designed to resist seismic impacts in accordance with the applicable Municipal Code Title 16 – Buildings and Construction standards. (DEIR Section 5.6 Geology and Soils, p. 5.2-11.)

The Project site does not contain steep slopes in excess of 30 percent, which would be areas of high susceptibility to landslides. The proposed grading exceptions associated with the Project would allow for steeper slopes; however, these slopes will be engineered to be consistent with all applicable building codes. Building code compliance will ensure that potential impacts related to seismic-related hazards such as rupture of an earthquake fault, strong seismic ground shaking, seismic-induced ground failure, and landslides are less than significant. (DEIR Section 5.6 Geology and Soils, pp. 5.6-12, 5.2-13.)

2. Soils

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant impact. (DEIR Section 5.6 Geology and Soils, p. 5.2-13.)

Explanation: Construction activities such as grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through the required implementation of a Storm Water Pollution Prevention Plan (SWPPP) in compliance with the National Pollutant Discharge Elimination System (NPDES) program as well as the incorporation of best management practices (BMPs) intended to reduce soil erosion. Additionally, a drainage network of storm drains and gutters will be provided throughout the Project site to convey water appropriately and to avoid on-site ponding outside any detention basins. Therefore, with implementation of measures outlined in the SWPPP as well as the Project's design considerations, potential impacts from erosion during Project construction and operation will be less than significant. (DEIR Section 5.6 Geology and Soils, p. 5.2-13.)

Threshold: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Finding: Less than significant impact. (DEIR Section 5.6 Geology and Soils, pp. 5.2-13, 5.6-14.)

Explanation: The Project site is not susceptible to liquefaction or landslides and is not located within an area with soils identified as having a high shrink-swell potential. This was confirmed during the site

geotechnical investigation conducted by CHJ Consultants at the Project site, where testing of on-site soils determined that soils have a "very low" expansion potential and are underlain by granitic bedrock. For this reason, the potential for lateral spreading at the site is also considered low. Thus, the Project site is not considered to be susceptible to lateral spreading or located on a site or unit that is unstable. Even so, the Project will incorporate the Project-specific geotechnical recommendations provided by CHJ Consultants and will conform to the adopted building code; potential impacts associated with seismically induced landslides will be less than significant. (DEIR Section 5.6 Geology and Soils, pp. 5.2-13, 5.6-14.)

Threshold: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Finding: Less than significant impact. (DEIR, p. 5.6-14.)

Explanation: The Project's geological investigation included testing on-site soils and determined that the soils have a "very low" expansion potential and are underlain by granitic bedrock. Even so, the Project will incorporate the Project-specific geotechnical recommendations provided by CHJ Consultants and will conform to the adopted building code; thus, impacts will be less than significant.

Threshold: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Finding: No impact. (DEIR, p. 5.6-14.)

Explanation: The Project will be served by existing sewer infrastructure at the Sycamore Canyon Business Park; therefore, septic tanks or alternative waste disposal systems are not proposed and no impact will occur.

G. HAZARDS AND HAZARDOUS MATERIALS

1. Transport

Threshold: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Finding: Less than significant impact. (DEIR, pp. 5.8-17 – 5.8-19.)

Explanation: Project construction may involve the limited transport of fuels, lubricants, and various other liquids for operation of construction equipment. The exact tenants of the logistics buildings are unknown at this time, so there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products such as paint products, solvents, and cleaning products may be stored and transported in conjunction with the proposed logistics center use. These hazardous materials would only be stored and transported to and from the site. Manufacturing and other chemical processing will not be permitted under the provisions of the Specific Plan. (DEIR, p. 5.8-17.)

Although the overall quantity of hazardous materials and waste generated in the Project area may increase as a result of implementation of the proposed Project, all new implementing development that will handle or use hazardous materials would be required to comply with the regulations, standards, and guidelines established by USEPA, the State of California, County of Riverside and City of Riverside, related to storage, use, and disposal of hazardous materials. As a result of this oversight and through compliance with all applicable regulations related to the handling and storage of hazardous materials, the risk of the public's potential exposure to hazardous substances is less than significant. (DEIR, p. 5.8-19.)

2. Upset and Accidents

Threshold: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Finding: Less than significant impact. (DEIR, pp. 5.8-19 – 5.8-20.)

Explanation: The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65952.2. The results of a Phase II Subsurface Investigation determined that there are no residual organochlorine pesticides present in on-site soils. Compliance with the applicable federal and state laws related to the transportation of hazardous materials would reduce the likelihood and severity of accidents during transit; therefore, impacts would be less that significant. Additionally, because future use will be subject to federal, state, and local regulations for the storage of hazardous materials, potential impacts related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment are less than significant. (DEIR, pp. 5.8-19 – 5.8-20.)

3. Schools

Threshold: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Finding: No Impact. (DEIR, p. 5.8-20.)

Explanation: The Project site is not located within a quarter-mile of an existing or proposed school site. Therefore, no impacts are anticipated. (DEIR, p. 5.8-20.)

4. Cortese List Sites

Threshold: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Finding: Less than significant impact. (DEIR, p. 5.8-20.)

Explanation: The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A state database identified a soil and groundwater case related to a leaking underground storage tank (LUST) associated with the Ralphs Distribution Center located approximately a quarter-mile southeast of the Project site. However, the case is closed and LUST was hydraulically downgradient from the project site; therefore, impacts are less than significant. (DEIR, p. 5.8-20.)

5. Airport Hazards

Threshold: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Finding: No impact. (DEIR, p. 5.8-24.)

Explanation: There are no private airstrips within the City or its Sphere of Influence; therefore, the proposed Project will not result in a safety hazard for people residing or working in the Project area and no impact will occur. (DEIR, p. 5.8-24.)

6. Emergency Plans

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

Finding: Less than significant impact. (DEIR, pp. 5.8-24 – 5.8-25.)

Explanation: The City has developed an extensive Emergency Operations Plan (EOP), created by the Riverside Fire Department Emergency Management Office. Riverside Fire Department promotes a high level of multijurisdictional cooperation and communication for emergency planning and response management through activation of the Standardized Emergency Management System (SEMS), a framework for responding to and managing emergencies and disasters involving multiple jurisdictions and multiple agency responses. (DEIR, p. 5.8-24.)

Upon completion of Project construction, emergency vehicles will be able to access the Project site from two driveways along Lance Drive. Lance Drive, in turn, can be accessed from existing, fully improved roadways including Sycamore Canyon Boulevard via Dan Kipper Drive or Sierra Ridge Drive. Therefore, with continued use of the SEMS, implementation of the above GP 2025 policies enforcing compliance with the Emergency Operations Plan, and Lance Drive extension improvement, impacts to emergency response and evacuation plans will be less than significant. (DEIR, p. 5.8-25.)

H. HYDROLOGY AND WATER QUALITY

1. Water Quality Standards and Water Runoff

Threshold: Would the project violate any water quality standards or waste discharge requirements?

Finding: Less than significant impact. (DEIR, pp. 5.9-22 – 5.9-23.)

Explanation: The Project would be required to comply with the NPDES Statewide General Construction Permit (Order No. 09-09-DWQ) which requires preparation of an effective Storm Water Pollution Prevention Plan (SWPPP) describing erosion and sediment control BMPs to prevent stormwater pollution during construction. (DEIR, p. 5.9-22.)

The proposed Project is part of a larger common plan of development that has an existing stormwater runoff treatment basin ("the marsh") that will contribute to treatment of pollution and runoff from the Project site once it is developed. In addition, more than 10 percent of the developed site area will be designated "Self-Treating Areas" that meet the requirement for low-impact development (LID) BMPs as outlined in the approved *Project-Specific Preliminary Water Quality Management Plan* (P-WQMP). Therefore, through compliance with the regulatory requirements of the NPDES permits and implementation of Site Control, Source Control, and Treatment Control BMPs as identified in the *Project-Specific Preliminary WQMP,* and the forthcoming Final Project-Specific WQMP, the Project's potential to violate water quality standards or waste-discharge requirements is considered to be less than significant. (DEIR, p. 5.9-23.)

Threshold: Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Finding: Less than significant impact. (DEIR, pp. 5.9-26 – 5.9-27.)

Explanation: The Project site and surrounding development are tabled to a 120-inch diameter public storm drain in Eastridge Avenue approximately 1,250 feet south of the site. This storm drain was designed for 100-year storm events. An existing public storm drain in Lance Drive adjacent to the Project site is not adequately sized to carry discharge from the Project site. Therefore, the Project proposes to construct a second public storm drain in Lance Drive from the Project site to the 120-inch diameter storm drain in Eastridge Avenue. (DEIR, pp. 5.9-26 – 5.9-27.)

The potential for polluted runoff from the Project site will be limited through treatment in on-site self-treating landscape areas, as described in the Project's Preliminary Water Quality Management Plan (P-WQMP), or an existing treatment "marsh" shared with the Project and neighboring businesses in the Sycamore Canyon Business Park. The existing regional conveyance and treatment facilities for the Sycamore Canyon Business Park Specific Plan have been deemed adequate by the City to treat increased flows and water quality conditions of the proposed development within the specific plan areas. Therefore, with implementation of these regional and localized measures, impacts related to additional sources of polluted runoff are less than significant. (DEIR, p. 5.9-27.)

2. Groundwater Supplies

Threshold: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Finding: Less than significant impact. (DEIR, pp. 5.9-23 – 5.9-24.)

Explanation: According to the *Water Supply Assessment (WSA)* prepared by Western Municipal Water District (WMWD), the proposed Project is not expected to be served with groundwater supplies. Although local groundwater recharge could be impacted due to the increase in impervious surfaces associated with Project construction at the site, this will not affect local groundwater availability because infiltration is not recommended at the site due to the existing underlying bedrock. Therefore the Project will not cause a net deficit in aquifer volume or a lowering of the local groundwater table level and impacts related to groundwater will be less than significant. (DEIR, p. 5.9-23.)

3. Existing Drainage Patterns and Runoff

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Finding: Less than significant impact. (DEIR, pp. 5.9-24 – 5.9-26.)

Explanation: The proposed Project site is currently an undeveloped dirt lot that drains from north to south. Although construction of the proposed Project and off-site storm drain improvements will change the appearance of the lot, it will continue to drain southerly. However, post-construction stormwater runoff will flow into several new storm drain inlets, all of which drain into the regional stormwater basin, or "marsh." The owner of the Project site and all other property owners within CFD No. 92-1 pay special taxes to maintain the storm water drainage system and the treatment "marsh". (DEIR, p. 5.9-24.)

The site will construct and implement the storm drain facilities already contemplated through the Sycamore Canyon Business Park Specific Plan; therefore, although the natural drainage patterns will be modified, water conveyed through the site in the existing conditions will still be discharged in a manner that is suitable to surrounding areas, and comply with existing storm water quality regulations. Thus, any potential impacts to the existing drainage pattern and associated erosion or siltation on- or off-site will be less than significant. (DEIR, p. 5.9-26.)

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Finding: Less than significant impact. (DEIR, p. 5.9-26.)

Explanation: Existing drainage patterns flow via surface flows southerly towards a neighboring property and easterly towards Lance Drive and no evidence of significant flooding of the site was observed during

the geologic field reconnaissance or on the aerial photographs reviewed. The proposed Project will alter the existing drainage pattern of the Project site due to the relocation of this shallow stream channel to the western edge of the development. The proposed drainage pattern will capture runoff in the Mitigation Area for conveyance to proposed on-site and offsite storm drain systems with conveyance ultimately to the regional marsh for treatment prior to discharge into Sycamore Canyon. (DEIR, p. 5.9-26.)

Because the Project will construct adequate on- and off-site drainage facilities that will convey runoff to a regional treatment facility, potential impacts resulting from a change to the existing drainage pattern, which would result in flooding, will be less than significant. (DEIR, p. 5.9-26.)

4. Otherwise Degrade Water Quality

Threshold: Would the project otherwise substantially degrade water quality?

Finding: Less than significant impact. (DEIR, pp. 5.9-27 – 5.9-28.)

Explanation: Through compliance with the regulatory requirements of the NPDES Statewide General Construction Permit, the project is not expected to violate any water quality standards or waste discharge requirements during construction. Once constructed, all catch basins on the Project site will drain to the regional treatment basin ("marsh"), which is considered a treatment control BMP according to the Riverside County Flood Control and Water Conservation District (RCFCWCD) sufficient to remove pollutants prior to discharge of runoff to Sycamore Canyon. Therefore, the Project's potential to substantially degrade water quality is considered less than significant. (DEIR, p. 5.9-27.)

5. Flood Hazards

Threshold: Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map?

Finding: No impact. (DEIR, p. 5.9-28.)

Explanation: The Project does not involve the construction of housing and the Project site is not located within a 100-year flood hazard area; therefore, no impact will occur. (DEIR, p. 5.9-28.)

Threshold: Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Finding: No Impact (DEIR, p. 5.9-28.)

Explanation: The Project site is not located within a 100-year flood hazard area; therefore, no impact will occur. (DEIR, p. 5.9-28.)

6. Dam or Levee Failure

Threshold: Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?

Finding: No impact. (DEIR, p. 5.9-28 – 5.9-29.)

Explanation: The City of Riverside General Plan Figure PS-4, "Flood Hazard Areas" does not identify any dam inundation areas located within proximity to any of the Project's proposed improvements; therefore, no impact would occur. (DEIR, p. 5.9-28 – 5.9-29.)

7. Inundation

Threshold: Would the project [expose people or structures to a significant risk or loss, injury, or death involving] inundation by seiche, tsunami, or mudflow?

Finding: Less than significant impact. (DEIR, p. 5.9-29.)

Explanation: There are no bodies of water near the Project site that would pose a risk of inundation by a seiche and the Project site is not located in a coastal area; so no impact due to sieche or tsunami will occur. The Project site is not located near any areas identified in the City's General Plan with a high potential for significant mudflows. Nonetheless, potential impacts associated with limited nuisance mudflows in the event of an extreme storm resulting in erosion of urban landscaping are addressed through the City's standard construction BMPs to control erosion and protect areas with slopes. As such, impacts from mudflow will be less than significant. (DEIR, p. 5.9-29.)

I. LAND USE AND PLANNING

1. Divide a Community

Threshold: Would the project physically divide an established community?

Finding: No impact. (DEIR, pp. 5.10-9 – 5.10-10.)

Explanation: The Project site is bounded by medium and high density residential to the north/northeast, and business/office park to the east and south, and very low density residential and the Sycamore Canyon Wilderness Park to the west. (DEIR, p. 5.10-9.) The Project will not divide an established community because it does not propose to eliminate any existing roadways or create barriers to accessing existing development. To the contrary, the Project will complete a connection between Dan Kipper Drive and Lance Drive required by the Sycamore Canyon Business Park Specific Plan; and thus, improve access for emergency vehicles and passenger vehicles. Therefore, no impacts with regard to physically dividing an established community will occur as a result of the proposed Project. (DEIR, p. 5.10-10.)

2. Plans, Policies or Regulations

Threshold: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the airport land use plan, or zoning ordinance) adopted for the purpose of avoiding mitigating an environmental effect?

Finding: Less than significant impact. (DEIR, p. 5.10-10 – 5.10-11, Appendix M.)

Explanation: The proposed Project will be consistent with both the existing land use designation of the GP 2025 and the Sycamore Canyon Business Park Specific Plan. As established in Appendix M of the DEIR, the Project does not conflict with any land use plan, policy, or regulation as the land use and zoning would remain consistent. Therefore, impacts from the proposed Project would be less than significant. (DEIR, p. 5.10-10.)

A discussion of the proposed Project's consistency with any applicable habitat conservation plan or natural community conservation plan is addressed in Section 4.2-B1, consistency with the applicable Air Quality Management Plan is discussed in Section 4.1-C1, and consistency with SCAG's 2012 Regional Transportation Plan is discussed in Section 4.1-L1 of these Findings of Fact. (DEIR, p. 5.10-11.)

J. MINERAL RESOURCES

1. Known and Locally Important Resources

Threshold: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Finding: Less than significant impact. (DEIR, p. 5.11-3.)

Explanation: The Project site is within Mineral Resource Zone 3 (MRZ-3), which means that the significance of mineral deposits cannot be determined from the available data. Nevertheless, there are no known mineral resources on the Project site and the surrounding land uses, which are residential, industrial, and the Sycamore Canyon Wilderness Park, are incompatible with mining operations. Therefore, Project impacts with regard to the loss of a known mineral resource with region- or state-wide value will be less than significant. (DEIR, p. 5.11-3.)

Threshold: Would the project result in the loss of availability of a locally-important mineral resource recovery site, delineated on a local general plan, specific plan, or other land use plan?

Finding: No impact. (DEIR, p. 5.11-~~34~~.)

Explanation: According to the City's General Plan, there are no specific areas within the City or its Sphere of Influence which have locally-important mineral resource recovery sites; therefore there will be no impacts with regard to the loss of any locally-important mineral resources. (DEIR, p. 5.11-4.)

K. NOISE

1. Groundborne Vibration

Threshold: Would the project cause the exposure of persons to or the generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant impact. (DEIR, pp. 5.12-36 – 5.12-38.)

Explanation: Groundborne vibration attenuates quickly with distance. Due to the distance between the residences adjacent to the Project site and the Project site the majority of construction activity will not result in groundborne vibration that would be considered annoying. Additionally, the Project will comply with Section 7.35.010 of the Municipal Code to further minimize potential impacts due to construction-related vibration. Therefore, potential impacts upon persons or structures due to construction-related vibration are less than significant. (DEIR, p. 5.12-37.)

Threshold: Would the project be located within the vicinity of a private airstrip, and expose people residing or working in the project area to excessive noise levels?

Finding: No impact. (DEIR, p. 5.12-44.)

Explanation: There are no private airstrips located within the City, its Sphere of Influence, or in the area surrounding the Project site; therefore, no impact will occur. (DEIR, p. 5.12-44.)

L. POPULATION AND HOUSING

1. Substantial Growth and Displacement

Threshold: Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Finding: Less than significant impact. (DEIR, pp. 5.13-5 – 5.13-6.)

Explanation: The Project site will be accessed by an existing roadway, Lance Drive, which will be fully realized consistent with the Circulation and Community Mobility Element of the General Plan 2025, and served by existing water and wastewater utilities. The Project's proposed offsite 8-inch diameter storm drain will only serve the proposed Project. As such, the Project does not require major extensions of roadway or other infrastructure that will directly or indirectly induce population growth. (DEIR, p. 5.13-5.)

Construction of the proposed Project will create approximately 300 to 400 temporary construction jobs and approximately 860 to 1,335 permanent jobs; however, given the size of the proposed structures and the availability of labor in both the inland Riverside County and San Bernardino County region, and the Southern California region as a whole, it is reasonable to assume that the construction of the Project will be completed by existing companies doing business in the area and jobs filled by employees already residing in the area. The operation of the Project will also result in additional employment opportunities; however, all jobs created by the Project are well within employment predictions outlined by the Southern California Association of Governments (SCAG) and the City. Therefore, because SCAG's growth projections for the City incorporate the type of growth that will result from the Project and because the Project will not require roadway or utility infrastructure other than to connect Lance Drive to Dan Kipper Drive to existing utility infrastructure already serving the Sycamore Canyon Business Park, impacts will be less than significant. (DEIR, pp. 5.13-5 – 5.13-6.)

Threshold: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (DEIR, pp. 5.13-6 – 5.13-7.)

Explanation: The Project site is vacant without any housing, and does not require removal of any residential dwelling units. Therefore, no impacts will occur. (DEIR, p. 5.13-7.)

Threshold: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (DEIR, p. 5.13-7.)

Explanation: The Project will not displace any people, necessitating the construction of replacement housing elsewhere as the Project site is proposed on vacant land that has no existing housing or residents that could be removed or affected by the proposed Project. Therefore, no impacts will occur. (DEIR, p. 5.13-7.)

M. PUBLIC SERVICES

1. Governmental Facilities

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection; police protection; schools; parks; and/or other public facilities?

Finding: Less than significant impact. (DEIR, pp. 5.14-6 – 5.14-8.)

Explanation:

Fire Protection
Given the nature of the proposed use and the proximity of existing fire stations, as well as stations throughout the City, the Project will not impact fire response times and will not otherwise create a substantially greater need for fire protection services than already exists and so no new or expanded fire protection facilities will be required as a result of this Project. The Project will be designed to meet safety equipment standards, provide adequate emergency access, fire hydrants, water flows, and fire sprinklers in compliance with the current building code and RFD requirements. Project implementation will have a less than significant impact on fire hazard management within the Sycamore Canyon Wilderness Park because fire access will be maintained via the proposed on-site trail and parking lot. (DEIR, p. 5.14-7.)

Any incremental impacts to the provision of fire protection or emergency medical facilities and services will be offset by the payment of development impact fees as required by Chapter 16.52 of the Riverside Municipal Code and from revenue generated for the City from property taxes. Therefore, impacts to fire protection services will be less than significant. (DEIR, p. 5.14-7.)

Police Services
The proposed Project will not result in any unique or more extensive crime problems that cannot be adequately handled by the existing level of police resources. Police staffing needs have been accounted for in the City's General Plan based on the types of development proposed; therefore, because there is no change in land use, the Project is not anticipated to increase the amount of police resources needed and impacts will be less than significant. (DEIR, pp. 5.14-7 – 5.14-8.)

Schools
The Project does not include a residential component and will not directly increase the numbers of school-aged children within either Riverside Unified School District or Moreno Valley Unified School District. Employment opportunities created by construction and operation of the proposed Project are anticipated to be filled by residents that already reside in the region due to the availability of labor in the area. Even so, in accordance with California Government Code, the school facility impact fees in effect at the time of building permit issuance will be paid by the Project developer; therefore, impacts will be less than significant. (DEIR, p. 5.14-8.)

Libraries
The Project does not include a residential component and will not directly or indirectly increase the use of existing library services because it is reasonably anticipated that employees at the Project site would utilize existing library facilities by their place of residence. Nonetheless, the City collects a library parcel tax to mitigate potential indirect impacts to libraries and the Project site property owners have been and will continue to pay this tax. Therefore, impacts will be less than significant. (DEIR, p. 5.4-8.)

Community Centers
The Project does not include a residential component and will not directly increase the use of existing community centers in the City. Because it is reasonably anticipated that the Project's employment opportunities will be filled by residents that already reside within the region, indirect impacts are not expected. Therefore, impacts will be less than significant. (DEIR, p. 5.14-8.)

N. RECREATION

1. Existing and New Facilities

Threshold: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Finding: Less than significant impact. (DEIR, p. 5.15-7.)

Explanation: Increase in demand for neighborhood or regional parks or other recreational facilities generally occurs due to population increase. Because, as discussed in the Population and Housing Section of the DEIR, new Project-related housing opportunities are reasonably expected to be filled by residents that already reside in the City and surrounding areas, the Project will not in and of itself result in the increased use of parks and other recreational facilities. Access to the Sycamore Canyon Wilderness Park will be maintained and Project implementation will formalize the existing path of travel to the park's existing trail system. Since the Project will not contribute to the physical deterioration of existing park and recreational facilities as a result of increased usage, impacts are considered less than significant. (DEIR, p. 5.15-7.)

Threshold: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Finding: Less than significant impact. (DEIR, p. 5.15-8.)

Explanation: The proposed Project does not include recreational facilities; however, the Project includes a trail and Fire Access/Parks Maintenance Road that provide controlled access to the Sycamore Canyon Wilderness Park. This Fire Access/Parks Maintenance Road will be designed in accordance with the requirements outlined in the *Sycamore Canyon Wilderness Park Stephens Kangaroo Rat Management Plan and Updated Conceptual Development Plan* as well as mitigation measures **MM AES 2, MM AES 3, MM AES 5, MM AES 6** and **MM AES 7** (listed in Section 4.2-A1 of these findings). These mitigation measures guide design of the Fire Access/Parks Maintenance Road and are not directly related to demand on recreational facilities. (DEIR, p. 5.15-8.)

Prior to the issuance of an occupancy permit, the proposed Project developer will be required to pay development impact fees, including the Local Park Development Fees and Regional Parks and Reserve Park Development Fee pursuant to Chapters 16.60 and 16.44 of the Municipal Code, respectively. Therefore, the Project will not have an increased demand on the use of parks and other recreational facilities that would necessitate the construction or expansion of these types of facilities; and impacts with regard to recreation facilities are less than significant. (DEIR, p. 5.15-8.)

O. TRANSPORTATION/TRAFFIC

1. Congestion Management Plans

Threshold: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Finding: Less than significant impact. (DEIR, p. 5.16-53 – 5.16-54.)

Explanation: The Riverside County Transportation Commission (RCTC) prepares and periodically updates the Congestion Management Program (CMP) for the County to meet federal and state CMP regulatory guidelines. According to the December 14, 2011 Riverside County CMP, the segments of Alessandro Boulevard from the intersection of Central Avenue/Arlington Avenue/Chicago Avenue to I-215 and I-215

are the only roads in close proximity to the Project site listed as part of the CMP System of Highways and Roadways. (DEIR, p. 5.16-53.)

The Traffic Impact Analysis (TIA) prepared for the Project analyzed six freeway segments, only the Eastridge-Eucalyptus I-215 Northbound off-ramp and Fair Isle-Box Springs I-215 Northbound on-ramp are expected to operate at an unacceptable LOS. The Eastridge-Eucalyptus I-215 is projected to operate at Level of Service ("LOS") E during the peak PM hour as a result of ambient growth without the Project (E+A) and will continue to operate at LOS E with the addition of Project traffic (E+A+P). According to Caltrans, if an existing State highway facility is operating at less than the target LOS, the existing MOE should be maintained; therefore, because the projected LOS at this off-ramp will not change from the E+A to the E+A+P condition, this impact is not significant. (DEIR, p. 5.16-53 – 5.16-54.)

Similarly, the Fair Isle-Box Springs I-215 Northbound on-ramp is projected to operate at LOS E in the AM peak hour and LOS F in the PM peak hour as a result of traffic from the cumulative development projects (E+A+C). With the addition of Project traffic (E+A+C+P), this on ramp will continue to operate at LOS E (AM peak hour) and LOS F (PM peak hour). However, with the addition of one mainline mixed flow lane for northbound I-215 at the Fair Isle-Box Springs Drive on-ramp, in the E+A+C+P condition this on-ramp will operate at LOS C (AM peak hour) and LOS D (PM peak hour). (DEIR, p. 5.16-54.)

Overall, since the proposed Project will not contribute to exceedances that go beyond an unacceptable level or which will result in a change in LOS from an acceptable level to an unacceptable level, the proposed Project will result in a less than significant impact to an applicable congestion management program and no mitigation measures are required. (DEIR, p. 5.16-54.)

2. Air Traffic Patterns

Threshold: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Finding: No impact. (DEIR, p. 5.16-54.)

Explanation: The Project site is located within Zones C1 and D of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). On December 10, 2015 the Riverside County Airport Land Use Commission (ALUC) determined that the Project was consistent with the MARB/IPA LUCP. The Specific Plan Amendment and General Plan amendment were also considered by ALUC on October 17, 2016 and determined to be consistent with the MARB/IPA LUCP. Therefore, although the Project is located within an airport influence area it will not result in a change to air traffic patterns, increase air traffic levels and/or change the location of air traffic patterns and no impact will occur. (DEIR, p. 5.16-54.)

3. Traffic Hazards

Threshold: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Finding: Less than significant. (DEIR, pp. 5.16-54 – 5.16-55.)

Explanation: All Project installed street improvements to portions of Lance Drive will be designed and constructed to City standards and an offer of dedication will be made to the City for maintenance of Lance Drive. The Project proposes an amendment to the GP 2025 Circulation Element and an amendment to the Circulation Plan of the SCBBSP to: i) delete the portion of Dan Kipper Drive that traverses the Project site; (ii) delete the north/south street known as River Ridge that traverses the site; (iii) delete the no name east/west street (known as Kangaroo Court) that traverses the site, southerly of River Ridge; (iv) delete the portion of Sierra Ridge Drive that traverses the site; and (v) end Dan Kipper Drive at Lance Drive. Because the streets proposed to be deleted from the GP 2025 and SCBPSP were intended to provide internal circulation to the Project site, the elimination of these streets will not increase traffic hazards on public

streets. The Project proponent will also pay the City's traffic signal and railroad signal mitigation fee. For these reasons, impacts will be less than significant. (DEIR, pp. 5.16-54 – 5.16-55.)

4. Emergency Access

Threshold: Would the Project result in inadequate emergency access?

Finding: Less than significant. (DEIR, p. 5.16-55.)

Explanation: The Project proposes an on-site fire access road along the southerly boundary of the Project site. The fire access road will be a 12-foot wide road providing a minimum 210-foot wide, 4-inch thick decomposed gravel surface with 13.5 feet of vertical clearance. The fire access road will allow emergency response vehicles to access the Project site and the Sycamore Canyon Wilderness Park in case of an emergency. The Project will be reviewed by the City of Riverside and will be required to be in compliance with applicable sections of the Municipal Code (such as Chapter 18.210, Development Standards and Section 13.32.080, Fire Apparatus Access Roads) regarding emergency access. The Project will also be reviewed by the City Fire Department to ensure compliance with the Fire Code. As such the Project will provide adequate emergency access in accordance with City regulations and requirements. Therefore, impacts will be less than significant. (DEIR, p. 5.16-55.)

5. Alternative Transportation

Threshold: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Finding: Less than significant. (DEIR, pp. 5.16-55 – 5.16-56.)

Explanation: Riverside Transit Agency (RTA) Route 208 (Temecula to Metrolink) utilizes existing roadways within the vicinity of the Project area. The closest bus stop for the Project site is located on Sycamore Canyon Boulevard just north of Eastridge Avenue, which is approximately 0.5 mile southeast of the Project site. This route will connect riders to the Downtown Riverside Metrolink Station, which is served by the Los Angeles Union Station and San Bernardino Lines of the Metrolink commuter rail which as well as Los Angeles Union Station and San Bernardino Lines of the Amtrak rail. Given that the Project will be located approximately 0.5 mile near a bus route which will connect commuters to a transit center; it can be considered a transit oriented development (TOD) per the Transit Orientated Development Institute (TODI). (DEIR, pp. 5.16-55 – 5.16-56.)

Roadway improvements installed by the Project are anticipated to provide safe and efficient pedestrian connections between the proposed Project and surrounding area through construction of sidewalks along the Project frontage and the Project's trail will provide bicycle and pedestrian access to the Sycamore Canyon Wilderness Park. The Project will provide bicycle parking per the Cal Green Code Standards including short-term bicycle parking (5.710.6.2.1) and long-term bicycle parking (5.710.6.2.2). Therefore, impacts are less than significant. (DEIR, p. 5-16.56.)

P. UTILITIES AND SERVICE SYSTEMS

1. Water and Wastewater Treatment and Facilities

Threshold: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Finding: No impact. (DEIR, p. 5.17-12.)

Explanation: The Riverside Public Works Department owns and operates the Riverside Regional Water Quality Control Plant (RWQCP) under the Santa Ana Regional Water Quality Control Board (RWQCB), and currently meets all Santa Ana RWQCB wastewater treatment requirements. Accordingly, the Project

will also be required to follow all federal and state regulations pertaining to wastewater discharge in addition to the requirements established by the Santa Ana RWQCB under the NPEDES permit there will be no impact. (DEIR, p. 5.17-12.)

Threshold: Would the Project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less than significant impact. (DEIR, pp. 5.17-12 – 5.17-13.)

Explanation: The City of Riverside Public Works Department issued a Sewer Availability letter for the Project site on July 12, 2016 that an 8-inch diameter sewer main located in Sierra Ridge Drive at the intersection of Lance Drive has capacity to serve the property. There is also an 8-inch diameter sewer main at the westerly terminus of Dan Kipper Drive to serve the property. Construction of new water or wastewater treatment facilities will not be required for the proposed Project. Western has demonstrated adequate supplies to serve the Project, and the City has sufficient capacity at its RWQCP. Therefore, impacts will be less than significant. (DEIR, p. 5.17-13.)

Threshold: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Finding: Less than significant impact. (DEIR, p. 5.17-15.)

Explanation: Project-generated wastewater will be treated at the RWQCP, the Public Works Department has indicated there is sufficient capacity in the existing sewer pipelines and at the RWQCP to serve the Project. Therefore, adequate capacity exists to serve the Project, and impacts are less than significant. (DEIR, p. 5.17-15.)

2. Storm Water Drainage Facilities

Threshold: Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less than significant impact. (DEIR, pp. 5.17-13 – 5.17-14, 5.17-18.)

Explanation: Because the existing public storm drain in Lance Drive does not have sufficient capacity to accommodate additional runoff, the Project proposes to construct a new public storm drain that will connect to an existing 120-inch diameter storm drain in Eastride Drive before discharging into a system of water quality marshes within Sycamore Canyon Wilderness Park. The proposed storm drain will be primarily constructed within the Lance Drive right-of-way; however an easement will be required to construct portions of this pipeline within private property (the Ozburn Hessey Logistics Center). Because the proposed storm drain is part of the Project, effects resulting from its construction and operation are considered and fully evaluated in the DEIR. Impacts with regard to off-site storm drain will be less than significant. (DEIR, pp. 5.17-13, 5.17-18.)

3. Water Supply

Threshold: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Finding: Less than significant impact. (DEIR, pp. 5.17-14 – 5.17-15, Appendix K.)

Explanation: Western Municipal Water District ("WMWD") is the water provider for the Project and prepared a *WSA* pursuant to Senate Bill (SB) 610. The Project site is within WMWD's Riverside Retail Area. The Project's projected water demand is 100 acre-feet per year (AFY), which is almost double the

planned development for the Project site estimated by WMWD's 2010 UWMP (47 AFY). However, the Project's water demand is consistent with the overall projected increase in commercial water demand within WMWD's Riverside Retail Area as set forth in the 2010 UWMP and the proposed Project's water demand is accounted for in Western's 2015 UWMP. (DEIR, p. 5.7-14.)

Western relies almost entirely on imported State Water Project (SWP) and Colorado River supplies from the Metropolitan Water District of Southern California (Metropolitan) during normal water years. When Metropolitan's Water Supply Allocation Plan (WSAP) is in effect then Metropolitan member agencies, including Western, do not lose their ability to receive imported water but instead are limited in the amounts that they can purchase without being assessed a surcharge. Because Western concluded that its total projected water supplies during normal, single-dry, and multiple-dry years throughout the next 20 year horizon are sufficient to meet the projected water demands of the proposed Project in addition to Western's existing and planned future uses, no new water supplies or entitlements are needed to serve the proposed Project and impacts are less than significant. (DEIR, pp. 5.17-14 – 5.17-15.)

4. Solid Waste

Threshold: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Finding: Less than significant impact (DEIR, pp. 5.17-15 – 5.17-17.)

Explanation: The proposed Project is anticipated to generate approximately 2,665 tons of construction related solid waste. However, given the limited contribution of construction related solid waste anticipated to be generated by the proposed Project over an estimated 12 month construction period (a negligible percent of the annual landfill capacity), Project construction will not substantially contribute to the exceedance of the permitted capacity of the designated landfills. Further, the California Green Building Standards Code (CalGreen) requires projects involving construction and demolition to recycle, reuse, compost, and/or salvage a minimum of 50 percent by weight of material or waste generated on site and the Project will be required to prepare a Waste Recycling Plan to identify the estimated quantity and location of recycling for construction and demolition waste. (DEIR, p. 5.17-16.)

The operation of the proposed Project is anticipated to result in the disposal of approximately 3,800 tons of solid waste per year assuming 2,000 employees. Given the identified contribution of solid waste anticipated to be disposed of by the proposed Project, implementation of the proposed Project would not substantially contribute to the exceedance of the permitted capacity of the designated landfills. Further, the proposed Project will be required to comply with all Federal, State, and Local solid waste-related statues and regulations; therefore, operational impacts are less than significant. (DEIR, p. 5.17-17.)

Threshold: Would the project comply with federal, state and local statutes and regulations related to solid waste?

Finding: No Impact. (DEIR, p. 5.17-17.)

Explanation: The Project will comply with all regulatory requirements regarding solid waste including Assembly Bill (AB) 939 and AB 341, which aim to reduce the quantity of solid waste generated. Additionally, mandates set forth by the California Green Building Standards Code (CALGreen Code) aim to reduce solid waste generation and promote recycling and diversion design and activities, to which this Project is required to comply (California Code of Regulations, Title 24, Part 11). There will be no impacts with regard to compliance with federal, state, and local statutes and regulations related to solid waste. (DEIR, p. 5.17-17.)

Q. ENERGY USE/CONSERVATION (From Chapter 7 of DEIR)

1. Electric Power

Threshold: Would the project result in the wasteful, inefficient, or unnecessary consumption of energy?

Finding: DEIR, pp. 7-15 – 7-22 .

Explanation:

Construction
A total of 48,565 gallons of diesel fuel and 1,107 gallons of gasoline are estimated to be consumed during Project construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project also includes design features which encourage ridesharing and transit use for the construction crews and require utilizing cleaner, more efficient off-road equipment by requiring Tier 3 certified equipment during the grading phase. Construction equipment is also required to limit idling to three minutes in excess of CCR Title 13 §2449(d)(3). Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Therefore, it is expected that construction-related fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region. (DEIR, pp. 7-15 – 7-17.)

Operation
The Project will be constructed in compliance with all applicable energy efficiency standards and regulatory standards designed to reduce vehicle miles travelled and fuel usage. As part of the greenhouse gas analysis prepared for this Project, it was determined that the Project's electrical consumption will be approximately 4,359,450 kilowatt-hours (kWh) or approximately 4.36 million kWh of electricity per year and the natural gas consumptions was estimated to be approximately 2,160,430,000 British thermal units (BTUs) or approximately 21,604 therms. The electricity use associated with the Project water consumption was also estimated to be approximately 361,749 KWh per year, which represents approximately 0.2 percent of the existing electricity demand in the City of Riverside and the natural gas demand would be approximately 0.004 percent of the existing natural gas use in the Southern California Gas service area. (DEIR, pp. 7-16 – 7 7-17.)

The Project design features related to energy conservation measures and fuel efficiency measures include but are not limited to: "solar ready" roofs, LED lighting, bicycle parking, electric vehicle charging stations, water efficient landscaping, cool roofs, Energy Star rated appliances, windows, and heating and cooling systems, and encouragement of ridesharing and transit usage. Collectively, compliance with regulatory programs and implementation of these design features would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy. (DEIR, pp. 7-17 – 7-18.)

Effects of Project on Local and Regional Energy Supplies and Capacity
The Project's electrical consumption is minimal in-comparison to Riverside Public Utilities' (RPU's) 2014 production of approximately 2.1 billion KWh. The Project will comply with applicable state, RPU, and City General Plan policies that require energy conservation to reduce electrical demand within the Project site. The Project's natural gas consumption is estimated to be approximately 21,604 therms. The Project will comply with applicable California Public Utilities Commission (CPUC), state, Southern California Gas Company (SCGC), and City policies and standards that require energy conservation to reduce natural gas demand within the Project area. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SCGC-wide use and as SCGC continuously expands its network, as needed, to meet the need in Southern California, there will be adequate capacity to serve the proposed Project. Therefore, the Project would not have a significant effect on local and regional energy supplies. (DEIR, p. 7-19.)

Effects of Project on Peak and Base Period Demands for Electricity and Other Forms of Energy

The Project is expected to represent 0.2 percent of RPU's total electricity usage; therefore, it can be stated that the Project will not have a substantial effect on energy supplies. The Project will meet regulatory standards (Title 24) and incorporate Project design features such as incorporating Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, and other electrical equipment that will result in energy efficient buildings. With regard to peak hour demands, purveyors of energy resources, including RPU, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. (DEIR, pp. 7-19 – 7-20.)

The Degree to which Project Complies with Existing Energy Standards
The proposed Project would be required to comply with City, state and federal energy conservation measures related to construction and operations. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and vehicle miles traveled (VMT). In addition, the Project will be consistent with applicable goals and polices within the General Plan and the Riverside Green Action Plan. Through implementation of energy conservation measures and sustainable practices, the Project will not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted plans or policies. (DEIR, p. 7-20.)

Effects of the Project on Energy Resources
Project construction is estimated to consume approximately 48,565 gallons of diesel fuel and 1,107 gallons of gasoline. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project also includes design features (listed below) which encourage ridesharing and transit use for the construction crews and require utilizing cleaner, more efficient off-road equipment by requiring Tier 3 certified equipment during the grading phase. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. (DEIR, pp. 7-16 – 7-17.)

Project operation is calculated to consume approximately 4.36 million kilowatt-hours (kWh) of electricity per year and approximately 21,604 therms of natural gas per year. Electricity use associated with the Project's water consumption is estimated to be approximately 361,749 kWH per year. (DEIR, p. 7-17 – 7-18.)

In regards to the effects of the Project on energy resources, the Project incorporates a number of design features to ensure that the Project does not result in the inefficient, unnecessary, or wasteful consumption of energy. Notable design features include the following:

- Incorporate Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.
- Design building to have solar ready roofs that will structurally accommodate later installation of rooftop solar panels.
- Provide up to three electric vehicle charging facilities to encourage the use of low or zero-emission vehicles.
- Install efficient lighting and lighting control systems. Solar or light-emitting diodes (LEDs) will be installed for outdoor lighting. The site and buildings will be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems in buildings. Lighting will incorporate motion sensors that turn them off when not in use.
- Use trees and landscaping on west and south exterior building walls to reduce energy use.

The above design features are intended to reduce the effects of the Project on energy resources. In this way, the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy. (DEIR, pp. 7-20 – 7-21.)

Transportation Energy Use and Efficient Transportation Design

Based on the traffic data from the Project's greenhouse gas analysis, a total of 3,325,249,685 gallons of diesel fuel and 355,394,340 gallons of gasoline are estimated to be consumed each year.

The Project supports alternative transportation choices by coordinating the facility location in close proximity to RTA's Route 208 which connects commuters to the Riverside Downtown Metrolink. In addition, the Project provides bike racks and electric vehicle charging facilities to further encourage a variety of transportation choices. Specific design features incorporated in the Project include:

- Provide up to three electric vehicle charging facilities to encourage the use of low or zero-emission vehicles.
- Provide bicycle parking per the Cal Green Code Standards including both short-term and long-term bicycle parking.
- Designate 10 or more vehicular parking spaces, for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles.
- The Building Operator will support and encourage ridesharing and transit for the construction crew.

The Project also includes a fully improved trail to be located along the southern perimeter of Parcel 1 that will allow bicycle use and access to the Sycamore Canyon Wilderness Park. The above design features will provide the Project with options for non-vehicular circulation which will reduce car trips. Therefore, the Project promotes efficient alternative transportation choices. (DEIR, p. 7-21.)

4.2 Findings Regarding Less Than Significant Impacts After the Incorporation of Mitigation

The City Council hereby finds that feasible Mitigation Measures have been identified in the EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. AESTHETICS

1. Visual Character

Threshold: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Finding: Less than significant with mitigation. (DEIR, pp. 5.1-13 – 5.1-29.)

Explanation: Although the Project will change the Project site from vacant property to a modern logistics center, the proposed Project is being developed as intended per the GP 2025, the *Sycamore Canyon Business Park Specific Plan,* and the Zoning Code. The site will be developed with manicured landscaping and logistics structures that will be designed, as mitigated, with aesthetic treatments intended to be visually attractive with the use of color and architectural articulations. The area surrounding the Project site to the northwest and north is residential, and the areas to the east and south are developed with industrial, manufacturing, and warehousing center uses. The Sycamore Canyon Wilderness Park is located to the west of the Project site. The residences adjacent to the Project site currently have a view of existing industrial areas to the south and east of the proposed Project. Some of the homes to the west of the Project site have limited views of the Sycamore Canyon Wilderness Park. (DEIR, p. 5.1-13.)

Because the proposed Project's buildings will be consistent with other large-scale logistics and industrial uses adjacent to the east and south of the Project site, as well as industrial uses visible in the distance, the proposed Project will not introduce a new type of use or new type of construction to the Project area, thus,

Project development will not substantially degrade the existing visual character or quality of the Project site or its surroundings. (DEIR, p. 5.1-27.)

The Project also includes Design Review (P14-1081) to make sure that the Project is consistent with the *Citywide Design and Sign Guidelines*, Title 19, Title 17, Chapter 19.710 – Design Review Process, and the *Sycamore Canyon Business Park Specific Plan* in addition to all applicable City plans and municipal codes. With implementation of mitigation measures **MM AES 1** through **MM AES 11**, to ensure incorporation of Project design elements, impacts will be less than significant. (DEIR, pp. 5.1-27 – 5.1-29.)

The following mitigation measures will be implemented:

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.

MM AES 2: For consistency with the Sycamore Canyon Wilderness Park Management Plan, the Project developer shall install fencing along the western boundary of the Project site. The fence and gate shall be constructed per the specifications of the City of Riverside Parks, Recreation, and Community Services Department Standard Detail No. 5520 and specifications. If the developer chooses to install a taller fence, a maximum 8-foot high fence is permitted. Note that increased fence height may require increased post, footing and rail sizes, which shall be engineered and stamped approved by a structural engineer. As part of Design Review and prior to the issuance of a grading permit, the developer shall submit a revised site plan showing this fence, the modified standard detail (if a fence taller than 8 feet is proposed), and specifications to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

MM AES 3: If the Project developer wants to construct a private 8-feet tall tubular steel fence along the northern boundary of the trail, such fence shall be installed a minimum of three-feet from the edge of the trail and clear of the Fire Access/Parks Maintenance Road easement. If the Project developer choses to construct said private fence, as part of Design Review and prior to the issuance of a grading permit the developer shall submit a revised site plan showing this fence as a separate graphic fence line and a materials board showing the proposed design and materials to the Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval. If the Project developer chooses not to construct this private fence, this mitigation measure does not apply.

MM AES 4: In order to screen views of the parking lot, loading docks, and trailer parking areas from the public right-of-way, the on-site fencing securing the trailer parking areas and the metal, manual operated gates that permit access to these areas shall incorporate an opaque layer (i.e. mesh or screening) that will withstand wind loads of 85 miles per hour. As part of Design Review and prior to the issuance of a grading permit, a revised site plan and materials board showing the proposed screening shall be submitted to the Community and Economic Development Department, Planning Division for review and approval.

MM AES 5: To provide safe and controlled pedestrian and bicycle access to the Sycamore Canyon Wilderness Park in a manner consistent with the design and materials of the fence in mitigation measure **MM AES 2**, the Project developer shall:

a. Construct the proposed trail and access gates consistent with the City of Riverside Parks, Recreation, and Community Services Department trail and gates details and specifications and subject to the review and approval by the City of Riverside Parks, Recreation, and Community Services Department, As part of Design Review and prior to the issuance of a grading permit, a revised site plan that identifies this standard and shows the Parks, Recreation, and Community Services Department Standard Trail Construction detail shall be submitted to the Parks, Recreation, and Community Services Department for review and approval.

b. Install a galvanized steel swing arm gate access gate that locks in the open and closed positions at the trail and parking lot driveway entry. As part of Design Review and prior to the issuance of a grading permit, a revised site plan that shows the detail for this gate and Standard Detail No. 5110 shall be submitted to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

c. Install pedestrian/bicycle gates between the trail and parking lot and the beginning of the trail and between the western terminus of the trail and the Sycamore Canyon Wilderness Park per the City's standard pedestrian/bicycle gate. These gates shall be minimum 4-feet wide and constructed of material to match Standard Detail No. 5520 identified in mitigation measure **MM AES 2**. The pedestrian/bicycle gates shall be lockable in the open and closed position. As part of Design Review and prior to the issuance of a grading permit, a revised site plan that shows the detail for these gates shall be submitted to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

d. Install Parks, Recreation, and Community Services Department Standard PVC trail fence along the northern side of the trail in-between the Fire Access/Parks Maintenance Road and along those portions of the southern side of the trail where the grade drops 3 feet or more. As part of Design Review and prior to the issuance of a grading permit, a revised site plan that references the Standard 3-rail PVC fence detail only and includes Parks, Recreation, and Community Services Department Standard PVC trail fence shall be submitted to the Parks, Recreation, and Community Services Department for review and approval.

e. Install Parks, Recreation, and Community Services Department standard trail sign at the Project's western property line and at the proposed parking lot on Lot B of Tentative Parcel Map 36879. As part of Design Review and prior to the issuance of a grading permit, a revised site plan that includes a note that states "PRCSD standard trail sign" and Parks, Recreation, and Community Services Department standard trail sign detail 12 shall be submitted to the Parks, Recreation, and Community Services Department for review and approval.

MM AES 6: To provide access for fire and parks maintenance vehicles consistent with the intent of the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan, the Project developer shall:

a. Design and construct the Fire Access/Parks Maintenance Road per the City of Riverside Fire Department requirements, including but not limited to, providing a 36,000 pound wheel load. As part of Design Review and prior to the issuance of a grading permit, the Fire Access/Parks Maintenance Road detail shall be submitted to the Community and Economic Development Department, Planning Division, the Parks, Recreation, and Community Services Department, and the City Fire Department for review and approval.

b. Install vehicular gates between the vehicular access road on the south end of the Project site and the eastern terminus of the Fire Access/Parks Maintenance Road and between the western terminus of the Fire Access/Parks Maintenance Road and the Sycamore Canyon Wilderness Park. The vehicular gates shall be double galvanized steel swing arm gates a minimum of 12-feet in width and provided with a Knox padlock. The gates shall lock in the open and closed positions per Park Standard Detail No. 5110. The gate at the western property line shall be constructed to match Standard Detail No. 5520. As part of Design Review and prior to the issuance of a grading permit, a revised site plan that shows the details of these gates and Park Standard Detail No. 5110 shall be submitted to the Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

MM AES 7: To ensure there is adequate clearance for the fire vehicles, prior to building permit issuance the landscape plans shall be revised to relocate the trees shown on the trail and the Fire Access/Parks Maintenance Road such that all trees shall be setback from the trail and Fire Access/Parks Maintenance Road easements a minimum of 5 feet. Once planted, the developer shall maintain all trees such that a minimum 13.5-feet vertical clearance over the Fire Access/Parks Maintenance Road and a minimum 8.5-feet vertical clearance over the trail is provided and maintained. The revised landscape plans shall be designed per the City's Water Efficient Landscape and Irrigation Ordinance adopted on December 1, 2015 (http://aquarius.riversideca.gov/clerkdb/0/doc/215696/Page1.aspx). The revised landscape plans shall be reviewed and approved by City Design Review staff and Western Municipal Water District as part of Design Review prior to the issuance of a grading permit.

MM AES 8: To ensure that all roof-mounted equipment shall be adequately screened, prior to the issuance of a grading permit as part of the Design Review process, the proposed screening shall be reviewed and approved by Design Review staff.

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.

MM AES 10: To eliminate light spill and glow into the residential backyards to the north, lighting mounted on the north wall of Building 2 shall be placed on this wall as low as feasible to provide the required security lighting.

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.

Threshold: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant with mitigation. (DEIR, pp. 5.1-29 – 5.1-31.)

Explanation: The proposed Project will result in the installation of new security and internal roadway and parking lot lighting within the Project site for public safety and operation of the proposed structures. All lighting will comply with the development standards contained in the City's Zoning Code and conditions of approval placed on the Project by the Riverside County Airport Land use Commission (ALUC), which are included as mitigation measure **MM HAZ 4** (reproduced below). Additionally, the City will require its "Standard Lighting Condition" and mitigation measure **MM AES 10** requires that lighting mounted on the north side of Building 2 shall be placed on the building wall as low as feasible to provide the required security lighting while preventing as much light spill and glow into the residential backyards adjacent to the northern boundary of the Project site. (DEIR, pp. 5.1-30 – 5.1-31.)

Further, high-glare and reflective materials are not proposed to be used at the Project site and Project implementation is not anticipated to create a new source of substantial glare that would adversely affect day or nighttime views in the area. Thus, with incorporation of mitigation measures **MM HAZ 4** and **MM AES 10,** and compliance with any other applicable lighting requirements and regulations, impacts will be less than significant with mitigation. (DEIR, p. 5-31.)

In addition to **MM AES 10**, the following mitigation measure will be implemented:

> **MM HAZ 4:** The following additional March Air Reserve Base-required risk-reduction Project design features shall be incorporated into Project design:
>
> - The Project will not include:
>
> - Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light, visual approach slope indicator, or FAA-approved obstruction lighting;
>
> - Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport;
>
> - Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area;
>
> - Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation; or
>
> - Although such uses are not anticipated, in Building 1: Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, places of assembly, noise sensitive outdoor nonresidential uses and hazards to flight are prohibited.
>
> - Any outdoor lighting that is installed will be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. All outdoor lighting will be downward facing;

- March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result;

- No skylights will be included;

- Exterior walls will consist of 8-inch-thick solid grouted, 4-hour rated concrete masonry;

- Building roof will consist of structural steel columns and steel roof structure framing elements, including structural steel decking;

- Use of windows will be limited to only the structures' main entrances;

- The structure will incorporate an enhanced fire sprinkler system to exceed California Fire Code requirements; and

- The structure will include emergency exits that exceed the exit requirements set forth by the Riverside County Fire Code by approximately 15 to 20 percent.

- The applicant will not propose any uses prohibited or discouraged in Compatibility Zones C1 or D.

B. BIOLOGICAL RESOURCES

1. Sensitive Species and Habitats

Threshold: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: Less than significant with mitigation. (DEIR, pp. 5.4-18 – 5.4-20, Appendix C.1.)

Explanation: The *Biological Assessment and Western Riverside Multi-Species Habitat Conservation Plan Compliance Report* prepared by AMEC for this Project did not identify any sensitive plant species on the site and the site is not located within a special plant survey area of the MSHCP; therefore, development of the Project site will have less than significant impacts to special-status plant species. (DEIR, p. 5.4-19.)

AMEC observed one sensitive wildlife species at the Project site: San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). This species is "covered" under the MSHCP and impacts to this species are mitigated through the City's payment of MSHCP fees, which is required of the Project proponent as set forth by the MSHCP and pursuant to City Ordinance No. 6709 (codified as Riverside Municipal Code Chapter 16.72). AMEC also observed a golden eagle (*Aquila chrysaetos*) flying over the project site during their surveys. The Project site contains low quality raptor foraging habitat, the loss of which is not considered a significant impact under CEQA. (DEIR, p. 5.4-19.)

The Project site may support nests utilized by birds protected under the Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations Section 10.13) or the California Fish and Game Code. Thus, the potential exists for construction-related disturbance to nesting birds. Mitigation measure **MM BIO 1** will be implemented requiring construction activities to be scheduled outside of the breeding season of MBTA-covered bird species to the greatest extent feasible and monitoring prior to ground disturbance activities at the site by a qualified biologist if construction is scheduled within the breeding season. Additionally, because all undeveloped areas of the Project site and adjacent areas are suitable for burrowing owl and are within the protocol survey area for burrowing owl, mitigation measure **MM BIO 2** will be implemented to require a preconstruction survey for this species 30 days prior to any ground disturbance. Therefore, the

Project impacts with regard to special-status wildlife species will be less than significant with mitigation. (DEIR, pp. 5.4-19 – 5.4-20.)

The following mitigation measures will be implemented:

> **MM BIO 1:** To comply with the provisions of the MBTA and the California Fish and Game Code, potential impacts to nesting habitat (i.e., site grading or removal of trees) shall be limited to the times when birds are less likely to be nesting (i.e., the non-breeding season, approximately September to February) to the extent feasible. The period from approximately February 1 to August 31 covers the breeding season for most birds that may occur in the Project area. If construction is conducted during breeding season, a qualified biologist shall check potential nesting sites no more than three (3) days prior to any Project related ground disturbance or tree removal activities. If nesting birds are present, the area shall be avoided until young have fledged (as determined by a qualified biologist). Avoidance will involve prescribed 500-foot buffer zone for birds of prey and 100- to 300-foot buffer zone for songbirds from sensitive locations.
>
> **MM BIO 2:** Per MSHCP Species-Specific Objective 6, preconstruction presence/absence surveys for burrowing owl shall be conducted on the Project site and within 150 meters (500 feet) 30 days by a qualified biologist prior to any ground disturbance. Take of active nests shall be avoided. Passive relocation (use of one-way doors and collapse of burrows) will occur when owls are present outside the nesting season. If feasible, the owls will be relocated to the Sycamore Canyon Wilderness Park or to property owned by the California Department of Fish and Wildlife in proximity to the Project site.

Threshold: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Finding: Less than significant with mitigation. (DEIR, pp. 5.4-20 – 5.4-21, Appendix C.4, C. 6.)

Explanation: The Project site is dominated by disturbed non-native grassland with an ephemeral drainage with sparse riparian vegetation and a small isolated ponded area. Drainage 1 and Drainage 2 contain riparian habitat and/or riverine characteristics and are hence considered riparian/riverine areas as designated by the MSHCP. Based on the proposed site plan for the Project, impacts to riparian habitat cannot feasibly be avoided, and as such, a Project-level Determination of Biologically Equivalent or Superior Preservation (DBESP) was required by the MSHCP and prepared by AMEC. As a result, a focused burrowing owl survey was conducted at the site and mitigation measure **MM BIO 2** was required to ensure that burrowing owls have not colonized or taken up residence on the site or immediately adjacent areas prior to construction activities. (DEIR, p. 5.4-20.)

The Project also proposes an approximately three acre Mitigation Area along the western edge of the Project site. The DBESP determined that the habitat that will be created in the Project's Mitigation Area is considered biologically superior in comparison to the existing drainage. Therefore, with implementation of mitigation measure **MM BIO 3**, which requires a Habitat Mitigation Management Plan (HMMP) be prepared describing the habitat creation and establishment of success criteria and **MM BIO 4**, which requires recordation of a conservation easement, there will be no net loss of riparian/riverine habitat. (DEIR, p. 5.4-21.)

Based on the proposed site plan for the Project, all three of the jurisdictional features on the Project site will be permanently impacted by implementation of the Project, and therefore, the Project applicant is required to obtain a Section 404 Permit from United States Army Corps of Engineers (USACE), Section 401 Certification from Regional Water Quality Control Board (RWQCB), and Streambed Alteration Agreement from California Department of Fish and Wildlife (CDFW) and comply with the provisions of such permits prior to any ground disturbance within any jurisdictional area as required by mitigation measure **MM BIO 5**. No other sensitive natural communities were identified at the Project site. Therefore, impacts with regard

to riparian habitat and other sensitive natural communities will be less than significant with mitigation. (DEIR, p. 5.4-21.)

The following mitigation measures will be implemented:

MM BIO 3: As required by the Project's DBESP, prior to issuance of grading permits the Project proponent shall provide evidence to the City Planning Division that a Habitat Mitigation and Monitoring Plan (HMMP) has been approved by the USFWS and CDFW for the Mitigation Area. Success criteria for the HMMP will include: 85% percent coverage of the existing riparian habitat, no more than 10% cover of non-native species, and reduction of supplemental watering during the last two years of monitoring. The Mitigation Area shall be monitored by a qualified biologist retained by the Project proponent for a minimum of five (5) years and monitoring reports shall be provided to the City, RCA, USFWS, and CDFW.

MM BIO 4: Prior to the issuance of any occupancy permit, the Project proponent shall provide evidence to the City Planning Division that the Mitigation Area has been placed under a conservation easement and dedicated to an approved mitigation entity to be managed in perpetuity.

MM BIO 5: Prior to any ground disturbing activities within jurisdictional waters, the Project proponent shall obtain the necessary authorization from the regulatory agencies for proposed impacts to jurisdictional waters. Impacts to jurisdictional waters shall require authorization by the corresponding regulatory agency. Authorization may include, but is not limited to, a Section 404 permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFW. Project-specific impacts to jurisdictional waters shall be mitigated by the USACE, CDFW, and the RWQCB where applicable.

2. Habitat Conservation Plans

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Finding: Less than significant with mitigation. (DEIR, pp. 5.4-23 – 5.4-30.)

Explanation: The proposed Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan, Stephens' Kangaroo Rat Habitat Conservation Plan, and Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan and will be required to comply with requirements outlined in each plan.

Western Riverside County Multiple Species Habitat Conservation Plan
The Project site is located within the MSHCP Plan Area. The site is not located in a Criteria Cell. The MSHCP requires projects comply with Sections 6.1.2 (Protection of Species within Riparian/Riverine Areas and Vernal Pools), 6.1.3 (Protection of Narrow Endemic Plant Species), 6.1.4 (Urban and Wildlands Interface), 6.3.2 (Additional Survey Needs and Procedures), and Appendix C (Standard Best Management Practices).

Section 6.1.2 Because the requisite focused surveys were completed for the Project site, the Project proposes an on-site Mitigation Area to replace lost riparian habitat, and only common fairy shrimp were observed, the Project will be compliant with Section 6.1.2 of the MSHCP. (DEIR, p. 5.4-24.)

Section 6.1.3 The Project site is not located within a Narrow Endemic Species Survey Area, or in a Criteria Area Species Survey Area for plants, and no focused surveys for these species are required. Therefore, the Project is compliant with Section 6.1.3 of the MSHCP. (DEIR, p. 5.4-24.)

Section 6.1.4 To minimize edge effects, MSHCP Section 6.1.4 identifies guidelines applicable to Projects adjacent to Conservation Areas. The Project will incorporate mitigation measures **MM BIO 7**, which requires site lighting is designed to minimize impacts on the Sycamore Canyon Wilderness Park, **MM AES 2** and **MM AES 3**, which contain design guidelines for fencing adjacent to the Wilderness Park, as well as **MM BIO 8**, which requires a barrier between the Project site and Park area during construction. With implementation of the above identified mitigation measures, the proposed Project will be consistent with MSHCP Section 6.1.4 Urban/Wildland Interface Guidelines related to drainage, toxics, lighting, noise, invasives, barriers, and grading. (DEIR, pp. 5.4-24 – 5.4-28.)

Section 6.3.2 The Project is located within an MSHCP Additional Survey Area for burrowing owl, and appropriate surveys were conducted due to the presence of suitable habitat on-site. Because no suitable burrowing owl burrows were found to be present within the Project site, protocol surveys for burrowing owls are not required under the MSHCP guidelines. To confirm compliance with the MSHCP requirement for a preconstruction survey for burrowing owls 30 days prior to ground disturbing activities, mitigation measure **MM BIO 2** shall be implemented. Thus, the Project will be compliant with MSHCP Section 6.3.2. (DEIR, p. 5.4-28.)

Appendix C Appendix C of the MSHCP identifies standard Best Management Practices (BMPs) to be implemented during construction of projects in proximity to the MSHCP Conservation Area. Through compliance with the applicable provisions of the Riverside Municipal Code, **MM BIO 6** and mitigation measures identified in this DEIR, and conditions of the regulatory permits issued by the Wildlife Agencies, the Project will be compliance with Appendix C. (DEIR, p. 5.4-29.)

Stephens' Kangaroo Rat Habitat Conservation Plan
Because the Project site is not within a Stephens' Kangaroo Rat Habitat Conservation Plan (SKR-HCP) Core Reserve Area, payment of the Stephens' Kangaroo Rat Preservation Fee in effect at the time that the grading permit is issued constitutes compliance with the SKR-HCP. (DEIR, p. 5.4-29.)

Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan
The proposed Project has been designed to comply with the regulations outlined in this Plan. In particular, this Plan contains guidelines related to edge treatments between the park and other uses. To be consistent with The *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan*, a parking lot is proposed at the southeastern corner of the Project site. Through implementation of mitigation measures **MM AES 2** and **MM AES 3**, which require fencing to be installed in accordance with the requirements outlined in this plan, the Project will not conflict with this plan. (DEIR, p. 5.4-29.)

The following mitigation measures will be implemented:

MM BIO 6: The Project shall be required to comply with the following standard best management practices (BMPs) outlined in Volume I, Appendix C of the MSHCP:

- A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be completed.

- Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian species identified in MSHCP Global Species Objective No. 7.

- The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.

- Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.

- The Permittee, City of Riverside, shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions including these BMPs.

MM BIO 7: The Project shall also comply with the following BMPs, not outlined in Volume I, Appendix C of the MSHCP:

- Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development. Energy-efficient LPS or HPS lamps shall be used exclusively to dampen glare.

- During construction, equipment storage, fueling, and staging areas will be located on areas of the site with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas will be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials will be reported to appropriate entities including but not limited to applicable jurisdictional City, UFWS, and CDFW, RWQCB regulated areas and will be cleaned up immediately and contaminated soils removed to approved disposal areas.

- To avoid attracting predators of the species of concern during site grading and construction activities, the Project site will be kept clean of debris. All food related trash items will be enclosed in sealed containers and regularly removed from the site(s). This requirement will be addressed by the biologist conducting the training session prior to site grading.

MM BIO 8: To avoid impacts to the Sycamore Canyon Wilderness Park resulting from construction activity such as compaction and erosion. The Project developer shall provide a temporary barrier along the western portion of the Project site. Prior to issuance of a grading permit, the developer shall identify the type and location of this barrier to the City of Riverside Parks, Recreation, and Community Services Department for review and approval.

MM AES 2 and **MM AES 3** are included in their entirety in Section 4.2-A of this document.

C. CULTURAL RESOURCES

1. Archaeological Resources

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Finding: Less than significant with mitigation. (DEIR, pp. 5.5-24 – 5.5-29.)

Explanation: The cultural resources assessment of the Project site area identified three prehistoric bedrock milling sites (CA-RIV-8750, CA-RIV -8751, and CA-RIV -8752) that will be impacted by the implementation of the proposed Project because they are located within the proposed Project footprint. However, these archaeological sites were previously determined ineligible for listing on the NRHP, California Register of Historic Resources (CRHR), or City of Riverside Designated Cultural Resource in the 2007 report. A reevaluation of the significance of the resources by Applied Earthworks in 2015 confirms earlier recommendations and suggests that none of the sites are historic properties as defined by the NHPA and/or historical resources under CEQA. (DEIR, p. 5.5-28.)

As part of the Native American coordination efforts undertaken by Applied Earthworks and the SB18 / AB 52 consultation process, the Soboba Band of Mission Indians, the Pechanga Band of Luiseño Indians, and the Morongo Band of Mission Indians requested monitoring of Project-related ground-disturbing activities. As a result, archaeological monitoring of ground-disturbing activities is required by mitigation measure **MM CR 2**. Additionally, in the event that the Project's site plan changes prior to grading permit issuance, mitigation measure **MM CR 1**, requires the Project Applicant and City contact interested tribes, provide an electronic copy of the revised plans for their review, and provide an opportunity for additional consultation. Therefore, impacts to archaeological resources will be less than significant with mitigation. (DEIR, p. 5.5-29.)

The following mitigation measures will be implemented:

> **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 developer shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject 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 Developer 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 Developer and the City. The 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, Developer, City and Native Tribal Monitors as to which features of sites CA-RIV-8750, CA-RIV-8751 and CA-RIV-8752 can be successfully relocated to locations on-site 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 Developer, 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.

2. Tribal Cultural Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074?

Finding: Less than significant with mitigation. (DEIR, pp. 5.5-31 – 5.5-33.)

Explanation: The archaeological resources identified on-site do not meet the requirements to be listed under the NRHP, CRHR, or local policies. Therefore, there are no officially designated tribal cultural resources (TCR) at the Project site. Nevertheless, through the SB 18/AB 52 consultation process, the Tribes requested

full avoidance of all three archaeological sites (CA-RIV-8750, CA-RIV-8751, and CA-RIV-8752) but acknowledged that the current design of the proposed Project will entail removal of all the known archaeological resources at the Project site. In order to reduce impacts to the known archaeological resources at the Project site to less than significant, the Project will implement mitigation measures **MM CR 1** through **MM CR 4,** as requested by the Tribes. (DEIR, p. 5.5-33.)

The following mitigation measures will be implemented:

MM CR 1 and **MM CR 2** are included above.

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.

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.

C. GREENHOUSE GAS EMISSIONS

1. Policy Consistency

Threshold: Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Less than significant with mitigation. (DEIR, pp. 5.7-34 – 5.7-45, Appendix B.)

Explanation: Consistency with the City of Riverside's Climate Action Plan (CAP) was used to assess the significance of greenhouse gas emissions, pursuant to the *Newhall Ranch* court decision. The CAP identifies strategies for reducing GHG emissions and prioritizes the implementation of policies that enable the City to fulfill the requirements of AB 32 and sets a 2020 emissions target of 26.4% below the City's 2007 baseline emissions inventory and 15% below 2010 emissions inventory. Thus, projects that demonstrate compliance with the reduction target described in the City's CAP are considered consistent with the AB 32 reduction target. (DEIR, p. 5.7-34.)

In order to demonstrate compliance with the reductions targets described in the City's CAP, a business as usual (BAU) analysis was performed for the proposed Project to determine its consistency with AB 32. A comparison of the Project's GHG emissions in 2020 to the BAU GHG emissions corresponds to an 18.2 percent reduction, which achieves the 15 percent greenhouse gas emission reduction target to meet the goal of the City's CAP pursuant to AB 32 reduction targets. (DEIR, pp. 5.7-43 – 5.7-44.)

Hence, construction and operation of the proposed Project will meet and exceed the 2020 City's CAP reduction target of 15 percent through implementing statewide regulations and the Project's incorporation of numerous design features to increase energy efficiency, reduce water consumption, and reduce waste as described in Project Design Features also included with **MM AQ 1** through **MM AQ 16**, **MM AQ 18**, **MM AQ 19**, and **MM AQ 22** through **MM AQ 24**. Therefore, impacts are less than significant with mitigation incorporated. (DEIR, p. 5.7-45.)

These mitigation measures are contained in their entirety in Section 4.3-A of this document.

Threshold: Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Less than significant with mitigation. (DEIR, pp. 5.7-45 – 5.7-55, Appendix B.)

Explanation: The Project's significance with respect to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emission have been evaluated below and addressed for each sector.

Transportation
Approximately 87% of the Project's opening year GHG emissions are from mobile sources, particularly heavy-duty trucks. Because transportation emissions are heavily regulated at the source, including, but not limited to engine emissions standards and fuel requirements, implementation of applicable State requirements, regional and local measures, and Project design features (also included as mitigation measures **MM AQ 11** through **MM AQ 13, MM AQ 14** through **MM AQ 16, MM AQ 18,** as well as **MM AQ 22** through **MM AQ 24**) will result in an approximately 17% reduction in Project-related mobile emissions as compared to BAU. (DEIR, pp. 5.7-43, p5.7-50.) The Project also incorporates a design feature (included as mitigation measure **MM AQ 17b**) that requires medium- and heavy-duty trucks that access the Project site to meet or exceed 2010 engine emissions standards.

Energy
Approximately 11% of the Project's opening year GHG emissions are from electricity and natural gas. Because energy-related-emissions are heavily regulated at the source, implementation of all applicable State requirements, regional and local measures, and Project design features (also included as mitigation measures **MM AQ 1** through **MM AQ 7**) will result in an approximately 31% reduction in Project-related energy emissions as compared to BAU. (DEIR, pp. 5.7-50, 5.7-52 – 5.7-53.)

Water
Approximately 1% of the Project's opening year GHG emissions are from electricity consumption related to water supply, treatment, and distribution and wastewater treatment. Collectively, implementation of all applicable State requirements, regional and local measures, and Project design features (also included as mitigation measures **MM AQ 8** and **MM AQ 9**) will result in an approximately 37% reduction in Project-related water-usage emissions as compared to BAU. (DEIR, p. 5.7-53 – 5.7-54.)

Waste Diversion
Approximately 1% of the Project's opening year GHG emissions are from disposal of solid waste in landfills. Collectively, implementation of State requirements regarding waste diversion, along with regional and local measures, and Project design features (also included as mitigation measures **MM AQ 10** and **MM AQ 19**) will result in an approximately 31% reduction in Project-related solid waste emissions as compared to BAU. (DEIR, pp. 5.7-54 – 5.7-55.)

Conclusion
In summary, the Project is consistent with the goals established under AB 32. The Project provides emission reductions demonstrating consistency with AB 32 targets, and complies with all present and future regulatory measures developed in accordance with AB 32 and the California Air Resources Board's (CARB's) Scoping Plan, and incorporates a number of Project design features (listed as **MM AQ 1** through **MM AQ 19**) that would further minimize GHG emissions. Accordingly, the Project will not conflict with any applicable plan, policy, or regulation for the reduction of GHG emissions. Therefore, the impacts are considered less than significant with mitigation incorporated. (DEIR, p. 5.7-55.)

Mitigation measures **MM AQ 1** through **MM AQ 19** are contained in their entirety in Section 4.3-A of this document.

D. HAZARDS AND HAZARDOUS MATERIALS

1. Airport Hazards

Threshold: Would the Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, and would the Project result in a safety hazard for people residing or working in the project area?

Finding: Less than significant with mitigation. (DEIR, pp. 5.8-20 – 5.8-24.)

Explanation: Portions of the Project site are located within Zones C1 and D the March Air Reserve Base/Inland Port Airport Land Use Consistency Plan (MARB/IPA LUCP). The proposed Project consists of light industrial activities, which are permitted within Zones C1 and D; therefore, the proposed Project was determined by ALUC to be consistent with this LUCP on December 10, 2015. (DEIR, p. 5.8-20.)

Nonetheless, Zone C1 discourages above ground storage of more than 6,000 gallons of hazardous or flammable materials per tank. Although no above ground storage is proposed, implementation of mitigation measure **MM HAZ 1**, will ensure impacts remain less than significant. Additionally, ALUC noted that Federal Aviation Administration (FAA) review would be required for any structures with top of roof exceeding 1711 feet above mean seal level (AMSL). Therefore, in the event Project construction or operation requires the use of cranes or other equipment that will exceed 1711 AMSL, mitigation measure **MM HAZ 2** requires the applicant to notify the FAA. (DEIR, p. 5.8-22.)

The MARB/IPA LUCP established Community Noise Equivalent Level (CNEL) contours that reflect noise exposure in decibels (dB) to the surrounding area created by aircraft activity. As a majority of Building 1 is located within Zone C1, which is within or near the 60-CNEL contour, mitigation measure **MM HAZ 3** would ensure potential tenants and building owners are aware of the potential for disruptive noise events. Regardless, the Project will not include noise sensitive uses. (DEIR, pp. 5.8-23 – 5.8-24.)

Therefore, with incorporation of mitigation measures **MM HAZ 1** through **MM HAZ 3,** impacts will be less than significant. (DEIR, p. 5.8-24.)

The following mitigation measures will be implemented:

> **MM HAZ 1:** Above ground storage tanks of more than 6,000 gallons of hazardous material shall not be permitted.
>
> **MM HAZ 2:** A minimum of 45 days prior to submittal of an application for a building permit, the Project applicant shall inform the City of Riverside Planning Division and Building and Safety Division if any Project-related vertical structures or construction equipment will exceed 1711 AMSL. If it is determined that any Project-related vertical structures or construction equipment will exceed 1711 AMSL, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA Form 7460-1 is required to be filed, the City shall not issue a building permit until the FAA issues a determination stating that the proposed construction will not be a hazard to air navigation.
>
> **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).

2. Wildland Fires

Threshold: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Finding: Less than significant with mitigation. (DEIR, pp. 5.8-25 – 5.8-26.)

Explanation: The Project site is not identified as being in a fire hazard area or State Responsibility Area (SRA). Riverside Fire Department (RFD) aims to meet and maintain a five minute response time for urban areas. RFD's nearest responding fire station is Box Springs Station 13, located approximately 0.5 mile to the southeast of the Project site at 6490 Sycamore Canyon Boulevard; well within the five minute response

time criteria. In the event of a fire, the Project site will be accessible from a fully improved, paved roadway network within the Sycamore Canyon Business Park. (DEIR, p. 5.8-25.)

With regard to firefighting access into the Sycamore Canyon Wilderness Park, the *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan* identifies a future paved cul-de-sac in the vicinity of Kangaroo Court as providing a logical emergency access point to the entire east half of the park. Although both the General Plan and Specific Plan will be amended to remove Kangaroo Court, the Project's proposed Fire Access/Parks Maintenance Road will provide access to the east half of the park. This access road will be maintained by the property owner designed and constructed to the standards identified in mitigation measures **MM AES 6** and **MM AES 7**. Therefore, project design, regulatory compliance, and implementation of these mitigation measures potential impacts from wildland fires will be less than significant. (DEIR, p. 5.8-26.)

MM AES 6 and **MM AES 7** are contained in their entirety in Section 4.2-A of this document.

E. LAND USE AND PLANNING

1. Habitat Conservation Plans

Threshold: Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?

Finding: Less than significant with mitigation. (DEIR, p. 5.10-11.)

Explanation: Potential conflicts with all applicable habitat conservation plans or natural community conservation plan are addressed in Section 5.4 – Biological Resources of the DEIR and Section 4.2-B of this document. (DEIR, p. 5.10-11.)

MM BIO 1 through **MM BIO 8** are included in their entirety in Section 4.2-B of this document.

F. NOISE

1. Permanent Ambient Noise

Threshold: Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Less than significant with mitigation. (DEIR, pp. 5.12-38 – 5.12-44.)

Explanation: Potential permanent or long-term noise impacts associated with the Project include on-site sources from typical Project operations (discussed in Section 4.3-A of this document and DEIR Section 5.12.5 under Threshold A) and off-site sources such as Project-specific traffic increases on area roadways. For purposes of this threshold, a clearly perceptible increase (+5 dB) in noise exposure of sensitive receptors is considered substantial. (DEIR, p. 5.12-38.)

On-Site Noise
The only receptor that will experience a Community Noise Equivalent Level (CNEL) increase of 5 dBA or greater is located approximately 10 feet east of the westerly property line in the Sycamore Canyon Wilderness Park. Although this will be a perceptible increase (i.e., an increase of greater than 5 dBA), this is not a significant impact because there are no sensitive receptors at this location within the Sycamore Canyon Wilderness Park and the Project's mitigated noise levels will be within the GP 2025 "normally acceptable" compatibility criteria for neighborhood park uses. Therefore, with implementation of mitigation measures **MM NOI 13** through **MM NOI 16**, the noise increase from Project operations is not considered a significant impact (DEIR, p. 5.12-40.)

Off-Site/Traffic-Related Noise
Off-site noise levels from Project-generated traffic were modeled using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model along roadway segments in the Project vicinity and Project-specific increases in noise levels at a distance of 50 feet from roadway centerline was used to provide a direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios. The noise increase from Project-generated traffic is not considered significant because although Project-generated traffic is projected to result in an approximate 7.2 dBA increase along Dan Kipper Drive west of Sycamore Canyon Boulevard, noise levels will not exceed the GP 2025 "Normally Acceptable" compatibility criteria for industrial and manufacturing land uses and there are no sensitive receptors adjacent to this road segment. For these reasons, impacts with regard to a substantial permanent increase in ambient noise levels in the project vicinity are less than significant with mitigation. (DEIR, pp. 5.12-42 – 5.12-44.)

Mitigation measures **MM NOI 13** through **MM NOI 16** are included in their entirety in Section 4.3-B of this document.

2. Airport Noise

Threshold: Is the project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Finding: Less than significant with mitigation. (DEIR, p. 5.12-44.)

Explanation: The Project site is located within the MARB/IPA LUCP and has been determined to be consistent with the LUCP. Approximately 46 acres of the Project site, consisting of Building 1, is located within Zone C1; while a small portion of Building 1 and the entirety of Building 2, approximately 28 acres, is located within Zone D of the LUCP. Noise impacts within Zone C1 are considered moderate to high because this zone is within or near the 60 CNEL contour and single-event noise may be disruptive to noise sensitive activities Noise impacts within Zone D are considered moderate to low because the this zone is mostly within the 55 CNEL contour. Mitigation measure **MM HAZ 3** will be implemented to ensure potential future tenants are aware of the potential for disruptive noise events as a result of the Project site's proximity to this airport. Therefore, impacts with regard to the exposure of people to excessive airport noise will be less than significant with mitigation. (DEIR, p. 5.12-44.)

MM HAZ 3 is included in Section 4.2-D of this document.

4.3 Findings Regarding Significant and Unavoidable Impacts

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR, the following impacts from the Project and related approvals cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. AIR QUALITY

1. Compliance with Air Quality Standards

Threshold: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 5.3-23 – 5.3-30.)

Explanation: Air quality impacts can occur on a regional, or basin-wide, scale or in the immediate Project vicinity (Localized). Analysis was conducted to determine the potential impacts at each scale in the DEIR, and summarized below:

Regional Air Quality Impacts
Based on the Regional Significance Threshold (RST) analysis prepared for this Project, the short-term construction emissions will not exceed any thresholds for any criteria pollutants with incorporation of mitigation measures **MM AQ 16** and **MM AQ 17.** Additionally, **MM AQ 20** and **MM AQ 21** will be implemented during construction to comply with SCAQMD fugitive dust requirements and avoid significant volatile organic compounds (VOC) emissions from architectural coating. (DEIR, p 5.3-30.)

However, the long-term operational emissions will exceed the SCAQMD threshold for oxides of nitrogen (NO_x) emissions, even with the incorporation of proposed Project design features, which are also included as mitigation measures **MM AQ 1** through **MM AQ 15, MM AQ 18,** and **MM AQ 19,** as well as additional mitigation measures **MM AQ 22** through **MM AQ 25**. Therefore, long-term regional air quality impacts are considered significant and unavoidable (DEIR, p 5.3-30.)

Localized Air Quality Impacts
A Localized Significance Threshold (LST) analysis methodology was developed by SCAQMD to determine if the daily emissions for proposed construction or operational activities associated with the proposed Project would result in significant localized air quality impacts. According to the SCAQMD methodology, the closest sensitive receptors to the Project site are the residences adjacent to the north and northwest area of the Project site. (DEIR, p. 5.3-28.)

Based on the Localized Significance Threshold (LST) analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will result in localized air quality impacts to sensitive receptors in the Project vicinity for any criteria pollutants. (DEIR, p 5.3-30.)

Conclusion
Therefore, because long-term operation of the proposed Project will exceed the SCAQMD threshold for NO_x, impacts are considered to be significant and unavoidable after implementation of mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p 5.3-30.)

The following mitigation measures will be implemented:

> **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 in compliance with the City's Water Efficient Landscape and Irrigation Ordinance 19.580. 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.

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to three minutes or in excess of 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 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 17a: 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 17b: All medium- and heavy-duty 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 any time.

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.

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.

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

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 idling times cannot exceed three minutes, 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) 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.

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.

2. Cumulatively Considerable Increase of Criteria Pollutants

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 5.3-30 – 5.3-31.)

Explanation: SCAQMD considers the thresholds for project-specific and cumulative impacts to be the same. Therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. None of the SCAQMD mass daily significance thresholds are exceeded during Project construction; however, the mass daily significance threshold for NO_x would be exceeded during Project operation. Thus, the Project would have a cumulatively considerable increase in emissions due to operational NO_x. Because the Project would have a cumulatively considerable increase in emissions due to operational NO_x, even with implementation of mitigation measures **MM AQ 1** through **MM AQ 25**, the impact is significant and unavoidable after implementation of mitigation. (DEIR, p. 5.3-31.)

Mitigation measures **MM AQ 1** through **MM AQ 25** are described above.

B. NOISE

1. Noise Exposure

Threshold: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, pp. 5.12-20 – 5.12-34.)

Explanation: Noise impacts under this threshold are evaluated from the perspective of noise impacts to the Project and noise impacts from the Project. Noise sources affecting the Project site will be sourced primarily from operations at the surrounding logistics/distribution uses and vehicular traffic travelling along roadways in proximity to the Project site. However, none of the applicable noise standards will be exceeded as a result of these surrounding uses and traffic and noise impacts to the Project will be less than significant. Implementation of the proposed Project has the potential to generate noise during short-term construction and long-term operation of the site, as discussed below. (DEIR, pp. 5.12-20 – 5.12-21.)

Construction Impacts
Construction noise is considered temporary and short-term because once construction is completed this noise source ceases. Because of the topographical differences between the Project site and the location of sensitive receptors, the SoundPLAN Noise Model was used to calculate a worst-case construction noise scenario. The results of this modeling determined that construction noise will exceed the City's daytime exterior noise standard for residential property, which is 55 dBA. Because construction noise impacts to certain residential units adjacent to the Project site are considered significant, the Project is required to incorporate feasible mitigation. Likewise, noise impacts to the Sycamore Canyon Wilderness Park will be significant because the exterior noise standard for public recreation facilities, which is 65 dBA, will be exceeded. (DEIR, p. 5.12-22.)

Mitigation measures **MM NOI 1** through **MM NOI 12** will be implemented to reduce construction-related noise impacts to the adjacent residences and Sycamore Canyon Wilderness Park by an additional approximately 10 dBA; however, impacts will still be significant and unavoidable. (DEIR, p. 5.12-24.)

Operational Impacts
The dominant source of operational noise will generally include noise associated with semitrucks (tractor-trailers) entering and exiting the Project site and accessing dock areas, removal and hook-up of trailers, occasional truck air brakes, and vehicles associated with employees. The noisiest hour on-site Project operational noise was modeled utilizing the SoundPLAN model. Without mitigation, Project operational noise levels are expected to range between 30 and 52 dBA L_{eq} at nearby sensitive receptors and up to 55 dBA along the property line. Unmitigated operational noise is not expected to exceed the City's daytime exterior noise standards of 55 dBA L_{eq}. Unmitigated operational noise is expected to exceed the nighttime exterior noise standard of 45 dBA L_{eq} along the western project boundary and at certain single-family detached residential dwelling units adjacent to the northwest corner of the site. (DEIR, p. 5.12-26.)

Mitigation measures **MM NOI 15** and **MM NOI 16** are proposed to reduce these impacts; however, **MM NOI 16** is considered infeasible because it involves construction of ten-foot tall noise barriers at the eastern edge of two certain residential lots and these two residential lots are not owned or controlled by the Project proponent or the City. Therefore, operational noise impacts to the adjacent residences receptors nos. 3 and 4. as shown on DEIR Figures 5.12-5 and 5.12-6 are considered significant and unavoidable because **MM NOI 16** is dependent on the private property owners. (DEIR, p. 5.12-28.)

Operational noise impacts to the Sycamore Canyon Wilderness Park will be less than significant because the operational noise level at the property line between the Park and the Project site is less than the Municipal Code noise standard for public recreational facilities, which is 65 dBA L_{eq}. (DEIR, p. 5.12-26.)

Additional Noise Criteria
In addition to the "base" daytime and nighttime noise standards discussed above, the City's Noise Ordinance also includes several other noise level criteria that are based on the percentage of time a particular noise level is exceeded over a measurement period. These criteria are represented by the L_{max}, L_{50}, L_{25}, L_8 and L_2. Activities that may violate these shorter time/louder criteria thresholds as presented in Municipal Code Section 7.25.010 include back-up warning beepers, trash compactor and loading activities. The Project includes mitigation measures **MM AQ 14**, **MM NOI 13**, **MM NOI 15**, and **MM NOI 16** to reduce construction and operational noise impacts so that none of these additional thresholds are exceeded. (DEIR, pp. 5.12-28 – 5.12-34.)

Conclusion
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. 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. Unmitigated operational noise will not exceed the daytime noise standard of 55 dBA Leq. However, it will exceed the nighttime noise standard of 45 dBA Leq along the western project boundary and at certain residential units adjacent to the northwest corner of the Project site. Implementation of **MM NOI 13** through **MM NOI 16** will reduce operational noise impacts; however, because the noise barrier outlined in **MM NOI 16** would be on private properties, the Project proponent does not have control over construction of the noise barrier. For this reason, impacts are significant even with incorporation of feasible mitigation. (DEIR, p. 5.12-34.)

The following mitigation measures will be incorporated to reduce Project-related noise impacts:

> **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.

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 (Leq) with Mitigation [of the DEIR].

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.

Mitigation measures **MM AQ 14** and **MM HAZ 3** are included in their entirety in Sections 4.3-A and 4.2-D, respectively, of this document.

2. Temporary Ambient Noise

Threshold: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Significant and unavoidable with implementation of mitigation. (DEIR, p. 5.12-44.)

Explanation: The temporary increase in ambient noise resulting from Project construction is discussed in DEIR Section 5.12.5 under Threshold A and in Section 4.3-B.1 of this document, above. Impacts were determined to be significant and unavoidable even with feasible mitigation incorporated. (DEIR, p. 5.12-44.)

Mitigation measures **MM NOI 1** through **MM NOI 16** are included in their entirety in Section 4.3-B of this document.

C. TRANSPORTATION/TRAFFIC

1. Applicable Plans, Ordinances, and Policies

Threshold: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Finding: Significant and unavoidable until improvements to freeway segments are constructed. (DEIR, pp. 5.16-27 – 5.16-53.)

Explanation: A Project-specific Traffic Impact Analysis (TIA, or "traffic study") was prepared to assess traffic conditions in the vicinity of the proposed Project under a variety of future development scenarios. 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 (E+A+C+P) 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. (DEIR, p. 5.16-52.)

The Eastridge-Eucalyptus I-215 Northbound off-ramp is projected to operate at LOS E during the PM peak hour as a result of ambient growth without the Project (Existing + Ambient, or E + A), which is considered to be an unsatisfactory LOS per Caltrans. With the addition of Project traffic (Existing + Ambient + Project, or E+A+P), this off-ramp will continue to operate at LOS E. Likewise, the Fair Isle-Box Springs I-215 Northbound on-ramp, this on-ramp is projected to operate at LOS E in the AM peak hour and LOS F in the PM peak hour as a result of traffic from the cumulative development projects (Existing + Ambient +

Cumulative, or E+A+C). With the addition of Project traffic (E+A+C+P), this on-ramp will continue to operate at LOS E (AM peak hour) and LOS F (PM peak hour). This on-ramp will operate at LOS C (AM peak hour) and LOS D (PM peak hour) in the E+A+C+P condition with the addition of one mainline mixed flow lane for northbound I-215 at the Fair Isle-Box Springs Drive on-ramp. However, these freeway facilities are under the jurisdiction of Caltrans and there is no mechanism or fund in place for the City or Project proponent to contribute fair share fees or implement improvements to change this LOS to a satisfactory level. For these reasons Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, pp. 5.16-52 – 5.16-53.)

With regard to the Sycamore Canyon Boulevard/Dan Kipper Drive intersection and the E+A+C condition, this intersection is projected to operate at LOS F as a result of traffic from cumulative development projects. When Project traffic is added to existing traffic, traffic from ambient growth and cumulative development project traffic (E+A+C+P), the delay at this intersection will increase by 0.9 seconds. Because this delay is increased by less than 1 second, this impact is not significant. (DEIR, p. 5.16-52.)

Truck queuing on public streets is not anticipated to be a problem because the Project is proposed to be a 24-hour a day, seven-day a week operation and there is designated commercial vehicle parking on Sycamore Canyon Road and Box Springs Road that can be used so as to avoid illegally parking in the adjacent residential neighborhood. Although the Project's intersection impacts will not be significant its impacts to freeway segments (on- and off-ramps) will be significant and unavoidable. Therefore the proposed Project will have a significant and unavoidable impact until improvements are constructed with regard to conflicts with plans, policies, and ordinances establishing measures of effectiveness for the performance of the circulation system. (DEIR, p. 5.16-53.)

4.4 Findings Regarding Cumulative Impacts

Consistent with CEQA's requirements, the EIR includes an analysis of cumulative impacts, which include the impacts of the Project plus all other pending or approved projects within the affected area for each resource. Where evaluation of potential cumulative impacts are located (e.g., noise, traffic, visual quality, biological, cultural resources, and public utilities) the analysis is based on a list of past, present, and probably future projects producing related or cumulative impacts. (See, DEIR, Table 6-A.) For potential cumulative impacts that are regional in scope (e.g., air quality and global warming/GHGs), planning documents were used to determine cumulative impacts. (DEIR, p. 6-2.)

A. Aesthetics

Development of the Project in conjunction with the cumulative development projects will result in a mix of urban infill including multi-family residential, logistics, warehouse, office, industrial, and hospitality uses. For cumulative development to result in a cumulative impact on aesthetics, the cumulative development projects typically must be contiguous to the Project site and/or be located within the same viewshed, i.e., viewable from the same points as the Project. The only cumulative projects that share the same viewshed as the Project site are Project No. 8 (Alessandro Business Center, Project No. 10 (CT Sycamore Canyon), and Project No. 12 (Mt Baldy Drive/San Gorgonio Drive Industrial Project. All of these cumulative development projects are within the SCBPSP. (DEIR, p. 6-8.)

Thus, the Project will not introduce a new type of use or construction material to the viewshed because the SCBPSP and City Municipal Code includes development standards that require landscaping, setbacks, pedestrian access, building elevations and street frontage improvements. For these reasons, the proposed Project's contribution to aesthetic resources with implementation of mitigation measures identified in DEIR Section 5.1 – Aesthetics, is not cumulatively considerable when added to the cumulative development proposed within the viewshed. Therefore, with regard to aesthetics cumulative impacts are not significant. (DEIR, p. 6-8.)

B. Agriculture and Forestry Resources

Cumulative impacts to agricultural resources would occur if the proposed Project and the cumulative development projects would result in the conversion of Farmland or property used for agricultural purposes to other uses. With regard to the conversation of Farmland, none of the cumulative development Projects are located on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Further, the Project site and cumulative development projects are located within developed areas and none of these sites are currently used for agricultural purposes, nor are they designated for agricultural uses in their respective General Plan documents. Therefore, no potentially significant cumulative effects related to Farmland or agricultural resources will result from the proposed Project. (DEIR, pp. 6-8 – 6-9.)

Likewise, cumulative impacts to forest land or timberland would occur if the Project and cumulative development projects would result in the conversion of forest land or timberland to other uses. The Project site and cumulative development projects are located within a developed area of the Cities of Riverside and Moreno Valley and none of these sites consist of forest land or timberland, nor are any of the cumulative development sites zoned to allow tree crops for commercial purposes. Therefore, no potentially significant cumulative effects related to forest or timberland resources will result from the proposed Project. (DEIR, p. 6-9.)

C. Air Quality

Due to the defining geographic and meteorological characteristics of the Basin, the cumulative area for air quality impacts is the Basin itself, which is a non-attainment area for ozone, PM-2.5, and PM-10 under State standards; and for ozone and PM-2.5 under both Federal standards. Project-related short-term emissions will not exceed any applicable SCAQMD thresholds; however, the NO_x threshold will be exceeded during Project operation. Because SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Therefore, because the Project's emissions exceed applicable SCAQMD thresholds during operation even with incorporation of mitigation, the Project will result in significant and unavoidable cumulative impacts to air quality. (DEIR, pp. 6-9 – 6-10.)

D. Biological Resources

The Project site and cumulative development projects are located within the MSHCP; thus the geographic scope for cumulative impacts to biological resources is the MSHCP plan area. The proposed Project is required to adhere to mitigation measures **MM BIO 1** through **MM BIO 8** to reduce impacts to less than significant, pay the Local Impact Development Fee (LDMF) in support of the MSHCP, and the pay the Stephens' Kangaroo Rat Preservation Fee. Cumulative development projects within the MSHCP plan area will also be required to pay the LDMF to offset impacts to the MSHCP, and additional mitigation measures will be identified on a project-specific level as they are proposed and approved. Therefore, because the proposed Project and cumulative development projects will comply with the MSHCP and the MSHCP provides mitigation for direct, indirect, and cumulative impacts to covered species, cumulative impacts are not significant. (DEIR, p. 6-10.)

E. Cultural Resources

The geographic scope for cumulative impacts to cultural resources is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. Western Riverside County was part of the territory of the Cahuilla and perhaps Luiseño people. Cumulative projects within the City have the potential to impact cultural resources; however, to reduce impacts to significant historical, archeological, and paleontological resources, the City's General Plan and General Plan EIR incorporate policies and programs to protect and/or document these resources as part of the City's development review process and mitigation measures that require preparation of technical studies, coordination with native American tribes, and the presence of monitors if necessary. Therefore, the General Plan EIR concluded that with adherence to and implementation of General Plan policies, mitigation measures, and standard federal, state, and City regulations, cumulative impacts to

historical resources, archaeological resources, and paleontological resources will be less than significant with mitigation. (DEIR, p. 6-11.)

F. Geology and Soils

The geographic scope for geology and soils is the State. Pursuant to City requirements and the current edition of the California Green Building Standards Code requirements, the proposed Project, the cumulative development projects, and all new development in the City will be required to incorporate appropriate design and construction measures to guard against ground-shaking hazards. Further, all projects and structures will be constructed in compliance with existing seismic safety regulations of the California Uniform Building Code. (DEIR, p. 6-11.)

The construction and operation of the proposed Project and all cumulative projects would involve exposure of ground surfaces during construction and the collection and discharge of stormwater. Cumulative impacts to geology and soils could occur if the proposed Project and cumulative projects are constructed within the same time period and erosion occurs during construction that creates sedimentation or bank stabilization issues within the local watershed. However, all new construction that involves disturbance of more than 1 acre of land is required to prepare a SWPPP and implement BMPs during construction in compliance with the NPDES General Permit for Construction Activities. Additionally, in accordance with the County of Riverside MS4 NPDES Permit, all new construction is required to implement permanent BMPs, such as water quality basins, vegetated swales, and other stabilization measures to minimize the potential for erosion and related impacts to water quality. Therefore, the Project's contribution to impacts with regard to geology and soils is not cumulatively considerable and with regard to geology and soils, cumulative impacts are not significant. (DEIR, p. 6-12.)

G. Greenhouse Gas Emissions

The cumulative impact area for GHG emissions is the earth's atmosphere. Implementation of the proposed Project along with the cumulative development projects will contribute GHG emissions to the atmosphere. Although the City has limited jurisdictional authority to limit many sources of emission, the City has adopted a Climate Action Plan (CAP) to ensure that projects within the City will comply with all necessary policies to achieve a 15 percent reduction in GHG emissions by 2020 compared to a business as usual scenario. (DEIR, p. 6-13.)

Greenhouse gas emission modeling was used to predict that Project design features will reduce the predicted greenhouse gas emissions in 2020 by 18.5 percent compared to a business as usual scenario. This percent reduction is greater than the 15 percent reduction target outlined in the City's CAP, pursuant to AB 32 reduction targets and the Project will not be a significant source of greenhouse gas emissions. Additional cumulative development projects will also be subject to consistency analysis with the City's CAP as well as state and subregional policies that restrict greenhouse gas production. As these buildings, roads, or other cumulative developments are updated or replaced over time, they will be subject to the then-existing requirements for greenhouse gas emissions reductions, including those set forth to ensure compliance with Executive Orders S-3-05 and B-30-15. Therefore, cumulative impacts to greenhouse gas emissions will be less than significant without mitigation from the proposed Project and other cumulative development projects within the City of Riverside. (DEIR, p. 6-13.)

H. Hazards and Hazardous Materials

The geographic context for cumulative impacts relative to the use of hazardous materials is the City and the portion of Moreno Valley in which cumulative development projects are located. Although the overall quantity of hazardous materials and waste generated in the City and the portion of Moreno Valley in which cumulative projects are located may increase as a result of implementation of the proposed Project in combination with the cumulative development projects, all new development that will handle or use hazardous materials and all existing development that handles or uses hazardous materials are required to comply with the regulations, standards, and guidelines established by USEPA, the State of California, County of Riverside, City of Riverside, and City of Moreno Valley, related to storage, use, and disposal of

hazardous materials. The proposed Project will incorporate design features to ensure that hazardous materials are safely stored and transported to reduce impacts to less than significant. Since hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with development proposals on these properties. Therefore, cumulative impacts with regard to hazardous materials are not significant. (DEIR, p. 6-14.)

The proposed Project and several of the cumulative projects are located within Compatibility Zones of the March Air Reserve Base/Inland Port Airport (MARB/IPA) Land Use Compatibility Plan (LUCP) which sets forth the types and intensity of uses that are suitable within each of these zones in order to reduce the risk of exposure to the hazards of an off-airport aircraft accidents. Proposed development (such as the Project and the cumulative development projects within the Compatibility Zones) that does not meet all criteria set forth in the LUCP is subject to review by ALUC. ALUC may, as part of its review, impose height, use, and lighting restrictions on development to reduce the potential impacts associated with aviation use of the MARB/IPA to less than significant levels. (DEIR, pp. 6-14 – 6-15.)

The City also maintains an EOP, as discussed in DEIR Section 5.8 – Hazards and Hazards Materials and Section 4.1.G.6 of this document. Moreno Valley has an adopted Local Hazard Mitigation Plan. The proposed Project along with the cumulative development projects will not interfere with any emergency response or evacuation plans, and with implementation of mitigation measure **MM HAZ 4**, will provide a planned emergency vehicle access to the Sycamore Canyon Wilderness Park. Because the cumulative development projects would also be required to comply with the City's EOP and Moreno Valley's Local Hazard Mitigation Plan, cumulative impacts with regard to conflicts with emergency response plans are not significant. (DEIR, p. 6-15.)

The proposed Project, when combined with cumulative project No. 8 – Alessandro Business Park as shown on DEIR Figure 6-1, has the potential to increase threats from wildland fires due to their adjacency to the Sycamore Canyon Wilderness Park. The proposed Project will incorporate sprinklers, landscaping along the Project/Park boundary, and includes the Fire Access/Parks Maintenance Road to provide emergency vehicle access to the Sycamore Canyon Wilderness Park, thus the Project's contribution is not considered cumulatively considerable. Therefore cumulative impacts with regard to the exposure of people to wildland fires are not significant. (DEIR, p. 6-15.)

I. Hydrology/Water Quality

The cumulative impact area for hydrology and water quality impacts is the Santa Ana River watershed hydrologic unit. Cumulative impacts to water quality could be significant with the addition of substantial increases in development and temporary construction activities in the Santa Ana River watershed. The proposed Project, along with all of the cumulative development projects, are required to comply with current storm water requirements for construction-related activities and operation of the site. Erosion and sediment control BMPs will be implemented during construction of the Project in compliance with the NPDES General Permit for Construction Activities. (DEIR, pp. 6-16 – 6-18.)

The increase in the amount of impermeable surfaces within the watershed resulting from the proposed Project and cumulative projects has the potential to affect groundwater recharge. However, because the Project and cumulative projects are not located within a groundwater recharge area, there would be no cumulative impacts in this regard. The proposed Project and all cumulative projects will comply with the State's current drought regulations, the Project's contribution is not considered cumulatively considerable and the cumulative development projects are also required to reduce water use. For these reasons cumulative impacts with regard to groundwater are not significant. (DEIR, p. 6-16.)

When combined with cumulative projects, the proposed Project would contribute to significant cumulative impacts to the drainage pattern in the area if not mitigated properly. Through compliance with the terms of the NPDES general construction permit and the City's MS4 permit, the Project's impact to altering existing drainage patterns is not cumulatively considerable. Therefore, cumulative impacts with regard to alteration of existing drainage patterns are not significant. (DEIR, p. 6-17.)

The Project site is not located within a flood hazard area or dam inundation zone; therefore, the Project would not contribute to cumulative flood or dam inundation hazards. Through implementation of the final Project-specific WQMP, SWPPP, and compliance with NPDES permit requirements, the Project's contribution to cumulative flood or dam inundation hazards is not cumulatively considerable. Therefore, cumulative impacts with regard to flood or dam inundation hazards are not significant. (DEIR, p. 6-17.)

J. Land Use and Planning

Land use and planning decisions for the cumulative development projects fall within the jurisdiction of the City of Riverside and the City of Moreno Valley; thus the geographic scope for land use and planning is the City and a portion of Moreno Valley. As with the proposed Project, all of the cumulative development projects are required to comply with applicable land use plans and policies of the applicable jurisdiction. Accordingly, a project cannot be approved that is not consistent with the GP 2025 or the Moreno Valley General Plan or the zoning ordinance of either City unless amendments, variances, or exceptions are proposed and adopted as part of the project. The Project's contribution with regard to conflicts with applicable land use plans, policies, or regulations is not considerable and cumulative impacts in this regard are not significant. (DEIR, p. 6-17.)

The Project will not divide an established community because it is located on the edge of the SCBPSP, will not eliminate any existing roadways, or create barriers to accessing existing development. Therefore, the Project's contribution with regard to physically dividing an established community is not considerable and cumulative impacts in this regard are not significant. (DEIR, p. 6-18.)

With regard to conflicts with a habitat conservation plan or natural community conservation plan, the proposed Project and cumulative development projects are subject to the provisions of the MSHCP and the SKR-HCP. Each of the cumulative projects would be required by the appropriate city (Riverside or Moreno Valley) to conduct surveys and mitigate for impacts to loss of sensitive habitats and species in accordance with the provisions of the MSHCP and the SKR-HCP. Project developers are also required to contribute mitigation fees identified in the MSHCP and the SKR-HCP, in support of continued implementation of the plans. Because compliance with these plans reduces impacts to less than cumulatively considerable levels, cumulative impacts are not significant. (DEIR, p. 6-18.)

K. Mineral Resources

A cumulative impact on mineral resources would occur if the proposed Project and cumulative development projects would contribute to the loss of availability of significant aggregate reserves. The Project site and cumulative development projects are located within a mineral resource zone for which the available data cannot determine the significance of the deposits (MRZ-3). However, given the current zoning designations of the Project site and the cumulative development projects, the amount of existing industrial, commercial, and residential development surrounding the Project site and the undeveloped cumulative project sites, it is highly unlikely that any surface mining or mineral resource recovery operation could feasibly take place. Therefore, no potentially significant cumulative effects related to mineral resources will result from the proposed Project. (DEIR, p. 6-18.)

L. Noise

The geographic scope for noise impacts associated with on-site construction and operations is the immediate vicinity of the Project site because noise by definition is a localized phenomenon, and drastically reduces in magnitude as the distance from the noise sources increases. Consequently, only those cumulative development projects within the immediate vicinity of the proposed Project will be likely to contribute to cumulative noise impacts resulting from Project construction or operation. (DEIR, p. 6-18.)

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. Project No. 11 – Sycamore Canyon Apartments, as

shown on DEIR Figure 6-1, is the only project with the potential to be constructed at the same time as the proposed Project. However, the Initial Study prepared for project No. 11 determined that noise impacts from this Project will be less than significant and these projects are separated from each other by intervening structures that would further reduce cumulative impacts. 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.)

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. 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 Road. Project-related noise is expected to result in a 2.6 dBA increase along Sierra Ridge Drive west of Sycamore Canyon Boulevard. Because noise increases of 3 dBA or less are barely perceptible, and the proposed Project will result in traffic noise increases of 3 dBA or less, the Project's contribution to cumulative traffic noise is not considerable. Therefore, cumulative impacts with regard to traffic noise are not significant. (DEIR, p. 6-19.)

The geographic scope for noise impacts associated with Project operations are the sensitive receptors adjacent to the Project site because noise a localized phenomenon, and drastically reduces in magnitude as the distance from the noise sources increases. 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 Project site. In order 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 (L_{eq}) with Mitigation) a ten-foot noise barrier is required along the perimeter of the outdoor use areas per mitigation measure **MM NOI 16**. In addition to the noise barrier, the use of the western portion of the dock doors and trailer parking area for Building 2 as shown on Figure 5.12-6 –will be limited as indicated in mitigation measure **MM NOI 16**. Mitigation measure **MM NOI 16** is considered infeasible because neither the City or Project proponent controls private property and so installation of the proposed noise barrier is not certain. Thus, Project-specific impacts are significant; however, because noise is such a localized phenomenon cumulative impacts with regard to operational noise are not significant. (DEIR, pp. 6-19 – 6-20.)

M. Population and Housing

The cumulative impact area for population and housing is the City. Implementation of the proposed Project and cumulative development projects could contribute to significant cumulative impacts to population and housing if they would induce substantial population growth or displace substantial numbers of existing housing units requiring the construction of replacement housing. The residential cumulative development projects represent a total of 596 future residences; 17 future single family residences (SFRs) and 579 new multi-family residences (MFRs).[1] The cumulative development projects represent an increase of approximately 0.6 percent over the 2012 population and households and approximately 0.5 percent of the population and households forecast for 2040. Because the Project will not directly contribute to new housing or the displacement of existing housing and the residential cumulative development projects are responsible for a less than one percent increase in population and households, direct cumulative impacts with regard to population and housing are not significant. (DEIR, p. 6-20.)

Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce. Given the nature of the job opportunities and availability of labor, it is reasonable to assume

[1] The residential cumulative development projects are No. 7– Tract Map No. 32180 (9 SFRs), No. 9 – Tract Map No. 36641 (8 SFRs), No. 11 – Sycamore Canyon Apartments (275 MFRs), No. 13 – Street Vacation for an Apartment Project (88 MFRs), and No. 16 – Quail Run Apartment (216 MFRs)

that any new jobs created by the proposed Project and cumulative development projects would not result in indirect population growth. Because the proposed Project will not indirectly induce population or housing growth, its contribution is not cumulatively considerable in this regard. Because the non-residential cumulative development projects will not result indirect population growth, cumulative impacts with regards to population and housing are not significant. (DEIR, p. 6-21.)

N. Public Services

Public services include fire protection, police protection, schools, parks, and other public facilities. The cumulative impact area for public services is the service area of each of the service providers. For example, the cumulative impact area for fire and police protection and parks is the City; whereas the cumulative impact area for schools would be the Riverside Unified School District.

Fire Protection

The proposed Project, in conjunction with the cumulative development projects within the City, will contribute toward an increased demand for fire protection services. The proposed Project and the cumulative development projects will be required to pay the "Fire Station Development Fee" per Riverside Municipal Code Chapter 16.52 prior to the issuance of a building permit for new construction for the purpose of providing RFD resources to purchase land and construct or expand fire stations as well as to acquire additional equipment and fire station furnishings. A CEQA analysis to determine the level of environmental impact resulting from the construction or expansion of fire station facilities is proper when actual plans for such facilities are proposed. Given the nature of the proposed Project, the proposed fire access across the southern portion of the Project site, and the proximity of the Box Springs Station (Fire Station No. 13), as well as stations throughout the City, the Project will not impact fire response times and will not otherwise create a substantially greater need for fire protection services than already exists; thus Project impacts are not cumulatively considerable. Cumulative impacts with regard to fire protection are not significant. (DEIR, pp. 6-21 – 6-22.)

Police Protection

The proposed Project, in conjunction with the cumulative development projects in the City, will contribute toward an increased demand for police protection services. The Project's potential incremental increase and the cumulative development projects' increase demand for police protection services are absorbed in the GP 2025 policies wherein RPD endeavors to provide proactive community policing, specifically to provide a minimum response time of 7 minutes on all Priority 1 calls, and 12 minutes on all Priority 2 calls. Of the multifamily-residential and commercial projects that qualify, the City also requires Crime Prevention through Environmental Design (CPTED) for projects requiring a Site Plan Review Permit and any large development projects, which involves review by RPD and the City Planning Division against CPTED principles. Any incremental impacts on level of service will also be offset from revenue generated for the City from property taxes. Therefore, cumulative impacts to police protection are less than significant. (DEIR, p. 6-22.)

Schools

Non-residential projects, including the proposed Project, do not increase school-age children or impact schools. The five residential cumulative development projects will result in a total of 596 future residences, which will probably include school-age children. In accordance with California Government Code, a standard school facility impact fee will be paid to offset any incremental impacts of the Project and the cumulative development projects. For CEQA purposes, pursuant to State law, payment of associated fees reduces school facilities impacts to a less than significant level. Moreover, impacts on school services are absorbed in the GP 2025 policies, which encourage accommodating growth needs, growing smarter, and housing strategies to best utilize existing infrastructure and services such as schools. Thus, cumulative impacts to schools are less than significant. (DEIR, p. 6-23.)

Parks, Libraries, and Other Public Services

The proposed Project and the non-residential cumulative development projects are not likely to result in a substantial direct or indirect increase in population or housing, and as such would not increase the demand for community services wherein new or expanded park or library facilities would be necessary or required.

The five residential cumulative development projects will result in a total of 596 future residences and generate a population of approximately 1,977 persons, which will increase the demand for library, park, and other public services. The proposed Project and all cumulative development projects within the City will be required to pay the "Regional Parks and Reserve Parks Development Fee" per Riverside Municipal Code Chapter 16.44 and the "Local Park Development Fee" per Riverside Municipal Code Chapter 16.60, which will offset potential impacts to park facilities. In addition, the Project will be required to pay the City's library tax in the amount of $19 per parcel, continuous until 2022. Payment of said fees will provide the resources for such activity if, in the future, new or expanded library or park facilities are necessary to serve the City's continued growth. A CEQA analysis to determine the level of environmental impact resulting from the construction or expansion of park facilities is proper when actual plans for such facilities are proposed. Therefore, no potentially significant cumulative effects related to public services will result from the proposed Project. (DEIR, p. 6-23.)

O. Recreation

Park and recreation services are provided by the City Parks, Recreation, and Community Services Department; therefore, the geographic scope for cumulative impacts to recreation is the City. The proposed Project and the non-residential cumulative development projects are not likely to result in a substantial direct or indirect increase in population or housing, and as such, would not increase the demand for park and recreation services. The residential cumulative development projects will increase the demand for park and recreation services. Nevertheless, the proposed Project and cumulative development projects will be required to pay the "Regional Parks and Reserve Parks Development Fee" per Riverside Municipal Code Chapter 16.44 and the "Local Park Development Fee" per Riverside Municipal Code Chapter 16.60, which will offset potential impacts to park and recreation facilities. Because local and regional park development fees must be paid by each of the cumulative development a project prior to construction, the Project's contribution is not considered cumulative considerable. (DEIR, p. 6-24.)

P. Transportation

The cumulative impact area for transportation/traffic impacts consists of the following nine intersections: (1) I-215 Northbound Ramps (NS) / Fair Isle Drive-Box Springs Road (EW), (2) Sycamore Canyon Boulevard (NS) / Fair Isle Drive (EW), (3) Sycamore Canyon Boulevard (NS) / I-215 Southbound Ramps (EW), (4) Sycamore Canyon Boulevard (NS) / Dan Kipper Drive (EW), (5) Sycamore Canyon Boulevard (NS) / Box Springs Boulevard (EW), (6) Sycamore Canyon Boulevard (NS) / Sierra Ridge Drive (EW), (7) Sycamore Canyon Boulevard (NS) / Eastridge Avenue (EW), (8) Box Springs Boulevard (NS) / Eastridge Avenue (EW), (9) I-215 Ramps (NS) / Eastridge Avenue-Eucalyptus Avenue (EW). The study area also includes a total of six I-215 freeway segments; three northbound: (1) Eastridge Ave-Eucalyptus Ave Off-Ramp, (2) Eastridge Ave-Eucalyptus Ave On-Ramp, and (3) Fair Isle Dr-Box Springs Rd On-Ramp; and three soutbound: (4) Sycamore Canyon Boulevard Off-Ramp, (5) Truck Bypass-Eastridge Ave-Eucalyptus Ave Off-Ramp Weaving Section, and Eastridge Ave-Eucalyptus Ave On-Ramp. Cumulative impacts to transportation/traffic would be significant if the addition of Project-related traffic, combined with ambient growth and the cumulative development projects (the E+A+C+P scenario) and/or 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 LOS 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, LOS E may be acceptable as determined on a case-by-case basis. (DEIR, pp. 6-24 – 6-25.)

Eight 8 of the 9 study area intersections will operate at LOS B, C, or D, during the peak hours with existing geometrics (i.e., without any improvements) for the existing plus ambient growth plus cumulative development project traffic condition (E+A+C), that is without the proposed Project. Under the E+A+C scenario, Intersection 9 (Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW)) will operate at LOS F during the AM peak hour. With the addition of Project related trips (E+A+P+C), there is no change in the LOS for 8 of the 9 intersections and Intersection 9 (Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW)) will continue to operate at LOS F. Based on the City's Traffic Impact Analysis Guidelines for intersections operating at LOS F a peak hour delay of 1.0 seconds is considered unacceptable. Because the delay attributable to Project traffic is only 0.9 seconds, cumulative impacts to

study area intersections the Project's contribution is not considered significant; thus, mitigation is not required. The Project proponents will pay the City's local development impact fee (DIF) related to transportation improvements as set forth in Chapter 16.64 of the Riverside Municipal Code. The Project will also participate in the Riverside County Transportation Uniform Mitigation Fee (TUMF) program through the payment of mitigation fees. For these reasons, cumulative impacts with regard to local traffic are not significant. (DEIR, p. 6-25.)

With regard to freeway segments, LOS for AM peak hour traffic with the Project (E+A+C+P) and without the Project (E+A+C) ranges from LOS B to E and the addition of Project traffic will not change the LOS on any of the 6 study area segments. The LOS for PM peak hour traffic with the Project (E+A+P) and without the Project (E+A) ranges from LOS C to F and the addition of Project traffic will not change the LOS on any of the 6 study intersections. (DEIR, p. 6-25.)

The PM peak hour LOS for the I-215 Northbound off-ramp at Eastridge-Eucalyptus changed from LOS D in the E+A (year 2018) condition to LOS E with the addition of traffic from the cumulative development projects without the Project (E+A+C). When Project traffic is added to the E+A+C condition (E+A+C+P), the LOS at the I-215 Northbound off-ramp at Eastridge-Eucalyptus remains at LOS E. The AM peak hour LOS for the I-215 Northbound on-ramp at Fair Isle-Box Springs changed from LOS C in the E+A condition to LOS E in the E+A+C condition. Under the E+A+C+P condition, LOS at the I-215 Northbound off-ramp at Fair Isle-Box Springs remains at LOS E. The PM peak hour LOS for the I-215 Northbound on-ramp at Fair Isle-Box Springs changed from LOS C in the E+A condition to LOS F in the E+A+C condition. Under the E+A+C+P condition, LOS at the I-215 Northbound off-ramp at Fair Isle-Box Springs remains at LOS F. Thus, the addition of Project-related traffic to an already failing freeway ramp is significant. (DEIR, pp. 5.16-36, 5.16-40, 6-25 – 6-26.)

The improvements needed to achieve a satisfactory LOS at the Eastridge-Eucalyptus I-215 Northbound off-ramp and the Fair Isle-Box Springs I-215 Northbound on-ramp are: one HOV lane for northbound I-215 at the Eastridge-Eucalyptus off-ramp (this improvement is part of the I-215 North Project and one mainline mixed flow lane for northbound I-215 at Fair Isle Drive-Box Springs Drive on-ramp. These improvements are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward either of these improvement is available. Further, Riverside County Transportation Commission's I-215 North Project is conceptual in nature; therefore, design of the project has not taken place. As a result, since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither, the City, as the lead agency, nor the Project proponent can contribute fair share fees or implement the required improvements needed, which must be designed and constructed by Caltrans. 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, cumulative impacts with regard to freeway LOS are significant. (DEIR, p. 6-26.)

With regard to GP 2025 buildout, 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 made, following discussion of the Circulation Element components in the Citizens Advisory Committee, Planning Commission and City Council, not to build roadways larger just to accommodate regional cut-through traffic and it was determined that LOS E or F would be acceptable for these roadways. Therefore, impacts with regard to buildout per GP 2025 are not significant. (DEIR, p. 6-26.)

Q. Utilities and Service Systems

Utilities and service systems include water, wastewater, storm drains, landfills, and solid waste disposal services.

Water Supply

Potable water service to the Project site is provided by WMWD; thus the geographic scope for water service is WMWD's Riverside Retail Area. The Project 's water demand combined with cumulative

development projects within WMWD's Riverside retail Area will increase the demand for water. According to the Project's *WSA*, WMWD concluded that its total projected water supplies during normal, single-dry, and multiple-dry year periods throughout the next 20 year horizon are sufficient to meet the projected water demands of the Project in addition to WMWD's existing and planned future uses. WMWD also determined no new water supplies or entitlements are needed to serve the proposed Project. WMWD's *2015 Urban Water Management Plan* concluded that WMWD has the ability to serve the proposed Project, as well as the cumulative development projects for the next 25 years. Because cumulative water supplies exceed water demand, cumulative impacts to water supply are less than significant and the proposed Project will not contribute to a cumulatively considerable impact on water supply. (DEIR, p. 6-27.)

Wastewater Services

Because the City's Public Works Department provides for the collection, treatment, and disposal of all wastewater the geographic scope for these services is the City. The RWQCP has a capacity of 46 million gallons per day (MGD) and can provide sufficient capacity to treat the wastewater generated by the proposed Project, cumulative development projects, and buildout in the City per the GP 2025. For these reasons, cumulative impacts to wastewater collection and treatment are less than significant and the proposed Project will not contribute to a cumulatively considerable impact in this regard. (DEIR, p. 6-27.)

Solid Waste

The geographic context for cumulative impacts regarding solid waste collection and disposal is Riverside County. Development of the proposed Project and cumulative development projects will increase the amount of solid waste entering the waste stream. The GP 2025 predicted a total maximum daily load of 17,000 tons per day at buildout, which represents approximately 8% of the solid waste the landfills are allowed to accept daily under the expected typical build-out. Therefore, assuming all other cumulative development Projects are consistent with the General Plan, no potential significant cumulative impacts with regard to solid waste will result from the proposed Project. (DEIR, p. 6-28.)

R. Energy Conservation

Electricity and natural gas services are provided to the proposed Project and the cumulative development projects by RPU and SCG, respectively. Therefore the geographic context for cumulative impacts to electricity is the City and the geographical context for cumulative impacts to natural gas is the service area of SCG. SCG's service area encompasses most of central and southern California. (DEIR, p. 6-28.)

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. These standards apply to new construction of both residential and non-residential buildings and are enforced through the local building permit process. The City has adopted building standards consistent with Title 24 and the proposed Project will comply with, and in some cases exceed, Title 24 standards for insulation, glazing, lighting, shading, and water and space-heating systems in all new construction. The Project will use modern energy-efficient construction materials and practices, incorporate Sustainability Features identified in Section 4.1.f of this document and comply with Title 24 standards. As a result, the proposed Project will be consistent with the State's energy conservation standards and, therefore will not conflict with an adopted energy conservation plan. (DEIR, pp. 6-28 – 6-29.)

The cumulative development projects must also abide by the City's building standards and the provisions of Title 24, and in some instances may exceed the Title 24 guidelines for new construction. It is also reasonable to assume that one or more of the cumulative development projects will use energy-efficient construction materials and practices. (DEIR, pp. 6-28 – 6-29.)

Both RPU and SCG have adequate energy supplies to serve the proposed Project, the cumulative development projects, and to meet existing demand in future years. RPU and SCG are both developing additional energy supplies to serve anticipated development in future years. Therefore, no potentially significant cumulative effects related to energy conservation will result from the proposed Project. (DEIR, p. 6-29.)

4.5 Findings Regarding Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) specifically requires that irretrievable commitments of resources should be evaluated to ensure that consumption of nonrenewable resources during the course of project construction or operation is justified.

In accordance with CEQA Guidelines Section 15126.2 (c):

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

CEQA Guidelines Section 15127 further clarifies:

> The information required by Section 15126.2(c) concerning irreversible changes, need be included only in EIRs prepared in connection with any of the following activities:
>
> (a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
>
> (b) The adoption by a Local Agency Formation Commission of a resolution making determinations; or
>
> (c) A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S.C. 4321–4347.

The proposed Project will involve construction and operation of two buildings to serve as a logistics center. The proposed Project site is currently undeveloped, except for a concrete v-ditch, and so implementation of the Project would result in irreversible environmental changes at the Project site. Nevertheless, the proposed Project site is within the SCBPSP and is designated for industrial use. Likewise, in the City's Zoning Map the Project site is zoned as Business and Manufacturing Park Zone. The proposed logistics center at the Project site is consistent with these land use and zoning designations and so these irreversible changes are not considered significant. (DEIR, p. 6-30.)

Nonrenewable resources, such as gravel and steel, will be consumed during Project construction. Energy, fossil fuels, oils, and natural gas will be irreversibly committed during Project construction. These same resources are used for vehicles traveling to and from the Project site and energy used to operate the site. The continued use of these resources associated with Project operations represents a long-term obligation. The energy consumed in construction and operation of the Project may be considered a permanent investment. However, the Project will use "green" building materials, where feasible, to reduce impacts to nonrenewable resources. Further, the Project will incorporate energy efficiency features in an effort to conserve energy over the life of its operation. Therefore, the proposed Project will not result in long-term significant energy use. (DEIR, p. 6-30.)

4.6 Findings Regarding Growth Inducing Impacts

According to State CEQA Guidelines Section 15126.2 (d), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- A project would remove obstacles to population growth;

- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

The Project will involve construction and operation of two logistics center buildings. Other than a storm drain that will serve only the Project, the Project will not require the expansion of infrastructure or utilities and will not remove obstacles to population growth. Further, the Project itself does not involve the creation of households and will not directly impact population growth. The jobs that are created during Project construction and operation are anticipated to be occupied by individuals already residing in the Project vicinity and so the proposed Project will not have an indirect impact on population growth either. (DEIR, pp. 6-29 – 6-30.)

5.0 ALTERNATIVES TO THE PROJECT

5.1 Summary of Project Alternatives and Objectives

The State CEQA Guidelines (§15126.6 *et. seq.*) require that a reasonable range of alternatives to the Project be evaluated, provided they would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines further require the analysis of the "No Project" Alternative, wherein the Project would not be approved and implemented. A number of project alternatives were considered but ultimately rejected for infeasibility or failure to lessen environmental effects.

The following alternatives to the Project were analyzed in the DEIR:

Alternative 1: No Project, No Build Alternative

Alternative 2: No Project/Specific Plan Build Alternative

Alternative 3: Reduced Density Alternative

State CEQA Guidelines section 15124(b) requires that a project description contain a statement of objectives including the underlying purpose of the project. The Project objectives are:

- Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.

- Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.

- Develop and operate a logistics center that is in close proximity to March Inland Port, Interstate 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.

- Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.

- Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.

- Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.

- Develop and operate a logistics center that meets industry standards for operational design criteria.

- Implement the Sycamore Canyon Business Park Specific Plan through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.

- Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the Sycamore Canyon Business Park Specific Plan area for a logistics center.

- Provide a densely landscaped buffer between the Project site and the residential development to the north.

- Provide on-site conservation to mitigate for the loss of riparian/riverine resources.

- Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base. (DEIR, pp. 3-44,.8-1 – 8-2)

5.2 Alternatives Considered and Rejected From Further Consideration

The CEQA Guidelines state that the EIR needs to examine in detail only the alternatives the lead agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among the factors used to eliminate alternatives from detailed consideration in the EIR are: failure to meet most of the basic project objectives; technical, legal, or economic infeasibility; and inability to avoid or lessen the significant environmental effects of the Project. (State CEQA Guidelines, § 15126.6(c)).

In addition to the three alternatives evaluated in the DEIR, several alternatives were considered, but were eliminated from further analysis.

1. Original Project as Submitted Alternative

Under the *Original Project as Submitted Alternative,* the Project Applicant proposed a two building logistics center totaling 1.43 million square feet. 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 reduction in the size of the Building 2, due to various environmental impacts. Collectively, this information provided constructive feedback regarding initial City comments, preliminary understanding of the Project environmental impacts, and both local and generalized sentiment regarding the Project by the public. Based on consideration of this input, the applicant elected to redesign the Project to reduce environmental impacts, improve Project compatibility, and increase amenities, while still providing an economically feasible Project that meets the objectives identified above. (DEIR, p. 8-3.)

2. Alternative Project Location

Pursuant to State CEQA Guidelines Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened. Three alternative locations were considered and rejected by the City as discussed below.

Alternative Location 1: Palmyrita Avenue/Michigan Avenue
Alternative Location 1 consists of approximately 68 acres of undeveloped property located at the southeast corner of Palmyrita Avenue and Michigan Avenue, in the City of Riverside within the Hunter Business Park Specific Plan and has a GP 2025 land use designation of Business/Office Park (B/OP) and is zoned Business and Manufacturing Park (BMP). Alternative Location 1 was rejected from further analysis in the DEIR because 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 I-215 and SR-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. (DEIR, p. 8-6.)

Alternative Location 2: Meridian Business Park, Phase 3
The Meridian Business Park (Meridian) is a 1,290-acre master-planned commerce center located west of Interstate 215 (I-215) in unincorporated Riverside County. Meridian is under the jurisdiction of the March Joint Powers Authority (March JPA) and is designated for Commercial (COM), Destination Recreation (DR), Industrial (IND), Mixed Use (MU), Park/Recreation/Open Space (P/R/OS), and Public Facilities (PF) by the March JPA General Plan Land Use Plan. Property in Meridian is zoned: Business Park (BP), Commercial (COM), Industrial (IND), Mixed Use (MU), Office (OF), Park/Recreation/Open Space (P/R/OS), and Public Facility (PF). (DEIR, p. 8-6.)

Meridian Phase 3 encompasses 409 acres, of which 134 acres are zoned for industrial development. Although Meridian has lots large enough for a logistics center, this location (Alternative Location 2) was rejected from further analysis in the DEIR because it 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. (DEIR, p. 8-6.)

Alternative Location 3: Property along Alessandro Boulevard within the Sycamore Canyon Business Park Specific Plan
Alternative locations along Alessandro Boulevard were considered in response to comments received at the Project's Scoping Meeting. All of the vacant parcels along Alessandro Boulevard are owned by another entity. Additionally, these parcels are either currently under construction for another project or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are owned by at least two different property owners and oddly shaped, making assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the USACE and CDFW making development difficult. The other vacant parcels in the SCPBSP are not feasible locations because they are owned by another party and are too small for the proposed Project. (DEIR, p. 8-9.)

Therefore, an alternative site is not considered feasible as the applicant does not own or control another site of comparable size within the City of Riverside and an alternative site would likely fail to achieve the underlying purpose and objectives of the Project. In addition, an alternative site would likely not avoid the Project's significant impacts with regard to air quality or construction noise because these impacts are a function of the Project's use and size and are not location-specific. An alternative site in proximity to the proposed Project would also not avoid the significant traffic impact to level of service (LOS) on I-215 because traffic from an alternate location would use that interstate, which will operate at an unacceptable LOS without Project traffic. Thus, an alternative site was rejected from further consideration in this DEIR. (DEIR, p. 8-9.)

5.3 Alternatives Carried Forward for Further Analysis

A. Alternative 1: No Project, No Build

Description

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative for a development project on identifiable property is the circumstance under which the proposed Project does not proceed, and the discussion of the No Project Alternative must 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. Accordingly, under the No Build Alternative, the site would remain in its existing condition and no development would occur. (DEIR, p. 8-11.)

Summary of Impacts

The following table presents a summary of the impacts associated with the No Project, No Build alternative. [2]

Threshold	Impacts
Aesthetics	Alternative 1 would retain the Project site's existing conditions and there would be no development that would modify the existing visual character, biological resources, cultural resources, or hydrology. Additionally, because Alternative 1 does not include any construction or operation of a logistics center facility, there would be no impacts related to air quality, greenhouse gas emissions, hazards and hazardous materials, noise, population and housing, public services, recreation, or transportation/traffic. Impacts in these regards would be less than that of the proposed Project. (DEIR, p. 8.11.)
Agriculture and Forestry	The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it under a Williamson Act contract; however the site does contain Locally Important Farmland. Agricultural uses are not permitted within the SCBPSP area, so even if the Project site were to remain undeveloped, it would not be able to be used for agriculture. Therefore, impacts of Alternative 1 as compared to the Project would be similar to that of the proposed Project. (DEIR, p. 8.11.)
Air Quality	Since no construction activity would occur, Alternative 1 would not generate any short-term or long-term emissions. Therefore, impacts associated with Alternative 1 would be less than that of the proposed Project. (DEIR, p. 8.11.)
Biological Resources	Since no site preparation or construction activity would occur, Alternative 1 would not result in a change to the existing biology of the Project site. Thus, impacts would be avoided as compared to the proposed Project and impacts associated with Alternative 1 would be less than that of the proposed Project. (DEIR, pp. 8.11 – 8-12.)
Cultural Resources	Because there would be no site preparation, grading, or construction, the three rock outcroppings would remain in place and not require relocation to another part of the Project site; therefore, impacts would be avoided compared to the proposed Project. (DEIR, p. 8.12.)
Geology and Soils	Because no structures would be constructed, they would not be subjected to seismic events. However, the potential for soil erosion and loss of top soils would continue. Thus, impacts associated with Alternative 1 would be greater than that of the proposed Project. (DEIR, p. 8.12.)
Greenhouse Gas Emissions	Due to the avoidance of short-term and long-term GHG emissions, Alternative 1's impacts with regard to GHG emissions would be less than that of the proposed Project. (DEIR, p. 8.12.)

[2] Source: DEIR, pp. 8-11 – 8-13.

Threshold	Impacts
Hazards and Hazardous Materials	Under Alternative 1, there would be no potential to create a significant hazard to the public due to improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development of the Project site. Therefore, impacts associated with the No Project/No Build Alternative would be less than that of the proposed Project. However, the Fire Access/Parks Maintenance Road, which is intended to increase the ease of access and potential response times in the event of a fire in the Sycamore Canyon Wilderness Park, would not be constructed. (DEIR, p. 8.12.)
Hydrology and Water Quality	Under Alternative 1 the existing hydrologic conditions would continue, and the existing storm drain facilities and storm flow patterns and capacity would remain. However, because the Project site drains into a regional water quality marsh, the potential for contamination of surface waters, such as the Santa Ana River, is the same as with the proposed Project. Thus, impacts associated with Alternative 1 would be the same as the proposed Project. (DEIR, p. 8.12.)
Land Use and Planning	The Project site would not be developed and one of the few remaining large industrial sites in the City would remain vacant and underutilized and certain goals and policies of the GP 2025 and the SCBPSP would not be realized. Therefore, impacts with regard to land use and planning would be worse than that of the proposed Project. (DEIR, pp. 8.12 – 8-13.)
Mineral Resources	Surrounding land uses are incompatible with mining operations and it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, impacts to mineral resources would be the same as the proposed Project. (DEIR, pp. 8.13.)
Noise	Since no construction would occur under Alternative 1, both construction-related and operation-related noise impacts would be avoided and impacts to noise would be less than that of the proposed Project. (DEIR, pp. 8.13.)
Population/ Housing	Alternative 1 would not contribute to new employment positions or housing opportunities anticipated in the GP 2025 and other Regional Plans. Therefore, under Alternative 1, impacts to population/housing would be greater than the proposed Project. (DEIR, pp. 8.13.)
Public Services	Under Alternative 1, the fire access road proposed along the Project's southern boundary, to lower emergency response times for the Sycamore Canyon Wilderness Park, would not be constructed; however, there would not be an increased demand for fire protection or police protection services due to the proposed Project buildings. Thus, impacts to fire and police protection services would be less than the proposed Project. Because Project implementation will not induce growth directly or indirectly, under Alternative 1 impacts with regard to other public services (i.e., schools, libraries, and community centers) would be the same as the proposed Project. (DEIR, pp. 8.13.)
Recreation	Under this alternative the trail parking at the southeast end of the Project site would not be provided and there would be no trail access across the southern portion of the Project site. Since these recreational amenities would not be provided with Alternative 1, impacts with regard to recreation would be greater than the proposed Project. (DEIR, pp. 8.13.)
Transportation / Traffic	Because Alternative 1 would not increase site-generated traffic above current levels, impacts to transportation/traffic would be less than that of the proposed Project. (DEIR, pp. 8.13.)

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 1 meets each objective.[3]

[3] Source: DEIR, pp. 8-14 – 8-15.

Project Objective	Alternative Meets Objective?
Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.	**No.** Alternative 1 will not develop and operate a logistics center nor would two buildings be constructed. Alternative 1 will not accommodate the intended uses of the land owners. (DEIR, p. 8-14.)
Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	**No.** Alternative 1 will not develop and operate a logistics center adjacent to similar uses that can take advantage of existing City infrastructure. (DEIR, p. 8-14.)
Develop and operate a logistics center that is in close proximity to March Inland Port, Interstate 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.	**No.** Alternative 1 will not develop and operate a logistics center; thus this Alternative will not support the distribution of goods throughout the region. (DEIR, p. 8-14.)
Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.	**No.** Alternative 1 will not develop and operate a logistics center; thus this Alternative will not attract quality tenants or be regionally competitive. (DEIR, p. 8-14.)
Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.	**No.** Alternative 1 will not maximize efficient goods movement because it will not locate a logistics center in proximity to the ports. (DEIR, p. 8-14.)
Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.	**No**. Alternative 1 will not develop and operate a logistics center in the City in proximity to the ports. Thus this Alternative will not allow the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods. (DEIR, p. 8-15.)
Develop and operate a logistics center that meets industry standards for operational design criteria.	**No.** Alternative 1 will not develop and operate a logistics center that meets industry standards for operational design criteria. (DEIR, p. 8-15.)
Implement the *Sycamore Canyon Business Park Specific Plan* through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	**No.** Alternative 1 will not implement the *Sycamore Canyon Business Park Specific Plan*. (DEIR, p. 8-15.)
Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the *Sycamore Canyon Business Park Specific Plan* area for a logistics center.	**No.** Alternative 1 will not facilitate the development of underutilized industrial land; thus this Alternative will not respond to the market demand in the *Sycamore Canyon Business Park Specific Plan* area. (DEIR, p. 8-15.)

Project Objective	Alternative Meets Objective?
Provide a densely landscaped buffer between the Project site and the residential development to the north.	**Yes.** Alternative 1 will meet this objective to some degree, in that the entire Project site becomes a buffer between and the residential development to the north and existing logistics uses to the south/ However Alternative 1 would not provide a densely landscaped buffer, simply disturbed vegetation per the existing conditions. (DEIR, p. 8-15.)
Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.	**No.** Alternative 1 will not provide on-site mitigation. (DEIR, p. 8-15.)
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.	**No.** Alternative 1 will not contribute to the economy of the City. (DEIR, p. 8-15.)

Finding: The City Council rejects Alternative 1 (No Project, No Build Alternative) as a project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Alternative 1 does not implement any of the 11 Project objectives; (2) Alternative 1 is infeasible because development of the Project site is likely; (3) Alternative 1 is not economically viable. Therefore, alternative 1 is rejected from further consideration.

Facts and Supporting Information

While 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. 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; Alternative 1 is neither suitable for the site nor economically viable. Although in the short-term this alternative may be feasible, 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, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

B. Alternative 2: No Project/Specific Plan Build Alternative

Description

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. (DEIR, p. 8-16.)

The GP 2025 designates the Project site for B/OP (Business/Office Park). Additionally, the Sycamore Canyon Business Park Specific Plan designates the Project site for 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. Alternative 2 would also include the on-site Mitigation Area on the western portion of the Project site and retain the trail and fire access at the southern portion of the Project site. (DEIR, p. 8-16.) The following table compares the proposed Project to the No Project/Specific Plan Build Alternative.

Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project[4]

Component	Proposed Project	Alternative 2	Difference
Type of Development	Logistics Center	Manufacturing	NA
Total Building Size	1,375,169 SF	1,375,169 SF	NA
Projected Employment	860–1,335a	2,063b	728–1,203 greater
On Site Mitigation Area	Yes	Yes	NA
Width of Landscaping at the Northern Property Boundary	64 feet	64 feet	NA
Trail Parking, Trail, Fire Access Road	Yes	Yes	NA
Trip Generation (No. Vehicles)			
Total Trips/Day	2,409	5,253	118% increase
Passenger Cars	1,492	3,215	115% increase
Trucks (total 2, 3, and 4+ Axle)	917	2,038	122% increase
2 Axle	156	326	109% increase
3 Axle	208	667	221% increase
4+ Axle	553	1,045	89% increase

Notes

a Low end based on Based on an average of 1,598 SF or logistics space per employee per *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010 prepared by the NAIOP Research Foundation. (2010 NAIOP, Figure 3, p. 12). Number of employees calculated as follows: 1,375,174 total SF ÷1,598 SF/employee = 860 employees. Upper end based on the County of Riverside employee generation rate for light industrial uses of 1,030 SF per employee; number of employees calculated as follows: 1,375,174 total SF ÷ 1,030 SF/employee = 1,335 employees.

b Based on 1.5 employees per 1,000 SF of building area per Table 8 of the Sycamore Canyon Business Park Specific Plan, calculated as follows: 1,375,169 SF ÷ 1,000 SF * 1,5 employees/1,000 SF = 2,063 employees.

Summary of Impacts

The following table presents a summary of the impacts associated with the Alternative 2 (No Project/Specific Build) alternative.[5]

Threshold	Impacts
Aesthetics	As with the proposed Project, Alternative 2 (No Project/Specific Plan Build Alternative) would modify the visual character of the Project site through grading, vegetation removal, construction of industrial buildings, associated parking, walls, fencing, landscaping, trail parking, a trail, fire access road, and parking and security lighting. The grading concept would remain the same as the proposed Project so that the structures' comparable height to existing large scale light industrial uses in the Sycamore Canyon Business Park would preserve views of the Box Springs Mountains. Lighting under Alternative 2 would be shielded and directed downward and away from the adjacent residences and Sycamore Canyon Wilderness Park. Therefore, impacts resulting from implementation of Alternative 2 would be similar to the proposed Project. (DEIR, p. 8-17.)
Agriculture and Forestry	As with the proposed Project, development per Alternative 2 would eliminate approximately 68 acres of Locally Important Farmland; however agricultural uses are not permitted in the SCBPSP area and the Project site has not been farmed for decades. Therefore impacts resulting from the implementation of Alternative 2 would be similar to the proposed Project. (DEIR, p. 8-17.)
Air Quality	Development of Alternative 2 would result in grading the same portion of the Project site as the proposed Project, the same amount of paving, and construction of a building of similar size as the

[4] Source: DEIR, pp. 8-16 – 8-17.
[5] Source: DEIR, pp. 8-17 – 8-22.

Threshold	Impacts
	proposed Project. Because construction under Alternative 2 would use a similar mix of Tier 3 construction equipment, incorporate the same project design features and mitigation measures as the proposed Project; short-term construction impacts would be essentially the same as the proposed Project, and will not exceed SCAQMD thresholds. (DEIR, p. 8-18.) During Project operation, Alternative 2 would result in more passenger car and truck trips than the proposed Project. This, in turn may result in higher levels of VOC, NO_x, CO, PM-10 and PM-2.5 emissions when compared to the proposed Project depending upon the total VMT. Localized emissions of criteria pollutants may increase due to the increase in total trucks trips accessing the site; however, similar to the proposed Project, localized emissions are not anticipated to exceed the applicable SCAQMD LST and the impacts would be less than significant. Health risks associated with diesel exhaust would be increased compared to the proposed Project because the total daily truck trips and on-site truck activity will increase. However, similar to the proposed Project, health risks are not anticipated to exceed the applicable SCAQMD LST and the impacts would be less than significant. (DEIR, p. 8-18.) Thus, air quality emissions and health risks may be greater, and would remain significant and unavoidable due to the long-term exceedance of NO_x emissions from operations. (DEIR, p. 8-18.)
Biological Resources	Because development of Alternative 2 would encompass the same footprint as the proposed Project impacts to biological resources would be the same. Alternative 2 would permanently impact suitable habitat for nesting birds and burrowing owls, and low quality raptor foraging habitat. Alternative 2 does not avoid impacts to approximately 1.67 acres of riparian/riverine resources located along the two ephemeral drainages present on the site or to waters under the jurisdiction of the USACE, Regional Water Quality Control Board, and CDFW. Because Alternative 2 would be required to comply with the provisions of the MSHCP and incorporate the same mitigation measures as the proposed Project, impacts would be similar to the proposed Project. (DEIR, p. 8-18.)
Cultural Resources	Because development of Alternative 2 would encompass the same footprint as the proposed Project, impacts to cultural resources would be the same and the three archaeological sites that have been identified as tribal cultural resources would be permanently impacted. Alternative 2 would be required to implement the same mitigation measures as the Project, which includes relocation of all or a portion of the bedrock milling features to another location on the Project site. Impacts would be similar to the proposed Project. (DEIR, pp. 8-18 – 8-19.)
Geology and Soils	Under Alternative 2 the Project site would be graded in substantially the same way to minimize visibility of the building(s) from the adjacent neighborhood through the use of elevational and building height differences and would require the same geotechnical design considerations and grading exceptions as the proposed Project. Therefore, impacts would be similar to the proposed Project. (DEIR, p. 8-19.)

Threshold	Impacts
Greenhouse Gas Emissions	Development of Alternative 2 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 2 were assumed to be the same as the Project. The same amount of trees would be planted in on-site Mitigation Area; therefore, the amount of CO2e emissions sequestered from development of Alternative 2 would be similar to the proposed Project. Total GHG emissions from Alternative 2 (which includes amortized construction emissions and sequestration and operational emissions) may be greater than the proposed Project due to the increase in total traffic trip generation and potential increase in on-site stationary equipment used for manufacturing. However, the truck trip lengths are unknown and may not be traveling the same distance as the proposed Project (to and from the Ports). Because the BAU emissions for Alternative 2 would also include the same development as Alternative 2, it is anticipated that Alternative 2's greenhouse gas emissions reductions from the BAU may be similar to the proposed Project and would also achieve the City's Riverside Restorative Growthprint Climate Action Plan (RRG CAP) reduction target for 2020 and hence the AB 32 reduction target for 2020. Alternative 2 would also comply with all present and future regulatory measures developed in accordance with AB 32 and the CARB Scoping Plan, and incorporates a number of Project design features that would further minimize GHG emissions, which are incorporated as mitigation measures **MM AQ 1** through **MM AQ 22**. Therefore, GHG impacts associated with Alternative 2 are considered to be the similar to the proposed Project. (DEIR, p. 8-18.)
Hazards and Hazardous Materials	Development of Alternative 2 would result in similar impacts as the proposed Project. Any potential impacts associated with hazards and hazardous materials would be reduced to less than significant levels through adherence to laws and regulations, compliance with FAR Part 77, and consistency with the MARB/APA LUCP. Thus, potential adverse impacts associated with hazards or hazardous materials are similar to that of the proposed Project. (DEIR, p. 8-18.)
Hydrology and Water Quality	Under Alternative 2 the same basic storm drain facilities would be constructed as those included with the proposed Project including the construction of the off-site storm drain in Lance Drive that ultimately connects to the 120-inch diameter storm drain in Eastridge Avenue prior to being discharged into the existing stormwater runoff treatment basin, also referred to as "the marsh." Potential runoff from the site would be similar to the proposed Project and would also be reduced to less than significant through compliance with mandatory regulatory requirements. Therefore, impacts associated with Alternative 2 would be the same as that of the proposed Project. (DEIR, p. 8-20.)
Land Use and Planning	Similar to the Project, with approval of the proposed GP 2025 Circulation Element Amendment, the proposed SCBPSP Amendment to the Circulation Plan, and the grading exception, all of which are part of the proposed Project, development of Alternative 2 would be consistent with the GP 2025 and SCBPSP. Development of the Project site for manufacturing is consistent with the GP 2025 Land Use designation of Business/Office Park and the zoning designation of BMP, Impacts would be similar to the proposed Project. (DEIR, p. 8-20.)
Mineral Resources	As with the proposed Project, development of Alternative 2 would preclude the use of the Project site for mining operations. Impacts would be the same as the proposed Project. (DEIR, p. 8-20.)
Noise	Development of Alternative 2 would result in grading the same portion of the Project site as the proposed Project, the same amount of paving, and construction of a building the same size as the proposed Project. Because construction of Alternative 2 would use the same mix of construction equipment as the Project it would result in the same levels of short-term noise impacts and construction vibration as the proposed Project. As with the proposed Project, Alternative 2 would require a 12-foot tall temporary noise barrier along the Project site's northern and western boundaries to reduce construction noise. However, even with the temporary wall and other construction noise mitigation measures, construction noise will result in a substantial increase in noise over the ambient noise level and impacts will be significant and unavoidable. (DEIR, p. 8-20.) Alternative 2 would generate long-term noise from on-site operations and vehicular traffic on area streets. Operational noise will be generated from parking lots, rooftop-mounted equipment, diesel truck engines, exhaust systems, and loading and unloading of materials. Alternative 2 will generate

Threshold	Impacts
	approximately 5,253 total trips per day, which is approximately twice as many trips as the proposed Project. With twice as many vehicles using the Project site, the resulting noise level will be approximately 3 dBA greater than the proposed Project. Because the average human ear can barely perceive a 3 dBA change; therefore this impact will be similar to the proposed Project. Due to the differences in topography between the Project site and the residences to the west, operational noise generated at the Project site will exceed the City's noise standards. Therefore, as with the proposed Project long term noise impacts from on-site operations under Alternative 2 will be significant and unavoidable. (DEIR, pp. 5-17, 8-20.) Traffic generated by Alternative 2 will use the same roadways as Project-generated traffic. Because Alternative 2 will result in twice as many vehicles as the proposed Project, noise levels along area roadways will be approximately 3 dBA greater. The City considers a 5 dBA increase in noise to be substantial. Project-generated noise will result in a less than 1 dBA increase above existing ambient noise levels for all evaluated roadway segments except Dan Kipper Drive west of Sycamore Canyon Boulevard (7.2 dBA increase) and Sierra Ridge Drive west of Sycamore Canyon Boulevard (2.7 dBA increase). Under Alternative 2, the increase in ambient noise level would be approximately 10 dBA along Dan Kipper Drive, which would sound twice as loud as the existing condition. There would be an approximate 6 dBA increase along Sierra Ridge Drive, which would be perceptible. Thus, in comparison to the proposed Project impacts with regard to a permanent increase above existing ambient noise levels would be greater; however, because there are no sensitive receptors in proximity to Dan Kipper Drive this impact could be less than significant. (DEIR, p. 8-21.)
Population/ Housing	Using the job projection rate from the SCBPSP, Alternative 2 is expected to generate 2,063 permanent jobs. Although this is more jobs than the proposed Project, it is within the population projections used by SCAG for the 2016 RTP/SCS and the GP 2025 because jobs generated by Alternative 2 represent an increase of one percent over the number of jobs in 2012 and one percent of the jobs forecast for 2040. Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce. Alternative 2 does not propose housing. Impacts will be similar to the proposed Project. (DEIR, p. 8-21.)
Public Services	Because Alternative 2 does not propose housing and future jobs are expected to be filled by the local workforce, this alternative will not directly or indirectly result in the need for new or expanded schools, libraries, or community centers. Due to the nature of Alternative 2, impacts with regard to fire and police services would be similar to the proposed Project. (DEIR, p. 8-21.)
Recreation	Development of Alternative 2 will include trail parking at the southeast portion of the Project site and a fully improved trail along the southern portion of the Project. Construction of these facilities is considered a beneficial impact to recreational facilities. Because employment opportunities generated by development of Alternative 2 are expected to be filled by residents from the City and surrounding area, Alternative 2 will not result in an increased demand for parks or other recreational facilities. Impacts will be similar to the proposed Project. (DEIR, p. 8-22.)

Threshold	Impacts
Transportation / Traffic	Development of Alternative 2 would increase traffic levels on existing streets by approximately 5,253 daily trips, which is a 118 percent increase over the proposed Project. Trip distribution under Alternative 2 will be similar to that of the proposed Project, thus traffic will be doubled on area roadways in comparison to the proposed Project. As with the proposed Project, egress on Dan Kipper Drive will be limited. (DEIR, p. 8-22.) In the existing traffic plus traffic from ambient growth plus cumulative development traffic plus Project traffic (E+A+C+P) condition, the only intersection that would operate at LOS F is Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW). Project-related delay at this intersection is 0.9 seconds. This is not a significant impact according to the City of Riverside Traffic Impact Analysis Guidelines because the delay is less than 1.0 second. Alternative 2 would double traffic at this intersection and result in a delay greater than 1.0 second, which would be a significant unavoidable impact because it is not feasible to widen this intersection. (DEIR, p. 8-22.) The Eastridge-Eucalyptus Interstate 15 (1-15) Northbound off-ramp is projected to fail in the E+A and E+A+C conditions without Alternative 2 traffic. This off-ramp will operate at an acceptable LOS with Alternative 2 traffic once the I-215 North Project is complete. The I-215 North Project is a Measure A project. However, since design has not commenced on the I-215 North Project and the City has no control over when design and construction will be completed, the addition of Alternative 2 traffic to this off-ramp is significant. (DEIR, p. 8-22.) The Fair Isle-Box Springs I-215 Northbound on-ramp is projected to fail in the E+A+C condition without Alternative 2 traffic. This on-ramp will operate at an acceptable LOS with the addition of one mainline mixed flow lane for this on-ramp. However, this improvement is not programmed and it is not a part of Measure A or any other funding program. The City cannot control when improvements to the interstate system are made and there is no mechanism for the collection or payment of fair share fees. The addition of Alternative 2 traffic to this on-ramp is significant. (DEIR, p. 8-22.)

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 2 meets each objective.[6]

Project Objective	Alternative Meets Objective?
Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.	**No.** Alternative 2 would not develop and operate at least one logistics center. Two buildings would be constructed under this alternative for manufacturing purposes. (DEIR, p. 8-23.)
Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	**No.** Under Alternative 2 a logistics center will not be developed. Alternative 2 proposes manufacturing uses. (DEIR, p. 8-23.)
Develop and operate a logistics center that is in close proximity to March Inland Port, Interstate 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.	**No.** Under Alternative 2 a logistics center will not be developed. (DEIR, p. 8-23.)

[6] Source: DIER, pp. 8-23 – 8-24.

Project Objective	Alternative Meets Objective?
Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.	**No.** Alternative 2 will not develop and operate a logistics center; thus this Alternative will not attract quality tenants or be regionally competitive. (DEIR, p. 8-23.)
Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.	**No.** Alternative 2 will not maximize efficient goods movement because it will not locate a logistics center in proximity to the ports. (DEIR, p. 8-23.)
Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.	**No**. Alternative 2 will not develop and operate a logistics center. Thus this Alternative will not allow the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods. (DEIR, p. 8-24.)
Develop and operate a logistics center that meets industry standards for operational design criteria.	**No.** Alternative 2 will not develop and operate a logistics center. (DEIR, p. 8-24.)
Implement the *Sycamore Canyon Business Park Specific Plan* through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	**Yes.** Alternative 2 will implement the *Sycamore Canyon Business Park Specific Plan* because manufacturing uses are permitted. (DEIR, p. 8-24.)
Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the *Sycamore Canyon Business Park Specific Plan* area for a logistics center.	**No.** Alternative 2 will not respond to the market demand in the Sycamore Canyon Business Park Specific Plan area for a logistics center. (DEIR, p. 8-24.)
Provide a densely landscaped buffer between the Project site and the residential development to the north.	**Yes.** Alternative 2 would provide a densely landscaped buffer between the Project site and the residential development to the north. (DEIR, p. 8-24.)
Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.	**Yes.** Alternative 2 would provide on-site mitigation. (DEIR, p. 8-24.)
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.	**Yes.** Alternative 2 would positively contribute to the economy of the City and provide opportunities for highly trained workers and the expansion of the tax base. (DEIR, p. 8-24.)

Finding

The City Council rejects Alternative 2 as a Project alternative on the following grounds, each of which is individually provides sufficient justification for rejection of this alternative: (1) Alternative 2 would not reduce or eliminate the significant and unavoidable impacts of the Project and would result in greater impacts to traffic/transportation and air quality; (2) Alternative 2 meets 3 of the Project's 11 objectives, however, it does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, Alternative 2 is rejected from further consideration as infeasible.

Facts and Supporting Information

Because Alternative 2 (No Project/Specific Plan Development) will generate twice as many trips as the proposed Project, none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. This alternative does not reduce or eliminate the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic. Because Alternative 2 proposes manufacturing, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, Alternative 2 is rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

C. Alternative 3: Reduced Density Alternative

Description

Under the reduced density logistics alternative, the proposed development of the site would be scaled down by reducing the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduction in floor area would lead to a proportional reduction in the building footprint (1,003,519 SF of floor area) and a corresponding decrease in Project parking area. This alternative assumes access to the site, trail and fire access to Sycamore Canyon Wilderness Park, and the on-site Mitigation Area would be the same as the proposed Project. (DEIR, p. 8-25.)

The reduced density alternative could be realized by scaling down both proposed buildings. If both buildings are scaled down, Building 1 would comprise approximately 709,096 SF, and Building 2 would comprise approximately 294,423 SF, for a total of 1,003,519 SF of floor area. The table below shows a comparison of the Proposed Project to the Reduced Density Alternative.[7] (DEIR, p. 8-25.)

Component	Proposed Project	Alternative 3	Difference
Type of Development	Logistics Center	Logistics Center	None
Total Building Size	1,375,169 SF	1,003,519 SF	30% decrease
Projected Employment	860–1,335[a]	602-935[b]	728-1,203 lesser
On Site Mitigation Area	Yes	Yes	NA
Width of Landscaping at the Northern Property Boundary	64 feet	50 feet	NA
Trail Parking, Trail, Fire Access Road	Yes	Yes	NA
Trip Generation (No. Vehicles)			
Total Trips/Day	2,409	1,686	30% decrease
Passenger Cars	1,492	1,044	30% decrease
Trucks (total 2, 3, and 4+ Axle)	917	642	30% decrease
2 Axle	156	109	30% decrease
3 Axle	208	146	30% decrease
4+ Axle	553	642	30% decrease

Notes

a Low end based on Based on an average of 1,598 SF or logistics space per employee per *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010 prepared by the NAIOP Research Foundation. (2010 NAIOP, Figure 3, p. 12). Number of employees calculated as follows: 1,375,174 total SF ÷1,598 SF/employee = 860 employees. Upper end based on the County of Riverside employee generation rate for light industrial uses of 1,030 SF per employee; number of employees calculated as follows: 1,375,174 total SF ÷ 1,030 SF/employee = 1,335 employees.

b Assumes 30 percent fewer employees based on reduced building size.

[7] Source: DEIR, p. 8-25.

Summary of Impacts

The following table presents a summary of the impacts associated with Alternative 3 (Reduced Density Alternative).[8]

Threshold	Impacts
Aesthetics	As with the proposed Project, Alternative 3 would modify the visual character of the Project site through grading, vegetation removal, construction of buildings, associated parking, walls, fencing, landscaping, trail parking, a trail, fire access road, and parking and security lighting. The grading concept would remain the same as the proposed Project so that the structures' comparable height to existing residences would preserve views of the Box Springs Mountains. Lighting under Alternative 3 would be shielded and directed downward and away from the adjacent residences and Sycamore Canyon Wilderness Park. Therefore, impacts resulting from implementation of Alternative 3 would be similar to the proposed Project. (DEIR, p. 8-26.)
Agriculture and Forestry	As with the proposed Project, development under Alternative 3 would eliminate approximately 68 acres of Locally Important Farmland; however agricultural uses are not permitted in the SCBPSP area and the Project site has not been farmed for decades. Therefore, impacts resulting from the implementation of Alternative 3 would be similar to the proposed Project. (DEIR, p. 8-26.)
Air Quality	Alternative 3 would develop approximately 30 percent less building square footage and reduce truck traffic by approximately 30 percent, which in turn reduces air quality emissions by a similar amount. Air quality impacts related to construction would be similar to the proposed Project and will not exceed SCAQMD thresholds because the daily construction activity would be similar and the same site acreage would be disturbed. The long-term air quality impacts resulting from mobile sources would be reduced due to the reduction of building size, but would not avoid impacts resulting from NO_x emissions exceeding the SCAQMD daily regional thresholds. Localized emissions of criteria pollutants would decrease due to the decrease in total trucks trips accessing the site. Like the proposed Project, localized emissions would not exceed the applicable SCAQMD LST and the impacts would be less than significant. (DEIR, p. 8-26.) Health risks associated with diesel exhaust would be reduced compared to the proposed Project because the daily truck trips will decrease as a result of building size, thus decreasing impacts of toxic air contaminants. This impact would be less than that of the proposed Project, but would also be less than significant.(DEIR, p. 8-27.) Therefore, under Alternative 3, impacts to air quality impacts would be less than the proposed Project, but would remain significant and unavoidable due to the long-term exceedance of NO_x emissions from operations. (DEIR, pp. 8-27.)
Biological Resources	Although Alternative 3 would have a smaller footprint with regard to building sizes and parking area, this alternative would permanently impact suitable habitat for nesting birds and burrowing owls, and low quality raptor foraging habitat. Because the riparian/riverine resources and waters under the jurisdiction of the USACE, RWQCB, and CDFW bisect the Project site in a north-south direction, Alternative 3 would not completely avoid impacts to these resources. Because Alternative 3 would be required to comply with the provisions of the MSHCP and incorporate the same mitigation measures as the proposed Project, impacts would be similar to the proposed Project. (DEIR, p. 8-27.)
Cultural Resources	Although Alternative 3 would have a smaller footprint with regard to building sizes and parking area, this alternative would permanently impact the three bedrock milling sites that have been identified as tribal cultural resources within a tribal cultural landscape by one or more Native American Tribes. Because Alternative 3 would be required to implement the same mitigation measures as the Project, which includes relocation of all or a portion of the bedrock milling features to another location on the Project site, impacts would be similar to the proposed Project. (DEIR, p. 8-27.)

[8] Source: DEIR, pp. 8-26 – 8-31.

Threshold	Impacts
Geology and Soils	Under Alternative 3 the Project site would be graded substantially in the same way to minimize visibility of the building(s) from the adjacent neighborhood through the use of elevation and building height differences. This alternative would require the same geotechnical design considerations and require the same grading exceptions as the proposed Project. (DEIR, p. 8-27.)
Greenhouse Gas Emissions	Development of Alternative 3 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 3 were assumed to be the same as the Project. For the purposes of Alternative 3, the same amount of trees would be planted in on-site Mitigation Area; therefore, the amount of CO2e emissions sequestered from development of Alternative 3 would be similar to the proposed Project. Total GHG emissions from Alternative 3 (which includes amortized construction emissions and sequestration and operational emissions) would be less than the proposed Project due to the decrease in total traffic trip generation and building size. Because the BAU emissions for Alternative 3 would also include the same development as Alternative 3, it is anticipated that Alternative 3's GHG emissions reductions from the BAU may be similar to the proposed Project and would also achieve the City's RRG CAP reduction target for 2020 and hence the AB 32 reduction target for 2020. Alternative 3 would also comply with all present and future regulatory measures developed in accordance with AB 32 and CARB's Scoping Plan, and incorporates a number of Project design features that would further minimize GHG emissions, which are incorporated as mitigation measures **MM AQ 1** through **MM AQ 22**. Therefore, GHG impacts associated with this Alternative are considered to be the similar to the proposed Project and less than significant. (DEIR, pp. 8-27 – 8-28.)
Hazards and Hazardous Materials	Development of Alternative 3 would be similar to the proposed Project. Any potential impacts associated with hazards and hazardous materials would be reduced to less than significant levels through adherence to laws and regulations, compliance with FAR Part 77, and consistency with the March Air Reserve Base/Inland Port Airport (MARB/APA) Land Use Consistency Plan. Thus, potential adverse impacts associated with hazards or hazardous materials are similar to that of the proposed Project. (DEIR, p. 8-28.)
Hydrology and Water Quality	Under Alternative 3 the same basic storm drain facilities would be constructed as those included with the proposed Project including the construction of the off-site storm drain in Lance Drive that ultimately connects to the 120-inch diameter storm drain in Eastridge Avenue. Drainage would be collected in on-site facilities that would be conveyed via the new storm drain in Lance Drive to the storm drain in Eastridge Avenue prior to being discharged into the "marsh." Under this alternative, there would be potential urban runoff from the alternative's paved areas. This potential impact is the same as the proposed Project and would also be reduced to less than significant levels through compliance with mandatory regulatory requirements. Therefore, impacts associated with Alternative 3 would be the same as that of the proposed Project. (DEIR, p. 8-28.)
Land Use and Planning	Similar to the proposed Project, with approval of the GP2025 Circulation Element Amendment, Sycamore Canyon Business Park Specific Plan Amendment to the Circulation Plan, and the grading exception, all of which are part of the proposed Project, development of Alternative 3 would be consistent with the GP 2025 and SCBPSP. Development of the Project site for logistics/industrial uses at a reduced density is consistent with the GP 2025 Land Use designation of Business/Office Park and the zoning designation of BMP. Impacts would be similar to the proposed Project. (DEIR, p. 8-28.)
Mineral Resources	As with the proposed Project, development of Alternative 3 would develop a site previously used for granite mining and preclude the use of the Project site for future mining operations. Impacts would be the same as the proposed Project. (DEIR, pp. 8-28 – 8-29.)
Noise	Alternative 3 would develop approximately 30 percent less building square footage and reduce trips by approximately 30 percent. Development of Alternative 3 would result in the same disturbance area (site footprint) as the proposed Project, therefore similar types and amounts of construction equipment will be used, and there would be no perceptible difference in construction noise levels under Alternative 3. As with the proposed Project, Alternative 3 would require a 12-foot tall temporary noise barrier along the Project site's northern and western boundaries to reduce construction noise. However, even with the temporary wall and other construction noise mitigation

Threshold	Impacts
	measures, construction noise will result in a substantial increase in noise over the ambient noise level and impacts will be significant and unavoidable. (DEIR, p. 8-29.) Alternative 3 would generate long-term noise from on-site operations and vehicular traffic on area streets. As with the proposed Project, Alternative 3 operations will generate noise from vehicle movements within the proposed parking areas, idling trucks, loading and unloading activities, trash compactors and rooftop HVAC systems. The dominant operational noise for Alternative 3 will generally include noise associated with semi-trucks (tractor-trailers) entering and exiting the Project site and accessing dock areas, removal and hook-up of trailers, occasional truck air brakes, and vehicles associated with employees. Point source noise decreases by 6 DBA for each doubling of distance between the noise source and receiver. (DEIR, p. 8-29.) Operational noise will be generated from parking lots, rooftop-mounted equipment, diesel truck engines, exhaust systems, and loading and unloading of materials. Alternative 3 will generate approximately 30 percent fewer trips than the proposed Project. With 30 percent fewer vehicles using the Project site, the resulting noise level will be approximately 1 dBA less than the proposed Project. However, this is not enough of a reduction in operational noise for impacts under Alternative 3 to be less than significant. (DEIR, p. 8-29.) In order to effectively attenuate noise, a continuous barrier that blocks the line of sight5 is needed between the noise source and the receiver. Due to the differences in topography between the Project site and the residences to the west, to be effective a barrier should be installed at the top of the slope on the resident's property. Because the Project applicant does not have control over the installation of noise barriers, long term noise impacts from on-site operations under Alternative 3 will be significant and unavoidable. (DEIR, p. 8-29.) Traffic generated by Alternative 3 will use the same roadways as Project-generated traffic. Because Alternative 3 will result in 30 percent fewer trips noise levels along area roadways will be less than trips associated with the proposed Project. Under Alternative 3, the projected increase in ambient noise along Dan Kipper Drive would be 6 dBA, which is less than the increase as a result of the Project. However, because this increase is more than 5 dBA over the existing ambient noise levels it is considered substantial but because there are no sensitive receptors in proximity to Dan Kipper Drive this impact would be less than significant. (DEIR, pp. 8-29 – 8-30.)
Population/ Housing	Using the same job projection rates as the Project, Alternative 3 is expected to generate 602 – 935 permanent jobs, which is 30% less than the proposed Project. Jobs generated by Alternative 3 represent an increase of approximately one percent over the number of jobs in 2012 and less than one percent of the jobs forecast for 2040. Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce. Alternative 3 does not propose housing. Impacts will be similar to the proposed Project. (DEIR, p. 8-30.)
Public Services	Because Alternative 3 does not propose housing and future jobs are expected to be filled by the local workforce, this alternative will not directly or indirectly result in the need for new or expanded schools, libraries, or community centers. Due to the nature of Alternative 3, impacts with regard to fire and police services would be similar to the proposed Project. (DEIR, p. 8-30.)
Recreation	Development of Alternative 3 will also include trail parking and a fully improved trail to provide access to the Sycamore Canyon Wilderness Park. Construction of these facilities is considered a beneficial impact to recreation. Because employment opportunities generated by development of Alternative 3 are expected to be filled by residents from the City and surrounding area, Alternative 3 will not result in an increased demand for parks or other recreational facilities. Impacts will be similar to the proposed Project. (DEIR, p. 8-30.)
Transportation / Traffic	Development of Alternative 3 would decrease traffic levels on existing streets by approximately 723 daily trips, which is a 30 percent reduction from the proposed Project. Trip distribution under Alternative 3 will be similar to that of the proposed Project, thus traffic will be reduced on area roadways in comparison to the proposed Project. As with the proposed Project, egress on Dan Kipper Drive will be limited.

Threshold	Impacts
	In the E+A+C+P condition, the only intersection that would operate at LOS F is Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW). Project-related delay at this intersection is 0.9 seconds. Because Alternative 3 generates fewer trips the delay would be less. This is not a significant impact because the delay is less than 1.0 second. The Eastride-Eucalyptus 1-15 Northbound off-ramp is projected to fail in the E+A and E+A+C conditions without Alternative 3 traffic. This off-ramp will operate at an acceptable LOS with Alternative 3 traffic once the I-215 North Project is complete. However, because the completion date of the I-215 North project is unknown, this impact is significant. The Fair Isle-Box Springs I-215 Northbound on-ramp is projected to fail in the E+A+C condition without Alternative 3 traffic. This on-ramp will operate at an acceptable LOS with the addition of one mainline mixed flow lane for this on-ramp. However, this improvement is not programmed and it is not a part of Measure A or any other funding program. The City cannot control when improvements to the interstate system are made and there is no mechanism for the collection or payment of fair share fees. The addition of Alternative 3 traffic to this on-ramp is significant. (DEIR, pp 8-30 – 8-31.)

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 3 meets each objective.[9]

Project Objective	Alternative Meets Objective?
Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.	**Yes.** Alternative 3 would develop and operate a logistics center consisting of two stand-alone buildings. However, because the largest building would be approximately 709,096 SF, this would not satisfy market demand for logistics centers, which is for buildings over one million SF. (DEIR, p. 8-31.)
Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	**Yes.** Alternative 3 would develop and operate a logistics center that would use existing City infrastructure and is adjacent to similar uses. However, since the largest building would be approximately 709,096 SF, this would not satisfy the market demand for logistics centers. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project. (DEIR, p. 8-31.)
Develop and operate a logistics center that is in close proximity to March Inland Port, Interstate 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.	**Yes.** Alternative 3 would develop and operate a logistics center in proximity to March Inland Port and area freeways that limits truck traffic in residential areas. (DEIR, p. 8-32.)
Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.	**No.** Alternative 3 would not develop and operate a logistics center that will attract quality tenants, because market demand is for buildings greater than 1 million SF. Alternative 3 will not be competitive because there is a high availability of buildings in the 700, 000 SF and 300,000 SF range. (DEIR, p. 8-32.)

[9] Source: DEIR, pp. 8-31- 8-33.

Project Objective	Alternative Meets Objective?
Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.	**Yes.** Due to the location of the Project site in the proximity to I-215 and State Route 60, Alternative 3 would allow trucks servicing the site to achieve a minimum of two roundtrips per day. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project. (DEIR, p. 8-32.)
Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.	**No.** Alternative 3 would not meet the market demand for logistics centers with buildings greater than 1 million SF since the largest building would be approximately 709,096 SF. Alternative 3 would also not maximize the use of one of the few remaining large industrial sites in the City. (DEIR, p. 8-32.)
Develop and operate a logistics center that meets industry standards for operational design criteria.	**Yes.** Alternative 3 would develop and operate a logistics center that meets industry standards for operational design criteria. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project. (DEIR, p. 8-32.)
Implement the *Sycamore Canyon Business Park Specific Plan* through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	**Yes.** With approval of the proposed amendment to the SCBPSP Circulation Plan, Alternative 3 would be consistent with the Specific Plan's development standards. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project. (DEIR, p. 8-32.)
Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the *Sycamore Canyon Business Park Specific Plan* area for a logistics center.	**No.** Alternative 3 reduces site coverage to 31 percent, which does not maximize site usage. (DEIR, p. 8-33.)
Provide a densely landscaped buffer between the Project site and the residential development to the north.	**Yes.** Alternative 3 would provide a landscaped buffer. (DEIR, p. 8-33.)
Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.	**Yes.** Alternative 3 would provide on-site mitigation for riparian/riverine resources. (DEIR, p. 8-33.)
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.	**Yes.** Alternative 3 would positively contribute to the economy through the construction of new buildings, creation of new employment opportunities, and the expansion of the tax base. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project. (DEIR, p. 8-33.)

Finding

The City Council rejects Alternative 3 as a project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Although Alternative 3 would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic, Alternative 3 would not meaningfully reduce the significant and unavoidable impacts of the Project; (2) Although Alternative 3 implements nine of the 11 Project objectives, six of the objectives are not implement

to the same degree as the Project; (3) Alternative 3's largest building would be approximately 709,096 SF, which would not satisfy the market demand for buildings over one million SF, thus development is infeasible. Therefore, Alternative 3 is rejected from further consideration.

Facts and Supporting Information

Because Alternative 3 (Reduced Density Alternative) reduces development by 30 percent in comparison to the propose 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. (DEIR, p. 8-33.)

Although Alternative 3 meets most of the Project objectives, these objectives are met to a lesser degree than the proposed Project, because of scarcity of sites of this size, the attendant land cost of sites of this size, and the low Inland Empire market lease rates for product of this type, unless site coverage (the percentage of the site that is covered with buildings) reaches at least 45 percent(the reduced density alternative reduces site coverage from 45 percent to 31 percent), the rate of return from the lease would be too low to justify the cost and risk of investment. The feasibility of the reduced density alternative is further impacted by the loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on the investment to below zero. Finally, a survey of industrial buildings in the Inland Empire submarket shows very low availability of buildings in the 1,000,000 square foot size range and greater and a high availability of buildings in the 700,000 square foot size range, and the 300,000 square foot size range, respectively. Due to all of these factors, a reasonable developer would not take the risk to develop the reduced density alternative. For these reasons, Alternative 3 is rejected as infeasible. (DEIR, pp. 8-33 – 8-34.) Thus, this alternative has been eliminated from further consideration. (DEIR, p. 8-33.)

5.4 Identification of No Project Alternative

The No Project Alternative is addressed to compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. "No project" can be interpreted as no development or maintaining the existing condition. This analysis is required pursuant to CEQA Guidelines Section 15126.6(e) and represents the analysis of Alternative 1 – No Project/No Build, above.

"No project" can also be interpreted as development under an adopted plan. CEQA Guidelines Section 15126.6(e)(3)(A) states:

> When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed.

Alternative 2, as discussed above, represents development which would be reasonably expected to occur in the foreseeable future if development of the site were to proceed based on the plans and policies of the GP 2025 and implementation of the SCBPSP.

5.4 Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires that an EIR identify the "environmentally superior alternative" based on the evaluation of the project and its alternatives. Considerations relevant to the identification and discussion of the environmentally superior alternative include a proposal which contemplates less development than the proposed project and which correspondingly reduces most or all of the proposed project's adverse environmental impacts. Of the alternatives evaluated above, Alternative 1 (No Project, No Build) is the environmentally superior alternative, because the Project site would stay in

its existing condition. Since no development would occur, Alternative 1 would eliminate the significant and unavoidable impacts to air quality, noise, and transportation/traffic. (DEIR, pp. 8-34 – 8-35.)

When a No Project Alternative is identified as the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. Alternative 3 (Reduced Density Alternative) is environmentally superior to the proposed Project because this alternative would reduce impacts to air quality, GHG emissions, noise, and transportation/traffic by approximately 30 percent in comparison to the proposed Project. However, it would not reduce the significant and unavoidable impacts to air quality, noise, and transportation/traffic to less than significant. Alternative 3 would meet most of the Project objectives and would meet the basic Project objective of a logistics center with two stand-alone buildings to accommodate the intended uses of two separate and unrelated landowners; however, it would not meet the market demand for buildings greater than 1 million SF. (DEIR, p. 8-35.)

Although Alternative 3 meets most of the Project objectives, because of scarcity of sites of this size, the attendant land cost of sites of this size, and the low Inland Empire market lease rates for product of this type, unless site coverage reaches at least 45 percent the rate of return from the lease would be too low to justify the cost and risk of investment. Site coverage under Alternative 3 is only 31 percent. Thus, the feasibility of Alternative 3 is further impacted by the loss of economies of scale in the construction of a smaller building, which would drive the rate of return on the investment to below zero. Finally, a survey of industrial buildings in the Inland Empire submarket shows very low availability of buildings in the 1,000,000 square foot size range and greater and a high availability of buildings in the 700,000 square foot size range, and the 300,000 square foot size range, respectively. Due to all of these factors, a reasonable developer would not take the risk to develop the reduced density alternative. For these reasons, Alternative 3 is rejected as infeasible. (DEIR, p. 8-35.)

6.1 Significant and Unavoidable Impacts

Based on the information and analysis set forth in the EIR and the record of proceedings, implementation of the proposed Project would result in the significant and unavoidable impacts identified below, and as such, a statement of overriding conditions must be adopted before the Project may be approved:

- Air Quality: The Project's long-term operational emissions will exceed the SCAQMD regional threshold for NO_x, even with feasible mitigation incorporated, and impacts are significant and unavoidable.

- Noise: Potential impacts to the adjacent residences and the Sycamore Canyon Wilderness Park from Project-related construction and operational noise will be significant, even with implementation of feasible mitigation measures. Implementation of mitigation measures MM NOI 13 through MM NOI 16 will reduce operational noise impacts; however, because the noise barrier outlined in MM NOI 16 would be on private properties, the Project proponent does not have control over construction of the noise barrier. Therefore, impacts are significant even with incorporation of feasible mitigation.

- Transportation/Traffic: Although necessary road improvements have been identified which would allow all roadway segments to operate at an acceptable level of service, even with additional Project-related traffic, these improvements are under the jurisdiction of Caltrans and no mechanism to contribute fair share towards a required improvement is available. Thus, because Caltrans has now fund established to receive payment and the timing of these improvements are unknown, impacts are significant and unavoidable.

The City Council finds that it has imposed all feasible mitigation to reduce the Project's significant impacts to a less than significant level. The City Council further finds that, except for the Project, all other alternatives set forth in the Draft EIR are infeasible because they would prohibit the realization of the Project objectives. Further analyses would be required to determine the full impact of the alternatives should the City ever select another alternative as a project and as such, the other alternatives are hereby found to be infeasible.

6.2 Project Benefits

The Riverside City Council, (i) having independently reviewed the information in the Final EIR and the record of proceedings; (ii) having made a reasonable and good-faith effort to eliminate or substantially lessen the impacts resulting from the Project to the extent feasible by adopting mitigation measures identified in the EIR and Mitigation Monitoring and Reporting Program ("MMRP"); and (iii) having balanced benefits of the Project against its significant and unavoidable environmental impacts, chooses to approve the Project despite its significant and unavoidable effects, because, in its view, specific economic, biological, social, technological, or other benefits of the Project render the significant effects acceptable in light of benefits.

The City Council finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the Project notwithstanding the significant and unavoidable impacts. The Project would provide the following benefits:

- Takes advantage of existing City infrastructure; is adjacent to similar industrial logistics and distribution center uses; is in close proximity to March Inland Port, Interstate 215/State

Route 60 and Interstate 10; and, limits traffic truck within residential areas in the City and neighboring jurisdictions.

- Creates both temporary and permanent on-site jobs and will indirectly support local and regional jobs. Additionally, construction spending will create a one-time stimulus to the local and regional economies. Once the proposed Project is completed, the facility will ultimately spur the creation of both local and regional jobs, and there would be additional output and earnings to the local and regional economies.

- Contributes towards maximizing employment opportunities in the City.

- Provides jobs for residents at a variety of income levels.

- Provides new development that will assist the City in obtaining fiscal balance in the years and decades ahead. Once construction is completed, the facility will annually generate additional City revenue. This increased revenue from the development will be driven by indirect sales tax, property tax, and business license fees.

- Provides additional property tax revenue to the City, which would contribute to the provision of public services.

- Responds to the market demand within the SCBPSP for a logistics center over one million SF in size by maximizing the use of one of the few remaining large industrial building sites in the City that is in proximity to the Ports of Los Angeles and Long Beach. By realizing the substantial unmet demand in the City and the region for buildings over one million SF in size, the City will be able to compete on a domestic and international scale through the efficient and cost-effective movement of goods.

- Includes sustainable design project features. Facilitates development of underutilized lands and maximizes the development potential by creating a plan for a unified, cohesive development of multiple parcels rather than a piecemeal, incremental approach to development.

- Provides safe and controlled access to the Sycamore Canyon Wilderness Park for use by fire and park maintenance vehicles, pedestrians, and bicyclists.

6.3 Overriding Considerations

The following discussion provides the support of overriding considerations, which are a result of infeasible mitigation measures or alternatives to avoid the significant and unavoidable impacts that would result from the proposed Project.

Economic Reasons

The proposed Project provides economic benefits in the form of: (1) new jobs; (2) the use of locally produced and/or manufactured construction materials for at least 10 percent of the Project's construction materials as required by mitigation measure MM AQ 18; (3) and increased property tax revenue once construction is complete.

Jobs

Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including the City. During the construction phase of the proposed Project, direct jobs, that would be created, further increase indirect jobs in the City and in the economic region. Additionally, over the construction period, construction spending would add revenue to local and regional output. Construction spending would also increase local earnings and regional earnings. After construction, the development would create new on-site jobs as well as indirect jobs in the City and in the economic region.

The new jobs would be an increase over existing conditions where no employment opportunities currently exist. This increase in jobs would be an overall benefit to the local and regional economy.

The provision of additional jobs by maximizing employment on the Project site would support a better jobs-to-housing ratio and would reduce unemployment in the City.

New jobs associated with the Project are expected to include both manual occupations (e.g., trucking, dock work, and freight handling) and other office- based occupations (e.g., logistics, sales, management, and freight forwarding). Both manual and office-based occupations have the potential to pay relatively high wages, thereby contributing to the provision of jobs for a variety of income levels. Additionally, as discussed previously, the proposed Project would generate short-term construction-related and long-term operational jobs.

Local Materials

The Project would use locally produced and/or manufactured materials for at least 10 percent of the Project's construction materials, as required by mitigation measure AQ-18.

Tax Revenue

The Project would have a positive fiscal impact on the City through construction and development of the Project, as well as throughout the life of the Project. As noted above, the construction and development of the site would produce a temporary economic stimulus as a result of one-time construction-related spending in the form of one-time development fees. These fees include city fees, school fees, sewer and water fees, transportation fees, and permit fees. In addition to the one-time payment of fees, property taxes and indirect sales taxes would be collected during this time and paid to the City. During the operational phase of the Project (during which time the building is fully constructed and functional), additional revenues will be paid to the City in the form of property taxes, indirect sales tax, business license fees.

Market Demand Reasons

The proposed Project has been designed to maximize the size of the on-site building, taking into consideration site constraints and applicable development standards. Further, according to market trends, the positive demand for warehouses over 1,000,000 sf has been spurred by the shift to internet sales and the increase in e-commerce retailers. Tenants continue to look for modern, large warehouse facilities to house their regional distribution centers that can accommodate the increase in e-commerce. The proposed Project would allow both a major retailer and smaller retailers to take advantage of new, modern construction that can accommodate large inventory handling and racking systems, and which provide a high number of dock doors and office space. Additionally, this location would provide access to a full range of transportation infrastructure, including a large freeway system that connects to points within and outside the region. The Project site is also located near two international airports: Ontario International Airport and Los Angeles International Airport, and to the Ports of Los Angeles and Long Beach. All of these facilities are critical in the movement of freight throughout Southern California and support the demand for warehouse facilities.

Social Reasons

In its existing condition the Project site has been used for illegal dumping, trespass, and off-road bicycle and vehicle use, which are considered nuisances. The proposed Project will secure the Project site, which will eliminate illegal dumping and trespass. The Project will provide controlled and safe access to the Sycamore Canyon Wilderness Park in the form of a parking lot and trail at the southeastern-most portion of the Project Site and a Fire Access/Parks Maintenance Road. The proposed Project will include on- and off-site drainage facilities that will eliminate flooding on adjacent properties that has occurred in the past. In addition to these facilities the Project will provide and be served by adequate infrastructure.

Legal Reasons

The proposed Project will provide development consistent with municipal standards, codes and policies. Specifically, the Project will be developed to implement the SCBPSP, the *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan*, and the MSHCP. The parking lot and trail is required to be designed, constructed, and maintained to the standards and specifications of the City's Park, Recreation, and Community Services Department, the SCBPSP, and the *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan.*

A Fire Access/Parks Maintenance Road will also be provided, with access taken from an internal driveway and provided back to the Sycamore Canyon Wilderness Park on a 12-foot wide road providing a minimum 10-foot wide 4-inch thick decomposed gravel surface with 13.5-foot vertical clearance for adequate clearance for large vehicles.

Conclusion

The City, after balancing the specific economic, social, and other benefits of the Project, has determined that the significant and unavoidable adverse environmental impacts identified may be considered "acceptable" due to the specific considerations listed above, which outweigh the unavoidable, adverse environmental impacts of the Project.

Accordingly, the City of Riverside adopts the above statement of overriding considerations, recognizing that significant and unavoidable cultural resources, land use, and traffic/transportation impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures; (ii) rejected alternatives to the proposed Project, as discussed above; and (iii) recognized all unavoidable significant impacts, the City hereby finds that each of the separate benefits of the Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its unavoidable significant effects, and, thereby, justifies the approval of the Project.