



SYCAMORE HILLS DISTRIBUTION CENTER

Final Environmental Impact Report

SCH#2020079023

prepared for

City of Riverside

Community Economic Development Department, Planning Division

3900 Main Street, 3rd Floor

Riverside, California 92522

Contact: Veronica Hernandez, Senior Planner

prepared by

Ruth Villalobos & Associates, Inc.

3602 Inland Empire Blvd., Suite C310

Ontario, CA 91764



November 2021

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Sycamore Hills Distribution Center FEIR

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1.0 Introduction

The Final Environmental Impact Report (FEIR), as required pursuant to State *CEQA Guidelines* Sections 15089 and 15132, includes the Draft Environmental Impact Report (DEIR) or a revision thereof, comments and recommendations received on the DEIR, a list of persons, organizations, and public agencies commenting on the DEIR, and the responses of the lead agency, which is the City of Riverside (City) for this Project, to significant environmental points raised in the review and consultation process. A Mitigation Monitoring and Reporting Program (MMRP) is also included to ensure compliance during Project implementation (Public Resources Code Section 21081.6, State *CEQA Guidelines* Section 15097).

1.1. Purpose of the EIR Process

This Final Environmental Impact Report (Final EIR) is an informational document to evaluate the potential environmental impacts of the proposed Sycamore Hills Distribution Center Project (Project). The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potentially significant environmental effects, identify feasible ways to minimize significant effects, and consider a reasonable range of alternatives to the project.

This Final EIR contains 1) The Draft EIR (incorporated by reference in accordance with State CEQA Guidelines Section 15150); 2) Errata, a revision of the DEIR, including minor changes that clarify or correct minor inaccuracies; 3) Comments received on the DEIR; 4) List of persons, public agencies, organizations that commented on the DEIR; and 5) Responses to significant environmental points raised in the review period. Pursuant to the requirements of CEQA, the City of Riverside must certify the EIR as complete and adequate prior to any potential approval of the project or a project alternative.

Revisions to the Draft EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are included in the responses to comments as well as the Errata. Underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR. All revisions are then compiled in the order in which they would appear in the Draft EIR (by section and page number) in Section 3, Revisions to the Draft EIR, of this document. Page numbers cited in this section correspond to the page numbers of the Draft EIR. When mitigation measure language has been changed, it has been changed in the text on the stated Draft EIR page, the summary table (Draft EIR Table 1) in the Executive Summary of the Draft EIR, and the Mitigation Monitoring and Reporting Plan (MMRP). The Final EIR includes the responses to comments on the Draft EIR provided herein and the text of the Draft EIR, revised based on responses to comments and other information.

1.2. EIR Certification Process and Consideration of Project Approval

In accordance with the requirements of CEQA and the procedures of the City of Riverside, the EIR must be certified as complete and adequate prior to any potential final action on the proposed project. Once the EIR is certified and all information considered, using its independent judgment, the City can choose to take no action, or to take action to go forward with the proposed project, make changes, or select an alternative to the proposed project. While the information in the EIR

does not constrain the City's ultimate decision under its land use authority, the City must respond to each significant effect and mitigation measure identified in the EIR as required by CEQA by making findings supporting its decision.

1.3. Public Review Summary

The City circulated the DEIR for the Project for a 45-day public review period from June 8, 2021 through July 22, 2021. Notices of Completion and Availability of the DEIR were circulated to the State Clearinghouse, responsible agencies, trustee agencies, and other interested parties on June 8, 2021.

General public Notice of Availability of the DEIR was also given by publication in The Press-Enterprise daily circulation newspaper on June 8, 2021. As required by Public Resources Code Section 21092.3, a copy of the public notice was posted with the Riverside County Clerk on June 8, 2021.

As prescribed by the State CEQA Guidelines Sections 21091 (d), the City of Riverside, as the lead agency, is required to 1) evaluate comments on significant environmental issues received during the 45-day public comment period, and may respond to late comments, from persons who have reviewed the Draft EIR; and 2) prepare written responses to comments. (CEQA Guidelines, § 15088). The Responses to Comments, along with the comment letters, are included in Section 2 of this FEIR. In accordance with the provisions of Public Resources Code Section 21092.5, the City has provided a written response to each commenting public agency no less than 10 days prior to the proposed certification date.

2.0 Responses to Comments

This Response to Comments (RTC) section provides responses to public and agency written comments received by the City of Riverside on the Draft Environmental Impact Report (DEIR) for the proposed Sycamore Hills Distribution Center (Project). The DEIR identifies the likely environmental consequences associated with development of the proposed Project and recommends mitigation measures to reduce potentially significant impacts. In addition to providing responses to public and agency comments received on the DEIR, this RTC document also revises the DEIR to clarify or amplify the existing analysis, as necessary, in response to those comments or to make clarifications to information presented in the DEIR.

2.1 Environmental Review Process

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the DEIR.

On July 28, 2020, the City of Riverside circulated a Notice of Preparation (NOP) for a 30-day period to identify environmental issue areas potentially affected if the proposed project were to be implemented. As discussed in Section 2.3 of the DEIR, the NOP was distributed to the State Clearinghouse, responsible agencies, and individuals/parties considered likely to be interested in the proposed Project and its potential impacts. Comments received by the City of Riverside on the NOP and during the August 12, 2020, virtual EIR scoping meeting held by the City are summarized in Table 2.0-1 of the DEIR. These comments were considered during the preparation of the DEIR.

The DEIR was made available for public review on June 8, 2021 and was distributed to local and State responsible and trustee agencies. Copies of the Notice of Availability of the DEIR were mailed to a list of interested parties, groups, and public agencies, as well as property owners and occupants of nearby properties. The DEIR and an announcement of its availability were posted electronically on the City's website. The Notice of Availability of the DEIR was also posted at the office of the Riverside County Clerk and with the State Clearinghouse. Due to the current COVID-19 guidance from the California Department of Public Health, and the closures of governmental facilities during the public review period, copies of the DEIR were made available for public viewing at the following City facilities: (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522; and (2) Riverside Public Library, Orange Terrace Branch, 20010-B Orange Terrace Parkway, Riverside, CA 92508.

The 45-day CEQA public comment period began on June 8, 2021 and ended on July 22, 2021. The City of Riverside received eleven (11) comment letters on the DEIR prior to the close of the public comment period. The City also received four (4) comment letters on the DEIR after the close of the public comment period. Copies of all written comments on the DEIR received are included in Section 2.3 of this document, as are responses to those comments.

2.2 Organization of Comment Letters and Responses

This section presents a list of comment letters received on the DEIR and describes the organization of the letters and comments that are provided in Section 2.3, Comments and Responses, of this document. The letters are presented in the order in which the letters were received.

Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue, as identified in the bracketing/numbering of each comment. For example, Response 1.1 indicates that the response is for the first issue raised in comment Letter 1.

Table 2.2-1 – DEIR Comment Letters Received

Letter Number and Commenter	Agency/Group/Organization/Individual	Page Number
1. Kim Ellis, Airport Manager	Riverside Municipal Airport	2.0-4
2. Daniel Zerda, Student Intern	County of Riverside Transportation and Land Management Agency, Airport Land Use Commission	2.0-9
3. Transmission Technical Services Department	SoCalGas	2.0-12
4. Jamie Nord, Cultural Resource Technician	San Manuel Band of Mission Indians	2.0-15
5. Mauricio Alvarez, Planning Analyst	Riverside Transit Agency	2.0-18
6. Diane Doesserich, Team Manager, Environmental Planning Section	The Metropolitan Water District of Southern California	2.0-24
7. Board of Directors	Golden State Environmental Justice Alliance	2.0-29
8. Adam Salcido	Adam Salcido	2.0-73
9. Matt Hagemann and Paul E. Rosenfeld	SWAPE on behalf of Golden State Environmental Justice Alliance	2.0-76
10. Deborah de Chambeau, Engineering Project Manager	Riverside County Flood Control and Water Conservation District	2.0-399
11. Leonard Nunney	Friends of Riverside's Hills	2.0-408
Comment Letters Received After Close of the DEIR Comment Review Period		
12. Robert Krieger, Branch Chief Risk Reduction Branch	California Air Resources Board	2.0-434
13. Steven Piepkorn	Golden State Environmental Justice Alliance	2.0-459
14. Lenora Mitchell	Lenora Mitchell	2.0-467
15. Cindy Roth, President/CEO	Riverside Chamber of Commerce	2.0-471

2.3 Comment Letters and Responses

Written responses to each comment letter received on the DEIR are provided in this section. All letters received on the DEIR are provided in their entirety, followed by responses to the comments contained in the letters.

Comment Letter 1 – Riverside Municipal Airport

Comment letter 1 commences on the next page.

Sonya Hooker

From: Ellis, Kim <KEllis@riversideca.gov>
Sent: Tuesday, June 8, 2021 9:22 AM
To: Hernandez, Veronica
Subject: RE: CITY OF RIVERSIDE - NOTICE OF AVAILABILITY OF DRAFT EIR - SYCAMORE HILLS DISTRIBUTION CENTER

1.1 { The Airport has no comment.

Kim Ellis, A.A.E.
 Airport Manager
 City of Riverside
 Riverside Municipal Airport
 Main: (951) 351-6113
 Cell: (909) 261-1867
RiversideCA.gov



From: Hernandez, Veronica <VHernandez@riversideca.gov>
Sent: Monday, June 7, 2021 6:35 PM
To: Hernandez, Veronica <VHernandez@riversideca.gov>
Subject: CITY OF RIVERSIDE - NOTICE OF AVAILABILITY OF DRAFT EIR - SYCAMORE HILLS DISTRIBUTION CENTER

Hello,

Attached please find the Notice of Availability of a Draft Environmental Impact Report for the Sycamore Hills Distribution Center.

PROJECT LOCATION: The Project site is located on the north side of Alessandro Boulevard, east of Barton Street and west of San Geronio Drive, in the City of Riverside. The Project site includes three parcels, Assessor Parcel Numbers (APNs) 263-060-022, 263-060-024, and 263-060-026, totaling 48.64 gross acres.

PROJECT DESCRIPTION: The Project consists of the development of two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls (including retaining walls), landscaping, and water quality treatment areas. The Project proposes subdividing the site into two numbered parcels (Parcels 1 and 2) and three lettered parcels (Parcels A, B, and C). Parcel 1 is proposed to be developed with Building A, a 400,000 square foot warehouse, and Parcel 2 with Building B, a 203,100 square foot warehouse, for a combined total of 603,100 square feet of warehouse. Both warehouse buildings are proposed for high cube transload short-term use, primarily for the short-term storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials), usually on pallet loads or larger handling products prior to their distribution to retail locations or other warehouses. A typical high cube warehouse has a high level of on-site automation and logistics management. No refrigeration use is proposed.

Parcels A and B contain the existing 11.6-acre Restricted Property that landlocks Parcel 1. The proposed Project includes modifications to the Restricted Property to create a driveway to connect Parcel 1/Building A to Alessandro Boulevard. The Project proposes to expand the Restricted Property by a net 0.63-acre, for a total acreage of 12.23 acres.

Parcel C is proposed to be developed with a trailhead parking lot, totaling 1.18 acres, to serve the Sycamore Canyon Wilderness Park. Improvements include a parking lot, sidewalk, shade structure, bike rack, drinking fountain, fencing, and a Fire Department access gate. Parcel C is proposed to be dedicated to the City.

Implementation of the proposed Project will require the following discretionary approvals:

- **Parcel Map (P20-0025)** – To subdivide 48.64 acres into 5 parcels;
- **Minor Conditional Use Permit (P19-0626)** – To permit an industrial building over 400,000 square feet in size;
- **Design Review (P19-0627)** – For the proposed site design and building elevations review;
- **Variances (P20-0258)** – 1) To allow the installation of combination retaining/freestanding walls wherein the retaining portion ranges from 6.4 to 7.6 feet in height, where a maximum retaining portion height of 4 feet is permitted by the Zoning Code, and 2) To allow combination retaining/freestanding walls with a combined height of 14.4 feet, where a maximum combined height of 10 feet is permitted by the Zoning Code;
- **Grading Exception (P20-0282)** – To allow the height of retaining walls not open to public view to be up to 11.5 feet, where the Grading Code allows a maximum height of 6 feet; and
- **Environmental Impact Report (P20-0024).**

PUBLIC REVIEW PERIOD: The Draft EIR is available for public review and comment beginning Tuesday, June 8, 2021, and ending Thursday, July 22, 2021. An electronic copy of the Draft EIR is available for public review on the City's website: <https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents>. If unable to access the electronic copy, please contact Veronica Hernandez, Senior Planner at (951) 826-3965 or vhernandez@riversideca.gov.

Due to current COVID-19 guidance from the California Department of Public Health, and the current limited hours of government facilities, copies of the Draft EIR will be made available for public viewing at the following City facilities: (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522 from 9 AM to 4 PM Mondays, Tuesdays, Thursdays, and Fridays and from 10 AM to 4 PM on Wednesdays; and (2) Riverside Public Library, Orange Terrace Branch, 20010-B Orange Terrace Parkway, Riverside, CA 92508 from 2 PM to 5 PM Tuesdays and Thursdays and 11 AM to 2 PM on Saturdays. Questions related to Draft EIR availability should be directed to the project contact.

Responses to this Draft EIR should be sent to Veronica Hernandez, Senior Planner, no later than 5:00 p.m. on Thursday, July 22, 2021 at the following address:

LEAD AGENCY:
 City of Riverside
 Community & Economic Development Department
 Planning Division
 3900 Main Street, 3rd Floor
 Riverside, California 92522
 Attn: Veronica Hernandez, Senior Planner
 (951) 826-3965
vhernandez@riversideca.gov

Should you have any questions regarding this case, please do not hesitate to contact me.

Best,

Veronica Hernandez | Senior Planner
 951.826.3965 | vhernandez@riversideca.gov

City of Riverside

Community & Economic Development Department
Planning Division
3900 Main Street | 3rd Floor | Riverside 92522

Our Collective Mission: Ensure the well-being of residents, employees, and visitors in the City of Riverside by limiting the spread of COVID-19. Stay Home, Maintain Your Space, Cover Your Face.

Keep Riverside healthy: Wear a face covering, maintain healthy diet and exercise, wash your hands, and get vaccinated. [RiversideCA.gov/COVID-19](https://www.riversideca.gov/COVID-19)

Letter 1 – Riverside Municipal Airport**Commenter:** Kim Ellis**Date:** June 8, 2021**Response 1.1:**

The commenter states that the Riverside Municipal Airport has no comment.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

**Comment Letter 2 – County of Riverside Transportation and Land Management Agency,
Airport Land Use Commission**

Comment letter 2 commences on the next page.

Sonya Hooker

From: [Zerda, Daniel](#) <DZerda@Rivco.org>
Sent: Tuesday, June 8, 2021 10:12 AM
To: Hernandez, Veronica
Subject: [External] CITY OF RIVERSIDE - NOTICE OF AVAILABILITY OF DRAFT EIR - SYCAMORE HILLS DISTRIBUTION CENTER (ALUC Comments)

2.1

Hi Veronica,
Thank you for sending the transmittal for the above referenced case. The project is located in Zone C1 of the March Airport Influence Area. It is my understanding that the project does not propose any legislative actions, and since the City's General Plan has been found consistent with the March Airport Land Use Compatibility Plan, City Staff may perform the Airport Compatibility review. Please let me know if you have any questions.

-Best Regards,

[Daniel Zerda](#)
Student Intern
Transportation and Land Management Agency
County of Riverside
(951)955-0982

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[County of Riverside California](#)

Letter 2 – County of Riverside Transportation and Land Management Agency, Airport Land Use Commission**Commenter:** Daniel Zerda**Date:** June 8, 2021**Response 2.1:**

The commenter indicates the project is in Zone C1 of the March Airport Influence Area (March Air Reserve Base), that the project does not propose any legislative actions, and since the City's General Plan has been found consistent with the March Airport (March Air Reserve Base) Land Use Compatibility Plan, City Staff may perform the Airport Compatibility review. The commenter's understanding and this information is consistent with the information contained in the DEIR, Sections 5.8 Hazards & Hazardous Materials, and 5.10 Land Use and Planning.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 3 – SoCalGas Transmission Technical Services Department

Comment letter 3 commences on the next page.



Transmission Technical
Services Department

9400 Oakdale Ave
Chatsworth, CA 91311
SC9314

June 8, 2021

Veronica Hernandez
City of Riverside
vhernandez@riversideca.gov

Subject: SYCAMORE HILLS DISTRIBUTION CENTER
DCF: 1027-21NC

3.1

The Transmission Department of SoCalGas does not operate any facilities within your proposed improvement. However, the Distribution Department of SoCalGas may maintain and operate facilities within your project scope.

To assure no conflict with the Distribution's pipeline system, please e-mail them at:

SCGSERegionRedlandsUtilityRequest@semprautilities.com

Best Regards,

SoCalGas Transmission Technical Services
SoCalGasTransmissionUtilityRequest@semprautilities.com

Letter 3 – SoCalGas**Commenter:** Transmission Technical Services Department**Date:** June 8, 2021**Response 3.1:**

The commenter states that while the Transmission Department of SoCalGas does not operate any facilities within the proposed Project, the Distribution Department of SoCalGas may maintain and operate facilities within the proposed Project's scope.

The City will condition the Applicant to contact the Distribution Department of SoCalGas to ensure the Project is not in conflict with the Distribution's pipeline system, pursuant to their request.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 4 – San Manuel Band of Mission Indians

Comment letter 4 commences on the next page.

Sonya Hooker

From: Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>
Sent: Tuesday, June 8, 2021 4:51 PM
To: Hernandez, Veronica
Cc: Ryan Nordness
Subject: [External] RE: Response to Draft EIR, Sycamore Hills Distribution Center, Riverside, Riverside County, California

Dear Veronica Hernandez,

4.1 [Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above-referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on June 7th, 2021. The proposed project is located outside of Serrano ancestral territory and, as such, SMBMI will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.]

Kind regards,

Jamie Nord

CULTURAL RESOURCES TECHNICIAN

Email: Jamie.Nord@SanManuel-NSN.Gov

O: (909) 864-8933 x50-3421

M: (909) 849-1186

26569 Community Center Dr Highland California 92346



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Letter 4 – San Manuel Band of Mission Indians**Commenter:** Jamie Nord**Date:** June 8, 2021**Response 4.1:**

The commenter states that because the Project site is located outside of Serrano ancestral territory, the Tribe will not be requesting consultation with the City on this Project.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 5 – Riverside Transit Agency

Comment letter 5 commences on the next page.

Hernandez, Veronica

From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Wednesday, July 14, 2021 10:32 AM
To: Hernandez, Veronica
Subject: RE: [External] RE: CITY OF RIVERSIDE - NOTICE OF AVAILABILITY OF DRAFT EIR - SYCAMORE HILLS DISTRIBUTION CENTER

Good Morning Veronica,

- 5.1 When I last received the plans for this project last year, the recommendation was, if possible, to provide an ADA compliant bus stop on Alessandro, west of Vista Grande Dr. I don't know if the recommendation was moved forward at the time. Looking at the plans again, the recommendation would still be the same now. In addition, there should be an ADA pathway from the main entrance/street on Alessandro to the warehouse facility to ensure pedestrians have a safe area to walk.

Thank you for considering this comment.

Mauricio Alvarez, MBA

Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

Letter 5 – Riverside Transit Agency**Commenter:** Mauricio Alvarez**Date:** July 14, 2021**Response 5.1:**

The commenter indicates it is recommended that, if possible, to provide an ADA compliant bus stop on Alessandro, west of Vista Grande Drive. In addition, there should be an ADA pathway from the main entrance/street on Alessandro to the warehouse facility to ensure pedestrians have a safe area to walk. The City Planning Department staff had a discussion with the RTA commenter subsequent to receiving the comment for further clarification on the recommendations. The RTA commenter indicated that only an ADA-compliant sidewalk which would accommodate a future bus stop are being requested of the applicant to provide, not the actual bus stop. RTA will construct the actual bus stop improvements in the future.

In the DEIR, Section 5.12 Transportation, page 5.12-50, it indicates “The Project is required to provide sidewalk with the capability for RTA to install an Americans with Disabilities Act (ADA) compliant RTA bus stop bench and pole marker in the future along Alessandro Boulevard, near the Alessandro Boulevard/Vista Grande Drive intersection.”

The sidewalk that will be installed is ADA compliant and the road improvements installed as part of the project will accommodate bus stop installation in the future by RTA. Therefore, the Project as designed, accommodates the RTA’s request.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 6 – The Metropolitan Water District of Southern California

Comment letter 6 commences on the next page.



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

July 15, 2021

Via Electronic Mail

Veronica Hernandez, Senior Planner
City of Riverside
Community and Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, California 92522

Dear Ms. Hernandez:

Notice of Availability of a Draft

Environmental Impact Report for the Sycamore Hills Distribution Center Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Sycamore Hills Distribution Center (Project). The proposed Project would construct two warehouse buildings, a trailhead parking lot, associated improvements including parking, fire lanes, fencing and walls, landscaping, and water quality treatment areas, and would extend Barton Street to access the Project in the city of Riverside. This letter contains Metropolitan's comments to the proposed Project and DEIR as an affected responsible public agency.

6.1

Metropolitan previously provided correspondence on the Project in August 2020 (copy attached) in response to the Notice of Preparation for the DEIR stating that the Project had the potential to impact Metropolitan's Box Springs Feeder and Perris Valley Pipeline waterlines, Henry Mills Water Treatment Plant, and associated fee-owned property. The attached exhibit provides an updated depiction of these facilities and fee property in relation to the Project. Due to the Project's proximity to these facilities and property we provided a copy of Metropolitan's "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way."

While we appreciate that our previous comments were noted and addressed in the DEIR, upon review of the document and the more detailed project depictions provided therein, including Figure 3.0-9, we determined that the Project would require the use of Metropolitan fee owned property on Barton Street. Specifically, Metropolitan owns the portion of the street extending westerly of its centerline. Metropolitan acquired the property, assigned MWD Parcel 1610-1-1, by grant deed recorded as Document No. 87059 on August 29, 1966, and re-recorded as Document No. 99077, on October 6, 1966 (see grant deed attached). As described in the DEIR, the Project would utilize Barton Street during construction and operation and would pave and extend the roadway north of its current terminus to provide access to Parcels 2 and C.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Veronica Hernandez

Page 2

July 15, 2021

6.1
cont'd

The use of Metropolitan's fee-owned property to extend Barton Street will require the submittal of a land use application (see attached) for the granting of a public road easement or the issuance of an entry permit. Metropolitan will consider the FEIR to evaluate the applicant's request for a public road easement or entry permit. However, Metropolitan's engineering and operations staff will analyze the project and construction documents as well as engineering reports to determine if the potential impacts from the proposed use cannot be adequately mitigated to negate disruptions or interference with current and future operational requirements. Therefore, the potential impacts associated with the use of Metropolitan's fee owned property on Barton Street should be analyzed and described in the FEIR. This discretionary action and the granting of permanent real property rights will be carried out by Metropolitan's Board of Directors.

We appreciate the opportunity to provide input to your planning process, and we look forward to receiving future environmental documentation and design plans regarding this proposed Project. If you have any questions, please contact Alex Marks at (213) 217-7629.

Very truly yours,

Diane Doesserich

Diane Doesserich

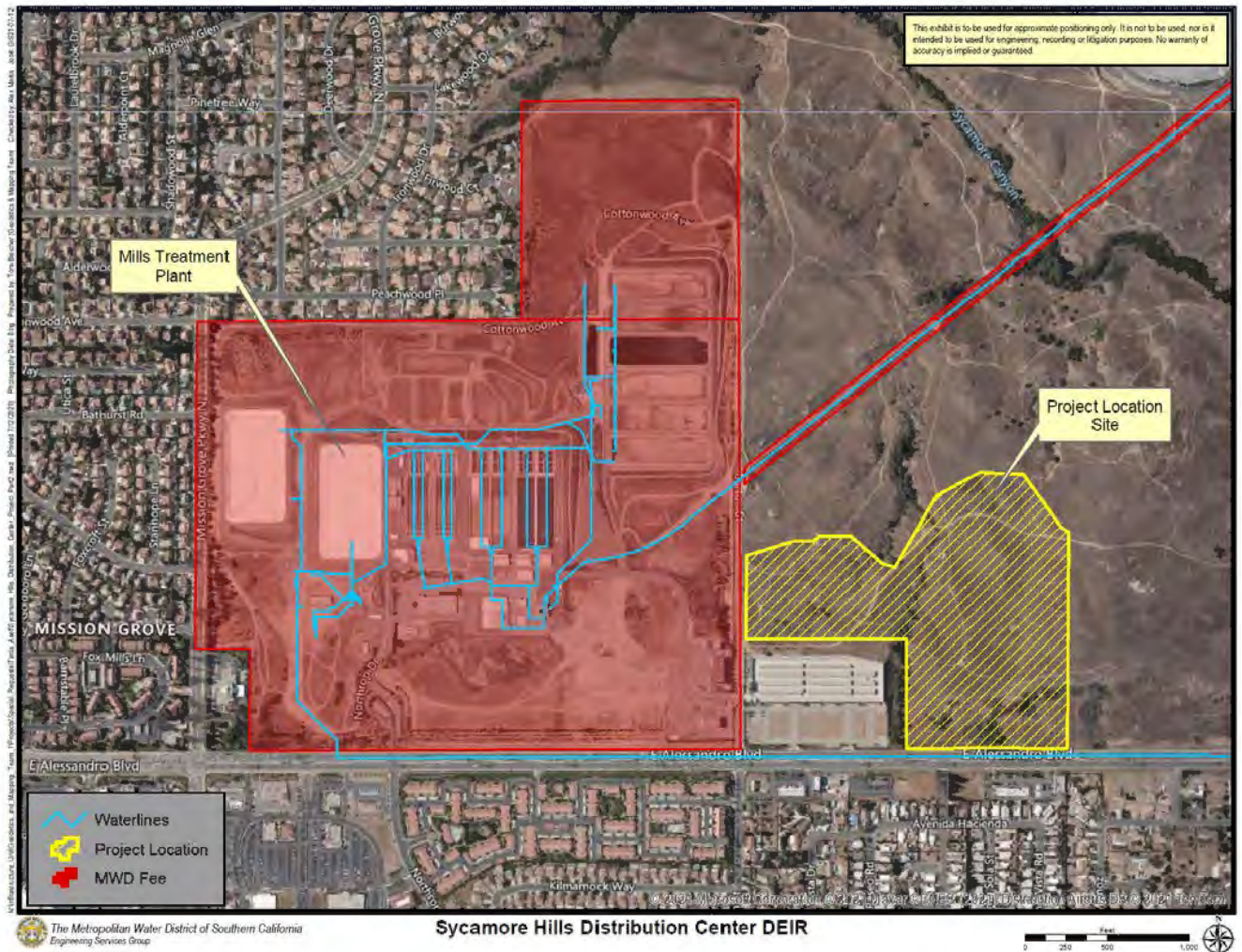
Team Manager, Environmental Planning Section

DD:asm

SharePoint: City of Riverside, Sycamore Hills, External Review

Enclosures:

- (1) Map of Metropolitan fee property and facilities in relation to the Project
- (2) Metropolitan Grant Deed DOC 99077
- (3) Metropolitan Land Use Application
- (4) Metropolitan comment letter on the NOP for the Project, dated August 17, 2020



99077 87059

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Riverside, California

*Clearing for Hand
6/6/69 9:00 AM*

5/11/50
1.25 87449-20-
GRANT DEED

MWD - 1610-1-1

For Valuable Consideration, CAROLINE N. TRAUTWEIN;
EMILY TRAUTWEIN STODDARD, also known as Emily T. Stoddard;
ARCHER I. SCHWEIZER; MARGARET TRAUTWEIN STODDARD, also known
as Margaret T. Stoddard, who acquired title as Margaret Trautwein;
KENNETH HENDRICK COLVILLE, also known as K. H. Colville; JESSIE
COLVILLE POWEL; DOROTHY COLVILLE DANN, and WILLIAM THOMAS
COLVILLE, JR., also known as William T. Colville, Jr., hereby
grant to

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA,
a public corporation,

The following described real property, hereinafter referred to
as Parcel A, in the City of Riverside, County of Riverside,
State of California; and Parcel B, in the County of Riverside,
State of California:

PARCEL A

The southeast quarter of the northeast quarter of
Section 8, Township 3 South, Range 4 West, San Bernardino
Meridian, in the City of Riverside, County of Riverside, State
of California, according to the official plat thereof on file in
the office of the Recorder of said County.

MAIL TAX STATEMENTS AS DIRECTED ABOVE

980-7
87059

PARCEL B

Lots 1 through 4, inclusive, in Block 5, and the east half of Lots 3 and 4 in Block 4, of Allesandro Tract, in the County of Riverside, State of California, as shown on map recorded in Book 6, page 13 of Maps in the office of said Recorder.

EXCEPT that portion of said land lying southerly of a line 40 feet north of and parallel with the south line of said Section 8, as described in deed to the County of Riverside, recorded June 20, 1956 as Instrument No. 42937, in Book 1930, page 506 of Official Records of said County.

Containing 240 acres, more or less.

Dated: _____

Caroline H. Trautwein
CAROLINE H. TRAUTWEIN

Margaret Trautwein Stoddard
MARGARET TRAUTWEIN STODDARD,
also known as Margaret T. Stoddard,
who acquired title as Margaret
Trautwein

Emily Trautwein Stoddard
EMILY TRAUTWEIN STODDARD,
also known as Emily T. Stoddard

Jessie Colville Powell
JESSIE COLVILLE POWELL

Archer I. Schweizer
ARCHER I. SCHWEIZER

Dorothy Colville Dann
DOROTHY COLVILLE DANN

William Thomas Colville, Jr.
WILLIAM THOMAS COLVILLE, JR.,
also known as William T. Colville, Jr.

By K. H. Colville
K. H. Colville

By W. B. Stoddard
W. B. Stoddard

Attorneys-in-Fact of and for said owners

Kenneth Hendrick Colville
KENNETH HENDRICK COLVILLE,
Individually

87059

State of Pennsylvania)
) ss.
 County of Lackawanna)

On this 6th day of May, 1966, before
 me, John R. Smith, Jr., a Notary Public in and for
 said County and Commonwealth, personally appeared K. H. Colville,
 and W. E. Stoddard, personally known to me to be the persons
 whose names are subscribed to the within instrument as the
 Attorneys-in-Fact of and for Caroline H. Trautwein, Emily
 Trautwein Stoddard, Archer I. Schweizer, Margaret Trautwein
 Stoddard, Jessie Colville Fowel, Dorothy Colville Dann, and
 William Thomas Colville, Jr., and acknowledged to me that K. H.
 Colville subscribed the names of Caroline H. Trautwein, Emily
 Trautwein Stoddard, Archer I. Schweizer, Margaret Trautwein
 Stoddard, Jessie Colville Fowel, Dorothy Colville Dann, and
 William Thomas Colville, Jr. thereto as principals, and their
 own names as Attorneys-in-Fact for each and all of said principals
 and grantors.

WITNESS my hand and official seal the day and year
 in this certificate first above written.

John R. Smith, Jr.
 Notary Public in and for
 said County and Commonwealth
John R. Smith, Jr.
 Name (Typed or Printed)
 My Commission Expires June 17, 1967
 My Commission Expires _____

(SEAL)

()

99077

State of Pennsylvania)
) ss.
 County of Lackawanna)

On this 6th day of May, 1966, before
 me, John R. Swindlehurst, a Notary Public in and
 for said County and Commonwealth, personally appeared Kenneth
 Hendrick Colville, individually, known to me to be the person
 whose name is subscribed to the within instrument and
 acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and
 affixed my official seal the day and year in this certificate
 first above written.

John R. Swindlehurst
 Notary Public in and for
 said County and Commonwealth

John R. Swindlehurst

Name (Typed or Printed)

My Commission Expires April 23, 1967

(SEAL)

93077
87059

12-64
RM-1

Certificate of Acceptance

This is to certify that the interest in real property conveyed by this deed dated May 6, 1966 from Caroline H. Trautwein, et al

to The Metropolitan Water District of Southern California, a public corporation, is hereby accepted by the undersigned officer on behalf of the Board of Directors of said District pursuant to authority conferred by Resolution 6615 of said Board adopted on November 17, 1964, and the grantee consents to recordation thereof by its duly authorized officer.

Dated: August 19, 1966

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

BW

General Manager

DEPARTMENT FOR ECONOMIC DEVELOPMENT

RECEIVED FOR RECORD

356 62 5th

AT 9:00 O'CLOCK A.M.

THE NEW YORK

Specialized Services in Psychiatry

Chronic

Camp. Book

Amesbury

FILE 1-20-24

24

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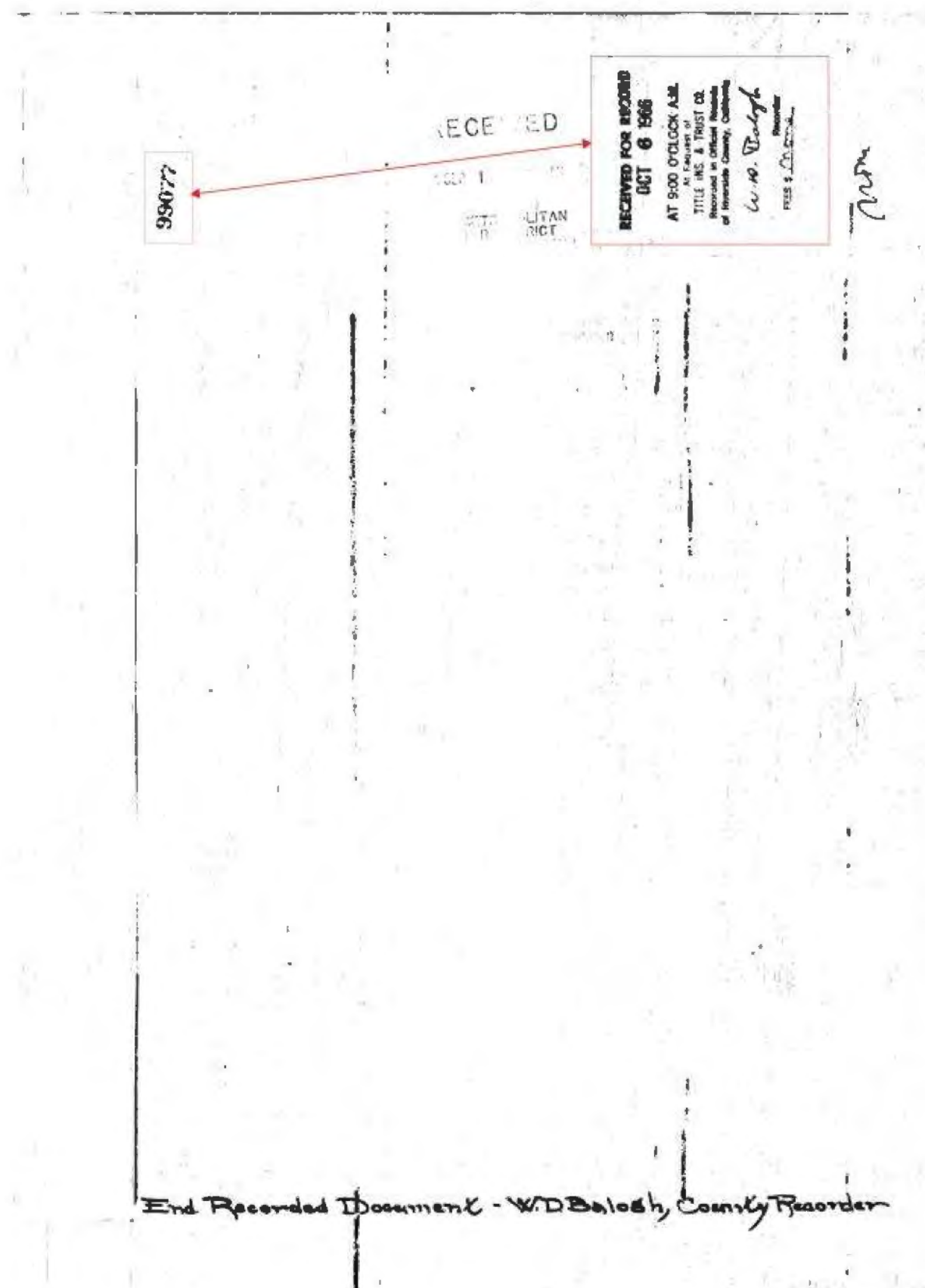
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87059



METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
Real Property Group | 213-217-7750



APPLICATION for USE of REAL PROPERTY

Please complete all sections below.
Incomplete applications will result in delayed processing and responses.
Complete applications do not guarantee approval.

Applicant Information

Company or Organization (if applicable)

Applicant Name:

Email address

Street address

Street address line 2

City

State

Zip

Office Phone

Cell Phone

Location of Property (Required)

Request Type:

(MWD will make final determination of agreement type)

Address or Location (include nearest cross streets if address is unavailable)

City

County

Zip

Assessor Parcel Number(s)

Proposed Use Description (If not applicable, mark with "n/a")

Property Use Type

Duration

Project Start Date

Project End Date

Description of proposed construction, on-site activities, or improvements:



Is temporary staging or construction area required? ☐ Yes ☐ No

Will security be provided for staging, construction or storage purposes?

Are vehicles and equipment required? ☐ Yes ☐ No

Project involves the following:

(Check all that apply)

- ☐ Engineering plans
- ☐ Soil environmental studies
- ☐ CEQA compliance documentation
- ☐ Other

If other, please explain below:



E-mail completed form and applicable documents to:

RealEstateServices@mwdh2o.com

FOR INTERNAL USE ONLY:

Metropolitan Parcel Number(s):

Request Type:

Use:

Metropolitan Facility:

Specific Use:

WSO Region:

Pipeline (if applicable):

Metropolitan Station Number(s)



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

August 17, 2020

VIA EMAIL

Veronica Hernandez, Senior Planner
City of Riverside
Community and Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, California 92522

Dear Ms. Hernandez:

Review of the Sycamore Hills Distribution Center
Project Notice of Preparation for Environmental Impact Report

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation for the Sycamore Hills Distribution Center Project (Project). The proposed Project to develop two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls, landscaping, and water quality treatment areas is located in Riverside County in the City of Riverside. The City of Riverside will be the lead agency for the proposed Project under the California Environmental Quality Act (CEQA). The City of Riverside determined that an Environmental Impact Report (EIR) would be the most appropriate level of environmental document under CEQA to address potentially significant impacts.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving approximately 19 million people in portions of six counties in Southern California, including Riverside County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. This letter contains Metropolitan's response to the Notice of Preparation for the Project as a potentially affected public agency.

Metropolitan owns property and owns and operates facilities on and adjacent to the site of the proposed action. As shown on the attached map (Exhibit A), Metropolitan's fee-owned property the Box Springs Feeder, and Mill's Treatment Plant, hereafter referred to as the "Property," are respectively located to the north, and west of the proposed Project. Perris Valley Pipeline is along the boundary of the south side of the proposed Project Site beneath East Alessandro Blvd.

Metropolitan is concerned with the potential impacts to its Property, the pipeline and associated facilities resulting from future excavation, construction, installation of utilities or any

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Veronica Hernandez
Page 2
August 17, 2020

development that may occur as a result of the proposed Project activities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. Metropolitan will not permit activities that could subject the pipeline to excessive vehicle, impact or vibratory loads.

Please note that Metropolitan does not allow any structures within its Property or easement. Development associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by emailing Metropolitan's Substructures Information Line at Engineeringstructures@mwadh2o.com or calling at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan's facilities, easements and properties, we have enclosed a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way". Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, Metropolitan requires that detailed design plans for any activities within the vicinity of our facilities, Property or rights-of way be submitted prior to construction for review and written approval. Approval of the proposed Project where it could impact Metropolitan's Property should be contingent on Metropolitan's approval of design plans for the proposed Project.

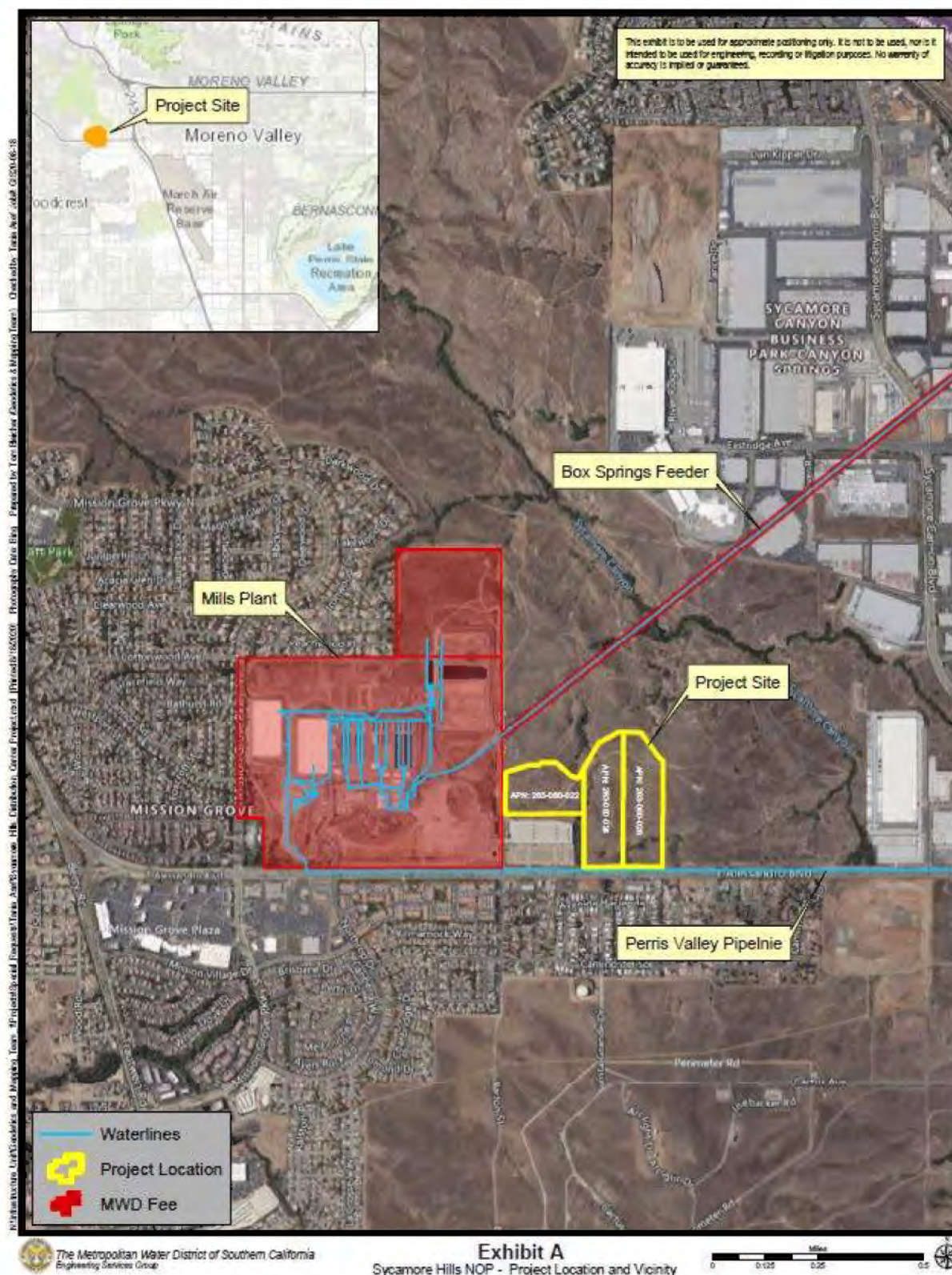
We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation and design plans regarding this proposed Project. If you have any questions, please contact Tania Asef at (213) 217-5687.

Very truly yours,
Diane Doesserich
Diane Doesserich
Interim Team Manager, Environmental Planning Section

DD:tsa
[SharePoint/CityofRiverside_SycamoreHills_External Review](#)

Enclosures:

- (1) Exhibit A: Map of Inland Feeder and the SR-60 World Logistics Center Parkway Interchange Project
- (2) Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way



**Guidelines for
Improvements and Construction Projects Proposed
in the Area of
Metropolitan's Facilities and Rights-of-Way**



July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

The Metropolitan Water District of Southern California

IMPROVEMENTS AND CONSTRUCTION GUIDELINES

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Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release

July 2018

Issue Date: July 2018

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Issue Date: July 2018

1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: P.O. Box 54153
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

- A. All applicable plans
- B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements**2.1 Vehicular Access**

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

- A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.
- B. Footings must not impose any additional loading on Metropolitan's facilities.
- C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels**A. General Requirements**

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's [Waterworks Standards Main Separation Alternative Request Checklist](#).

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

- A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)
- B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)
- C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)
- D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines
- E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations**6.1 Metropolitan Cathodic Protection**

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

- A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.
- B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

- A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.
- B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.
- C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

- A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.
- B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.
- C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.
- D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.
- E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

- A. Support drawings must include detailed procedures for the installation and removal of the support system.
- B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.
- C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.
- D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.
- E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

- A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.
- B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.
- C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.
- D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.
- E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.
- F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

- A. The concrete must be designed to meet the requirements of AASHTO
- B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.
- C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing**16.1 Plan Review Costs**

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com, or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

- A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).
- B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).
- C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.
- D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.
- E. Confirmation of the purpose of the land use.
- F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).
- G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

- A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)
- B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.
- C. California Fish and Game Code Sections 2050-2069 (California ESA)
- D. California Fish and Game Code Section 1602
- E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)
- F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712
- G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline¹ and Sanitary Sewer² or Hazardous Fluid Pipeline³

<u>Pipeline Crossings</u>	<p>Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) and secondary containment⁴. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing.</p> <p>These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.</p>
<u>Parallel Pipeline</u>	<p>Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) and secondary containment⁴.</p>
<u>Sewer Manhole</u>	<p>Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment⁵.</p>

Notes:

¹ Separation distances are measured from the outer edges of each pipe.

² Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less). Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

³ Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.

⁴ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

⁵ Secondary Containment for Structures - Secondary containment consists of external HDPE liner or other approved method.

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline¹ and Storm Drain and/or Disinfected Tertiary Recycled Water²

<u>Pipeline Crossings</u>	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment ³ within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
<u>Parallel Pipeline</u>	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment ³ are required.
<u>Storm Drain Manhole</u>	Permanent utility structures (e.g., manhole, catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment ⁴ .

Notes:

¹ Separation distances are measured from the outer edges of each pipe.

² Disinfected tertiary recycled water as defined in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 80301.

³ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

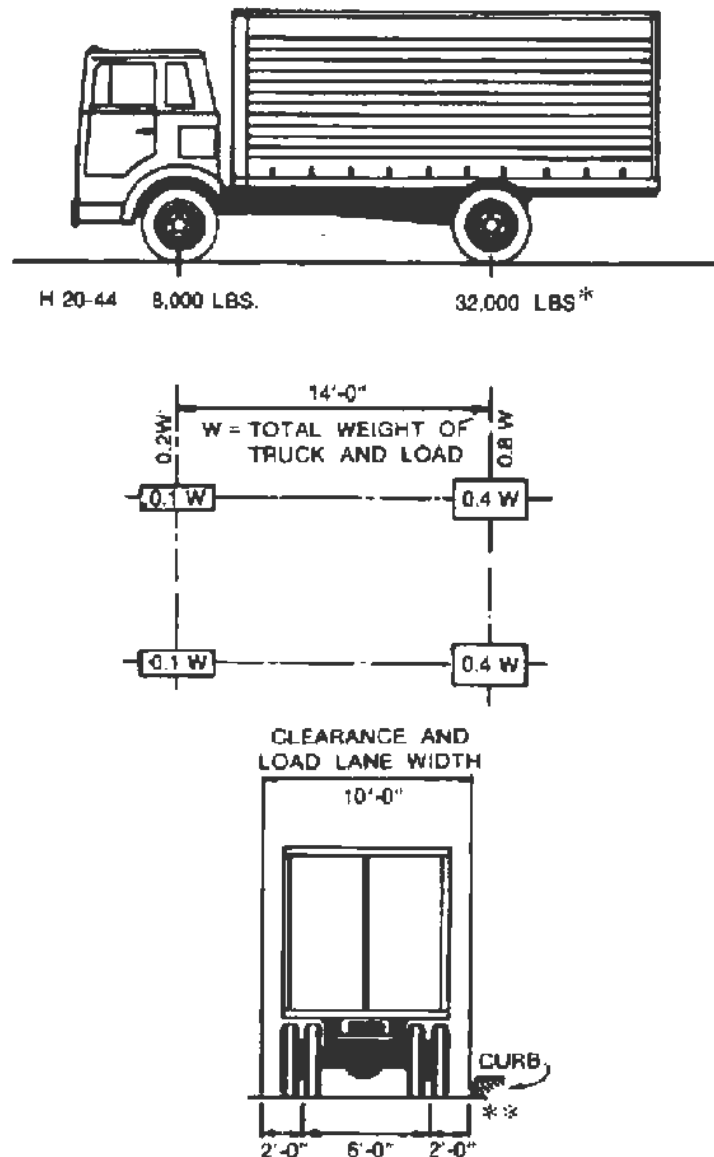
⁴ Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

Table 3: General Guidelines for Pipeline Separation¹ between Metropolitan's Pipeline and Recycled Water^{2,4} Irrigations

Pressurized recycled irrigation mainlines	<ul style="list-style-type: none"> Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment³ within 10-feet tangent to the outer edges of Metropolitan's pipeline. Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	<ul style="list-style-type: none"> Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment³. Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment³.
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:¹ Separation distances are measured from the outer edges of each pipe.² Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses. Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.³ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.⁴ Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

The technical drawing consists of two main views of a mechanical part.

- Top View (Side View):** Shows a cylindrical component with several horizontal and diagonal lines representing different surfaces or features. Labels include "CUTTING TOOL" pointing to a specific feature, "MOUNTING SURFACE" pointing to the outer cylinder, and "CYLINDRICAL MOUNT" pointing to a smaller cylindrical feature on the right. There is also a label "HOLE FOR CYLINDRICAL MOUNT" pointing to a small hole on the left.
- Bottom View (Front View):** Shows a circular cross-section of the component. It has a large central circle and several concentric circles. Radial lines extend from the center to the outer edge. Labels include "PLATE A" pointing to the top surface, "HOLE FOR CYLINDRICAL MOUNT" pointing to a hole on the left, and "HOLE FOR CYLINDRICAL MOUNT" pointing to a hole on the right. There is also a label "HOLE FOR CYLINDRICAL MOUNT" pointing to a hole on the bottom right. A dimension line indicates a distance of "100 ± 0.1".

At the bottom of the drawing, there is a title block containing the following information:

DESIGN	
DRAWN BY	
CHECKED BY	
DATE	
SHEET NO.	
TOTAL SHEETS	

Letter 6 – The Metropolitan Water District of Southern California**Commenter:** Diane Doesserich**Date:** July 15, 2021**Response 6.1:**

The commenter indicates that upon review of the DEIR and the more detailed project depictions provided therein, they determined that the Project would require the use of Metropolitan fee owned property on Barton Street, specifically, the portion of the street extending westerly of its centerline. The use of Metropolitan's fee-owned property to extend Barton Street will require the submittal of land use application (attached as part of the comment letter) for the granting of a public road easement or the issuance of an entry permit. The comment states Metropolitan will consider the FEIR to evaluate the applicants' request for a public road easement or entry permit.

The applicant will apply for a public road easement from Metropolitan. As outlined in the DEIR, Section 5.12 Transportation (DEIR, p. 5.12-50), "The Project would construct Barton Street between the Project's northern boundary and southern boundary at its ultimate full-section pavement width as a Local Street (66-foot right-of-way). Thus, the roadway improvements to Barton Street including within Metropolitan's fee-owned property are a part of the Project and is considered as part of the Project's construction impacts. The Project's potential direct, indirect, and cumulative impacts, including those from within Metropolitan's fee-owned property in Barton Street, are considered throughout the entire DEIR analysis, Section 5.0 Potentially Significant Environmental Effects to 8.0 Alternatives. Therefore, the potential impacts associated with the use of Metropolitan's fee owned property on Barton Street and issuance of a public road easement by Metropolitan are analyzed and described in this EIR. The DEIR, Section 3.4 Discretionary Actions and Approvals pp. 3.0-42-3.0-43, is revised as follows:

Metropolitan Water District

- Issuance of Public Road Easement

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Comment Letter 7 – Golden State Environmental Justice Alliance

Comment letter 7 commences on the next page.



July 16, 2021

VIA EMAIL

Veronica Hernandez, Senior Planner
City of Riverside
Community & Economic Development Department - Planning Division
3900 Main Street, 3rd Floor
Riverside, California 92522
vhernandez@riversideca.gov

SUBJECT: COMMENTS ON SYCAMORE HILLS DISTRIBUTION CENTER EIR (SCH NO. 2020079023)

To whom it may concern:

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

1.0 Summary

7.2 The project proposes the development and operation of two warehouse/distribution buildings on the approximately 48 acre project site. Building A is proposed on Parcel 1 and will be 400,000 square feet in size, including 10,000 square feet of office area, 390,000 square feet of warehouse area, 88 dock doors, 394 passenger car parking spaces and 117 truck parking spaces. Building B

7.2
Cont'd

is proposed on Parcel 2 and will be 203,100 square feet in size, including 10,000 square feet of office area, 193,100 square feet of warehouse area, 34 dock doors, 238 passenger car parking spaces and 45 truck parking spaces.

The project site contains an existing area of approximately 11.6 acres legally designated as "Restricted Property" which land locks proposed Parcel 1. The Restricted Property area supports a jurisdictional drainage and associated riparian habitat and was required as a condition of the Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers for construction of the Grove Community Church at an off-site location, approximately one mile southwest. The Restricted Property is intended for preservation in a natural condition. The project proposes to remove 0.81 acres of the Restricted Property to create a driveway connecting Parcel 1/Building A to Alessandro Boulevard. 1.44 acres of land elsewhere on the project site will be incorporated into Parcel A, for a net gain of 0.63 acre of new Restricted Property. Parcel A and B are proposed to have a total of 12.23 acres of Restricted Property.

Proposed Parcel C totaling 1.18 acres is proposed to be developed with a trailhead parking lot to serve the Sycamore Canyon Wilderness Park and subsequently dedicated to the City. Improvements include a parking lot, sidewalk, shade structure, bike rack, drinking fountain, fencing, and a Fire Department access gate.

3.0 Project Description

7.3

The project site has a General Plan Land Use designation of Business/Office Park (B/OP), a Zoning designation of Business/Manufacturing Park - Specific Plan Overlay (BMP-SP), and an Industrial (I) designation within the Sycamore Canyon Business Park Specific Plan. The B/OP General Plan designation provides for "light industrial and small warehouse uses (up to 10,000 square feet per site)".¹ A conflict exists between the quantity of warehousing allowed by the site's General Plan designation and the quantity allowed by the Zoning designation and Specific Plan. A General Plan Amendment to the Industrial Land Use designation which provides for larger warehousing/distribution uses is required for the proposed project to proceed. This information is not disclosed or analyzed anywhere throughout the EIR. The Land Use and Planning section and the Project Description do not provide a description of the B/OP Land Use designation. A revised EIR must be prepared which includes this information and provides an

Riverside General Plan 2025 - Land Use and Urban Design Element https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/general-plan-04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf

- 7.3
cont'd { accurate, adequate analysis of the proposed project's inconsistency with the existing General Plan Land Use designation.
- 7.4 { The EIR provides a list of the required entitlements and discretionary actions necessary for the proposed project to proceed. The EIR states that a Minor Conditional Use Permit is required pursuant to Riverside Municipal Code Section 19.150.020 - Base Zones Permitted Land Uses² for Business and Manufacturing Park (BMP) Zone. However, Section 19.150.020 notes that a Conditional Use Permit is required for any warehouse/distribution facility in the BMP Zone that exceeds 100,000 square feet (sf). The project proposes 603,100 sf of warehousing/distribution facilities; therefore, a CUP is required instead of a Minor CUP. The EIR is inadequate as an informational document and does not provide an accurate list or analysis of required discretionary actions (CEQA § 15121).
- 7.5 { Further, the EIR does not describe the mechanism or legal instrument in which the proposed modifications to the existing 11.6 acre Restricted Property will be completed. The proposed project cannot proceed without approval of the modifications to the Restricted Property and the mechanism for completing this must be included as part of a revised EIR.
- 7.6 { It is also notable that the EIR does not include a floor plan for either of the buildings. The basic components of a Planning Application include a site plan, floor plan, conceptual grading plan, and elevations. Additionally, the site plan provided in Figure 3.0-9 and the elevations of Figures 3.0-14A/B do not provide any detailed information such as parcel size, site coverage, or building height. The EIR has excluded the proposed floor plans and a detailed site plan/elevations from public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). An EIR must be prepared which includes these informational items.
- 7.7 { **5.2 Air Quality**
The CalFEEMod output sheets do not accurately reflect the project as proposed in the EIR. The CalFEEMod analysis does not include any surface parking spaces. Surface parking lots are

² Riverside Municipal Code Section 19.150.020 https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO_ARTVBAZOREUSDEPR_CH19.150BAZOPELAUS_19.150.020PELAUS

- 7.7 cont'd defined as individual land uses in the CalFEEMod User Guide³ and must be entered into the analysis. Further, the Air Quality modeling does not analyze the whole of the project. The CalFEEMod analysis excludes the trailhead parking lot, park, and associated improvements on Parcel C which will be dedicated to the City. The EIR must be revised which includes these items in order to accurately and adequately analyze the impacts of the proposed project.
- 7.8 The CalFEEMod output sheets have excluded any hauling trips for analysis. The Project Description states that an "estimated 40,000 cubic yards of excess material will be moved from Parcel 1 to Parcel 2" in order for the onsite grading to balance. The EIR notes that "this excess material will be transported via the existing dirt road between the parcels (crossing through Parcel A), which will be utilized temporarily during construction and restored post-construction." Figure 3.0-3 depicts the eastern half of Parcel A as existing restricted property. It is not feasible or appropriate for haul trucks to traverse the existing or proposed restricted property of Parcel A to transport soil/material between Parcel 1 and 2. It must also be noted that the California Department of Fish and Wildlife also expressed similar concerns about construction of an access road under lands conserved under a restricted covenant in written comments responding to the NOP.
- Given a standard 10 cubic yard haul truck capacity, transporting 40,000 cubic yards of soil material would require 400 haul truck trips. The EIR must be revised to include an enforceable mitigation measure requiring all vehicles, including haul trucks, to utilize public roads for all purposes and prohibit any activity related to project construction/operation on the existing or proposed restricted property. The revised EIR must also include the required 400 haul truck trips in all applicable sections of environmental analysis.
- 7.9 Section 7.35.010(B)(5) of the Riverside Municipal Code (RMC) prohibits construction activity between the hours of 7:00 P.M. and 7:00 A.M. Monday through Friday, and between 5:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays. Thus, the legal hours of construction in the City of Riverside are 7:00 A.M. - 7:00 P.M., Monday - Friday and 8:00 A.M. - 5:00 P.M. on Saturday. The EIR does not provide a "worst-case scenario" analysis of construction equipment emitting pollutants for the legal 12 hours per weekday plus 9 hours on Saturday. It is legal for construction to occur for much longer hours and an additional day (6 days per week including Saturday) than modeled in the Air Quality Analysis. The Air Quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days. If shorter hours of construction are proposed by the

³ CalFEEMod User Guide <http://www.aqmd.gov/docs/default-source/calfeemod-user's-guide---october-2017.pdf?sfvrsn=6>

- 7.9 cont'd { project, this must be reflected in the EIR analysis and included as an enforceable mitigation measure with field verification by an enforcement entity of the lead agency (CEQA § 21081.6 (b)).
- 7.10 { The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 3.0, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042217) ranks worse than 56% of the rest of the state overall. The surrounding community, including sensitive receptors such as the single family residences to the south, bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 98th percentile for ozone burden and the 84th percentile for PM 2.5 burden, which is typically attributed to heavy truck activity in the area.
- Further, the project's census tract is a diverse community including 22% Hispanic and 8% African-American residents, which are especially vulnerable to the impacts of pollution. Additionally, the surrounding community has a higher proportion of babies born with low birth weights than 59% of the state, which makes those children more vulnerable to asthma and other health issues. The community ranks in the 57th percentile for asthma and 38th percentile for incidence of cardiovascular disease, which are exacerbated by Air Quality and Greenhouse Gas impacts.
- 7.11 { Exhibit 4-1: Project (Passenger Car) Trip Distribution of Appendix L (Traffic and VMT Analysis) depicts 20% of passenger cars exiting the project site traveling westbound on Alessandro Blvd. The HRA's Exhibit 4-B: Receptor Locations only models project traffic traveling eastbound on Alessandro Blvd. Excluding the westbound Alessandro Blvd. traffic from modeling skews impacts downwards and does not equitably analyze all sensitive receptors, such as the residents along westbound Alessandro Blvd. The EIR must be revised with an HRA that models the 20% of project trips traveling westbound on Alessandro Blvd. to adequately and accurately analyze all potentially significant impacts of the proposed project.
- 7.12 { The HRA is misleading to the public and decision makers as the text appears to analyze each residential receptor for their respective 9- and 30- year exposure timeline. However, Appendix 2.2 Risk Calculations within Appendix C notes that modeling for all residential receptor age bins, workers, and schoolchild were averaged over a 70 year time period. OEHHA's 2015 Guidance

7.12
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Manual for Preparation of Health Risk Assessments⁴ state that, "together, the 9-, 30-, and 70-year cancer risk calculations provide a useful presentation of cancer risk and the relationship to duration of residency and, thus, exposure to a facility's emissions." The EIR must be revised to include modeling scenarios for the 9-, 30-, and 70-year cancer risk calculations in order to provide a useful presentation of cancer risk in accordance with the guidelines utilized for modeling. Additionally, the 16-70 age bin for sensitive receptors must be modeled as well.

7.13

5.3 Biological Resources

According to the Burrowing Owl Focused Survey Report within Appendix D - Biological Resources, the focused surveys were conducted on April 24, May 7, May 21, and June 5, 2020. The report notes that "the majority of the site is densely vegetated following high levels of late spring precipitation, resulting in minimal open areas and limited line-of-sight opportunities." However, the report does not indicate whether rain had occurred within five days of each survey. The Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area⁵ state that "absence of burrowing owl sign cannot be used to confirm absence of the species if the focused burrow survey is conducted within 5 days of rain." The EIR must be revised to indicate whether rain was present within 5 days of each survey.

7.14

Further, the report notes that "several small mammal burrows that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed scattered throughout the project site during the surveys." The Burrowing Owl Survey Instructions require that the "location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates." The EIR does not include maps or photographs of this data and must be revised to include this information in order to provide an accurate and adequate analysis in compliance with the Burrowing Owl Survey Instructions.

7.15

5.5 Energy

The State of California lists two approved compliance modeling softwares⁶ for non-residential buildings: CBECC-Cor and EnergyPro. CalFEEMod is not listed as an approved software. The

⁴ OEHA 2015 Guidance Manual for Preparation of Health Risk Assessments <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>

⁵ https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf

⁶ 2019 Building Energy Efficiency Standards Approved Computer Compliance Programs, California Energy Commission. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-2>

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modeling provided in the EIR does not comply with the 2019 Building Energy Efficiency Standards and under reports the project's potentially significant GHG and Energy impacts to the public and decision makers. Since the EIR did not accurately or adequately model the Energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling in one of the two approved software types must be circulated for public review in order to adequately analyze the project's potentially significant environmental impacts. This is vital as the EIR utilizes the CalEEMod defaults for construction equipment/operational sources, which is clearly not one of the approved softwares.

5.7 Greenhouse Gas Emissions

There are discrepancies within the CalEEMod Output Sheets regarding CO₂ emissions. The passenger car summer analysis determined there will be 9,581 MTCO₂e during construction and 8,074 MTCO₂e during project operations; the winter passenger car analysis determined there will be 9,256 MTCO₂e during construction and 7,582 MTCO₂e during project operations. The heavy trucks summer analysis determined there will be 9,581 MTCO₂e during construction and 26,653 MTCO₂e during project operations; the winter heavy trucks analysis determined there will be 9,256 MTCO₂e during construction and 26,514 MTCO₂e during project operations.

7.16

However, the annual passenger car analysis reduces these emissions to 638 MTCO₂e during construction and 3,047 MTCO₂e during project operations. The heavy trucks annual analysis reduces these emissions to 638 MTCO₂e during construction and 6,162 MTCO₂e during project operations. The annual analysis has reduced the heavy trucks seasonal scenarios by approximately 75% to achieve the annual operational MTCO₂e. There is no explanation for the reductions given or the manner in which the reductions were achieved. These reductions serve to skew emissions downwards, specifically below the SCAQMD 10,000 MTCO₂e significance threshold for industrial projects. Additionally, modeling errors such as those noted in the Energy, Air Quality, and Transportation discussions must be corrected in order to adequately analyze the project's GHG emissions. The EIR must be revised to present this for analysis and include a finding of significance.

5.8 Hazards and Hazardous Materials

7.17

The proposed project site is within March Air Reserve Base (MARB) Inland Port Airport Compatibility Zone C1. The EIR states that "the FAA staff has reviewed project information under the provisions of Title 14 of the Code of Federal Regulations, part 77 for Buildings A and

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B and issued determinations of No Hazard to Air Navigation based on the following building heights: Building A, with 1596 feet site elevation (SE), 45 feet above ground level (AGL) and 1641 feet above mean sea level (AMSL); and Building B, with 1609 feet SE, 45 feet AGL, and 1654 AMSL. Thus, potential impacts would be less than significant.” However, the EIR does not include the FAA determination reports as part of the EIR. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The FAA determination reports contribute directly to the analysis of the problem at hand. Not including the FAA determination reports as an attachment for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review including the FAA determination reports. This is especially vital as the building elevations provided in Figures 3.0-14A and B do not include pertinent information such as the overall height of each building which would assist the public and decision makers in determining compliance with these requirements.

7.18

5.10 Land Use and Planning

Appendix B and the EIR list relevant Policies for consistency analysis from the the Riverside General Plan. However, neither analysis includes Policies AQ-1.1 and AQ-1.2 related to Environmental Justice:

Policy AQ-1.1: Ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status or geographic location, from the health effects of air pollution.

Policy AQ-1.2: Consider potential environmental justice issues in reviewing impacts (including cumulative impacts for each project proposed).

The EIR must be revised to include analysis of environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution, as noted in the Air Quality discussion above.

7.19

Further, the Transportation analysis concludes the project will result in an LOS deficiency at Sycamore Canyon Boulevard and Alessandro Boulevard, which the EIR has not considered as a Land Use and Planning impact in conflict with the City’s General Plan or other guidelines. The

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EIR must be revised to include an analysis of the project's impact in relation to the following General Plan policies:

Policy CCM-2.3: Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

Policy CCM-2.4: Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.

7.20

The project site has a General Plan Land Use designation of Business/Office Park (B/OP), a Zoning designation of Business/Manufacturing Park - Specific Plan Overlay (BMP-SP), and an Industrial (I) designation within the Sycamore Canyon Business Park Specific Plan. The B/OP General Plan designation provides for "light industrial and small warehouse uses (up to 10,000 square feet per site)."⁷ A conflict exists between the quantity of warehousing allowed by the site's General Plan designation and the quantity allowed by the Zoning designation and Specific Plan. A General Plan Amendment to the Industrial Land Use designation which provides for larger warehousing/distribution uses is required for the proposed project to proceed. This information is not disclosed or analyzed anywhere throughout the EIR. The Land Use and Planning section does not provide a description of the B/OP Land Use designation. A revised EIR must be prepared which includes this information and provides an accurate, adequate analysis of the proposed project's inconsistency with the existing General Plan Land Use designation.

7.21

The EIR provides a list of the required entitlements and discretionary actions necessary for the proposed project to proceed. The EIR states that a Minor Conditional Use Permit is required pursuant to Riverside Municipal Code Section 19.150.020 - Base Zones Permitted Land Uses⁸ for Business and Manufacturing Park (BMP) Zone. However, Section 19.150.020 notes that a

⁷ Riverside General Plan 2025 - Land Use and Urban Design Element https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning-general-plan-04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf

⁸ Riverside Municipal Code Section 19.150.020 https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTTICOR_TIT19ZO_ARTVBAZOREUSDEPR_CH19.150BAZOPELAUS_19.150.020PELAUS

7.21
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Conditional Use Permit is required for any warehouse/distribution facility in the BMP Zone that exceeds 100,000 square feet (sf). The project proposes 603,100 sf of warehousing/distribution facilities; therefore, a CUP is required instead of a Minor CUP. The EIR is inadequate as an informational document and does not provide an accurate list or analysis of required discretionary actions (CEQA § 15121).

7.22

Additionally, the EIR has not provided any consistency analysis with the goals SCAG's 2020-2045 Connect SoCal RTP/SCS⁹. Due to errors in modeling, such as excluding haul truck trips and other issues as noted in the Air Quality/Greenhouse Gas/Energy discussions above and the project's significant and unavoidable VMT impacts, the proposed project has significant potential for inconsistency with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. Also as noted in the GHG discussion, the summer/winter GHG analyses exceed the GHG emissions thresholds, resulting in a significant impact. The EIR must be revised to include accurate Air Quality/HRA, Energy, and GHG modeling and discussion of significant and unavoidable Transportation/VMT impacts in order to accurately analyze potential consistency or inconsistency with SCAG's 2020-2045 RTP/SCS document.

5.12 Transportation

The study area for the EIR is arbitrary and capricious in that it does not include for analysis all potentially significant impacts on the transportation facilities providing access to the site. The EIR only analyzes eight intersections, two of which are proposed future driveways for the site. The EIR must be revised and circulated for public review to include analysis of the following transportation facilities providing direct access to the project site:

7.23

Intersections

Alessandro Blvd. at Mission Grove Pkwy.
Alessandro Blvd. at Canyon Crest Dr.
Alessandro Blvd. at Chicago Ave./Arlington Ave.
Alessandro Blvd./Central Ave. at Victoria Ave.

Freeway Merge/Diverge

I-215 at SR-60
I-215 at SR-91

⁹ SCAG 2020-2045 Connect SoCal RTP/SCS <https://scag.ca.gov/read-plan-adopted-final-plan>

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I-215 at I-10

I-215 at SR-210

I-215 at I-15

Freeway On/Off Ramps

SR-91 at Central Ave.

SR-91 at Arlington Ave.

I-215 at Cactus Ave.

I-215 at Eucalyptus Ave./Eastridge Ave.

This is especially vital for analysis since Exhibit 4-1 Project (Passenger Car) Trip Distribution within Appendix L - Traffic and VMT Analysis depicts 20% of passenger car trips heading westbound on Alessandro Blvd. towards Mission Grove Pkwy and 5% of passenger car trips heading southbound on Sycamore Canyon Blvd./Meridian Pkwy. Additionally, the I-215 provides direct access to the project site from the Southern California Logistics Airport. The project objectives also include developing and operating warehouse buildings that "are in close proximity to March Inland Port, State Route 60/Interstate 215, and Interstate 10 to support the distribution of goods throughout the region." A revised EIR must be prepared that includes analysis of all transportation facilities providing direct access to the project site.

7.24

The EIR chooses to model the project as a high-cube transload short-term warehouse because the ITE defines this type of warehouse as the lowest trip generation per 1,000 sf of all industrial land uses (0.10 trips per 1,000 sf)¹⁰. The ITE 2020 10th Edition Manual Supplement also reduced the total percentage of truck trips for high-cube transload short-term warehouses to 16% of all trips generated by the project¹¹. Modeling the proposed project as high-cube transload short-term warehouse serves to skew analysis downward and present unduly low emissions estimates and VMT. The Project Description includes operational and characteristic information about the project that indicate it is likely to be used as a fulfillment center based on SCAQMD's High-Cube Warehouse Vehicle Trip Generation Analysis¹². The proposed project encompasses more characteristics of a fulfillment center warehouse type which generates higher emissions and

¹⁰ Institute of Transportation Engineers Common Trip Generation Rates (PM Peak Hour) https://www.troutdaleoregon.gov/sites/default/files/fileattachments/public_works/page%20966/ite_land_use_list_10th_edition.pdf

¹¹ ITE 10th Edition Manual Supplement https://www.nxtbook.com/yscreprints/ITE ITE_March2020/index.php?startid=14

¹² SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis <https://www.ite.org/pub?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498>

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VMT, such as high levels of on-site automation and logistics management, handling products prior to their distribution to retail locations or other warehouses, and interior ceiling heights of 40 feet in order to accommodate mezzanines. The EIR must be revised to model the project accurately as ITE Land Use 155 High-cube Fulfillment Center Warehouse in accordance with planned operations as detailed in the Project Description in order for the EIR to be a reliable informational document.

7.25

The EIR concludes that the LOS deficiency at Sycamore Canyon Boulevard and Alessandro Boulevard is unavoidable but not significant as a traffic impact. However, it has not been considered as a Land Use and Planning impact in conflict with the City's General Plan or other guidelines. The EIR must be revised to include an analysis of the project's impact in relation to the following General Plan policies:

Policy CCM-2.3: Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

Policy CCM-2.4: Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.

7.26

6.0 Other CEQA Topics

6.2 Consistency with Regional Plans

The EIR concludes that the project is consistent with the General Plan Land use designation of Business Office Park (B/OP). However, as noted above, there is no discussion or analysis regarding the B/OP designation. The B/OP General Plan designation provides for "light industrial and small warehouse uses (up to 10,000 square feet per site)¹³." A conflict exists between the quantity of warehousing allowed by the site's General Plan designation and the quantity allowed by the Zoning designation and Specific Plan. A General Plan Amendment to the Industrial Land Use designation which provides for larger warehousing/distribution uses is required for the proposed project to proceed. This information is not disclosed or analyzed

¹³ Riverside General Plan 2025 - Land Use and Urban Design Element https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/general-plan/04_Land_Use_and_Urban_Design_Element_with%20maps%20COMPLETE%20AUGUST%202019.pdf

7.26
cont'd { anywhere throughout the EIR. The Land Use and Planning section does not provide a description of the B/OP Land Use designation. A revised EIR must be prepared which includes this information and provides an accurate, adequate analysis of the proposed project's inconsistency with the existing General Plan Land Use designation.

7.27 { Additionally, the EIR concludes that the project is consistent with SCAG's Connect SoCal and refers to discussion in Section 5.12 - Transportation for analysis. However, Section 5.12 does not include VMT discussion for analysis in relation to consistency analysis with Connect SoCal. The Transportation analysis concludes the project will have a significant and unavoidable impact regarding VMT impacts. The proposed project has ~~significant~~ potential for inconsistency with Connect SoCal's Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate as a result of the VMT impacts. The EIR must be revised to include this analysis for discussion regarding Connect SoCal. Additionally, no other analysis regarding consistency with Connect SoCal is given throughout the EIR other than in the Transportation Analysis. The revised EIR must include a consistency analysis with Connect SoCal for all portions of environmental analysis.

7.28 { *6.4 Growth Inducing Impacts*

The EIR utilizes misleading and uncertain language in concluding that the project will not have growth inducing population impacts. The EIR states that "the employment opportunities anticipated to be generated by the Project are *relatively minor* and within the Southern California Association of Governments (SCAG) population, housing, and employment forecasts." As noted in the Population and Housing discussion below, SCAG's Connect SoCal Demographics and Growth Forecast¹⁴ notes that the City will add 43,300 jobs between 2016 - 2045. The EIR's calculation of 586 employees is actually 1.3% of the City's employment growth from 2016 - 2045. Utilizing SCAG's Employment Density Study¹⁵ calculation of 1,046 employees, the project represents 2.4% of the City's employment growth from 2016 - 2045. A single project accounting for more than 1% of the projected employment growth over 29 years represents a significant amount of growth. The EIR must be revised to includes this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed the SCAG's employment growth forecast for the

¹⁴ SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

¹⁵ SCAG Employment Density Study <http://www.mwco.org/file.aspx?A=QTTITR24P00OUlw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D>

7.28 cont'd { City. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

7.29 { **7.0 Environmental Effects Found Not Significant**

7.29 { *7.1.1 Agriculture and Forestry Resources*

7.29 { The California Important Farmland Finder identifies the site as Farmland of Local Importance. The EIR excludes this information for analysis. A revised EIR must be prepared which discloses and analyzes this information.

7.30 { *7.1.7 Population and Housing*

7.30 { The EIR utilizes uncertain and misleading language which does not provide any meaningful analysis of the project's construction employment generation. For example, the EIR concludes that, "given the availability of labor in the 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 already doing business in the area with employees already residing in the area. Thus, construction-related growth inducement would not result from implementation of the Project." In order to comply with CEQA's requirements for meaningful disclosure, the EIR must provide an accurate estimate of construction employees generated by the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions. Additionally, an estimate of the number of workers relocating to the City as a result of the project should be provided utilizing existing housing vacancy rates in the City. Relying on the entire labor force of the SCAG region to fill the project's construction jobs will increase VMT and emissions during all phases of construction and each portion of the EIR must be revised to account for longer construction worker trip distances.

7.31 { The EIR provides a calculation of the employees generated by the proposed project based on the County of Riverside's General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology which includes a square foot per employee factor of 1,030 square feet per employee for Light Industrial land uses. Based on this factor, the EIR calculates the project will generate 586 employees. However, the EIR excludes the proposed office areas from the employment calculation. The project description states that each of the proposed buildings will include 10,000 sf of office space for a project total of 20,000 sf of office. The County's

Appendix E-2 includes a square foot per employee factor of 300 square feet per employee for Office land uses.

Applying these ratios results in the following calculation:

Office: $20,000 \text{ sf} \cdot 300 = 21$

Warehouse: $583,100 \text{ sf} \cdot 1,030 = 567$

Total: 634 employees

It must also be noted that utilizing the County of Riverside's General Plan as the methodology for employment calculation is not an appropriate source. The Introduction section of County's General Plan¹⁶ states that "The General Plan covers the entire unincorporated portion of the County of Riverside." It is not intended to be applied to the incorporated cities within the County.

7.31
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SCAG's Employment Density Study¹⁷ provides a technical analysis and average of county-wide parcels within the SCAG region for ten land use categories. The SCAG study is an appropriate source for employment calculation as it is meant to be applied as county-wide average, unlike the Riverside County General Plan which is applicable only to the unincorporated areas of the county. The SCAG study includes the following applicable employment generation rates for Riverside County:

Warehouse: 1 employee per 581 square feet

Office: 1 employee per 481 square feet

Applying these ratios results in the following calculation:

Warehouse: $583,100 \text{ sf} \cdot 581 = 1,004$

Office: $20,000 \text{ sf} \cdot 481 \text{ sf} = 42$

Total: 1,046 employees

¹⁶ County of Riverside General Plan, Introduction. [https://planning.rctima.org/Portals/14/genplan-general Plan 2017 elements/OCT17/Ch01_Intro_120815.pdf?ver=2017-10-11-102103-380](https://planning.rctima.org/Portals/14/genplan-general%20Plan%202017%20elements/OCT17/Ch01_Intro_120815.pdf?ver=2017-10-11-102103-380)

¹⁷ SCAG Employment Density Study <http://www.mwcog.org/file.aspx?A=QTTITR24POOOLw5mPNzK8F4d8djdJe4LF9Exj6IXOU%a3D>

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Utilizing SCAG's Employment Density Study ratios, the proposed project will generate 1,046 employees. The EIR concludes that its calculation of 586 employees generated by the project represents 0.3 percent of the expected opportunities within the City by 2045. SCAG's Connect SoCal Demographics and Growth Forecast¹⁸ notes that the City will add 43,300 jobs between 2016 - 2045. The EIR's calculation of 586 employees is actually 1.3% of the City's employment growth from 2016 - 2045. Utilizing SCAG's Employment Density Study calculation of 1,046 employees, the project represents 2.4% of the City's employment growth from 2016 - 2045. A single project accounting for more than 1% of the projected employment growth over 29 years represents a significant amount of growth. The EIR must be revised to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed the SCAG's employment growth forecast for the City. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

7.32

Conclusion

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

Sincerely,

Board of Directors

Golden State Environmental Justice Alliance

¹⁸ SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file_attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579

Letter 7 – Golden State Environmental Justice Alliance**Commenter:** Board of Directors**Date:** July 16, 2021**Response 7.1:**

The commenter requests the City consider the comments provided and to add Golden State Environmental Justice Alliance to the City's public interest list for all environmental documents.

The comment letter is being considered by the City as it is a part of this Final EIR and every individual comment within the letter provided a written response. The City has also added Golden State Environmental Justice Alliance to the City's master list for CEQA noticing with the address provided.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.2:

The commenter provides his own summary of project description details contained in the DEIR.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.3:

The commenter asserts that there is a conflict between the quantity of warehousing allowed by the site's General Plan designation and the quantity allowed by the Zoning designation and Specific Plan, and that a General Plan Amendment to the Industrial Land Use designation which provides for larger warehousing/distribution uses is required for the proposed Project to proceed. The commenter also states that a description of the B/OP Land use designation is not provided in the DEIR.

As outlined in the DEIR, Section 3.0 Project Description (DEIR, pp.3.0-13 – 3.0-14), "The City of Riverside General Plan 2025 (GP 2025) land use designation for the Project site is Business/Office Park (B/OP), Figure 3.0-5 Land Use Designation Map. The Project site is zoned BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones, Figure 3.0-6 - Zoning Map. The Project site is within the Sycamore Canyon Business Park Specific Plan (SCBPSP), which is considered a "Major Business Park" as shown on Figure LU-4 of the GP 2025. The SCBPSP designation for the Project site is Industrial, Figure 3.0-7." The DEIR further indicates "development of the Project site is guided by the SCBPSP, which was adopted in 1984 by the City to encourage and provide incentives for economic development in the 1,400-acre planning area. The SCBPSP designates the Project site land use as 'Industrial.'

Although the Project site is designated as Business/ Office Park (B/OP) in the GP 2025, properties within the SCBPSP are governed by the Development Standards and Criteria in the SCBPSP.

GP 2025 includes Objective LU-30, “Establish Riverside’s neighborhoods as the fundamental building blocks of the overall community, utilizing Neighborhood and Specific Plans to provide a more detailed design and policy direction for development projects located in particular neighborhoods. Implementing Objective LU-30 is Policy LU-30.9, “Interpret, apply or impose the development restrictions, conditions and/or standards of an approved Specific Plan in addition to those found in this General Plan.” The SCBPSP is such an approved Specific Plan that provides more detailed design and policy direction for projects located within its boundaries. Thus, although the Project is located in an area designated under the GP 2025 as Business/Office Park (B/OP), it is the land use designation and zoning in the SCBPSP that governs the type of developments allowed and the Development Standards and Criteria, such as size, height, setbacks, etc.

As outlined in the SCBPSP, Section 1.4 Legislative Context, “When adopted, the Specific Plan has the same effect as the local General Plan. The Council is required (by the Subdivision Map Act) to deny approval of any tentative or final subdivision which is inconsistent with the Specific Plan (Government Code Section 66474(b)).” (SCBPSP, p. 4) The Project is not required to be consistent with the GP 2025 Land Use Designation, but rather the land use and zoning in the SCBPSP, which is Industrial and allows for distribution and warehousing, without a limitation on the square footage of the use. As the Project does not need to demonstrate consistency with the land use designation B/OP, the DEIR need not provide a description of that designation, and it would be extraneous information. The DEIR demonstrates the Project’s consistency with the SCBPSP as outlined in the DEIR, Section 5.10 Land Use and Planning, (DEIR, p. 5.10-27) “The Project site is designated as Industrial in the SCBPSP, which allows warehouse uses.

Further, per the City’s Zoning Map, the Project site is within the BMP - SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park Specific Plan) Overlay Zones. The BMP zone is one of four industrial zones within the City.” (DEIR, p. 5.1-18) As provided in Section 19.220.020 of the Riverside Municipal Code, “For those properties where the Specific Plan Overlay Zone is applied, all permitted use restrictions, development standards, and other applicable standards or regulations governing development as contained within the adopted specific plan shall apply. To the extent that the specific plan does not enumerate use restrictions, development standards, or other applicable regulations, the standards associated with the underlying base zone shall apply. In the event that provisions of the adopted specific plan conflict with or do not correspond with the provisions of the underlying base zone, the provisions as contained in the adopted specific plan shall apply and supersede the underlying base zone requirements, with the exception of marijuana-related uses which shall be exclusively regulated by the underlying zone and are specifically prohibited.”

The Project has been reviewed for compliance with the SCBPSP, in particular the permitted uses, lot standards, setback standards, parking standards, outdoor storage and loading areas, lighting and utilities, sign standards, display medians, screening of mechanical equipment, trash collection areas, walls/fence standards, and rail service standards and has been found to be generally in compliance with the Sycamore Canyon Business Park Specific Plan standards as set forth in

Section 3.0 Development Standards and Criteria as modified by Resolution 23240 adopted November 7, 2012. Appendix B summarized the Project's consistency with SCBPSP policies."

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.4:

The commenter asserts that as the Project proposes 603,100 square feet of warehouse/distribution facilities and therefore a Conditional Use Permit (CUP) is required, not a Minor Conditional Use Permit (MCUP), and the EIR, therefore, does not provide an accurate list or analysis of required discretionary actions.

The DEIR correctly identifies the required discretionary actions, including the Minor Conditional Use Permit. As noted in Response 7.3, the Project is located in the BMP - SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park Specific Plan) Overlay Zones. Section 19.150.020 *currently* provides that a CUP is required for warehouses over 100,000 square feet in the BMP base zone. However, the Project is subject to the zoning regulations in place at the time the Project was deemed complete, which required a MCUP, rather than a CUP as stated by the commenter.

As identified in the DEIR, Section 5.2 Air Quality, Subsection 5.2.2.4 Local Regulations, "The City adopted Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities (GNG) in October 2008 to focus on the relationship between land use, permitting and air quality. ...On November 10, 2020 the Riverside City Council adopted updates to the GNG, in addition to associated amendment to Title 19 – Zoning Code of the Riverside Municipal Code (RMC), the Hunter Business Park Specific Plan, and the Sycamore Canyon Business Park Specific Plan related to siting industrial uses in the City when located adjacent to sensitive receptors, including residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals, and other public spaces. City Council action also allowed any project achieving substantial completion within 90 days of the effective date of the implementing ordinance to continue to be subject to the 2008 GNG. As this Project was deemed complete prior to adoption of the updated GNG (discussed further in Section 8.2.5), it does not need to comply with the updated GNG." (DEIR, pp. 5.2-18 – 5.2-19)

As outlined above, the 2020 update to the GNG also included associated amendments to Title 19 – Zoning Code of the RMC, Section 19.150, Table 19.150.020.A Permitted Uses Table, which included changing the requirement for a MCUP to CUP for warehouse & distribution facilities 100,000 square foot or greater. As the Project was deemed complete prior to adoption of the updated GNG and Title 19 – Zoning Code, it does not need to comply with the updated GNG, or this change to the Zoning Code. A copy of Table 19.150.020.A in effect at the time the Project was deemed complete is listed below. As illustrated, a MCUP is required for warehouse and distribution centers greater than 400,000 square feet. Therefore, a MCUP is required for the Project and correctly identified and analyzed in the DEIR. The City has consistently applied this

interpretation to other projects that have been deemed complete prior to adoption of the updated GNG and Zoning Code. The DEIR also specifically discloses that the applicable discretionary actions and approval are based on the requirements of the RMC at the time the Project was deemed substantially complete (November 2020). (DEIR, pp. 1.0-2, 3.0-19.) The DEIR thus does not fail as an informational document and provides an accurate list of the necessary entitlements and discretionary actions for the Project.

19.190.020-A Permitted Uses Table

This table identifies permitted uses and uses requiring approval of other permits by zoning designation. In addition to these uses, other incidental and temporary uses may also be permitted as noted in the Incidental Uses Table and the Temporary Uses Table.

Use	Zones																		Location of Required Standards in the Municipal Code		
	Residential Zones (Residential Conservation (RC), Residential Agricultural (RA-S), Rural Residential (RR), Residential Estate (RE), Single-Family Residential (R-1), Multiple Family Residential (R-3 and R-4))								Office & Commercial Zones (Office, Commercial Retail, Commercial General, Commercial Regional Center)				Mixed Use Zones (Neighborhood, Village, Commercial Urban)			Industrial Zones (Business Manufacturing Park, General Industrial, Airport, Industrial, Airport)				Other Zones (Public Facilities, Railroad, Neighborhood Commercial Overlay)	
	RC**	RA-S**	RR	RE	R-1	R-3	R-4	O	CR	CG	CRC*	MU-N	MU-V*	MU-U*	IMP	AI	AP	PF	RWY	MC Overlay	
Warehousing & Wholesale Distribution Centers:																					
400,000 sq. ft. or less	X	X	X	X	X	X	X	X	X	X	X	X	X	X	P	P	P	P	X	X	X
Greater than 400,000 sq. ft.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	MC	MC	MC	MC	X	X	X

P = Permitted

RCP = Recycling Center Permit, [Chapter 19.870](#)

PRD = Planned Residential Development Permit, [Chapter 19.780](#)

C = Subject to the granting of a conditional use permit (CUP), [Chapter 19.760](#)

TUP = Temporary Use Permit, [Chapter 19.740](#)

sq. ft. = Square Feet

MC = Subject to the granting of Minor Conditional Use Permit (MCUP), [Chapter 19.730](#)

X = Prohibited

SP = Site Plan Review Permit, [Chapter 19.770](#)

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.5:

The commenter claims that the DEIR does not describe the mechanism or legal instrument by which the proposed modifications to the existing 11.6-acre Restricted Property will be completed and that the Project cannot proceed without approval of the modifications to the Restricted Property.

As outlined in the DEIR, Section 3.0 Project Description, subsection 3.1.2 Project Site Background, "Construction of the Grove Community Church at the off-site 19900 Grove Community Drive location had impacts to a jurisdictional drainage and associated riparian habitat at that location. To mitigate for impacts from construction of the church at the off-site location, the U.S. Army Corps of Engineers required that the on-site jurisdictional drainage and riparian habitat along Alessandro Boulevard be set aside and preserved in a legally designated "Restricted Property," as a condition of the Clean Water Act Section 404 permit that was issued for the construction of the church. The "Restricted Property" was recorded in 2009." (DEIR, p. 3.0-11)

The DEIR requires that the Restricted Property be revised as part of a biological mitigation measure, DEIR, Section 5.3 Biological Resources, Subsection 5.3.6 Proposed Mitigation Measures (DEIR, p. 5.3-53) as follows:

MM BIO-6: Prior to issuance of occupancy permit, in order to reduce impacts to on-site Riparian/Riverine areas and suitable habitat for LBVI, on-site mitigation shall include:

1. Enhancement of a total of 1.58 acres of riparian habitat: 0.01 acre in Drainages A, 1.34 acres in B, and 0.23 acre in Area C.
2. Create (establish) 0.61 acre of in-kind riparian woodland in Area C.
3. Restoration of 0.02 acre of riparian habitat in Drainage B.
4. The non-jurisdictional, non- riparian/riverine upland areas of slopes associated with the access road will be restored/ replanted with native seed mix.
5. The roadway/access to Parcel 1/ Building A shall include culverts to provide a hydrological connection to the riparian habitat on the east side of the roadway and a corridor for small wildlife species.
6. Revise the existing Restricted Property to include Parcel A (7.19 acres) and Parcel B (5.04 acres), with a combined area of 12.23 acres. The revised 12.23 Restricted Property shall be managed in perpetuity with an endowment funded by the developer and by a CDFW approved 3rd party (such as Rivers and Lands Conservancy "RLC").

Therefore, as outlined above in MM BIO-6 (DEIR, p. 5.3-53), the DEIR indicates that the Restricted Property will need to be revised. As outlined above, as the designation of the Restricted Property was required by the U.S. Army Corps of Engineers as a condition of the Clean Water Act Section 404 permit that was issued for the construction of the church, the U.S. Army Corps of Engineers would need to concur with the Restricted Covenant Amendment. The legal mechanism for revising the Restricted Property is an amendment to the Restrictive Covenant, to which the March JPA is signatory. Therefore, the DEIR did identify that a revision to the Restricted Property, would be required as a part of the proposed Project as outlined in Mitigation Measure MM BIO-6, DEIR pages 1.0-10, 5.1-17, 5.3-53, and 5.7-27, and was analyzed as part of the Project's potential impacts in the DEIR. The applicant has submitted an Amendment to Declaration of Restrictive Covenant to the U.S. Army Corps of Engineers for review and concurrence. To provide further clarity, the DEIR Project Description, Section 3.4 is revised to identify that the U.S. Army Corps of Engineers would need to concur with the Restrictive Covenant Amendment. The DEIR would be revised as follows:

Section 3.4 Discretionary Actions and Approvals pp. 3.0-42-3.0-43 changes as follows:

March Joint Powers Authority

- Restrictive Covenant Amendment

U.S. Army Corps of Engineers

- Section 404 Permit for Disposal of Dredge or Fill Material per the Clean Water Act
- Concurrence with Restrictive Covenant Amendment

As the DEIR did identify that a revision to the Restricted Property would be required as part of the proposed Project and was analyzed as part of the Project's potential impacts these revisions only provide clarity and no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.6:

The commenter states that the DEIR does not include a floor plan for either of the buildings and states that the basic components of a Planning Application include a site plan, floor plan, conceptual grading plan, and elevations and that Figures 3.0-9 and 3.0-14 A and B do not provide detailed information such as parcel size, site coverage or building height. The commenter further claims that the DEIR has excluded the proposed floor plans and detailed site plan/elevations from public review, which does not comply with CEQA's requirement for adequate informational documents and meaningful disclosure.

The commenters reference to the CEQA Statute (Section 21003(b)) and Guidelines (Section 15121) does pertain to the document requirements pursuant to CEQA, but not to the Project Description requirements of CEQA as shown below.

CEQA Statute Section 21003 (b):

§ 21003. PLANNING AND ENVIRONMENTAL REVIEW PROCEDURES; DOCUMENTS; REPORTS; DATA BASE; ADMINISTRATION OF PROCESS

The Legislature further finds and declares that it is the policy of the state that:

- (a) Local agencies integrate the requirements of this division with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively.
- (b) Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public.

CEQA Guidelines Section 15121:

15121. INFORMATIONAL DOCUMENT

- (a) An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.
- (b) While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093.
- (c) The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.

Rather, the required contents of a Project Description, as part of the contents of an EIR, are identified in the CEQA Guidelines Section 15124, as follows:

15124. PROJECT DESCRIPTION

The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

- (a) The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map.
- (b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits.
- (c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.
- (d) A statement briefly describing the intended uses of the EIR.
 - (1) This statement shall include, to the extent that the information is known to the Lead Agency,
 - (A) A list of the agencies that are expected to use the EIR in their decision making, and
 - (B) A list of permits and other approvals required to implement the project.
 - (C) A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. To the fullest extent possible, the lead agency should integrate CEQA review with these related environmental review and consultation requirements.
 - (2) If a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed, preferably in the order in which they will occur. On request, the Office of Planning and Research will provide assistance in identifying state permits for a project.

The DEIR included a Project Description, in compliance with CEQA Guidelines Section 15124, as specifically outlined below:

Section 15124 (a): the precise location and boundaries of the Project are shown on detailed maps including Figure 3.0-2 – Vicinity Map, which contains the project site boundary on a topographic map, the site plan outline and project boundary on an aerial photograph in Figure 3.0-3, as well as a regional map, Figure 3.0-1 – Regional Map.

Section 15124 (b): the statement of objectives is included in Section 3.0 Project Description, subsection 3.3 Project Objectives (DEIR, pp. 3.0-40 – 3.0-41)

Section 15124 (c): a general description of the project's technical, economic and environmental characteristics is included in the DEIR Section 3.0 Project Description, subsections 3.1.1 Project Site – Existing Conditions (DEIR, p. 3.0-5), 3.1.2 Project Site Background (DEIR, p. 3.0-11), 3.1.3 Land Use and Zoning (DEIR, p. 3.0-13), 3.1.4 Surrounding Land Use and Zoning (DEIR, p. 3.0-14), 3.2.1 Project Entitlements (DEIR, p. 3.0-19), 3.2.2 Design and Appearance (DEIR, p. 3.0-27), 3.2.3 Infrastructure and Utilities (DEIR, p. 3.0-36), 3.2.4 Sustainability Features (DEIR, p. 3.0-38), 3.2.5 Operations and Employment (DEIR, p. 3.0-40), 3.2.6 Construction and Operation (DEIR, p. 3.0-41). The project description also contains the site map (Figure 3.0-9) and Elevations for both buildings (Figure 3.0-14A – Elevations Building A and Figure 3.0-14B Elevation Building B), as well as a Fencing Plan (Figure 3.0-11), and Landscaping Design (Figure 3.0-12A and Figure 3.0-12B). The parcel sizes are shown on the Tentative Parcel Map (Figure 3.0-8). The building heights and floor area ratio for each of the buildings are identified in Table 3.0-3 Building A and Table 3.0-4 – Building B (DEIR, pp. 3.0-22 – 3.0-23).

Section 15124 (d): (1) the statement of the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making and a list of permits and other approvals required to implement the project are contained in the DEIR, 3.0 Project Description, subsection 3.4 Discretionary Actions and Other Agency Approvals (DEIR, pp. 3.0-42 – 3.0-43). (2) All of the City of Riverside's decisions on the project that are subject to CEQA are listed, in the Project Description, in subsection 3.2.1 Project Entitlements, including the planning case numbers for each (DEIR, pp. 3.0-19 – 3.0-23).

Therefore, as outlined above, the DEIR includes all of the required project information in the Project Description (Section 3.0), pursuant to the CEQA Guidelines Section 15124. Nonetheless, the floor plans for Buildings A and B have been provided in the new Appendix O.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.7: The comment states that the air quality analysis did not include surfacing parking spaces or improvements on Parcel C. However, these statements are incorrect. Using ArcGIS and the ArcMap mapping programs along with applicant's engineer's CAD drawings of the site plan, it was determined that approximately 21 acres would be paved and of this, approximately 5 acres would be striped parking spaces. This includes all improvements to Parcel C. As shown in Attachment 1 CalEEMod Output of the Air Quality Analysis (Appendix C of the DEIR), these areas were modeled as 5 acres "Parking Lot" and 16 acres "Other Asphalt Surfaces". As such, the analysis in the DEIR and underlying technical studies is correct and no changes are needed.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.8:

The commenter states that the CalEEMod output sheets excluded any hauling trips in the analysis. The commenter states it would not be feasible or appropriate for haul trucks to utilize an existing dirt road that crosses through Parcel A to transport excess material between Parcel 1 and Parcel 2.

As stated in Section 6.1 of the Air Quality Analysis (appendix C to the DEIR), “During the grading phase, soil quantities would be balanced on-site between the two building areas with no net import or export.” The modeling assumes that this soil hauling between Parcel 1 and Parcel 2 would be done with the modeled grading equipment, which includes graders and scrapers capable of moving large quantities of soil, as part of the overall grading of the Project site. To be conservative and account for the usage of trucks to haul soil from one parcel to the other on existing roadways rather than the on-site dirt road, 40,000 cubic yards of soil hauling has been added to the grading phase with a trip length of one mile. The CalEEMod default number of trucks was modeled. This includes a total of 5,000 hauling trips over the grading period. This number is based on a default truck capacity of 16 cubic yards and two trips per haul (one trip loaded and one returning trip unloaded). The modeled grading equipment (graders and scrapers) were also included in the calculations. The revised emissions are summarized in Tables 6 and 7 of the revised Air Quality Analysis and Table 7 of the revised GHG Analysis. Accordingly, DEIR corresponding Tables 5.2-6, 5.2-7, and 5.7-7 have been revised as well (see below). All construction emissions would still be less than the applicable thresholds, and air quality and GHG impacts would be less than significant.

Table 5.2-6 – Total Annual Construction Emissions Comparison to General Conformity de Minimis Levels

Construction	Emissions (tons per year)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2021 Emissions (tons/year)	<u>0.35</u> <u>0.49</u>	<u>3.29</u> <u>4.59</u>	<u>2.78</u> <u>3.97</u>	0.01	<u>0.51</u> <u>0.88</u>	<u>0.25</u> <u>0.36</u>
Year 2022 Emissions (tons/year)	<u>1.77</u> <u>3.27</u>	<u>1.61</u> <u>2.44</u>	<u>1.95</u> <u>2.84</u>	0.01	<u>0.33</u> <u>0.62</u>	<u>0.13</u> <u>0.21</u>
Total Emissions (tons)	<u>2.12</u> <u>3.76</u>	<u>4.91</u> <u>7.02</u>	<u>4.73</u> <u>6.78</u>	<u>0.01</u> <u>0.02</u>	<u>0.83</u> <u>1.49</u>	<u>0.38</u> <u>0.57</u>
Maximum Annual Emissions (tons/year)	<u>1.77</u> <u>3.27</u>	<u>3.29</u> <u>4.59</u>	<u>2.78</u> <u>3.94</u>	0.01	<u>0.51</u> <u>0.88</u>	<u>0.25</u> <u>0.36</u>
De Minimis Levels	10	10	100	--	100	70
Exceed Threshold?	No	No	No	--	No	No

Table 5.2-7 – Maximum Daily Construction Emissions Comparison to SCAQMD Significance Thresholds

Construction	Emissions (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site Preparation	4	41	22	<1	<u>910</u>	6
Grading	<u>45</u>	<u>4657</u>	<u>3233</u>	<1	6	<u>24</u>
Building Construction/Architectural Coatings ¹	<u>3259</u>	<u>2945</u>	<u>3451</u>	<1	<u>611</u>	<u>24</u>
Paving/Architectural Coatings ¹	<u>3258</u>	<u>4613</u>	<u>3421</u>	<1	2	1
Maximum Daily Emissions²	<u>3259</u>	<u>4657</u>	<u>3451</u>	<1	<u>911</u>	6
SCAQMD Regional Threshold	75	100	550	450	150	55
Exceed Threshold?	No	No	No	No	No	No

¹The architectural coatings phase of construction was modeled simultaneously with building construction and parking lot paving emissions.

²Emissions were rounded to the nearest whole number, Emissions reported as <1 indicate that emissions were calculated to be less than 0.5 pound per day.

Table 5.7-7 – Summary of Project GHG Emissions (metric tons per year)

Source	MT CO ₂	MT CH ₄	MT N ₂ O	MT CO ₂ E
Mobile – Passenger Cars	<u>4,204</u> <u>1,465</u>	<1	0	<u>4,204</u> <u>1,466</u>
Mobile – Trucks	4,316	<1	0	4,320
Energy Source	<u>781603</u>	<1	<1	<u>782604</u>
Area Sources	<1	<1	0	<1
Water/Wastewater Sources	<u>728695</u>	<u>45</u>	<1	<u>846842</u>
Solid Waste Sources	<u>86115</u>	<u>57</u>	<u>40</u>	<u>214285</u>
Construction (Amortized over 30 years)	<u>3768</u>	<1	0	<u>3868</u>
Total	<u>7,152</u> <u>7,262</u>	<u>912</u>	<1	<u>7,405*</u> <u>7,587*</u>
SCAQMD Significance Threshold for Industrial Sources				10,000

MT CO₂E = metric tons of carbon dioxide equivalent
 MT CH₄ = metric tons of methane
 MT N₂O = metric tons of nitrous oxide
 *The GWPs included in CalEEMod are from the IPCC Fourth Assessment Report. For informational purposes, total emissions calculated by CalEEMod were adjusted to account for the updated IPCC Fifth Assessment Report GWPs. Using the current GWPs, total annual project emissions would be 7,428 7,618 MT CO₂, and would also be less than the screening threshold. Note that the IPCC updates the GWPs periodically, and the next anticipated update will occur in 2022.

Per DEIR Figure 3.0-9 – Site Plan (DEIR, p. 3.0-25), the dirt road that crosses Parcel A is identified as a “20’ wide temporary construction crossing on existing dirt road to be restored.” The existing dirt road is already utilized often by hikers, walkers, and mountain bikers, and the road would be scarified, replanted, and fenced off once its use as a temporary construction crossing is completed so that the area can no longer be used as a road through the restricted property. The recorded Declaration of Restrictive Covenants, dated June 11, 2009, recorded as Document No. 2009-0303932 Section 5(a) permits reasonable access through the Restricted Property to adjacent land over existing roads, and Section 5(d) provides that nothing in the Restrictive Covenant is intended

to limit the Declarant from developing adjoining property for any purposes. Consistent with these provisions, the Amendment to the Restrictive Covenant, described above in Response 7.5 contains a provision to specifically allow the temporary use of the existing dirt road between the parcels by construction vehicles, and will provide for a restoration of this road upon completion of the project. It is also a part of the project description in the Riparian-Riverine DBESP report (contained in Appendix D of the DEIR) that was reviewed and approved by the U.S. Fish and Wildlife Service and the California Department of the Fish and Wildlife as part of the review for consistency with the Western Riverside County MSHCP, as indicated in the DEIR, Section 5.3 Biological Resources (DEIR, pp. 5.3-26 – 5.3-27). Thus, use of the existing dirt road as a temporary construction crossing is not infeasible or inappropriate as the commenter states as the road is already utilized, use of the road is permitted in the existing restrictive covenant, and the road would be restored upon completion of excess material transport activities during construction.

The commenter additionally states that the California Department of Fish and Wildlife (CDFW) expressed similar concerns in written comments responding to the Notice of Preparation (NOP) about construction of an access road under lands conserved under a restricted covenant. The commenter appears to have misconstrued/referenced this CDFW comment out of context in relation to his or her own comment regarding the existing dirt road which will be temporarily utilized to transport excess material between the parcels. Per pages 7 of 12 and 8 of 12 of DEIR Appendix A, the CDFW comment in question refers to the construction of the proposed access road to allow access to Building A from Alessandro Boulevard. In DEIR Appendix A, CDFW expresses that the DEIR should address how proposed mitigation would provide superior conservation values given that the conserved lands would be bisected by a road. As stated on DEIR pp. 3.0-19 through 3.0-20, “As part of mitigation for the Project, 1.44 acres will be incorporated into Parcel A for a net gain of 0.63 acre of new Restricted Property... Parcels A and B will be managed in perpetuity by a professional conservation organization funded by the applicant as part of the mitigation for the Project.” DEIR p. 5.3-35 further states, “The creation of riparian habitat in Area C on the southernmost portion of the Project site would provide biologically superior habitat.” Thus, CDFW’s concerns regarding the access road to Building A have been addressed by the DEIR and do not lend to the commenter’s statements regarding use of the existing dirt road, which, as previously mentioned, would be scarified, and replanted upon completion of temporary construction crossing activities.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.9: The commenter claims that because the Riverside Municipal Code (RMC) allows for construction to occur 7 AM – 7 pm, Monday – Friday and 8 AM – 5 PM on Saturday, that the EIR does not provide a “worst-case scenario” analysis of construction equipment emitting pollutants for the legal 12 hours per weekday plus 9 hours on Saturday.

Just because the RMC would allow these hours of construction does not automatically mean that the construction contractor would conduct construction activities for 12 hours a day or on Saturdays. A standard 8-hour day, 5-days a week construction is anticipated for the duration of construction for this Project. Construction activities will be restricted to these hours with a Condition of Approval (COA). The estimates of equipment operation are based on surveys, performed by the South Coast Air Quality Management District (SCAQMD) and the Sacramento Metropolitan Air Quality Management District, of typical construction projects that provide a basis for scaling equipment needs and schedule with a project's size.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.10: The commenter states the DEIR does not include analysis relevant to environmental justice issues in reviewing potential impacts, including cumulative impacts.

Environmental justice is not an environmental impact required to be evaluated or considered pursuant to CEQA, per CEQA Guidelines Article 9. Contents of Environmental Impact Reports, Sections 15120 to 15132. Nonetheless, the air quality analysis contained in the DEIR demonstrates the Project would not result in environmental justice issues as further outlined below.

The air quality analysis prepared for the Project provides an assessment of potential cumulative air quality impacts. The SCAQMD shares the responsibility with California Air Resources Board (CARB) for ensuring that all federal and state ambient air quality standards are achieved and maintained throughout the air basin. The SCAQMD has developed methodologies and thresholds of significance that are widely used throughout the air basin. SCAQMD staff has suggested in the cumulative significance methodologies contained in the CEQA Air Quality Handbook that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. These thresholds were used in the Air Quality Analysis to assess the significance of the Project -specific and cumulative air quality impacts. Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. Therefore, the ambient air quality measurements provided in the Air Quality Analysis provide a summary of basin-wide cumulative air quality impacts. As the individual Project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts. As shown in Tables 7 and 9 of the Air Quality Analysis (Appendix C to the DEIR), construction and operational emissions would be less than the applicable project-level thresholds. Additionally, the project would be consistent with the growth projections used to develop the AQMP and would therefore not conflict with implementation of the AQMP or applicable portions of the SIP. As such, air quality impacts would be less than significant.

On DEIR pp. 5.2-31 to 5.2-32, in response to Threshold C, which questions whether the Project would expose sensitive receptors to substantial pollutant concentrations, the DEIR describes the localized significance threshold (LST) analysis utilized in determining these potential impacts.

DEIR pp. 5.2-31 to 5.2-32 state that, “LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities.” These pages of the DEIR further state that, “the Project was analyzed for its potential to result in significant health risk impacts resulting from short-term construction and long-term operational emissions” and that it was determined, “the Project would not exceed the SCAQMD LSTs during construction and operational activities.”

SCAQMD also recommends the preparation of a mobile source Health Risk Assessment (HRA) if a project is expected to generate or attract heavy-duty diesel trucks, which emit diesel particulate matter (DPM). The Project’s Health Risk Assessment (HRA; DEIR Appendix C) discusses the Project’s potential impacts regarding DPM emissions, cancer risk, non-carcinogenic risk, residential exposure, worker exposure, and school children exposure. Because construction and operational activity would not result in an exceedance of the SCAQMD’s DPM cancer risk exposure threshold of 10 in one million, or non-cancer risk threshold of 1.0, sensitive receptors would not be exposed to substantial DPM pollutant concentrations during Project construction or operation, and impacts would be less than significant with Mitigation Measure MM AIR-1. (DEIR, pp. 5.2-33 – 5.2-35.)

Thus, contrary to the commenter’s statements, the DEIR does include analysis relevant to environmental justice issues as the LSTs utilized in determining potential impacts to sensitive receptors were developed in response to environmental justice concerns and the Project HRA assesses potential Project-related health risks to residents, workers, and school children.

Further, as stated on DEIR p. 5.2-37 under Cumulative Environmental Effects, “SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. Therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable.” DEIR p. 5.2-37 goes on to state, “in terms of localized air quality impacts, construction and operation of the Project would not have a cumulatively considerable impact due to criteria pollutant emission.” Therefore, as the Project was determined not to exceed any of the emissions significance thresholds, including localized significance thresholds, and would accordingly not result in cumulatively significant air quality impacts, the Project would not result in significant impacts regarding the environmental justice issues stated by the commenter.

Therefore, this comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.11:

The commenter correctly summarizes Exhibit 4-1: Project (Passenger Car) Trip Distribution of Appendix L (Traffic and VMT Analysis), which identifies 20 percent of passenger cars exiting the Project site traveling westbound on Alessandro Boulevard. The commenter opines that the Health Risk Assessment (HRA) excluded westbound traffic from the HRA and only includes eastbound traffic on Alessandro Boulevard as illustrated on Exhibit 4-B of the HRA. First, it should be noted that the focus of the HRA is on *truck traffic*, which has the potential to generate diesel particulate

matter. The analysis in the HRA has been conducted in accordance with the guidelines in the *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (HRA Guidance). (HRA, Appendix C, p. 20.) As set forth in SCAQMD's guidance, "Emissions of diesel particulates can occur from the following activities associated with *diesel trucks* [emphasis added]:

- Truck traffic on local streets and arterials in transit to or from the facility (i.e., truck stop, warehouse/distribution center or transit center),
- Truck idling and movement on-site at the facility (i.e., truck stop, warehouse/distribution center or transit center), and
- Operation of Transportation Refrigeration Units (TRUs) at the facility (i.e., truck stop, warehouse/distribution center or transit center)." (HRA Guidance, pp. 3-4.)

The commenter fails to acknowledge that Exhibit 4-2 Project (Truck) Trip Distribution of Appendix L (Traffic and VMT Analysis) identifies that truck traffic is *required* to travel eastbound on Alessandro Boulevard and would *not* travel westbound on Alessandro Boulevard. Also, as outlined in the DEIR, Section 5.12 Transportation, 5.12.5 Project Design Considerations (DEIR, p. 5.12-35) both of the driveways, Barton Street and Driveway 1 and Driveway 2/Vista Grande Drive and Alessandro Boulevard, will have full access driveway for passenger cars only and trucks will be restricted from heading westbound on Alessandro Boulevard. As such, the analysis in the DEIR and underlying technical studies is correct and no changes are needed.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.12:

The commenter states that the DEIR must be revised to include modeling scenarios for 9-, 30-, and 70-year cancer risk calculation to provide a useful representation of cancer risk in accordance with guidelines utilized for modeling. The commenter additionally states that the 16-70 age bin for sensitive receptors must be modeled as well.

The HRA modeled three different time periods of exposure, for three distinct land use types, as summarized in Appendix C of the DEIR. The HRA includes a 30-year exposure scenario for residential occupancies, a 25-year exposure scenario for worker occupancies, and a 9-year exposure scenario for a school-child occupancy. Therefore, the DEIR and supporting Mobile Source Health Risk Assessment (HRA) did evaluate modeling scenarios for 9- and 30-year cancer risk, as outlined in the HRA page 3, Table ES-1: Summary of Cancer and Non-Cancer Risks, and as shown below.

TABLE ES-1: SUMMARY OF CANCER AND NON-CANCER RISKS

Location	Time Period ¹	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
Maximum Exposed Sensitive Receptor	30 Year Exposure	0.49	10	No
Maximum Exposed Worker Receptor	25 Year Exposure	0.08	10	No
Maximum Exposed School Child Receptor	9 Year Exposure	0.003	10	No
Location	Time Period	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Maximum Exposed Sensitive Receptor	Annual Average	0.0002	1.0	No
Maximum Exposed Worker Receptor	Annual Average	0.00003	1.0	No
Maximum Exposed School Child Receptor	Annual Average	0.000006	1.0	No

¹ Based on the Office of Environmental Health Hazard Assessment (OEHA) recommendations, cancer risk to residential receptors are based on a 30-year exposure duration, 25 years for worker receptors, and 9 years for children at school sites (2).

The use of the 30-year and 25-year exposure durations for residential and worker occupancies is based on recommendations published by SCAQMD in their *Risk Assessment Procedures for Rules 1401, 1401.1, & 212* (2017).¹ Page 7 of the SCAQMD guidance clearly identifies the Exposure Duration (ED) for a residential land use as 30-years and a worker location as 25-years. The commenters request for evaluating a 70-year exposure duration is not necessary or supported by substantial evidence.

Furthermore, the HRA utilized relevant and appropriate procedures to quantify risk. Under available risk assessment guidance from the U.S. Environmental Protection Agency (USEPA)², variable exposure adjustments can be utilized to quantify risk. The HRA uses acceptable levels of risk or thresholds, including the exposure duration.

In the HRA, exposure duration is discussed relative to residential occupancy. As noted, the HRA is based on USEPA guidance to develop viable, realistic, and accurate dose estimates based on reasonable maximum exposures, which are defined as the “highest exposure that is reasonably expected to occur.” USEPA’s long-standing guidance for the quantification of dose estimates is based on what is defined as “reasonable.” According to the USEPA:

Reasonableness refers to the findings of the risk assessment in the context of the state-of-the science, the default assumptions and the science policy choices made in the risk

¹ <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12>

² <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=12464#Download>

assessment. It demonstrates that the risk assessment process followed an acceptable, overt logic path and retained common sense in applying relevant guidance. The assessment is based on sound judgment. Reasonableness is achieved when: a) the risk characterization is determined to be sound by the scientific community, EPA risk managers, and the lay public, because the components of the risk characterization are well integrated into an overall conclusion of risk which is complete, informative, well balanced, and useful for decision making b) the characterization is based on the best available scientific information c) the policy judgments required to carry out the risk analyses use common sense given the statutory requirements and Agency guidance d) the assessment uses generally accepted scientific knowledge e) appropriate plausible alternative estimates of risk under various candidate risk management alternatives are identified and explained.

The USEPA (Risk Assessment Guidance for Superfund -Volume 1: Human Health Evaluation Manual³) introduced the concept of reasonable maximum exposures (RMEs). This approach is intended to estimate a conservative exposure case (i.e., well above the average case) that is representative of the range of possible exposures. Activity patterns for population mobility are specifically addressed in the Exposure Factors Handbook (U.S. EPA, 1997⁴), whereby lifetime risk values for residents account for an exposure duration of 30 years (95th percentile).

Additionally, as identified by the Office of Environmental Health Hazard Assessment (OEHHA)⁵, the Integrated Public Use Microdata Series (IPUMS-USA) census data⁶ was reviewed to determine an appropriate assumption for length of residency to determine the exposure duration used in the analysis. The IPUMS-USA database consists of more than 50 samples of the American population drawn from 15 federal censuses and from the American Community Surveys (ACS). ACS is a nationwide survey that collects and produces population and housing information every year from 3 million selected housing unit addresses across every county in the nation. IPUMS-USA samples, which draw on every surviving census from 1850 to 2000 and the 2000 to 2009 ACS samples, collectively constitute the quantitative information on long-term changes in the American population. Based on this review, the most recent IPUMS-USA ACS data (2006 to 2009) show that the percentage of California households with a residency period of 30 years or greater is less than 9 percent, meaning that over 91 percent of California residents had lived in their current location for less than 30 years. This data also showed that over 63 percent of Californians have lived at their current residence for 9 years or less. Therefore, a 70-year

³ http://www.epa.gov/oswer/riskassessment/ragsa/pdf/rags_a.pdf

⁴ <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=12464#Download>

⁵ http://oehha.ca.gov/air/hot_spots/SRP/Appendix%20L.pdf

⁶ Steven Ruggles, J. Trent Alexander, Katie Genadek, Ronald Goeken, Matthew B. Schroeder, and Matthew Sobek. Integrated Public Use Microdata Series: Version 5.0 [Machine-readable database]. Minneapolis: University of Minnesota, 2010

exposure duration is very unlikely to occur given average residency times, specifically in California.

The 30-year lifetime exposure is a default assumption recommended by the OEHHA that takes into account early life (infant and children) exposures. The averaging time for exposure was correctly assumed to be 70 years, which is the lifetime exposure period OEHHA uses to develop cancer potency factors or dose. This approach is consistent with the identified averaging times recommended by SCAQMD in their *Risk Assessment Procedures for Rules 1401, 1401.1, & 212*⁷ which also correctly utilize a 70-year exposure duration as part of the risk calculation for averaging time since that is the same averaging time used by OEHHA to develop the cancer potency factor, as SCAQMD notes, use of a 70-year averaging time is also a recommendation from OEHHA. As outlined in the SCAQMD's *Risk Assessment Procedures for Rules 1401, 1401.1, & 212, Instructions for Calculating Cancer Burden* (page 18) the cancer burden for 70-year exposure duration only needs to be calculated if the resulting Maximum Individual Cancer Risk (MICR) from a 30-year exposure duration is greater than one in one million, as shown in the excerpt from this document below.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
RISK ASSESSMENT PROCEDURES FOR RULES 1401, 1401.1 & 212**

INSTRUCTIONS FOR CALCULATING CANCER BURDEN

The cancer burden is the estimated increase in the occurrence of cancer cases in a population as a result of exposures to TAC emissions from the equipment over a 70-year exposure duration. The cancer burden for a population unit (city, census tract, sub-area or grid) is the product of the number of persons in the population and the estimated individual risk from TACs. The cancer burden only needs to be calculated if the resulting MICR from a 30-year exposure duration is greater than one in one million.

As outlined above, the HRA page 3, Table ES-1: Summary of Cancer and Non-Cancer Risks indicates the Project will not result in cancer risk from a 9-, 25-, or 30-year exposure of greater than one in one million. Therefore, the 70-year exposure calculation is warranted and not required consistent with SCAQMD and OEHHA recommended methodology. Also, a separate calculation for the 16-70 year age bin is not warranted or required either, as the 16-30 year group is included within the 30-year exposure calculations and the 31-70 year age bin, which would be included in the 70-year exposure calculation is not warranted or required as the 30-year exposure calculation does not reach or exceed the threshold of one in one million.

Therefore, this comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.13: The commenter states that the Burrowing Owl Focused Survey Report within DEIR Appendix D does not indicate whether rain had occurred within five days of each burrowing

⁷ <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12>

owl survey. The commenter goes on to state that the DEIR must be revised to indicate whether rain was present within five days of each survey.

Review of dates within five days of each survey based on Records of Climatological Observations obtained from the National Oceanic & Atmospheric Administration's (NOAA) Climate Data Online Search indicate that no rain/precipitation was present within 5 days of the April 24, 2020 survey; within 5 days of the May 7 survey; within 5 day of the May 21 survey; or within 5 days of the June 5 survey. Therefore, each survey was conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Area. In response to this comment, DEIR p. 5.3-8 of Section 5.3 Biological Resources has been revised as follows:

Burrowing Owl

Burrowing owl (*Athene cunicularia*; BUOW) is protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code and is a CDFW SSC. BUOW focused surveys were conducted in 2018 with updated focused surveys conducted in 2020 on April 24, May 7, May 21, and June 5, 2020. No rain was present within five (5) days of each survey in accordance with the Burrowing Owl Survey Instructions for the Western Riverside MSHCP Area. Based on the results of the 2018 and 2020 BUOW focused surveys, BUOW are presumed absent on the Project site (ELMT p. 15). Although no individual BUOW or BUOW sign was observed during the surveys, potentially suitable BUOW burrows were recorded via CNDDDB observations within a five (5) mile radius of the BSA as shown on Figure 5.3-5 – CNDDDB BUOW Observations.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.14:

The commenter states that the DEIR does not include maps or photographs of data including the locations of "suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed" per The Burrowing Owl Survey Instructions. Per this comment, DEIR Appendix D – Burrowing Owl Focused Survey Report has been revised to include the revised Exhibit 4 "Survey Area and Suitable Habitat," which depicts suitable burrowing owl habitat and suitable burrows within the Project site and survey area.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.15:

The commenter states that the State of California lists two approved compliance modeling software for non-residential buildings related to energy. The commenter is correct that the two approved compliance models referenced are the two approved compliance methods specifically for Title 24 compliance. However, these models require specific building material and equipment information as inputs to the model that are not yet available. Very specific information on ventilation rates, pipe installation, recirculation duct leakage, etc. are required input parameters for running these models and is simply not available at this time. The compliance modeling software that is referenced by the commenter would be used to confirm final building design and equipment, with the detailed information that is included in construction drawings and prepared approximately 12-18 months after entitlement, to confirm the buildings would be Title 24 compliant. The construction drawings are not available at this time and are not typically prepared until after the Project is approved/entitled. The DEIR and underlying technical studies correctly utilize CalEEMod which estimates energy demand based on average intensity factors for similar land use types based on the site plans provided to the City for entitlement. Since the Project's tenant is unknown at this time, and information about the future tenant's energy use is not available at this time, it is appropriate to defer to the CalEEMod default assumptions which have been derived by the California Air Pollution Control Officers Association (CAPCOA) based on survey data. There is no requirement of the DEIR to show specific compliance with 2019 Building Energy Efficiency Standards at this time as that will be a requirement prior to issuance of a building permit and verified by the City Building and Safety Department.

Therefore, this comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.16: The commenter claims that there are discrepancies within the CalEEMod output sheets regarding CO₂ emissions.

The comment incorrectly interprets the CalEEMod output. Summer and winter emissions are expressed in terms of pounds per day, while annual emissions are expressed in terms of metric tons per year. The daily summer/winter emissions (pounds) are calculated based on the worst-case daily construction activity per phase which includes amount of equipment operational in one day (see Table 5 of the Air Quality Analysis and Table 4 of the GHG Analysis), and the number of daily workers, vendor, and hauling trips. The annual emissions (metric tons) are calculated based on the same worst-case daily construction activity per phase and the standard assumption that construction would occur five days per week, which is what would occur for project construction. Construction activities will be restricted to 8 hours a day, 5 days a week, with a Condition of Approval (COA). Note that there are approximately 2,205 pounds per metric ton. The comment incorrectly states that a 75 percent reduction in emissions was applied. The correct GHG emissions in terms of metric tons per year are found in the CalEEMod annual output and are summarized in Table 7 of the Greenhouse Gas Analysis. As such, the analysis in the DEIR and underlying technical studies is correct and no changes are needed.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.17:

The commenter states the DEIR does not include the Federal Aviation Administration (FAA) determination reports and, thus, the DEIR must be revised and recirculated for public review including the FAA determination reports.

While the FAA determination reports themselves had not been included as part of the DEIR, a summary of the reports' findings and an analysis of Project compliance with Federal Aviation Regulation (FAR) Part 77 as it relates to building heights was included on DEIR p. 5.8-26. Building heights were also included in the Project description (DEIR, pp. 3.0-27 – 3.0-28.) The discussion provided on DEIR p. 5.8-26 references/summarizes the findings of the reports; thus, the inclusion of the reports would not have changed the analysis of Project compliance and, accordingly, recirculation of the DEIR is not required. Nonetheless, the FAA determination reports will be provided as an appendix to the Final EIR as Appendix M.

It should be noted that even with the addition of the FAA determination reports as Appendix M, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.18:

The commenter states that the DEIR and DEIR Appendix B includes Riverside General Plan 2025 (GP 2025) Policies AQ-1.1 and AQ-1.2 related to environmental justice and that the DEIR must be revised to include analysis of environmental justice issues in reviewing potential impacts, including cumulative impacts.

Environmental justice is not an environmental impact required to be evaluated or considered pursuant to CEQA, per CEQA Guidelines Article 9. Contents of Environmental Impact Reports, Sections 15120 to 15132. Nonetheless, the air quality analysis contained in the DEIR demonstrates the Project would not result in environmental justice issues as further outlined below.

Please see Response 7.10, which discusses how the DEIR Section 5.2 Air Quality includes analysis related to environmental justice with the localized significance threshold (LST) analysis utilized in determining potential impacts to sensitive receptors. As discussed in Response 7.10, DEIR pp. 5.2-31 to 5.2-32 state that, "LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities" and that it was determined, "the Project would not exceed the SCAQMD LSTs during construction and operational activities." Response 7.10 further discusses that the Project's Health Risk Assessment (HRA; DEIR Appendix C) discusses the Project's potential impacts

regarding diesel particulate matter (DPM) emissions, cancer risk, non-carcinogenic risk, residential exposure, worker exposure, and school children exposure. Further, the Project was determined not to exceed any of the emissions significance thresholds, including localized significance thresholds, and would accordingly not result in cumulatively significant air quality impacts. Thus, the DEIR does include air quality analysis as it relates to environmental justice issues and the Project would be consistent with GP 2025 Policies AQ-1.1 and AQ-1.2. However, in response to this comment, the following has been added to DEIR p. 5.2-17 in Section 5.2 Air Quality:

Policy AQ-1.1: Ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution.

Policy AQ-1.2: Consider potential environmental justice issues in reviewing impacts (including cumulative impacts for each project proposed).

The following has additionally been added to DEIR Appendix B, pp. 29-30:

Air Quality Element			
Objective AQ-1:	Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.		
Policy AQ-1.1	<u>Ensure that all land use decisions, including enforcement actions, are made in an equitable fashion to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution.</u>	<u>Section 5.2 as well as Project's Air Quality Analysis discuss the localized significance threshold (LST) analysis utilized in determining potential air quality impacts to sensitive receivers. The LSTs "were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities" (DEIR pp. 5.2-31 to 5.2-32). It was determined "the Project would not exceed the SCAQMD LSTs during construction and operational activities."</u>	<u>Consistent</u>
Policy AQ-1.2	<u>Consider potential environmental justice issues in reviewing impacts (including cumulative impacts for each project proposed)</u>	<u>As stated under Policy AQ-1.1 above, Section 5.2 as well as Project's Air Quality Analysis discuss the localized significance threshold (LST) analysis utilized in determining potential air quality impacts to sensitive receivers. The LSTs "were developed in</u>	<u>Consistent</u>

		<u>response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities” (DEIR pp. 5.2-31 to 5.2-32). The Project was determined not to exceed any of the emissions significance thresholds, including localized significance thresholds, and would accordingly not result in cumulatively significant air quality impacts.</u>	
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It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.19:

The commenter claims that the DEIR must be revised to include analysis of the Project’s impact in relation to General Plan policies CCM-2.3 and CCM-2.4, which state:

“Policy CCM-2.3: Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

Policy CCM-2.4: Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.”

The DEIR states in Section 5.10.5, Pg. 5.10-22,

“Although the General Plan target LOS will be exceeded, the intersection is currently built out to its General Plan ultimate cross-section and until additional right-of-way beyond those designated in the General Plan is obtained, there are no anticipated feasible improvements.”

Additionally, per the Office of Planning and Research,

“Even if a General Plan contains a LOS standard and a project is found to exceed that standard, that conflict should not be analyzed under CEQA. CEQA is focused on planning conflicts that lead to environmental impacts. (The Highway 68 Coalition v. County of Monterey (2017) 14 Cal.App.5th 883; see, e.g., Appendix G, IX(b) [asking whether the project will “Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an

environmental effect?"].) Auto delay, on its own, is no longer an environmental impact under CEQA." (<https://www.opr.ca.gov/ceqa/updates/sb-743/faq.html#general-plans-with-los>)

The following has additionally been added to DEIR Appendix B, pp. 9-10 for clarity:

Circulation and Community Mobility Element			
<u>Objective CCM-2:</u>	<u>Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.</u>		
<u>Policy CCM-2.3</u>	<u>Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.</u>	<u>The DEIR was prepared while the State and City were transitioning from LOS to VMT as a CEQA impact. While the DEIR includes LOS and VMT analysis, the Office of Planning and Research confirms that auto delay, on its own, is no longer an environmental impact under CEQA. While the Project would not be consistent with this policy, the Project would not have a significant impact related to LOS because LOS is not considered an environmental impact.</u>	<u>Inconsistent</u>
<u>Policy CCM-2.4</u>	<u>Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.</u>	<u>Although the General Plan target LOS will be exceeded at the Sycamore Canyon Boulevard and Alessandro Boulevard intersection, the intersection is currently built out to its General Plan ultimate cross-section and until additional right-of-way beyond those designated in the General Plan is obtained, there are no anticipated feasible improvements.</u> <u>Additionally, the DEIR was prepared while the State and City were transitioning from LOS to VMT as a CEQA impact. While the DEIR includes LOS and VMT impacts, the Office of Planning and Research confirms that auto delay, on its own, is no longer an environmental impact under</u>	<u>Inconsistent</u>

		<u>CEQA. While Project would not be consistent with this policy, the Project would not have a significant impact related to LOS because LOS is not considered an environmental impact.</u>	
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The DEIR states in Section 5.10.5, pg. 5.10-20,

“Although the LOS target in the General Plan Circulation Element cannot be achieved for the Sycamore Canyon Boulevard and Alessandro Boulevard intersection, the Project would not conflict with any other General Plan policies addressing the circulation system and potential impacts are less than significant.”

The DEIR was prepared while the State and City were transitioning from LOS to VMT as a CEQA impact. While the DEIR includes LOS and VMT impacts, the Office of Planning and Research confirms that auto delay, on its own, is no longer an environmental impact under CEQA. The Project would not have a significant impact related to LOS because LOS is not considered an environmental impact. By including a LOS analysis, the DEIR goes above and beyond CEQA requirements when analyzing transportation related deficiencies and its relation to land use and planning impacts. This comment does not affect the analysis completed or conclusions provided in the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.20:

The commenter alleges a conflict exists between the quantity of warehousing allowed between the site's General Plan designation of Business/Office Park (B/OP) and that of the quantity allowed by the Zoning and Specific Plan designation.

Refer to Response 7.3 above which addresses this comment.

Response 7.21:

The commenter claims the Project requires a Conditional Use Permit instead of a Minor Conditional Use Permit because the Project would have warehouse facilities that would exceed 100,000 square feet (SF). The commenter claims this would conflict with the City's current Municipal Code Section 19.150.020.

Refer to Response 7.4 above which addresses this comment.

Response 7.22:

For response to the commenter's incorrect claim of AQ and GHG modeling errors, such as the incorrect claim regarding haul truck trips, please see Response 7.8 above.

The commenter claims the DEIR did not provide any consistency analysis with the goals SCAG's 2020-2045 Connect SoCal RTP/SCS. The commenter incorrectly states that the Project has significant potential for inconsistency with Goal 5, Goal 6, and Goal 7 of SCAG's 2020-2045 Connect SoCal RTP/SCS. The Project would be consistent with the goals listed by the

commenter, as outlined below in Table 3 – Project Consistency with the 2020-2045 Connect SoCal RTP/SCS Goals. The Project would be consistent with Goal 5 related to AQ and GHG because the Project would not have significant AQ or GHG impacts, DEIR pp. 5.2-24 - 5.2-37 and 5.7-21 – 5.7-41. The DEIR does include analysis relevant to environmental justice issues as the LSTs utilized in determining potential impacts to sensitive receptors were developed in response to environmental justice concerns and the Project HRA assesses potential Project-related health risks to residents, workers, and school children. As the Project was determined not to exceed any of the emissions significance thresholds, including localized significance thresholds, the Project would not result in significant impacts regarding environmental justice.

The Project would support Goal 6 regarding healthy and equitable communities by providing various benefits to the community such as employment opportunities as well as donation of land for a trailhead parking lot with improvements such as a shade structure with benches, bike rack, drinking fountain, and car and bicycle parking for accessing the Sycamore Canyon Wilderness Park. The Project would support Goal 7 regarding adapting to a changing climate in various aspects through Project design features such as installment of conduits for vehicle charging stations and bicycle parking at the Project site.

The following has additionally been added to DEIR Appendix B, p. 54 for clarity:

Table 3- Project Consistency with the 2020-2045 Connect SoCal RTP/SCS

<p><u>2020-2045 RTP/SCS Goal 4:</u> <u>Increase person and goods</u> <u>movement and travel choices within</u> <u>the transportation system.</u></p>	<p><u>Consistent:</u> The Project proposes a logistics center within the <u>SCBPSP</u> on a site that has been designated for industrial uses since 1984. The <u>SCBPSP</u> is strategically located near State Route 60 and Interstate 215, which provide good access to the Ports of Long Beach and Los Angeles.</p>
<p><u>2020-2045 RTP SCS Goal 5: Reduce</u> <u>greenhouse gas emissions and</u> <u>improve air quality.</u></p>	<p><u>Consistent:</u> The Air Quality and Greenhouse Gas analysis (DEIR Appendix C and H) conducted for the Project determined it would not result in emissions that would exceed thresholds or result in significant impacts. The Project will meet or exceed all applicable standards under California's Green Building Code (CalGreen) and Title 24. The Project includes design considerations to help reduce emissions both during construction and operations including:</p> <p><u>Energy Efficiency</u></p> <ul style="list-style-type: none"> • <u>Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.</u> • <u>Use of Energy Star products such as appliances, building products, heating and cooling equipment,</u>

	<p><u>appliances, and other energy-efficient equipment.</u></p> <ul style="list-style-type: none"> • <u>Install efficient lighting and lighting control systems. Solar or light-emitting diodes (LEDs) will be installed for outdoor lighting. Lighting will incorporate motion sensors that turn them off when not in use.</u> • <u>Install skylights on the rooftops, 2.5% of roof area of the buildings and incorporate the use of natural light.</u> • <u>Achieve construction energy efficiencies and energy conservation through bulk purchase, transport, and use of construction materials. Use of materials in bulk reduces the preparation and transport of construction materials as well as transport and disposal of construction waste.</u> • <u>Use trees and landscaping on west and south exterior building walls to reduce energy use.</u> <p><u>Renewable Energy</u></p> <ul style="list-style-type: none"> • <u>Design buildings to have “solar ready” roofs that will structurally accommodate later installation of rooftop solar panels. Building operators providing rooftop solar panels will submit plans for solar panels prior to occupancy.</u> <p><u>Water Conservation and Efficiency</u></p> <ul style="list-style-type: none"> • <u>Create water-efficient landscapes in compliance with the City’s Water Efficient Landscape and Irrigation Ordinance 19.570.</u> • <u>Surface parking lots will be landscaped in accordance with City standards to reduce heat island effect.</u> • <u>Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the City’s Water Efficient Landscape and Irrigation Ordinance 19.570, which complies with the California Department of Water Resources Model Efficient Landscape Ordinance.</u> • <u>Design buildings to be water efficient. Install water-efficient fixtures and appliances.</u> • <u>Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.</u> • <u>Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.</u> <p><u>Solid Waste Measures</u></p>
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	<ul style="list-style-type: none"> • <u>Sort, recycle, and divert from landfills Project-related construction and demolition waste in accordance with mandatory regulatory requirements.</u> • <u>Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.</u> • <u>The property operator will provide readily available information provided by the City for employee education about reducing waste and available recycling services.</u> <p><u>VMT, Transportation and Motor Vehicles</u></p> <ul style="list-style-type: none"> • <u>Limit idling time for commercial vehicles to no more than five minutes.</u> • <u>Implement sidewalks to facilitate and encourage pedestrian and access, which would reduce vehicle miles traveled (VMT).</u> • <u>Provide a total of 39 electric vehicle (EV) parking stalls to encourage the use of low or zero-emission vehicles.</u> • <u>Provide a total 13 clean air/van pool parking stalls to support and encourage ridesharing.</u> • <u>Provide short-term and long-term bicycle parking per the Cal Green Code Sections 5.710.6.2.1 and 5.710.6.2.2, respectively.</u> • <u>The Building Operator will support and encourage ridesharing and transit for the construction crew.</u> <p><u>On-Site Equipment and Loading Docks</u></p> <ul style="list-style-type: none"> • <u>The Project will require building operators (by contract specifications) to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities will post signs requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes.</u> <p><u>Construction</u></p> <ul style="list-style-type: none"> • <u>Require Construction Equipment to Turn Off When Not in Use.</u> • <u>Use "green" building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally conscious way.</u> • <u>During grading heavy-duty construction equipment shall be CARB/ US EPA Tier 3 certified. All</u>
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	<u>construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation.</u>
<u>2020-2045 RTP/SCS Goal 6: Support healthy and equitable communities.</u>	<p><u>Consistent:</u> The Project includes design considerations to <u>promote walking and the use of bicycles:</u></p> <ul style="list-style-type: none"> • <u>Implement sidewalks to facilitate and encourage pedestrian and access.</u> • <u>Promote the use of bicycles as an alternative means of transportation by providing short-term and long-term bicycle parking per the California Green Building Standards Code Sections 5.710.6.2.1 and 5.710.6.2.2, respectively.</u> • <u>The Project also includes a trailhead parking area adjacent to the Sycamore Canyon WildernessPark, which is a popular location for mountain biking and hiking.</u>
<u>2020-2045 RTP SCS Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.</u>	<p><u>Consistent:</u> The Project proposes a logistics center within the <u>SCBPSP</u> on a site that has been designated for industrial uses since 1984. The <u>SCBPSP</u> is strategically located near State Route 60 and Interstate 215, which provide good access to the Ports of Long Beach and Los Angeles. The Project includes design considerations to promote the use of an integrated transportation network:</p> <ul style="list-style-type: none"> • <u>Implement sidewalks to facilitate and encourage pedestrian and access, which would reduce vehicle miles traveled (VMT).</u> • <u>Provide a total of 39 electric vehicle (EV) parking stalls to encourage the use of low or zero-emission vehicles.</u> • <u>Provide a total13 clean air/van pool parking stalls to support and encourage ridesharing.</u> <p><u>Provide short-term and long-term bicycle parking per theCal Green Code Sections 5.710.6.2.1 and 5.710.6.2.2, respectively.</u></p>
<u>2020-2045 RTP/SCS Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.</u>	<p><u>Not Applicable:</u> Encouraging development of diverse housing types in areas that are supported by multiple transportation options is beyond the scope of the proposed Project and the authority ofthe Project proponents. The Project site is within the <u>SCBPSP</u> and has been planned for industrial uses since 1984. The <u>SCBPSP</u> is strategically located in proximity to State Route 60and Interstate 215.</p>

<p><u>2020-2045 RTP/SCS Goal 10:</u> <u>Promote conservation of natural and agricultural lands and restoration of habitats.</u></p>	<p><u>Not Applicable. Promoting conservation of natural and agricultural lands and restoration of habitats is beyond the scope of the proposed Project and the authority of the Project proponents. However, the Project does not include any component that would impede the attainment of this goal.</u></p>
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It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.23:

The commenter asserts the DEIR Transportation analysis does not include all potentially significant impacts on the transportation facilities providing access to the site. The commenter incorrectly claims the DEIR must be revised and circulated to include analysis of additional intersections, freeway merge/diverge segments, and freeway on/off ramps.

The Traffic Operations Analysis (TA), contained in Appendix L of the DEIR, was prepared by a licensed engineer employed by Urban Crossroads and in accordance with the City of Riverside Traffic Impact Analysis Preparation Guide (December 2017), the California Department of Transportation (Caltrans) Guide for the Preparation of Traffic Impact Studies (December 2002), and consultation with City of Riverside staff during the scoping process. Further, the TA was prepared using the Highway Capacity Manual (HCM) methodology with study area intersections located within the City of Riverside, County of Riverside, March Joint Powers Authority, and City of Moreno Valley have been analyzed using the software package Synchro (Version 10). Synchro is a macroscopic traffic software program that is based on the signalized intersection capacity analysis as specified in the HCM. (TA, Section 2.2)

The commenter incorrectly claims the DEIR must analyze additional facilities not included in the TA because of 20 percent of passenger car trips heading westbound on Alessandro Boulevard and 5 percent of passenger car trips heading southbound on Sycamore Canyon Boulevard/Meridian Parkway. The passenger car trip percentages were calculated based on the Project's TA, which considers multiple factors in its analysis, such as existing and projected cumulative traffic counts. The Project's passenger car trips were analyzed separately from the truck trips. The commenter fails to acknowledge that Exhibit 4-2 Project (Truck) Trip Distribution of Appendix L (Traffic and VMT Analysis) identifies that truck traffic is *required* to travel eastbound on Alessandro Boulevard and would *not* travel westbound on Alessandro Boulevard.

The DEIR states in Section 5.12.1, pg. 5.12-1:

“The intersections studied were those where the Project is anticipated to contribute 50 or more peak hour trips. If the Project was not anticipated to increase peak hour trips by 50

or more at other nearby intersections, they were screened out and not evaluated further in the TA.”

The facilities mentioned by the commenter were screened out of the TA because the Project would not contribute enough peak hour trips to warrant analysis.

The DEIR was prepared while the State and City were transitioning from LOS to VMT as a CEQA impact. While the DEIR includes LOS and VMT impacts, the Office of Planning and Research confirms that auto delay, on its own, is no longer an environmental impact under CEQA. The Project would not have a significant impact related to LOS because LOS is not considered an environmental impact. By including a LOS analysis, the DEIR goes above and beyond CEQA requirements when analyzing transportation related deficiencies and its relation to land use and planning impacts. Additionally, per the Office of Planning and Research,

“Even if a General Plan contains a LOS standard and a project is found to exceed that standard, that conflict should not be analyzed under CEQA. CEQA is focused on planning conflicts that lead to environmental impacts. (The Highway 68 Coalition v. County of Monterey (2017) 14 Cal.App.5th 883; see, e.g., Appendix G, IX(b) [asking whether the project will “Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?”].) Auto delay, on its own, is no longer an environmental impact under CEQA.” ([https://www.opr.ca.gov/ceqa/updates/sb-743/faq.html#general-plans-with- los](https://www.opr.ca.gov/ceqa/updates/sb-743/faq.html#general-plans-with-los))

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.24:

The commenter incorrectly claims the Project should not be modeled as a high-cube transload short-term warehouse and should be modeled as a fulfillment center warehouse instead.

The DEIR describes the proposed warehouse buildings in Section 3.2, pg. 3.0-20:

“The proposed warehouse buildings are proposed for high cube transload short-term use, primarily for the short-term storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials), usually on pallet loads or larger handling products prior to their distribution to retail locations or other warehouses. A typical high cube warehouse has a high level of on-site automation and logistics management. No refrigeration use is proposed in the warehouses (cold storage) or with the trucks (transport refrigeration units “TRUs”).”

The commenter references the SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis and provides a website link to this reference.

The referenced SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis states in the Executive Summary, pg. 1:

“Definition of High-Cube Warehouse – A high-cube warehouse is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the HCW. For the purpose of this trip generation analysis, HCWs are grouped into five types: fulfillment center, parcel hub, cold storage facility, transload facility, and short-term storage facility.”

The commenter erroneously claims the Project is more of a fulfillment center warehouse than a high-cube transload short-term warehouse (HCW) due to high levels of on-site automation and logistics management and the handling of products prior to their distribution to retail locations or other warehouses. As shown in the SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis excerpt above, these are descriptions of typical HCWs regardless of the five types of HCWs.

As outlined in the DEIR, Section 3.0 Project Description, the proposed Project includes high-cube warehouse uses within the two buildings and was appropriately analyzed as such in the various technical studies (traffic, VMT, air quality, greenhouse gas) supporting the DEIR. However, to further ensure future use of the site is consistent with what was analyzed in the EIR, Mitigation Measure MM AIR-1 is revised accordingly to include a restrictive covenant on the property that restricts the use of a fulfillment center and use of TRUs as follows:

MM AIR-1: The project applicant is required to record a covenant on the property (Parcels 1 and 2) that prohibit manufacturing, fulfillment center, and use of Transportation Refrigeration Units (TRUs). Proof of the record of covenant shall be submitted to the City of Riverside Planning Department prior to issuance of Building Permits.

As summarized in the DEIR and underlying technical studies, the proposed Project that was analyzed (as defined in the Project Description of the DEIR) was High-Cube Transload Short-Term Warehouse, and not fulfillment center warehouse or refrigerated warehouse and correlating use of TRUs on trucks. Therefore, the EIR and supporting technical studies do not evaluate or cover other uses of the site, and if other uses are proposed or would be allowed on the site, that would require new air quality, greenhouse gas, and HRA modeling and analyses, as well as subsequent CEQA review and approval by the City.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR.

Response 7.25:

See Response 7.19 above.

Response 7.26:

See Response 7.3 above.

Response 7.27:

See Response 7.22 above and Appendix B Table 3 – Project Consistency with the 2020-2045 Connect SoCal RTP/SCS.

Response 7.28: The commenter claims that the EIR's calculation of 586 employees is actually 1.3% of the City's employment growth from 2016 – 2045 and that a single project accounting for more than 1% of the projected employment growth over 29 years represents a significant amount of growth. The commenter additionally asserts that the EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide accurate environmental analysis. The commenter references a SCAG Employment Density study calculation of 1,046 employees to claim the project represents 2.4% of the City employment growth from 2016 – 2045 and that a single project accounting for more than 1% of the projected employment growth over 29 years represents a significant amount of growth.

The SCAG Connect SoCal Demographics and Growth Forecast data referenced by the commenter, Table 14 Jurisdiction-Level Growth Forecast, page 39 does indicate employment for the City of Riverside is forecast to grow from 145,400 in 2016 to 188,700 in 2045, for an increase of 43,300 jobs. The 586 employees or jobs created by the Project would constitute 1.3% of the forecast growth in Riverside from 2016-2045. There was a typographical error in the DEIR and Initial Study (Initial Study, DEIR Appendix A p. 43.) and is revised as follows:

Section 6.4.1 Population Growth, p. 6.0-6 changes as follows:

However, the anticipated number of employees for both buildings was calculated using the County of Riverside generation rate⁸ to be approximately 586. This number represents approximately ~~0.3~~ 1.3 percent of the expected opportunities within the City by 2045. Thus, the Project will not induce substantial population growth and impacts would be less than significant.

Section 6.4.2 Economic Growth, p. 6.0-6 changes as follows:

Additionally, as described above in Section 6.4.1, the 586 employment opportunities represent approximately ~~0.3~~ 1.3 percent of the expected opportunities within the City by 2045.

However, the SCAG Employment Density Study referenced by the commenter with 1,046 employees, is taken out of context and is not appropriate for the City of Riverside or the Project area as it is a study by the Metropolitan Washington DC Council of Governments and from October 2001, thus it is outdated, and is not from an area on the west coast, let alone southern California, and is not appropriate or correct for employment rates for the Project area.

As the GP 2025 does not contain employment generation rates for different land use types, use of the County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use, was appropriate as the County of Riverside is an adjacent jurisdiction and has a land use designation for Light Industrial similar to the City of Riverside, and has existing warehouse developments of various sizes and uses, also consistent with the City of Riverside.

⁸ County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use, Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology, April 11, 2017, <https://planning.rctlma.org/General-Plan-Zoning/General-Plan>

The commenter does not provide any substantial evidence as to why the County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use is not an appropriate generation rate, or why a threshold of 1% is an appropriate threshold for defining a significant amount of growth. Therefore, the commenter's claim that the Project, with an estimated 586 employees, would constitute a significant amount of growth is arbitrary and not based on evidence.

As the Project is consistent with the existing land use plan designations (GP 2025 and SCBPSP), SCAG's growth Projections for the City incorporate the type of growth that would result from the Project. Per the SCAG Connect SoCal Demographics and Growth Forecast, Table 14 Jurisdiction-Level Growth Forecast, page 39, employment for the City of Riverside is forecast to grow from 145,400 in 2016 to 188,700 in 2045, for an increase of 43,300 jobs. This employment forecast exceeds the employment generated by the Project and the other 27 planned or pending projects identified in the cumulative project list of the DEIR (Section 4.0, pages 4.0-2 to 4.0-5, and Figure 4.0-1), as the SCAG region analyzed encompasses a much larger geographic area including all of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 586 employees or jobs created by the Project would constitute 1.3% of the forecast growth in Riverside from 2016-2045. Per SCAG's Connect SoCal Demographics and Growth Forecast Technical Report⁹, data for the City of Riverside for 2016 the jobs to housing ratio is 1.54, increasing to 1.64 for 2045 and is considered housing rich. Also, as outlined in this report page 4, "While job growth and unemployment drops have characterized the recovery from the Great Recession, slower population growth is anticipated not just in the SCAG region but across California and nationwide." Therefore, it can reasonably be assumed that there are enough residents to fill jobs generated by the Project and the Project will not induce substantial population growth.

It should be noted that even with this revision to the DEIR, no change to the significance conclusions presented in the DEIR will result. Accordingly, this comment and the subsequent DEIR revisions do not affect the analysis completed or conclusions provided in the DEIR, do not provide new information or evidence related to the analysis completed in the DEIR, and do not reflect on the adequacy or content of the DEIR. This comment is noted for the record, and revisions to the DEIR have been made as noted above.

Response 7.29: The commenter claims the California Important Farmland Finder identifies the site as Farmland of Local Importance and that the EIR excludes this information.

The DEIR does, in fact, identify that the Project site contains mapped Farmland of Local Importance, as show in Figure 4 – Farmland Mapping, of the Initial Study, contained in Appendix A to the DEIR. A discussion of impacts to Farmland of Local Importance is included in the DEIR in Section 7.1.1.1 (DEIR, p. 7.0-1) as well as in greater detail in the Initial Study on page 26, as outlined below, and concludes the potential impacts to be less than significant:

⁹ <https://scag.ca.gov/read-plan-adopted-final-plan>

The Project site includes approximately 33.67 acres of designated Farmland of Local Importance and approximately 14.18 acres of Other Land (see Figure 5, Farmland Mapping). There is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Project site, or in the immediately surrounding area. It is important to note that CEQA's definition of "agricultural land" only includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, and does not include Farmland of Local Importance or Grazing Land. Under CEQA, impacts to designated Farmland of Local importance are not considered significant and do not require mitigation.

The Project site is located within the BMP-SP – Business and Manufacturing Park and SCBPSP Overlay Zones with a land use designated for Industrial Land Use. The proposed use for the Project site is industrial, which is consistent with the designated Overlay Zones. Also, other than the Sycamore Canyon Wilderness Park, the Project site and the surrounding area is primarily developed with industrial and commercial uses. The Project would not impact any existing farmland and no surrounding land is designated for agricultural or farming use.

Although implementation of the Project will result in the conversion of approximately 33.67 acres of Farmland of Local Importance to a non-agricultural use, the proposed Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), and therefore, the Project will have **a less than significant impact**, directly, or cumulatively, and further analysis in an EIR is not warranted.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.30:

The commenter claims the DEIR does not provide meaningful analysis of the Project's construction employment generation. The DEIR already notes that temporary employment opportunities generated during construction of the Project are expected to come from the existing regional workforce. Additionally, the Initial Study, Section 14, Threshold a., pg. 43, states,

"Construction is anticipated to last approximately 15 months. Construction of the Project would generate the demand for temporary construction jobs. However, given the availability of labor in the 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 already doing business in the area with employees already residing in the area. Thus, construction-related growth inducement would not result from implementation of the Project."

Based on default construction worker assumptions from CalEEMod, the Project is expected to require the following number of construction workers: 9 for site prep, 10 for grading, 319 for building construction, 8 for paving, and 64 for architectural coatings, for a combined total of 410. The CalEEMod default assumptions have been derived by the California Air Pollution Control Officers Association (CAPCOA) based on survey data.

As outlined in Response 7.28 above, the Project is consistent with the existing land use plan designations (GP 2025 and SCBPSP), SCAG's growth Projections for the City incorporate the type of growth that would result from the Project. Per SCAG's Connect SoCal Demographics and Growth Forecast Technical Report, data for the City of Riverside for 2016 the jobs to housing ratio is 1.54 increasing to 1.64 for 2045 and is considered housing rich. Therefore, it can reasonably be assumed that there are enough residents to fill jobs generated by the Project and the Project will not induce substantial population growth.

Further, as described in the DEIR Air Quality Section 5.2, and as shown in Tables 7 and 9 of the Air Quality Analysis (Appendix C to the DEIR), construction and operational emissions would be less than the applicable project-level thresholds. The Project would not result in significant impacts related to air quality and greenhouse gas emissions; therefore, there is no obligation under CEQA to further reduce potential impacts via a local hiring requirement or otherwise. Regardless, construction activity is typically short-term (1-2 years or less), as is anticipated for the proposed Sycamore Hills Distribution Center project, and does not constitute long-term construction needs which would trigger a large number of construction workers to move to Riverside permanently.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.31: The commenter incorrectly claims that the EIR excludes the proposed office areas from the employment calculation.

As the GP 2025 does not contain employment generation rates for different land use types, use of the County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use, was appropriate as the County of Riverside is an adjacent jurisdiction and has a land use designation for Light Industrial similar to the City of Riverside, and has existing warehouse developments of various sizes and uses, also consistent with the City of Riverside. As outlined in the County of Riverside's General Plan Appendix E-2: Socioeconomic Build Out Assumptions, page 3:

Square Feet (SF)/Employee Factor: This factor indicates the number of employees typically associated with a given amount of square feet of building space per employee. It is used to estimate the number of jobs resulting for a given land use designation. These factors for the commercial land use designations are listed in Table E-5 below.

Table E-5: Commercial Employment Factors

Land Use Designation	SF/Employee
Commercial Retail (CR)*	500
Commercial Tourist (CT)	500
Commercial Office (CO)	300
Light Industrial (LI)	1,030
Heavy Industrial (HI)	1,500
Business Park (BP)	600

*It is assumed that CR designated lands will build out at 40% CR and 60% MDR.

Employment: Employment for commercial, industrial, and business park land uses is calculated by dividing the total number of building square feet by the SF/Employee factor. For example, 300,000 square feet of commercial office building space would yield 1,000 employees.

Using this Square Feet (SF)/Employee factor to determine employment, the appropriate methodology is to divide the total number of building square feet for Light Industrial building by the SF/Employee factor of 1,030. Therefore, the total Light Industrial building square footage for the Project is 603,100 SF divided by 1,030, which is 585.5, which is rounded to the nearest whole number of 586. To use this method of determining employment it is not correct to use the square

footage of office space within the larger warehouse building and then separately calculate the non-office designated areas within the warehouse as Light Industrial. This is in essence double counting and combining two different land use designation types within the same building. Therefore, it is inappropriate and inaccurate to use the SF/Employee factor for within the office portion of the warehouse when the methodology identified above indicates to use the total number of building square feet for the specified Land Use Designation, which for the warehouse buildings is Light Industrial.

As outlined in Response 7.28 above, the SCAG Employment Density Study referenced by the commenter with 1,046 employees, is taken out of context and is not appropriate for the City of Riverside or the Project area as it is a study by the Metropolitan Washington DC Council of Governments and from October 2001, thus it is outdated, is not from an area on the west coast, let alone southern California, and is not appropriate or correct for employment rates for the Project area.

Also as outlined in Response 7.28 above, the commenter does not provide any substantial evidence as to why the County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use is not an appropriate generation rate, or why a threshold of 1% is an appropriate threshold for defining a significant amount of growth. Therefore, the commenters claim that the Project, with an estimated 586 employees, would constitute substantial growth is arbitrary and not based on evidence.

As outlined in the DEIR, Section 4.3 Developments Considered in Cumulative Impact Analysis (DEIR, pp. 4.0-2 – 4.0-3), “The cumulative impact analysis utilized in this EIR considers a list of planned and pending projects. Currently planned and pending projects in Riverside and surrounding areas, including in the City of Moreno Valley and County of Riverside, are include in Table 4.0-1 and shown on Figure 4.0-1.” The DEIR contains a cumulative impact analysis consistent with the requirements of CEQA (State CEQA Guidelines Section 15130). The intent of the cumulative impact analysis is to evaluate the Project’s potential impacts on the environment considered together with impacts to the environment from other planned and pending projects. The cumulative analysis is not intended or required to determine if the project will exceed the SCAG employment growth forecast for the City.

As outlined in Response 7.28 above, the Project is consistent with the existing land use plan designations (GP 2025 and SCBPSP), SCAG’s growth Projections for the City incorporate the type of growth that would result from the Project. Per SCAG’s Connect SoCal Demographics and Growth Forecast Technical Report, data for the City of Riverside for 2016 the jobs to housing ratio is 1.54 increasing to 1.64 for 2045 and is considered housing rich. Also, as outlined in this report page 4, “While job growth and unemployment drops have characterized the recovery from the Great Recession, slower population growth is anticipated not just in the SCAG region but across California and nationwide.” Therefore, it can reasonably be assumed that there are enough residents to fill the estimated 586 warehousing and logistics industry jobs generated by the Project and the Project will not induce substantial population growth.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does

not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Response 7.32: The commenter claims the EIR is flawed and a revised EIR must be prepared and circulated for public review. The commenter also requests that Golden State Environmental Justice Alliance be added to the City's public interest list for any subsequent environmental notices, public notices, public hearings, and notices of determination.

For all the reasons set forth above in Responses to Comments 7.1 through 7.31, no new information of substantial importance has been added to the EIR, and no new significant environmental impacts or substantial increases in existing significance impacts exist. Accordingly, recirculation of the DEIR is not required. (State CEQA Guidelines 15088.5)

The City has added Golden State Environmental Justice Alliance with the mailing address provided to the City's CEQA notification list.

Therefore, this comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 8 – Adam Salcido

Comment letter 8 commences on the next page.

From: adam salcido, <asalcido.07@gmail.com>
Sent: Monday, July 19, 2021 1:25 PM
To: Hernandez, Veronica
Cc: Unknown; jbourgeois029@gmail.com; Terrance Lucio; PATRICK HANINGER
Subject: [External] Sycamore Hills Distribution Center

Good Afternoon Ms. Hernandez,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

t.lucio57@gmail.com

phaninger1@gmail.com

jboung2271@aol.com

jbourgeois029@gmail.com

asalcido.07@gmail.com

8.1

Mailing Address:

P.O. Box 79222

Corona, CA 92877

Please confirm receipt of this email.

Thank You,

Adam Salcido

Letter 8 – Adam Salcido**Commenter:** Adam Salcido**Date:** July 19, 2021

Response 8.1: The commenter requests that the City add the provided email and mailing address to the City's notification list. The City has added these emails and the mailing address to the City's CEQA notification list.

This comment does not affect the analysis completed or conclusions provided in the DEIR, does not provide new information or evidence related to the analysis completed in the DEIR, and does not reflect on the adequacy or content of the DEIR. This comment is noted for the record and no changes to the DEIR are required.

Comment Letter 9 – SWAPE on behalf of Golden State Environmental Justice Alliance

Comment letter 9 commences on the next page.

From: Hannah Bentley <bentley@blumcollins.com>
Sent: Wednesday, July 21, 2021 11:03 AM
To: Hernandez, Veronica
Cc: Joe Bourgeois; t.lucio57@gmail.com; Craig Collins
Subject: [External] Sycamore Hills Distribution Center EIR
Attachments: 2021.07.21_SycamoreHills_Comments[1].pdf

Dear Ms. Hernandez

Please see the additional comments by SWAPE submitted on behalf of the Golden State Environmental Justice Alliance, attached. Please confirm receipt.

Thank you,

Hannah Bentley

—

Hannah Bentley APC

Of Counsel

Blum Collins LLP

Bentley@blumcollins.com

Phone (213) 572-0400 x106

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July 21, 2021

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

Subject: Comments on the Sycamore Hills Distribution Center Project (SCH No. 2020079023)

Dear Mr. Ho,

9.1

We have reviewed the May 2021 Draft Environmental Impact Report ("DEIR") for the Sycamore Hills Distribution Center Project ("Project") located in the City of Riverside ("City"). The Project proposes to construct two warehouse buildings totaling 603,100-SF, with Building A consisting of 10,000-SF of office space, 390,000-SF of unrefrigerated warehouse space, 388 parking spaces and 110 trailer stalls; and Building B consisting of 10,000-SF of office space, 193,100-SF of unrefrigerated warehouse space, 235 parking spaces, and 45 trailer stalls; as well as a 1.18-acre trailhead parking lot, on the 12.23-acre Project site.

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

9.2

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2 (Appendix C, p. 21).¹ CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with

¹ CAPCOA (November 2017) CalEEMod User's Guide, http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4.

9.2
cont'd

project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are utilized in calculating the Project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

When reviewing the Project's CalFEEMod output files, provided in the Air Quality Analysis, Health Risk Assessment, Construction Health Risk Assessment Memorandum ("AQ & HRA Memo") as Appendix C to the DEIR, we found that several model inputs were not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions may be underestimated.

Incorrect Land Use Type

According to the DEIR, the project proposes to construct two warehouses, each with 10,000-SF of office space (p. 3.0-21 – 3.0.22). As such, the model should have included 20,000-SF of "General Office Building" and 583,100-SF of "Unrefrigerated Warehouse-No Rail." However, review of the CalFEEMod output files demonstrate that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include all 603,100-SF as "Unrefrigerated Warehouse-No Rail" (see excerpt below) (Appendix C, pp. 46, 79, 112, 139, 166, 193).

9.3

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	603.10	1000sqft	16.00	603,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	9.00	Acre	9.00	217,800.00	0

As you can see in the excerpt above, the models fail to distinguish between the unrefrigerated warehouse and office land uses. This inconsistency presents an issue, as CalFEEMod includes 63 different land use types that are each assigned a distinctive set of energy usage emission factors.² Furthermore, each land use type includes a specific trip rate that CalFEEMod uses to calculate mobile-source emissions.³ Thus, by failing to include the proposed office space, the models may underestimate the Project's construction and operational emissions and should not be relied upon to determine Project significance.

9.4

Unsubstantiated Reductions to CH₄, CO₂, and N₂O Intensity Factors

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include manual reductions to the default CH₄, CO₂, and N₂O intensity factors (see excerpt below) (Appendix C, pp. 48-49, 81-82, 114-115, 141-142, 168-169, 195-196).

² "CalFEEMod User's Guide, Appendix D." CAPCOA, September 2016, available at:

http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05_appendix-d2016-3-1.pdf?sfvrsn=2

³ CalFEEMod User's Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/01_user-39-s-guide2016-3-1.pdf?sfvrsn=2, p. 14.

Table Name	Column Name	Default Value	New Value
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.023
tblProjectCharacteristics	CO2IntensityFactor	1325.65	1051.61
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.005

As you can see in the excerpt above, the CH₄, CO₂, and N₂O intensity factors were reduced by approximately 21%, 21%, and 17%, respectively. As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.⁴ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "RPS – 33% goal by 2020, 18.4% accounted for in CalFEEMod" (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, regarding the Renewable Portfolio Standard ("RPS"), the DEIR states:

"The Project would be served by Riverside Public Utilities, which has achieved 36 percent renewables as of 2017. The Project's energy related GHG emissions would decrease as Riverside Public Utilities increases its renewables procurement beyond 2020 towards the 2030 goal of 50 percent" (p. 5.5-25, Table 5.5-15).

However, these justifications fail to substantiate the models' changes for four reasons.

First, the DEIR and AQ & HRA Memo fail to provide a source for the claim that the utility provider "has achieved 36 percent renewables as of 2017" (p. 5.5-25, Table 5.5-15). Without a source to corroborate this claim, we are unable to substantiate the revised CH₄, CO₂, and N₂O intensity factors.

Second, the justification provided in the "User Entered Comments & Non-Default Data" table states that the model includes an 18.4% reduction; however, review of the modeling demonstrates that the CH₄, CO₂, and N₂O intensity factors were reduced by approximately 21%, 21%, and 17%, respectively.

Third, even if the utility provider *did* achieve 36% renewable energy, this does not inherently result in a 36% reduction from the 2016 CalFEEMod default values. Without a justification explaining how a power mix including 36% renewable energy correlates in 21%, 21%, and 17% reductions from 2016 values, we are unable to verify the changes.

Finally, simply stating that the Project's "emissions would decrease" as the utility provider "increases its renewables procurement beyond 2020 towards the 2030 goal of 50 percent" does not offer substantial evidence to justify the reductions included in the models.

These unsubstantiated reductions present an issue, as CalFEEMod uses the CH₄, CO₂, and N₂O intensity factors to calculate the Project's GHG emissions associated with electricity use.⁵ Thus, by including unsubstantiated reductions to the default CH₄, CO₂, and N₂O intensity factors, the models may underestimate the Project's GHG emissions and should not be relied upon to determine Project significance.

⁴ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

⁵ "CalFEEMod User's Guide." CAPCOA, November 2017, available at: <http://www.caleemod.com/>, p. 17.

Underestimated Parking Land Use Size

According to the DEIR, the proposed Project includes 388 parking spaces and 110 trailer stalls for Building A, 235 parking spaces and 45 trailer stalls for Building B, and a 1.18-acre trailhead parking lot (p. 3.0-19, Table 3.0-2; p. 3.0-22, Table 3.0-3; p. 3.0-23, Table 3.0-4). However, review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include only a 5-acre parking lot (see excerpt below) (Appendix C, pp. 46, 79, 112, 139, 166, 193).

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	603.10	1000sqft	16.00	603,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	5.00	Acre	5.00	217,800.00	0

9.5 As you can see in the excerpt above, the model includes only 5-acres of parking lot space. However, when inputting 778 parking spaces⁶ into CalFEEMod, plus the addition of the 1.18-acre trailhead parking lot, the model should include 8.18-acres of parking lot space. Thus, the parking lot land use size is underestimated by 3.18-acres in the model.

This underestimation present an issue, as the land use size feature is used throughout CalFEEMod to determine default variable and emission factors that go into the model's calculations. The square footage of a parking lot land use space is used for certain calculations such as determining the ground space to be painted and amount of degreaser to be used (i.e., VOC emissions from architectural coatings and consumer products) and area that is lighted (i.e., energy impacts).⁷ Thus, by underestimating the proposed parking lot land use size, the models underestimate the Project's construction-related and operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reductions to Architectural Coating Emission Factors

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include several reductions to the default architectural coating emission factors (see excerpt below) (Appendix C, pp. 47, 80, 113, 140, 167, 194).

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	50.00

9.6 As you can see in the excerpt above, the nonresidential exterior and interior architectural coating emission factors were each reduced from the default value of 100- to 50-grams per liter (g/L). As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.⁸

⁶ 388 parking spaces for Building A + 110 trailer stalls for Building A + 235 parking spaces for Building B + 45 trailer stalls for Building B = 778 total parking spaces.

⁷ "CalFEEMod User's Guide." CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/calfeemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 28.

⁸ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

9.6
cont'd

According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "SCAQMD Rule 1113 - Building Envelope and Non-Flat Coating limit = 50 g/L" (Appendix C, pp. 47, 80, 113, 140, 167, 194). However, these changes remain unsupported for two reasons.

First, the DEIR fails to mention SCAQMD Rule 1113, or specify the reactive organic gas/volatile organic compound ("ROG"/"VOC") content limits that would be required. As a result, we cannot verify the revised architectural coating emission factors.

Second, we cannot verify the accuracy of the revised architectural coating emission factors based on SCAQMD Rule 1113 alone. The SCAQMD Rule 1113 Table of Standards provides the required VOC limits (grams of VOC per liter of coating) for 57 different coating categories (e.g., Floor coatings, Faux Finishing Coatings, Fire-Proofing Coatings, Cement Coatings, Multi-Color Coatings, Primers, Sealers, Recycled Coatings, Shellac, Stains, Traffic Coatings, Waterproofing Sealers, Wood Coatings, etc.).⁹ The VOC limits for each coating varies from a minimum value of 50 g/L to a maximum value of 730 g/L. As such, we cannot verify that SCAQMD Rule 1113 substantiates a reduction to the default coating values without more information regarding what category of coating will be used. Absent additional information regarding which categories of coating would be used for Project construction, we cannot compare the revised emission factors with the SCAQMD Rule 1113 requirements for those categories. The DEIR and associated documents fail to mention what type of coating will be used, and as such, we are unable to verify the revised emission factors assumed in the model.

These unsubstantiated reductions present an issue, as CalFEEMod uses the architectural coating emission factors to calculate the Project's ROG/VOC emissions associated with application rates and coating content.¹⁰ Thus, by including unsubstantiated reductions to the default architectural coating emission factors, the models may underestimate the Project's ROG/VOC emissions and should not be relied upon to determine Project significance.

9.7

Unsubstantiated Changes to Individual Construction Phase Lengths

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include changes to the default individual construction phase lengths (see excerpt below) (Appendix C, pp. 47-48, 80-81, 113-114, 140-141, 167-168 194-195).

⁹ SCAQMD Rule 1113 Advisory Notice." SCAQMD, February 2016, available at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24>, p. 1113-14, Table of Standards

1.

¹⁰ CalFEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 35, 40.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	55.00	111.00
tblConstructionPhase	NumDays	740.00	243.00
tblConstructionPhase	NumDays	75.00	47.00
tblConstructionPhase	NumDays	55.00	18.00
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	PhaseEndDate	11/27/2024	6/30/2022
tblConstructionPhase	PhaseEndDate	6/26/2024	6/6/2022
tblConstructionPhase	PhaseEndDate	8/25/2021	6/30/2021
tblConstructionPhase	PhaseEndDate	9/11/2024	6/30/2022
tblConstructionPhase	PhaseEndDate	5/12/2021	4/26/2021
tblConstructionPhase	PhaseStartDate	9/12/2024	1/27/2022
tblConstructionPhase	PhaseStartDate	8/26/2021	7/11/2021
tblConstructionPhase	PhaseStartDate	5/13/2021	4/27/2021
tblConstructionPhase	PhaseStartDate	6/27/2024	6/7/2022

As a result of these changes, the model includes a construction schedule as follows (see excerpt below) (Appendix C, pp. 53, 86, 118, 145, 172, 199).

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	4/1/2021	4/26/2021	5	18	
2	Grading	Grading	4/27/2021	6/30/2021	5	47	
3	Building Construction	Building Construction	7/11/2021	6/6/2022	5	243	
4	Paving	Paving	6/7/2022	6/30/2022	5	18	
5	Architectural Coatings	Architectural Coating	1/27/2022	6/30/2022	5	111	

9.7
cont'd

As you can see in the excerpts above, the site preparation phase length was reduced by roughly 67%, from the default value of 55 to 18 days; the grading phase length was reduced by roughly 37%, from the default value of 75 to 47 days; the building construction phase length was reduced by roughly 67%, from the default value of 740 to 243 days; the paving phase length was reduced by roughly 40%, from the default value of 30 to 18 days; and the architectural coating phase length was increased by roughly 102%, from the default value of 55 to 111 days. As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.¹¹ According to the "User Entered Comments & Non-Default Data" table, the justification provided for this change is: "Grading/Preliminary Road Construction - 3 months Building Permit/Building Construction - 12 months" (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, regarding the anticipated construction schedule, the DEIR states:

"Overall construction is anticipated to last approximately 15 months. Grading and preliminary road construction is the first phase and is expected to last approximately 3 months. After grading, building construction will last approximately 12 months and includes slab and wall framing, concrete pouring, roof installation building interiors" (p. 1.0-3 – 1.0-4).

¹¹ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

9.7
cont'd

However, these justifications are insufficient, as the DEIR fails to justify or explain why the individual construction phase lengths were *disproportionately* altered. While the grading and site preparation phases correctly last for three months, and the building construction, paving, and architectural coating correctly last for one year, the model should have proportionally altered them based on the CalEEMod default values.

These unsubstantiated changes present an issue, as they improperly spread out construction emissions over a longer period of time for some phases, but not others. According to the CalEEMod User's Guide, each construction phase is associated with different emissions activities (see excerpt below).¹²

Demolition involves removing buildings or structures.

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

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

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

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

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

As such, by disproportionately altering individual construction phase lengths without proper justification, the model's calculations are altered and may underestimate emissions. Thus, by including unsubstantiated changes to the default individual construction phase lengths, the model may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reductions to Vendor and Worker Trip Numbers

Review of the CalEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include several changes to the default vendor and worker trip numbers (see excerpt below) (Appendix C, pp. 49, 82, 115, 142, 169, 196).

9.8

Table Name	Column Name	Default Value	New Value
blTripsAndVMT	VendorTripNumber	249.00	99.00
blTripsAndVMT	WorkerTripNumber	638.00	253.00

As you can see in the excerpt above, the default vendor trip and worker trip numbers were reduced by approximately 50%, from the default value of 249 to 99 trips, and from the default value of 638 to 253 trips, respectively. As previously mentioned, the CalEEMod User's Guide requires any changes to model

¹² "CalEEMod User's Guide." CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 31.

9.8
cont'd

defaults be justified.¹³ According to the “User Entered Comments & Non-Default Data” table, the justification provided for these changes is: “CalFEEMod applies same worker/vendor trip rates to parking/asphalt surfaces as it does to office/industrial building construction, resulting in overestimate of actual trips. Default trips adjusted to reflect building construction of buildings only” (Appendix C, pp. 47, 80, 113, 140, 167, 194). However, these changes remain unsubstantiated. According to the CalFEEMod User’s Guide:

“CalFEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA.”¹⁴

Here, as the DEIR and AQ & HRA Memo fail to provide substantial evidence to support these reduced vendor and worker trip numbers, we cannot verify the changes. Furthermore, while the DEIR mentions worker and vendor trips, these changes are not substantiated whatsoever, and a greater number of vendor trips is indicated than is included in the model (p. 5.5-18; 5.5-19; p. 5.5-20, Table 5.5-4; p. 5.5-20, Table 5.5-5).

These unsubstantiated changes present an issue, as CalFEEMod uses the vendor and worker trip numbers to estimate the construction-related emissions associated with on-road vehicles.¹⁵ Thus, by including unsubstantiated changes to the default vendor and worker trip numbers, the models may underestimate the Project’s mobile-source construction-related emissions and should not be relied upon to determine Project significance.

9.9

Unsubstantiated Operational Vehicle Fleet Mix Percentages

Review of the CalFEEMod output files demonstrates that the “9309 Sycamore Hills Distribution Center – Passenger Cars” and “9309 Sycamore Hills Distribution Center – Trucks” models include several changes to the default operational vehicle fleet mix percentages (see excerpt below) (Appendix C, pp. 48, 81, 114, 141, 168, 195).

¹³ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

¹⁴ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 12.

¹⁵ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 34.

"9309 Sycamore Hills Distribution Center – Passenger Cars"

Table Name	Column Name	Default Value	New Value
toFleetMix	HHD	0.03	0.00
toFleetMix	LDA	0.55	1.00
toFleetMix	LDT1	0.04	0.00
toFleetMix	LDT2	0.20	0.00
toFleetMix	LHD1	0.02	0.00
toFleetMix	LHD2	5.6470e-003	0.00
toFleetMix	MCY	4.8220e-003	0.00
toFleetMix	MDV	0.12	0.00
toFleetMix	MH	8.6900e-004	0.00
toFleetMix	MHD	0.02	0.00
toFleetMix	OBUS	2.1100e-003	0.00
toFleetMix	SBUS	7.1000e-004	0.00
toFleetMix	UBUS	1.7690e-003	0.00

"9309 Sycamore Hills Distribution Center – Trucks"

Table Name	Column Name	Default Value	New Value
toFleetMix	HHD	0.03	0.37
toFleetMix	LDA	0.55	0.00
toFleetMix	LDT1	0.04	0.00
toFleetMix	LDT2	0.20	0.00
toFleetMix	LHD1	0.02	0.17
toFleetMix	LHD2	5.6470e-003	0.21
toFleetMix	MCY	4.8220e-003	0.00
toFleetMix	MDV	0.12	0.00
toFleetMix	MH	8.6900e-004	0.00
toFleetMix	MHD	0.02	0.25
toFleetMix	OBUS	2.1100e-003	0.00
toFleetMix	SBUS	7.1000e-004	0.00
toFleetMix	UBUS	1.7690e-003	0.00

9.9
cont'd

As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.¹⁸ However, according to the "User Entered Comments & Non-Default Data" tables in the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models, the justifications provided for these changes are: "Passenger cars only" and "Trucks only, mix per TIA," respectively (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, the Traffic Impact Analysis, Vehicle Miles Traveled (VMT) Analysis ("TIA"), provided as Appendix L to the DEIR, provide the following fleet mix percentages (see excerpt below) (pp. 64, Table 4-1):

¹⁸ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

Project Trip Generation Rates									
Land Use ¹	ITE LU Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Transload Short-Term Warehouse without Cold Storage ^{3,4,5}	154	Tsf	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.043	0.013	0.056	0.022	0.056	0.078	0.949
2-Axle Trucks (5.14% AM, 3.62% PM, 5.38% Daily)			0.003	0.001	0.004	0.001	0.003	0.004	0.076
3-Axle Trucks (6.38% AM, 4.49% PM, 6.66% Daily)			0.004	0.001	0.005	0.001	0.003	0.004	0.093
4-Axle Trucks (19.28% AM, 13.59% PM, 20.16% Daily)			0.012	0.003	0.015	0.004	0.010	0.014	0.282

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), *Trip Generation Manual*, Tenth Edition (2017).

² Tsf = thousand square feet

³ Vehicle Mix Source: Institute of Transportation Engineers (ITE), *Trip Generation Handbook*, Third Edition (September 2017).

⁴ Vehicle Mix Source: Institute of Transportation Engineers (ITE), *High-Cube Warehouse Vehicle Trip Generation Analysis* (October 2018).

⁵ Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014).

Normalized % - Without Cold Storage.

10 PM 2-Axle Trucks, 20 PM 3-Axle Trucks, 62.6% 4-Axle Trucks.

⁶ TOTAL TRIPS (Actual Vehicles) = Passenger Cars + Truck Trips (Actual Trucks)

9.9
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However, this is insufficient for two reasons. First, the "9309 Sycamore Hills Distribution Center – Passenger Cars" model includes 100% light-duty auto ("LDA") vehicles; however, passenger cars refers to all light-duty and medium-duty vehicles. Second, the DEIR and associated documents fail to mention or justify how the truck fleet mix provided by the TIA correlates to the revised operational vehicle fleet mix percentages included in the "9309 Sycamore Hills Distribution Center – Trucks" model. As such, we cannot verify the revised values.

These unsubstantiated changes present an issue, as operational vehicle fleet mix percentages are used by CalFEEMod to calculate the Project's operational emissions associated with on-road vehicles.¹⁷ Thus, by including unsubstantiated changes to the default operational vehicle fleet mix, the models may underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reduction to Indoor Water Use Rate

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include a manual reduction to the default indoor water use rate (see excerpt below) (Appendix C, pp. 49, 82, 115, 142, 169, 196).

9.10

Table Name	Column Name	Default Value	New Value
tblWater	IndoorWaterUseRate	139,466,875.00	111,573,500.00

As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.¹⁸ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "CalGreen requires 20% reduction in indoor water use (111,573,500 gallons)" (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, the DEIR states:

¹⁷ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

¹⁸ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

9.10
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"[T]he project would be required to reduce indoor water consumption by 20 percent in accordance with CalGreen" (p. 5.7-40, Table 5.7-8).

However, these justifications are insufficient. Simply because CalGreen *expects* a 20% reduction in indoor water use does not *guarantee* that this reduction would be implemented locally on the Project site. Absent additional information demonstrating that these reductions would be achieved through the implementation, monitoring, and enforcement of water-related mitigation measures, we are unable to verify the revised indoor water use rate inputted into the model.

This unsubstantiated reduction presents an issue, as CalFEEMod uses indoor water use rates to estimate the amount of wastewater, which has direct emissions of GHGs.¹⁹ By including an unsubstantiated reduction to the default indoor water use rate, the models may underestimate the Project's water-related operational emissions and should not be relied upon to determine Project significance.

Incorrect Application of Construction-Related Mitigation Measure

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include the following construction-related mitigation measure (see excerpt below) (Appendix C, pp. 55, 88, 120, 147, 174, 201):

3.1 Mitigation Measures Construction

Water Exposed Area

As a result, the model includes 61% PM₁₀ and PM_{2.5} reductions (see excerpt below) (Appendix C, pp. 47, 80, 113, 140, 167, 194):

9.11

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterExposedAreaPM10PercentReducti on	55	61
tblConstDustMitigation	WaterExposedAreaPM25PercentReducti on	55	61

As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.²⁰ According to the "User Entered Comments and Non-Default Data" table, the justification provided for the inclusion of this measures is: "61% fugitive dust reduction associated with watering" (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, the DEIR incorporates Mitigation Measure "MM" BIO-3, which states:

"Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions" (p. 1.0-17, Table 1.0-1).

¹⁹ CalFEEMod User Guide, available at: <http://www.caleemod.com/>, p. 44, 45.

²⁰ CalFEEMod User's Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9.

9.11
cont'd

However, while this measure is included in the DEIR, there is no mention of a 61% reduction in PM₁₀ and PM_{2.5} emissions whatsoever. As such, we are unable to verify this percent emissions reduction included in the models. By incorrectly including an emissions reduction associated with the above-mentioned construction-related mitigation measure, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Incorrect Application of Waste-Related Operational Mitigation Measure

Review of the CalFEEMod output files demonstrates that the "9309 Sycamore Hills Distribution Center – Passenger Cars" and "9309 Sycamore Hills Distribution Center – Trucks" models include the following waste-related operational mitigation measure (see excerpt below) (Appendix C, pp. 75, 108, 138, 165, 192, 219):

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

However, the inclusion of this waste-related operational mitigation measure is unsupported. As previously mentioned, the CalFEEMod User's Guide requires any changes to model defaults be justified.²¹ However, the "User Entered Comments and Non-Default Data" table fails to provide a justification for the inclusion of these measures (Appendix C, pp. 47, 80, 113, 140, 167, 194). Furthermore, the DEIR's *Project Design Considerations* state:

9.12

"Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas" (p. 5.5-15).

However, this design feature is not formally included as a mitigation measure. This is incorrect, as according to the Association of Environmental Professionals ("AEP") *CEQA Portal Topic Paper* on mitigation measures:

"While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact" (emphasis added).²²

As you can see in the excerpt above, design features that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as the above-mentioned waste-

²¹ CalFEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9.

²² "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

9.12
cont'd

related operational measure is not formally included as a mitigation measure, we cannot guarantee that it would be implemented, monitored, and enforced on the Project site. As a result, the inclusion of the above-mentioned operational mitigation measure in the model is incorrect. By including an operational mitigation measure without properly committing to its implementation, the models may underestimate the Project's operational emissions and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to more accurately estimate the Project's construction-related and operational emissions, we prepared updated CalFEEMod models, using the Project-specific information provided by the DEIR. In our updated model, we included the correct land use types and sizes, omitted the unsubstantiated changes to the default CH₄, CO₂, and N₂O intensity factors, architectural coating emission factors, vendor and worker trip numbers, and indoor water use rate; proportionally altered the individual construction phase lengths as well as proportionally adjusted to the operational vehicle fleet mix percentages to reflect CalFEEMod default values; and excluded the unsubstantiated construction-related percent PM₁₀ and PM_{2.5} emissions reductions and waste-related operational mitigation measure.

Our updated analysis estimates that the Project's construction-related ROG and operational NO_x emissions exceed the applicable SCAQMD threshold of 75- and 55- pounds per day ("lbs/day"), as referenced by the DEIR (p. 5.2-26, 5.2-31) (see table below).

9.13

Model	VOC (lbs/day)
DEIR Construction	32.00
SWAPE Construction	347
% Increase	984%
SCAQMD Regional Threshold (lbs/day)	75
Threshold Exceeded?	Yes

Model	NO _x (lbs/day)
DEIR Operation	38
Area	< 1
Energy	< 1
Passenger Car Mobile	2
Truck Mobile	58
SWAPE Operation	60
% Increase	58%
SCAQMD Regional Threshold (lbs/day)	55
Threshold Exceeded?	Yes

As you can see in the excerpt above, the Project's construction-related VOC and operational NO_x emissions, as estimated by SWAPE, increase by approximately 984% and 58%, respectively, and exceed

9.13
cont'd

the applicable SCAQMD significance thresholds. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the DEIR. As a result, an updated EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the surrounding environment.

9.14

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The DEIR concludes diesel particulate matter ("DPM") emissions associated with Project operation would pose a maximum incremental cancer risk of 0.49 in one million to nearby, existing sensitive receptors, which would not exceed the SCAQMD significance threshold of 10 in one million (p. 5.2-34 – 5.2-35). Furthermore, in regard to the Project's construction-related health risk impacts, the DEIR states:

"Heavy-duty off-road construction equipment (graders, excavators, dozers, scrapers, loaders, etc.) typically have diesel engines and emit DPM emissions. However, construction activity is typically short-term (1-2 years or less), as is anticipated for the proposed Sycamore Hills Distribution Center project, and does not constitute long-term exposure, typically used to generate risk estimates. As outlined above, construction emissions would not exceed SCAQMD thresholds established to protect public health and air quality. Therefore, the health risk associated with construction emissions would be less than significant for the surrounding sensitive uses and no mitigation is required" (p. 5.2-35).

As demonstrated above, the DEIR concludes that the Project would result in a less-than-significant construction-related health risk impact because construction activity would be short term and construction-related criteria air pollutant emissions would not exceed thresholds. However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

9.15

First, the DEIR fails to quantitatively evaluate the Project's construction-related toxic air contaminant ("TAC") emissions or make a reasonable effort to connect these emissions to potential health risk impacts posed to nearby existing sensitive receptors. Despite the DEIR's qualitative claims, construction of the proposed Project will produce emissions of DPM through the exhaust stacks of construction equipment over a potential construction duration of one year and three months (p. 1.0-3). However, the DEIR's vague discussion of potential DPM associated with Project construction fails to indicate the concentrations at which such pollutants would trigger adverse health effects. Thus, without making a reasonable effort to connect the Project's construction-related TAC emissions to the potential health risks posed to nearby receptors, the DEIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project with the potential adverse impacts on human health.

9.16

Second, the State of California Department of Justice recommends the preparation of a quantitative HRA pursuant to the Office of Environmental Health Hazard Assessment ("OEHHHA"), the organization responsible for providing guidance on conducting HRAs in California, as well as local air district

- 9.16 **cont'd** guidelines.²³ OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015.²⁴ This guidance document describes the types of projects that warrant the preparation of an HRA. The OEHHA document recommends that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors. As the Project's proposed construction duration vastly exceeds the 2-month requirement set forth by OEHHA, it is clear that the Project meets the threshold warranting a quantified construction-related HRA under OEHHA guidance. These recommendations reflect the most recent state health risk policies, and as such, we recommend that an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated construction DPM emissions be included in an updated EIR for the Project.
- 9.17 Third, while the DEIR includes an HRA evaluating the Project's mobile-source operational health risk impacts to nearby, existing receptors as a result of Project-generated mobile emissions, the HRA fails to evaluate the cumulative lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. According to OEHHA guidance, as referenced by the AQ & HRA Memo, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location" (Appendix C, p. 22).²⁵ However, the DEIR's HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect and thus, an updated analysis should quantify the entirety of the Project's construction and operational health risks together and then sum them to compare to the SCAQMD threshold of 10 in one million, as referenced by the AQ & HRA Memo (Appendix C, p. 22).
- 9.18 **Screening-Level Analysis Indicates a Potentially Significant Health Risk Impact**
In order to conduct our screening-level risk analysis we relied upon AERSCREEN, which is a screening level air quality dispersion model.²⁶ The model replaced SCREEN3, and AERSCREEN is included in the OEHHA²⁷ and the California Air Pollution Control Officers Associated ("CAPCOA")²⁸ guidance as the appropriate air dispersion model for Level 2 health risk screening analyses ("HRSAs"). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

²³ "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, available at:

<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>, p. 6.

²⁴ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

²⁵ "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf> p. 8-4

²⁶ U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model. http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf

²⁷ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf

²⁸ CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

We prepared a preliminary HRA of the Project's construction-related health risk impact to residential sensitive receptors using the annual PM₁₀ exhaust estimates from the DEIR's CalFEEMod output files. Consistent with recommendations set forth by OEHHA, we assumed residential exposure begins during the third trimester stage of life. The DEIR's CalFEEMod model indicates that construction activities will generate approximately 253 pounds of DPM over the 455-day construction period. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average DPM emission rate by the following equation:

$$\text{Average DPM Emission Rate} = \frac{253.3 \text{ lbs DPM}}{455 \text{ days}} \times \frac{455 \text{ days}}{1 \text{ year}} \times \frac{1 \text{ year}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3600 \text{ seconds}} = 0.00292 \text{ g/s}$$

Using this equation, we estimated a construction emission rate of 0.00292 grams per second ("g/s"). Construction activities were simulated as a 12.23-acre rectangular area source in AERSCREEN with dimensions of 505 by 98 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

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The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.¹⁹ According to the DEIR, "[t]he sensitive receptors nearest to the Project site include single and multi-family residences to the south and southeast of the Project site" (p. 5.2-10). Review of Google Earth demonstrates that these sensitive receptors are located roughly 100 meters from the site. However, review of the AERSCREEN output files demonstrates that the *maximally* exposed receptor is located approximately 250 meters from the Project site. Thus, the single-hour concentration estimated by AERSCREEN for Project construction is approximately 2.414 µg/m³ DPM at approximately 250 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.2414 µg/m³ for Project construction at the MEIR.

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by OEHHA. Consistent with the 455-day construction schedule included in the Project's CalFEEMod output files, the annualized average concentration for Project construction was used for the entire third trimester of pregnancy (0.25 years) and one year of the infantile stage of life (0 – 2 years).

¹⁹ "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised." EPA, 1992, available at: http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf; see also "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/crmr/2015guidancemanual.pdf> p. 4-36.

Consistent with the DEIR's operational HRA, we used Age Sensitivity Factors ("ASF") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution (Appendix B, p. 83). When applying ASFs, the quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant) as well as multiplied by a factor of three during the child stage of life (2 – 16 years). Furthermore, in accordance with the guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.³⁰ Finally, according to SCAQMD guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.³¹ We used a cancer potency factor of 1.1 (mg/kg-day)⁻¹ and an averaging time of 25,550 days. The results of our calculations are shown below.

The Maximum Exposed Individual at an Existing Residential Receptor (MEIR)

Activity	Duration (years)	Concentration (ug/m ³)	Breathing Rate (L/kg-day)	ASF	Cancer Risk with ASFs*
Construction	0.25	0.2414	361	10	3.3E-06
<i>3rd Trimester Duration</i>	<i>0.25</i>			<i>3rd Trimester Exposure</i>	<i>3.3E-06</i>
Construction	1.00	0.2414	1090	10	4.0E-05
<i>Infant Exposure Duration</i>	<i>2.00</i>			<i>Infant Exposure</i>	<i>4.0E-05</i>
Construction	6.00	*	572	3	*
Operation	6.00	*	572	3	*
Operation	14.00	*	261	1	*
<i>Adult Exposure Duration</i>	<i>14.00</i>			<i>Adult Exposure</i>	
Lifetime Exposure Duration	30.00			Lifetime Exposure	4.3E-05

* Operational cancer risk calculated separately in the AQ, GHG, & HRA Report.

As demonstrated in the table above, the excess cancer risks to infants and during the 3rd trimester of pregnancy at the MEIR located approximately 250 meters away, over the course of Project construction, are approximately 40 and 3.3 in one million, respectively. The excess cancer risk associated with the

³⁰ "Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act," July 2018, available at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf>, p. 16.

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

³¹ "Risk Assessment Procedures for Rules 1401, 1401.1, and 212." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

9.18
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Project construction alone over the course of a residential lifetime is approximately 43 in one million. When summing Project's construction-related cancer risk, as estimated by SWAPE, with the DEIR's excess operational cancer risk estimate of 0.49 in one million, we estimate an excess cancer risk of approximately 43.49 in one million over the course of a residential lifetime (Appendix C, pp. 502, Table ES-1).³² The infant and lifetime cancer risks exceed the SCAQMD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the DEIR.

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection.³³ The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level HRA indicates a potentially significant impact, the City should prepare a Project-specific EIR with an HRA which makes a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors. Thus, the City should prepare an updated, quantified air pollution model as well as an updated, quantified refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

9.19

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would generate net annual greenhouse gas ("GHG") emissions of 7,405 metric tons of carbon dioxide equivalents per year ("MT CO₂e/year"), which would not exceed the SCAQMD bright-line threshold of 10,000 MT CO₂e/year for industrial projects (see excerpt below) (p. 5.7-26, Table 5.7-7).

³² Calculated: 78 in one million + 4.62 in one million = 82.62 in one million.

³³ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments," OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>, p. 1-5

Table 5.7-7 – Summary of Project GHG Emissions (metric tons per year)

Source	MT CO ₂	MT CH ₄	MT N ₂ O	MT CO ₂ E
Mobile – Passenger Cars	1,204	<1	0	1,204
Mobile – Trucks	4,316	<1	0	4,320
Energy Source	781	<1	<1	782
Area Sources	<1	<1	0	<1
Water/Wastewater Sources	728	4	<1	846
Solid Waste Sources	86	5	1	214
Construction (Amortized over 30 years)	37	<1	0	38
Total	7,152	9	<1	7,405*
SCAQMD Significance Threshold for Industrial Sources				10,000

MT CO₂E = metric tons of carbon dioxide equivalent

MT CH₄ = metric tons of methane

MT N₂O = metric tons of nitrous oxide

*The GWPs included in CalEEMod are from the IPCC Fourth Assessment Report. For informational purposes, total emissions calculated by CalEEMod were adjusted to account for the updated IPCC Fifth Assessment Report GWPs. Using the current GWPs, total annual project emissions would be 7,428 MT CO₂, and would also be less than the screening threshold. Note that the IPCC updates the GWPs periodically, and the next anticipated update will occur in 2022.

9.19
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Furthermore, the DEIR relies upon the Project's consistency with the 2008 Good Neighbor Guidelines, CARB's 2017 Scoping Plan, and the Riverside Restorative Growthprint and Climate Action Plan ("RRG-CAP") in order to conclude that the Project would result in a less-than-significant GHG impact (p. 5.7-28 - 5.7-40). However, the DEIR's GHG analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

- (1) The DEIR's GHG analysis relies upon an incorrect and unsubstantiated air model;
- (2) The DEIR incorrectly relies upon the Riverside Restorative Growthprint and Climate Action Plan; and
- (3) The DEIR fails to consider the performance-based standards under CARB's Scoping Plan.

1) Incorrect and Unsubstantiated Quantitative Analysis of Emissions

As previously stated, the DEIR estimates that the Project would generate net annual GHG emissions of 7,405 MT CO₂e/year (p. 5.7-26, Table 5.7-7). However, the DEIR's quantitative GHG analysis is unsubstantiated. As previously discussed, when we reviewed the Project's CalEEMod output files, provided in the AQ & HRA Memo as Appendix C to the DEIR, we found that several of the values inputted into the model are not consistent with information disclosed in the DEIR. As a result, the model underestimates the Project's emissions, and the DEIR's quantitative GHG analysis should not be relied upon to determine Project significance. An updated EIR should be prepared that adequately assesses the potential GHG impacts that construction and operation of the proposed Project may have on the surrounding environment.

9.20

2) Failure to Comply with the Riverside Restorative Growthprint and Climate Action Plan

As previously discussed, the DEIR relies upon the Project's consistency with the City of Riverside Restorative Growthprint and Climate Action Plan (RG-CAP). However, review of these guidelines demonstrates that the DEIR's analysis is unsubstantiated, and the less-than-significant impact conclusion should not be relied upon. Specifically, according to the RG-CAP:

9.20
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"The Subregional CAP suggests a goal for 2035 equivalent to 49 percent below baseline emissions. This is derived from a straight-line interpolation of the state-wide AB 32 goal and Executive Order (EO) S-3-05, which aims for 80% below 1990 levels by 2050.⁵ Using this approach, the City of Riverside is setting its 2035 GHG emissions goal to 49% below the 2007 baseline" (p. B.2-15).³⁴

As demonstrated in the excerpt above, the RG-CAP sets a 2035 emissions reduction target of 49% below 2007 baseline emissions. However, review of the DEIR demonstrates that the Project fails to mention or demonstrate compliance with this goal whatsoever. While the DEIR includes a list discussing compliance with various strategies/goals of the RG-CAP, the DEIR fails to mention or provide substantial evidence of a 49% emissions reduction from the 2007 baseline. As such, the DEIR's GHG analysis and subsequent less-than-significant impact conclusion should not be relied upon and an updated EIR should instead demonstrate compliance with the RG-CAP.

9.21

3) Failure to Consider Performance-based Standards Under CARB's 2017 Scoping Plan

As previously discussed, the DEIR relies upon the Project's consistency with CARB's 2017 *Scoping Plan* to determine Project GHG significance (p. 5.7-28 - 5.7-40). However, this is incorrect, as the DEIR fails to consider performance-based measures proposed by CARB.

i. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375

In reaching the State's long-term GHG emission reduction goals, CARB's 2017 *Scoping Plan* explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.³⁵ CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a "baseline scenario" that includes "current projections of VMT included in the existing Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State's 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015."³⁶ By dividing the projected daily VMT by the population, we calculated the daily VMT per capita for each year at the state and county level for 2010 (baseline year), 2022 (Project operational year), and 2030 (target years under SB 32) (see table below).

³⁴ "Riverside Restorative Growthprint: Economic Prosperity Action Plan and Climate Action Plan." City of Riverside, January 2016, available at:

<https://corweb.riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/other-plans/2016%20Riverside%20Restorative%20Growthprint%20Economic%20Proposerity%20Action%20Plan%20and%20Climate%20Action%20Plan.pdf>.

³⁵ "California's 2017 Climate Change Scoping Plan." CARB, November 2017, available at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, p. 25, 98, 101-103.

³⁶ "Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions," Excel Sheet "Readme." CARB, January 2019, available at: https://ww2.arb.ca.gov/sites/default/files/2019-01/sp_mss_vmt_calculations_jan19_0.xlsx.

9.21
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2017 Scoping Plan Daily VMT Per Capita						
Year	San Bernardino County			State		
	Population	LDV VMT Baseline	VMT Per Capita	Population	LDV VMT Baseline	VMT Per Capita
2010	2,043,484	55,741,307.23	27.28	37,335,085	836,463,980.46	22.40
2022	2,278,414	61,507,949.89	27.00	41,321,565	916,010,145.57	22.17
2030	2,478,888	65,538,854.28	26.44	43,939,250	957,178,153.19	21.78

As the DEIR fails to evaluate the Project's consistency with the CARB 2017 *Scoping Plan* performance-based daily VMT per capita projections, the DEIR's claim that the proposed Project would not conflict with the CARB 2017 *Scoping Plan* is unsupported. An updated EIR should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

9.22

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and greenhouse gas impacts that should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the Department of Justice Warehouse Project Best Practices document.³⁷ Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.

³⁷ "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice.

9.22
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- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.

9.22
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- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

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

9.23

Disclaimer

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

otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



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

9.23
cont'd



Paul E. Rosenfeld, Ph.D.

Attachment A: Air Modeling Calculations

Attachment B: CalFEEMod Output Files

Attachment C: Health Risk Calculations

Attachment D: AERSCREEN Output Files

Attachment E: Matt Hagemann CV

Attachment D: Paul E. Rosenfeld

Attachment A

Construction Schedule Calculations						
Phase	Default Phase Length	Total Default Length	%	Revised Total Length	Revised Phase Length	
Site Prep	30	146	0.205479452	90	18	
Grading	75	146	0.51369863	90	46	
Construction	740	1189	0.622371741	365	227	
Paving	55	1189	0.046257359	365	17	
Coating	55	1189	0.046257359	365	17	

Passenger Car Fleet Mix Calculations			
Vehicle Type	Default Fleet Mix %	Total Fleet Mix %	Revised Fleet Mix %
LDA	0.552111		0.603017759
LDT1	0.043066	0.91558	0.047036851
LDT2	0.201891		0.220506127
MDV	0.118512		0.129439263

Truck Fleet Mix Calculations			
Vehicle Type	Default Fleet Mix %	Total Fleet Mix %	Revised Fleet Mix %
LHD1	0.015605		0.21
LHD2	0.005863	0.074108	0.08
MHD	0.021387		0.29
HHD	0.031253		0.42

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	20.00	1000sqft	0.46	20,000.00	0
Unrefrigerated Warehouse-No Rail	583.10	1000sqft	15.54	583,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	8.18	Acre	8.18	356,320.80	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2022
Utility Company	Riverside Public Utilities				

CO2 Intensity (lb/MMBtu)	1325.65	CH4 Intensity (lb/MMBtu)	0.029	N2O Intensity (lb/MMBtu)	0.006
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1.3 User Entered Comments & Non-Default Data

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Project Characteristics - See SWAPE comment regarding CO₂, CH₄, and N₂O intensity factors.

Construction Phase - Total construction length consistent with information provided in the DEIR, but phase lengths are **proportionally** altered.

Vehicle Trips - Consistent with the DEIR's model.

Land Use - Consistent with the DEIR's model.

Grading -

Trips and VMT - See SWAPE comment regarding vendor and worker trip numbers.

Architectural Coating - See SWAPE comment regarding architectural coating emission factors.

Fleet Mix - See SWAPE comment regarding operational vehicle fleet mix. Only passenger cars. Trucks reduced to 0, passenger car percentages proportionally altered based on CalEEMod defaults. See construction calculations.

Energy Use -

Water And Wastewater - See SWAPE comment regarding indoor water use rate.

Construction Off-road Equipment Mitigation - See SWAPE comment regarding the PM₁₀ and PM_{2.5} % reductions.

Mobile Land Use Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	740.00	227.00
tblConstructionPhase	NumDays	75.00	46.00
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	PhaseEndDate	11/27/2024	6/29/2022
tblConstructionPhase	PhaseEndDate	6/26/2024	5/12/2022
tblConstructionPhase	PhaseEndDate	8/25/2021	6/29/2021
tblConstructionPhase	PhaseEndDate	9/11/2024	6/6/2022
tblConstructionPhase	PhaseEndDate	5/12/2021	4/26/2021
tblConstructionPhase	PhaseStartDate	9/12/2024	6/7/2022
tblConstructionPhase	PhaseStartDate	8/26/2021	6/30/2021
tblConstructionPhase	PhaseStartDate	5/13/2021	4/27/2021

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tblConstructionPhase	PhaseStartDate	6/27/2024	5/13/2022
tblFleetMix	HHD	0.03	0.00
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.55	0.60
tblFleetMix	LDA	0.55	0.60
tblFleetMix	LDT1	0.04	0.05
tblFleetMix	LDT1	0.04	0.05
tblFleetMix	LDT2	0.20	0.22
tblFleetMix	LDT2	0.20	0.22
tblFleetMix	LDT2	0.20	0.22
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.8630e-003	0.00
tblFleetMix	LHD2	5.8630e-003	0.00
tblFleetMix	MCI	4.8030e-003	0.00
tblFleetMix	MCI	4.8030e-003	0.00
tblFleetMix	MDV	0.12	0.13
tblFleetMix	MDV	0.12	0.13
tblFleetMix	MH	8.9600e-004	0.00
tblFleetMix	MH	8.9600e-004	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	OBUS	2.0870e-003	0.00
tblFleetMix	OBUS	2.0870e-003	0.00
tblFleetMix	SBUS	7.0800e-004	0.00
tblFleetMix	SBUS	7.0800e-004	0.00
tblFleetMix	UBUS	1.8180e-003	0.00
tblFleetMix	UBUS	1.8180e-003	0.00

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tbl_anduse	tbl_dcreage	13.39	15.54
tblVehicleTops	CC_TL	8.40	24.20
tblVehicleTops	CC_TL	8.40	24.20
tblVehicleTops	CNW_TL	6.90	24.20
tblVehicleTops	CNW_TL	6.90	24.20
tblVehicleTops	CW_TL	16.60	24.20
tblVehicleTops	CW_TL	16.60	24.20
tblVehicleTops	ST_TR	2.46	0.95
tblVehicleTops	ST_TR	2.46	0.95
tblVehicleTops	SU_TR	1.05	0.95
tblVehicleTops	SU_TR	1.05	0.95
tblVehicleTops	WD_TR	11.03	0.95
tblVehicleTops	WD_TR	11.03	0.95
tblVehicleTops	WD_TR	1.68	0.95
tblVehicleTops	WD_TR	1.68	0.95

2.0 Emissions Summary

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2.1 Overall Construction**Unmitigated Construction**

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
2021	0.5040	4.4881	4.0782	0.0130	0.6888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.497	1,194.497	0.1277	0.0000	1,197.660
2022	3.2316	2.1106	2.2883	8.1000e-003	0.4525	0.0485	0.5010	0.1220	0.0455	0.1675	0.0000	747.5736	747.5736	0.0589	0.0000	749.0453
Maximum	3.2316	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.498	1,194.498	0.1277	0.0000	1,197.690

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
2021	0.5040	4.4881	4.0782	0.0130	0.6888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.497	1,194.497	0.1277	0.0000	1,197.669
2022	3.2316	2.1106	2.2883	8.1000e-003	0.4525	0.0485	0.5010	0.1220	0.0455	0.1675	0.0000	747.5736	747.5736	0.0589	0.0000	749.0451
Maximum	3.2316	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.497	1,194.497	0.1277	0.0000	1,197.689

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

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOx (tons/quarter)	Maximum Mitigated ROG + NOx (tons/quarter)
1	4-1-2021	6-30-2021	1.5910	1.5910
2	7-1-2021	9-30-2021	1.6707	1.6707
3	10-1-2021	12-31-2021	1.6868	1.6868
4	1-1-2022	3-31-2022	1.5280	1.5280
5	4-1-2022	6-30-2022	3.7137	3.7137
		Highest	3.7137	3.7137

2.2 Overall Operational Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	MBio- CO2	Total CO2	CH4	N2O	CO2e
Area	2.5423	7.0000e-006	8.0200e-003	0.0000		3.0000e-006	3.0000e-006		3.0000e-006	3.0000e-006	0.0000	0.0166	0.0166	4.0000e-006	0.0000	0.0166
Energy	0.7600e-003	0.0614	0.0616	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	1.083.613	1.083.613	0.0236	5.6300e-003	1.086.138
Mobile	0.1673	0.3609	4.3664	0.0168	1.7477	0.0113	1.7590	0.4640	0.0104	0.4743	0.0000	1.518.493	1.518.493	0.0320	0.0000	1.519.292
Waste						0.0000	0.0000		0.0000	0.0000	115.0370	0.0000	115.0370	6.7865	0.0000	284.6963
Water						0.0000	0.0000		0.0000	0.0000	43.8068	1.066.142	1,142.040	4.5337	0.1115	1,288.604
Total	2.7164	0.4524	4.4160	0.0171	1.7477	0.0160	1.7637	0.4640	0.0161	0.4790	158.9439	3,700.465	3,859.409	11.2877	0.1173	4,179.091

2.2 Overall Operational Mitigated Operational

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	MBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Area	2.5423	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166
Energy	6.7800e-003	0.0814	0.0518	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	1.083.813	1.083.813	0.0236	5.2300e-003	1.086.136
Mobile	0.1673	0.3608	4.3564	0.0168	1.7477	0.0113	1.7590	0.4640	0.0104	0.4743	0.0000	1.518.483	1.518.483	0.0320	0.0000	1.519.292
Waste						0.0000	0.0000		0.0000	0.0000	115.0370	0.0000	115.0370	6.7986	0.0000	284.8983
Water						0.0000	0.0000		0.0000	0.0000	43.8068	1.098.142	1.142.046	4.5337	0.1115	1.288.804
Total	2.7154	0.4524	4.4160	0.0171	1.7477	0.0160	1.7637	0.4640	0.0151	0.4790	158.9439	3.700.485	3.859.409	11.3877	0.1173	4.179.051
MT/yr																
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	4/1/2021	4/26/2021	5	18	
2	Grading	Grading	4/27/2021	6/29/2021	5	46	
3	Building Construction	Building Construction	6/30/2021	5/12/2022	5	227	
4	Paving	Paving	5/13/2022	6/6/2022	5	17	
5	Architectural Coating	Architectural Coating	6/7/2022	6/29/2022	5	17	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 115

Acres of Paving: 24.18

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 904,650; Non-Residential Outdoor: 301,550; Striped Parking Area: 63,197 (Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.48
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	76	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD, Mix	HD, Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD, Mix	HD, Mix	HHDT
Building Construction	9	694.00	271.00	0.00	14.70	6.90	20.00	LD, Mix	HD, Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD, Mix	HD, Mix	HHDT
Architectural Coating	1	139.00	0.00	0.00	14.70	6.90	20.00	LD, Mix	HD, Mix	HHDT

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3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bleed CO ₂	Off-Road CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	tons/yr										MT/yr					
Fugitive Dust					0.1628	0.0000	0.1628	0.0894	0.0000	0.0894	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0350	0.3845	0.1904	3.4000e-004		0.0184	0.0184		0.0169	0.0169	0.0000	30.0922	30.0922	9.7300e-003	0.0000	30.3355
Total	0.0350	0.3845	0.1904	3.4000e-004	0.1628	0.0184	0.1810	0.0894	0.0169	0.1063	0.0000	30.0922	30.0922	9.7300e-003	0.0000	30.3355

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3.2 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	5.0000e-004	5.6500e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7500e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508
Total	6.7000e-004	5.0000e-004	5.6500e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7500e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.1626	0.0000	0.1626	0.0864	0.0000	0.0864	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0350	0.3645	0.1904	3.4000e-004		0.0184	0.0184		0.0189	0.0189	0.0000	30.0921	30.0921	9.7300e-003	0.0000	30.3354
Total	0.0350	0.3645	0.1904	3.4000e-004	0.1626	0.0184	0.1810	0.0864	0.0189	0.1053	0.0000	30.0921	30.0921	9.7300e-003	0.0000	30.3354

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3.2 Site Preparation - 2021**Mitigated Construction Off-site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net-Bio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	6.0000e-004	6.6600e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7800e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508
Total	6.7000e-004	6.0000e-004	6.6600e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7800e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508

3.3 Grading - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net-Bio- CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.1995	0.0000	0.1995	0.0827	0.0000	0.0827	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0804	1.0672	0.7102	1.4300e-003		0.0457	0.0457		0.0420	0.0420	0.0000	125.3385	125.3385	0.0405	0.0000	126.3519
Total	0.0804	1.0672	0.7102	1.4300e-003	0.1995	0.0457	0.2452	0.0827	0.0420	0.1247	0.0000	125.3385	125.3385	0.0405	0.0000	126.3519

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3.3 Grading - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBio-CO2	Total CO2	CH4	H2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.9100e-003	1.4200e-003	0.0161	5.0000e-006	5.0500e-003	4.0000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4006	4.4006	1.2000e-004	0.0000	4.4036
Total	1.9100e-003	1.4200e-003	0.0161	5.0000e-006	5.0500e-003	4.0000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4006	4.4006	1.2000e-004	0.0000	4.4036

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBio-CO2	Total CO2	CH4	H2O	CO2e
tons/yr																
Fugitive Dust					0.1995	0.0000	0.1995	0.0827	0.0000	0.0827	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0964	1.0872	0.7102	1.4300e-003		0.0457	0.0457		0.0420	0.0420	0.0000	125.3383	125.3383	0.0405	0.0000	126.3517
Total	0.0964	1.0872	0.7102	1.4300e-003	0.1995	0.0457	0.2452	0.0827	0.0420	0.1247	0.0000	125.3383	125.3383	0.0405	0.0000	126.3517

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3.3 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.910e-003	1.4200e-003	0.0161	5.0000e-005	5.0500e-003	4.2000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4008	4.4008	1.2000e-004	0.0000	4.4038
Total	1.910e-003	1.4200e-003	0.0161	5.0000e-005	5.0500e-003	4.2000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4006	4.4006	1.2000e-004	0.0000	4.4036

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	0.1264	1.1592	1.1023	1.7900e-003	0.0638	0.0638	0.0638	0.0669	0.0669	0.0669	0.0000	154.0388	154.0388	0.0372	0.0000	154.9679
Total	0.1264	1.1592	1.1023	1.7900e-003	0.0638	0.0638	0.0638	0.0669	0.0669	0.0669	0.0000	154.0388	154.0388	0.0372	0.0000	154.9679

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3.4 Building Construction - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0618	1.7530	0.4430	4.6100e-003	0.1136	3.6700e-003	0.1171	0.0328	3.4100e-003	0.0362	0.0000	437.6736	437.6736	0.0282	0.0000	438.2791
Worker	0.1818	0.1424	1.8106	4.8800e-003	0.6093	3.8200e-003	0.6102	0.1346	3.5500e-003	0.1360	0.0000	441.5045	441.5045	0.0119	0.0000	441.8015
Total	0.2436	1.8953	2.0637	9.3900e-003	0.6159	7.3900e-003	0.6273	0.1672	6.3000e-003	0.1742	0.0000	879.0783	879.0783	0.0401	0.0000	880.0606

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	0.1264	1.1592	1.1023	1.7900e-003		0.0638	0.0638		0.0589	0.0589	0.0000	154.0386	154.0386	0.0372	0.0000	154.8677
Total	0.1264	1.1592	1.1023	1.7900e-003		0.0638	0.0638		0.0589	0.0589	0.0000	154.0386	154.0386	0.0372	0.0000	154.8677

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3.4 Building Construction - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Biogenic CO ₂	Other CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0518	1.7530	0.4430	4.5100e-003	0.1136	3.5700e-003	0.1171	0.0328	3.4100e-003	0.0392	0.0000	437.5738	437.5738	0.0282	0.0000	438.2791
Wicker	0.1918	0.1424	1.6108	4.8800e-003	0.5063	3.8200e-003	0.5102	0.1345	3.5200e-003	0.1380	0.0000	441.5045	441.5045	0.0118	0.0000	441.8015
Total	0.2436	1.8953	2.0537	9.3900e-003	0.6199	7.3900e-003	0.6273	0.1672	6.9300e-003	0.1742	0.0000	879.0783	879.0783	0.0401	0.0000	880.0806

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

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Biogenic CO ₂	Other CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Off-Road	0.0802	0.7338	0.7681	1.2700e-003		0.0380	0.0380		0.0358	0.0358	0.0000	108.9108	108.9108	0.0281	0.0000	109.5632
Total	0.0802	0.7338	0.7681	1.2700e-003		0.0380	0.0380		0.0358	0.0358	0.0000	108.9108	108.9108	0.0281	0.0000	109.5632

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0344	1.1796	0.2995	3.1900e-003	0.0803	2.2000e-003	0.0826	0.0232	2.1000e-003	0.0253	0.0000	306.5308	306.5308	0.0192	0.0000	307.0119
Worker	0.1273	0.0609	1.0512	3.3300e-003	0.3579	2.6200e-003	0.3605	0.0660	2.4100e-003	0.0676	0.0000	300.8841	300.8841	7.5900e-003	0.0000	301.0537
Total	0.1617	1.2565	1.3476	6.4900e-003	0.4381	4.8200e-003	0.4429	0.1182	4.5100e-003	0.1227	0.0000	607.3949	607.3949	0.0268	0.0000	608.0656

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	0.0802	0.7339	0.7681	1.2700e-003		0.0380	0.0380		0.0368	0.0368	0.0000	108.9107	108.9107	0.0261	0.0000	109.5630
Total	0.0802	0.7339	0.7681	1.2700e-003		0.0380	0.0380		0.0368	0.0368	0.0000	108.9107	108.9107	0.0261	0.0000	109.5630

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

Category	ROG	NO _x	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio- CO ₂	MBio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0344	1.1756	0.2665	3.1600e-003	0.0803	2.2000e-003	0.0826	0.0232	2.1000e-003	0.0253	0.0000	309.5308	309.5308	0.0192	0.0000	307.0119
Worker	0.1273	0.0808	1.0512	3.3300e-003	0.3679	2.6300e-003	0.3685	0.0860	2.4100e-003	0.0876	0.0000	300.8641	300.8641	7.5900e-003	0.0000	301.0537
Total	0.1617	1.2655	1.3476	6.4900e-003	0.4381	4.8300e-003	0.4429	0.1182	4.5100e-003	0.1227	0.0000	607.3949	607.3949	0.0268	0.0000	608.0656

3.5 Paving - 2022**Unmitigated Construction On-Site**

Category	ROG	NO _x	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio- CO ₂	MBio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Off-Road	9.3700e-003	0.0846	0.1239	1.9000e-004		4.8300e-003	4.8300e-003		4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611
Paving	0.0317					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0411	0.0846	0.1239	1.9000e-004		4.8300e-003	4.8300e-003		4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611

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3.5 Paving - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768
Total	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	8.2700e-003	0.0846	0.1236	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611
Paving	0.0317				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0411	0.0846	0.1236	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611

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3.5 Paving - 2022**Mitigated Construction Off-Site**

Category	PM10	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1780	1.1780	3.0000e-005	0.0000	1.1788
Total	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1780	1.1780	3.0000e-005	0.0000	1.1788

3.6 Architectural Coating - 2022**Unmitigated Construction On-Site**

Category	PM10	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	2.9418					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7400e-003	0.0120	0.0164	3.0000e-005		6.8000e-004	6.8000e-004		6.8000e-004	6.8000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738
Total	2.9436	0.0120	0.0164	3.0000e-005		6.8000e-004	6.8000e-004		6.8000e-004	6.8000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738

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3.6 Architectural Coating - 2022

Unmitigated Construction Off-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6100e-003	3.2200e-003	0.0391	1.2000e-004	0.0130	9.0000e-006	0.0131	3.4400e-003	9.0000e-006	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.8049
Total	4.6100e-003	3.2200e-003	0.0391	1.2000e-004	0.0130	9.0000e-006	0.0131	3.4400e-003	9.0000e-006	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.9049

Mitigated Construction On-Site

Category	ROG	NOX	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Archit. Coating	2.9419				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7400e-003	0.0120	0.0194	3.0000e-005	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738
Total	2.9436	0.0120	0.0194	3.0000e-005	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	6.9000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738

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3.6 Architectural Coating - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CC2	NEC-CC2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6100e-003	3.2200e-003	0.0361	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8960	10.8960	2.7000e-004	0.0000	10.9048
Total	4.6100e-003	3.2200e-003	0.0361	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8960	10.8960	2.7000e-004	0.0000	10.9048
MT/yr																

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.1673	0.3608	4.3694	0.0188	1.7477	0.0113	1.7590	0.4640	0.0104	0.4743	0.0000	1,518,483.8	1,518,483.8	0.0320	0.0000	1,519,282.7
Unmitigated	0.1673	0.3608	4.3694	0.0188	1.7477	0.0113	1.7590	0.4640	0.0104	0.4743	0.0000	1,518,483.8	1,518,483.8	0.0320	0.0000	1,519,282.7

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated		Mitigated	
	Weekday	Saturday	Sunday	Annual VMT		Annual VMT	
General Office Building	19.00	19.00	19.00	136,850		136,850	
Other Asphalt Surfaces	0.00	0.00	0.00				
Parking Lot	0.00	0.00	0.00				
Unrefrigerated Warehouse-No Rail	553.95	553.95	553.95	4,550,823		4,550,823	
Total	572.95	572.95	572.95	4,687,674		4,687,674	

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	24.20	24.20	24.20	33.00	48.00	19.00	77	19	4
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	24.20	24.20	24.20	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LD1	LD2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Other Asphalt Surfaces	0.552111	0.043066	0.201891	0.118512	0.015605	0.005663	0.021387	0.031253	0.002087	0.001818	0.004803	0.000706	0.000896
Parking Lot	0.552111	0.043066	0.201891	0.118512	0.015605	0.005663	0.021387	0.031253	0.002087	0.001818	0.004803	0.000706	0.000896
Unrefrigerated Warehouse-Iso Rail	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MB-CO2	UB-CO2	Total CO2	CH4	N2O	CO2e
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,018.843	0	1,018.843	0.0223	4.6000e-003	1,018.871
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,018.843	0	1,018.843	0.0223	4.6000e-003	1,018.871
Natural Gas Mitigated	6.7600e-003	0.0814	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8998	66.8998	1,2800e-003	1.2800e-003	1.2300e-003	67.2872
Natural Gas Unmitigated	6.7600e-003	0.0814	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8998	66.8998	1,2800e-003	1.2800e-003	1.2300e-003	67.2872

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5.2 Energy by Land Use - ~~NaturalGas~~, Unmitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Eqv CO2	NBP-CO2	Total CO2	CH4	N2O	CO2e
Land Use	887000	Emissions											MT/yr				
General Office Building	88400	3.7000e-004	3.4000e-003	2.8800e-003	2.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	3.7035	3.7035	7.0000e-005	7.0000e-005	3.7256
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	116300e+003	0.2800e-003	0.0580	0.0487	3.5000e-004		4.100e-003	4.100e-003		4.100e-003	4.100e-003	0.0000	63.1964	63.1964	1.2100e-003	1.1800e-003	63.5417
Total		6.7500e-003	0.0614	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8698	66.8698	1.2800e-003	1.2300e-003	67.2672

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5.2 Energy by Land Use - Natural Gas Mitigated

Land Use	Units	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Nat Gas CO2	Total CO2	CH4	N2O	CO2e
General Office Building	66400	3.7000e-004	3.4000e-003	2.8800e-003	2.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	3.7035	3.7035	7.0000e-005	7.0000e-005	3.7295
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.18380e+003	6.3800e-003	0.0590	0.0487	3.5000e-004		4.4100e-003	4.4100e-003		4.4100e-003	4.4100e-003	0.0000	63.1664	63.1664	1.2100e-003	1.1900e-003	63.5417
Total		6.7600e-003	0.0614	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8636	66.8636	1.2800e-003	1.2300e-003	67.2672

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5.3 Energy by Land Use - Electricity Unmitigated

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4 MT/yr	N2O MT/yr	CO2e MT/yr
General Office Building	180400	114.4884	2.5000e-003	5.2000e-004	114.7095
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	124712	74.8801	1.8400e-003	3.4000e-004	75.1322
Unrefrigerated Warehouse-No Rail	1.37612e+009	827.4851	0.0181	3.7500e-003	828.0337
Total		1,016.9436	0.0222	4.6100e-003	1,018.8714

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

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	GHG MTCO2e	NO2 MT/yr	CO2e MT/yr
General Office Building	160400	114.4884	2.5000e-003	5.2000e-004	114.7055
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	124712	74.9801	1.6400e-003	3.4000e-004	75.1322
Unrefrigerated Warehouse-No Rail	1.37612e+003	827.4861	0.0181	3.7500e-003	828.0337
Total		1,016.9436	0.0222	4.6100e-003	1,018.8714

6.0 Area Detail**6.1 Mitigation Measures Area**

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Mitigated	2.5423	7.0000e-005	8.0200e-003	0.0000	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156
Unmitigated	2.5423	7.0000e-005	8.0200e-003	0.0000	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156

6.2 Area by SubCategory, Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Architectural Coating	0.2842				0.0000		0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.2474				0.0000		0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.5000e-004	7.0000e-005	8.0200e-003	0.0000	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156
Total	2.5423	7.0000e-005	8.0200e-003	0.0000	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156
MT/yr																

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	MB- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2942					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.2474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.5000e- 004	7.0000e- 005	8.0200e- 003	0.0000		3.0000e- 005	3.0000e- 005		3.0000e- 005	3.0000e- 005	0.0000	0.0156	0.0156	4.0000e- 005	0.0000	0.0156
Total	2.5423	7.0000e- 005	8.0200e- 003	0.0000		3.0000e- 005	3.0000e- 005		3.0000e- 005	3.0000e- 005	0.0000	0.0156	0.0156	4.0000e- 005	0.0000	0.0156

7.0 Water Detail**7.1 Mitigation Measures Water**

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	Total CO2	CH4	N2O	CO2e
Category	MT/Yr			
Mitigated	1,142,049 ⁵	4,5337	0.1115	1,288,804 ⁴
Unmitigated	1,142,049 ⁵	4,5337	0.1115	1,288,804 ⁴

7.2 Water by Land Use

Unmitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
General Office Building	3,554,877 2,178,67	43,5140	0.1188	2.9300e-003	47,3051
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse/No Rail	134,842 / 0	1,088,535 ⁵	4,4189	0.1086	1,241,289 ³
Total		1,142,049 ⁵	4,5337	0.1115	1,288,804 ⁴

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7.2 Water by Land Use**Mitigated**

Land Use	Indoor/Outdoor Use	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	Mgd	MTYR			
General Office Building	3,554.87 / 2,178.87	43,514.0	0.1188	2.8900e-003	47,305.1
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	134,342 / 0	1,086,535.5	4,416.6	0.1085	1,241,268.3
Total		1,142,049.5	4,535.7	0.1115	1,288,604.4

8.0 Waste Detail**8.1 Mitigation Measures Waste**

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Category/Year

	Total CO2	CH4	N2O	CO2e
Mitigated	115.0370	6.7985	0.0000	284.9983
Unmitigated	115.0370	6.7985	0.0000	284.9983

8.2 Waste by Land Use
Unmitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
General Office Building	18.8	3.7756	0.2231	0.0000	9.3540
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Wastehouse-No Rail	548.11	111.2614	6.5754	0.0000	275.6454
Total		116.0370	6.7985	0.0000	284.9983

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8.2 Waste by Land Use**Mitigated**

Land Use	Waste Disposed Tons	Total CO2	CH4	N2O	CO2e
General Office Building	18.6	3.7756	0.2231	0.0000	9.3540
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	548.11	111.2614	6.5754	0.0000	275.6454
Total		115.0370	6.7985	0.0000	284.9993

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

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

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

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Equipment Type	Number
----------------	--------

11.0 Vegetation

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9309 Sycamore Hills Distribution Center - Passenger Cars**South Coast Air Basin, Summer****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	20.00	1000sqft	0.46	20,000.00	0
Unrefrigerated Warehouse-No Rail	583.10	1000sqft	15.54	583,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	8.18	Acre	8.18	356,320.80	0

1.2 Other Project Characteristics

Urbanization Urban

Wind Speed (m/s)

2.2

Precipitation Freq (Days)

31

Climate Zone 10

Operational Year

2022

Utility Company Riverside Public Utilities

CO2 Intensity
(lb/MMBtu)

1325.65

CH4 Intensity
(lb/MMBtu)

0.029

N2O Intensity
(lb/MMBtu)

0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics - See SWAPE comment regarding CO₂, CH₄, and N₂O intensity factors.

Construction Phase - Total construction length consistent with information provided in the DEIR, but phase lengths are ~~proportionally~~ altered.

Vehicle Trips - Consistent with the DEIR's model.

Land Use - Consistent with the DEIR's model.

Grading -

Trips and VMT - See SWAPE comment regarding vendor and worker trip numbers.

Architectural Coating - See SWAPE comment regarding architectural coating emission factors.

Fleet Mix - See SWAPE comment regarding operational vehicle fleet mix. Only passenger cars. Trucks reduced to 0; passenger car percentages proportionally altered based on CalEEMod defaults. See construction calculations.

Energy Use -

Water And Wastewater - See SWAPE comment regarding indoor water use rate.

Construction Off-road Equipment Mitigation - See SWAPE comment regarding the PM₁₀ and PM_{2.5} % reductions.

Mobile Land Use Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	740.00	227.00
tblConstructionPhase	NumDays	75.00	46.00
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	PhaseEndDate	11/27/2024	6/29/2022
tblConstructionPhase	PhaseEndDate	6/26/2024	5/12/2022
tblConstructionPhase	PhaseEndDate	8/25/2021	6/29/2021
tblConstructionPhase	PhaseEndDate	9/11/2024	6/6/2022
tblConstructionPhase	PhaseEndDate	5/12/2021	4/26/2021
tblConstructionPhase	PhaseStartDate	9/12/2024	6/7/2022
tblConstructionPhase	PhaseStartDate	8/26/2021	6/30/2021
tblConstructionPhase	PhaseStartDate	5/13/2021	4/27/2021

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tblConstructionPhase	PhaseStartDate	6/27/2024	5/13/2022
tblFleetMix	HHD	0.03	0.00
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.55	0.60
tblFleetMix	LDA	0.55	0.60
tblFleetMix	LDT1	0.04	0.05
tblFleetMix	LDT1	0.04	0.05
tblFleetMix	LDT2	0.20	0.22
tblFleetMix	LDT2	0.20	0.22
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.8630e-003	0.00
tblFleetMix	LHD2	5.8630e-003	0.00
tblFleetMix	MCI	4.8030e-003	0.00
tblFleetMix	MCI	4.8030e-003	0.00
tblFleetMix	MDV	0.12	0.13
tblFleetMix	MDV	0.12	0.13
tblFleetMix	MH	8.9600e-004	0.00
tblFleetMix	MH	8.9600e-004	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	MHD	0.02	0.00
tblFleetMix	OBUS	2.0870e-003	0.00
tblFleetMix	OBUS	2.0870e-003	0.00
tblFleetMix	SBUS	7.0800e-004	0.00
tblFleetMix	SBUS	7.0800e-004	0.00
tblFleetMix	UBUS	1.8180e-003	0.00
tblFleetMix	UBUS	1.8180e-003	0.00

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tbl_andUse	tblAverage	13.39	15.54
tblVehicleEmissions	CC_TL	8.40	24.20
tblVehicleEmissions	CC_TL	8.40	24.20
tblVehicleEmissions	CNW_TL	6.90	24.20
tblVehicleEmissions	CNW_TL	6.90	24.20
tblVehicleEmissions	CW_TL	16.60	24.20
tblVehicleEmissions	CW_TL	16.60	24.20
tblVehicleEmissions	ST_TR	2.46	0.95
tblVehicleEmissions	ST_TR	1.68	0.95
tblVehicleEmissions	SU_TR	1.05	0.95
tblVehicleEmissions	SU_TR	1.68	0.95
tblVehicleEmissions	WD_TR	11.03	0.95
tblVehicleEmissions	WD_TR	1.68	0.95

2.0 Emissions Summary

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9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

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

Year	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
2021	5.5678	46.4644	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17,572.39	17,572.39	1.9488	0.0000	17,504.31
												35	35			28
2022	346.8476	41.8782	48.4289	0.1682	9.4913	0.8109	10.4022	2.5955	0.8956	3.4131	0.0000	17,233.97	17,233.97	1.2373	0.0000	17,284.90
												30	30			41
Maximum	346.8476	46.4544	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17,572.39	17,572.39	1.9488	0.0000	17,504.31
												35	35			29

Mitigated Construction

Year	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
2021	5.5678	46.4544	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17,572.39	17,572.39	1.9488	0.0000	17,504.31
												35	35			29
2022	346.8476	41.8782	48.4289	0.1682	9.4913	0.8109	10.4022	2.5955	0.8956	3.4131	0.0000	17,233.97	17,233.97	1.2373	0.0000	17,284.90
												30	30			41
Maximum	346.8476	46.4544	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17,572.39	17,572.39	1.9488	0.0000	17,504.31
												35	35			29
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

2.2 Overall Operational**Unmitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NEBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	13.8324	5.8000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3386	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8878	403.8878	7.7400e-003		408.2880
Mobile	1.0029	1.8036	26.1424	0.0698	8.7838	0.0618	8.8457	2.5936	0.0570	2.6506		9,671.1447	9,671.1447	0.2051		9,678.2730
Total	14.9723	2.2426	26.4893	0.0990	9.7838	0.0877	9.8715	2.5936	0.0828	2.6764		10,075.1798	10,075.1798	0.2132	7.4000e-003	10,082.7173

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NEBio- CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Area	13.8324	5.8000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3386	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8878	403.8878	7.7400e-003		408.2880
Mobile	1.0029	1.8036	26.1424	0.0698	8.7838	0.0618	8.8457	2.5936	0.0570	2.6506		9,671.1447	9,671.1447	0.2051		9,678.2730
Total	14.9723	2.2426	26.4893	0.0990	9.7838	0.0877	9.8715	2.5936	0.0828	2.6764		10,075.1798	10,075.1798	0.2132	7.4000e-003	10,082.7173

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	NBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	4/1/2021	4/26/2021	5	18	
2	Grading	Grading	4/27/2021	6/29/2021	5	46	
3	Building Construction	Building Construction	6/30/2021	5/12/2022	5	227	
4	Paving	Paving	5/13/2022	6/6/2022	5	17	
5	Architectural Coating	Architectural Coating	6/7/2022	6/29/2022	5	17	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 115

Acres of Paving: 24.18

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 304,650; Non-Residential Outdoor: 301,550; Striped Parking Area: 63,197 (Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	156	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.38
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	HDLMix	HDLMix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	HDLMix	HDLMix	HHDT
Building Construction	9	694.00	271.00	0.00	14.70	6.90	20.00	HDLMix	HDLMix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	HDLMix	HDLMix	HHDT
Architectural Coating	1	139.00	0.00	0.00	14.70	6.90	20.00	HDLMix	HDLMix	HHDT

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3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-DO2	NEC- CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Fugitive Dust					18.0863	0.0000	18.0863	9.9307	0.0000	9.9307			0.0000			0.0000
On-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8909	1.8909		3,685,666 ^g	3,685,666 ^g	1.1920		3,715.457 ³
Total	3.8882	40.4971	21.1543	0.0380	18.0863	2.0445	20.1107	9.9307	1.8909	11.8116		3,685,666 ^g	3,685,666 ^g	1.1920		3,715.457 ³

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

3.2 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	Net Bio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0753	0.0481	0.8758	2.0000e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547		199.2417	199.2417	5.3700e-003		199.3759
Total	0.0753	0.0481	0.8758	2.0000e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547		199.2417	199.2417	5.3700e-003		199.3759

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	Net Bio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
Fugitive Dust					18.0983	0.0000	18.0983	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.7543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,885.656	3,885.656	1.1920		3,715.457
Total	3.8882	40.4971	21.7543	0.0380	18.0983	2.0445	20.1107	9.9307	1.8809	11.8115	0.0000	3,885.656	3,885.656	1.1920		3,715.457

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3.2 Site Preparation - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MB-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0753	0.0491	0.6758	2.0000e-003	0.2012	1.4800e-003	0.2027	0.0634	1.3700e-003	0.0647		199.2417	199.2417	5.3700e-003		199.3759
Total	0.0753	0.0491	0.6758	2.0000e-003	0.2012	1.4800e-003	0.2027	0.0634	1.3700e-003	0.0647		199.2417	199.2417	5.3700e-003		199.3759

3.3 Grading - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MB-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Fugitive Dust					8.6733	0.0000	8.6733	3.6995	0.0000	3.6995			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9953	1.9953		1.8265	1.8265		6,007.043 ⁴	6,007.043 ⁴	1.9428		6,055.813 ⁴
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9953	10.6587	3.6995	1.8265	5.4230		6,007.043 ⁴	6,007.043 ⁴	1.9428		6,055.813 ⁴

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3.3 Grading - 2021

Unmitigated Construction Off-site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBP-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0837	0.0840	0.7508	2.2200e-003	0.2236	1.6500e-003	0.2236	0.0593	1.5200e-003	0.0608		221.3797	221.3797	5.9700e-003		221.5288
Total	0.0837	0.0846	0.7509	2.2200e-003	0.2236	1.6500e-003	0.2236	0.0593	1.5200e-003	0.0608		221.3797	221.3797	5.9700e-003		221.5288

Mitigated Construction On-site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBP-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	40.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.043	6,007.043	1.9428		6,055.813
Total	4.1912	46.3998	30.8785	0.0620	8.6733	1.9853	10.5587	3.5965	1.8265	5.4230	0.0000	6,007.043	6,007.043	1.9428		6,055.813

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3.3 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0837	0.0546	0.7509	2.2200e-003	0.2236	1.6500e-003	0.2252	0.0693	1.5200e-003	0.0608		221.3797	221.3797	5.6700e-003		221.5288
Total	0.0837	0.0546	0.7509	2.2200e-003	0.2236	1.6500e-003	0.2252	0.0693	1.5200e-003	0.0608		221.3797	221.3797	5.6700e-003		221.5288

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.8008	17.4321	16.5752	0.0289		0.9586	0.9586		0.8013	0.8013		2,553.3639	2,553.3639	0.6150		2,568.7643
Total	1.8008	17.4321	16.5752	0.0289		0.9586	0.9586		0.8013	0.8013		2,553.3639	2,553.3639	0.6150		2,568.7643

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3.4 Building Construction - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBP-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7624	25.8329	6.3017	0.0656	1.7341	0.0630	1.7871	0.4682	0.0607	0.5489		7,337.155 ⁹	7,337.155 ⁹	0.4537		7,348.498 ⁴
Worker	2.8043	1.8844	29.0578	0.0771	7.7572	0.0574	7.8147	2.0573	0.0629	2.1101		7,681.874 ¹	7,681.874 ¹	0.2071		7,687.050 ²
Total	3.5669	27.8474	32.3583	0.1457	9.4914	0.1104	9.6017	2.5655	0.1036	2.6690		15,019.02 ⁹⁶	15,019.02 ⁹⁶	0.6608		15,025.54 ⁸⁶

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBP-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Off-Road	1.9009	17.4321	16.5752	0.0206		0.5506	0.5506		0.5013	0.5013	0.0000	2,553.363 ⁹	2,553.363 ⁹	0.8160		2,568.764 ³
Total	1.9009	17.4321	16.5752	0.0206		0.5506	0.5506		0.5013	0.5013	0.0000	2,553.363 ⁹	2,553.363 ⁹	0.8160		2,568.764 ³

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3.4 Building Construction - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7624	29.9028	0.3017	0.0666	1.7341	0.0530	1.7871	0.4692	0.0507	0.5199	7.337199	0	7.337199	0.4937		7.348498
Worker	2.8043	1.8944	26.0979	0.0771	7.7573	0.0574	7.8147	2.0673	0.0529	2.1201	7.081874	1	7.081874	0.2071		7.087050
Total	3.5668	27.8474	32.3893	0.1437	9.4914	0.1104	9.6017	2.5365	0.1036	2.6400	15.01902	96	15.01902	0.6608		15.02554

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	16.8156	18.3634	0.0289		0.8090	0.8090		0.7612	0.7612	2.554333	0	2.554333	0.6120		2.569832
Total	1.7062	16.8156	18.3634	0.0289		0.8090	0.8090		0.7612	0.7612	2.554333	0	2.554333	0.6120		2.569832

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
10/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7155	24.8511	5.8888	0.0678	1.7341	0.0461	1.7802	0.4892	0.0441	0.5333		7.272.833	7.272.833	0.4381		7.283.786
												2	2			3
Worker	2.7248	1.7114	24.0869	0.0743	7.7573	0.0558	7.8131	2.0573	0.0514	2.1086		7.408.806	7.408.806	0.1872		7.411.485
												2	2			8
Total	3.4402	26.5625	30.0635	0.1422	9.4913	0.1019	9.5932	2.5565	0.0955	2.6519		14.679.63	14.679.63	0.6253		14.695.27
												94	94			19

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
10/day																
Off-Road	1.7002	15.8158	18.3634	0.0288		0.8090	0.8090		0.7612	0.7612	0.0000	2.554.333	2.554.333	0.6120		2.569.632
												6	6			2
Total	1.7062	15.8196	18.3634	0.0288		0.8090	0.8090		0.7612	0.7612	0.0000	2.554.333	2.554.333	0.6120		2.569.632
												6	6			2

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7155	24.9511	5.9605	0.0678	1.7341	0.0491	1.7802	0.4592	0.0441	0.5433	7,272.833	7,272.833	7,272.833	0.4381		7,283.786
											2	2	2			3
Worker	2.7248	1.7114	24.0869	0.0743	7.7573	0.0558	7.9131	2.0573	0.0514	2.1086	7,406.806	7,406.806	7,406.806	0.1872		7,411.485
											2	2	2			6
Total	3.4402	26.3626	30.0636	0.1422	9.4513	0.1019	9.5932	2.5565	0.0955	2.6519	14,679.63	14,679.63	14,679.63	0.6253		14,695.27
											94	94	94			19

3.5 Paving - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Off-Road	1.1028	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2,207.660	2,207.660	2,207.660	0.7140		2,225.510
											3	3	3			4
Paving	3.7266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	4.8294	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2,207.660	2,207.660	2,207.660	0.7140		2,225.510
											3	3	3			4

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3.5 Paving - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0689	0.0370	0.5208	1.6100e-003	0.1677	1.2100e-003	0.1689	0.0446	1.1100e-003	0.0456		160.0895	160.0895	4.0900e-003		160.1906
Total	0.0689	0.0370	0.5208	1.6100e-003	0.1677	1.2100e-003	0.1689	0.0446	1.1100e-003	0.0456		160.0895	160.0895	4.0900e-003		160.1906

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.1028	11.1249	14.5805	0.0228		0.6679	0.6679		0.5225	0.5225	0.0000	2,207.660	2,207.660	0.7140		2,225.510
Paving	3.7268					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	4.8294	11.1249	14.5805	0.0228		0.6679	0.6679		0.5225	0.5225	0.0000	2,207.660	2,207.660	0.7140		2,225.510

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3.5 Paving - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000		0.0000
Worker	0.0589	0.0370	0.5208	1.6100e-003	0.1677	1.2100e-003	0.1686	0.0445	1.1100e-003	0.0456			160.0895	4.0500e-003		160.1906
Total	0.0589	0.0370	0.5208	1.6100e-003	0.1677	1.2100e-003	0.1689	0.0445	1.1100e-003	0.0456			160.0895	4.0500e-003		160.1906

3.6 Architectural Coating - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	346.0674					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817			281.4481	0.0183		281.6062
Total	346.3019	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817			281.4481	0.0183		281.6062

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3.6 Architectural Coating - 2022**Unmitigated Construction Off-Site**

Category	PM10	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.5457	0.3428	4.8263	0.0148	1.5637	0.0112	1.5649	0.4121	0.0103	0.4223		1,463.4958	1,463.4958	0.0375		1,464.4330
Total	0.5457	0.3428	4.8263	0.0148	1.5637	0.0112	1.5649	0.4121	0.0103	0.4223		1,463.4958	1,463.4958	0.0375		1,464.4330

Mitigated Construction On-Site

Category	PM10	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	346.0974				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.8700e-003	0.0817	0.0817	0.0817	0.0817	0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.8062
Total	346.3019	1.4085	1.8136	2.8700e-003	0.0817	0.0817	0.0817	0.0817	0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.8062

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3.6 Architectural Coating - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Sox CO2	MBR-CO2	Total CO2	CH4	N2O	CO2e
[Day]																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.5467	0.3428	4.8263	0.0149	1.5637	0.0112	1.5649	0.4121	0.0103	0.4223		1,483,495 8	1,483,495 8	0.0375		1,484,433 0
Total	0.5467	0.3428	4.8263	0.0149	1.5637	0.0112	1.5649	0.4121	0.0103	0.4223		1,483,495 8	1,483,495 8	0.0375		1,484,433 0

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBP-CO2	Total CO2	CH4	N2O	CO2e
Mitigated	1.0029	1.9066	26.1424	0.0998	8.7838	0.0619	8.8457	2.5936	0.0570	2.6506		9,671.144	9,671.144	0.2051		9,678.273
Unmitigated	1.0029	1.9066	26.1424	0.0998	8.7838	0.0619	8.8457	2.5936	0.0570	2.6506		9,671.144	9,671.144	0.2051		9,678.273

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
General Office Building	19.00	19.00	19.00	136,850	136,850
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	553.95	553.95	553.95	4,550,623	4,550,623
Total	572.95	572.95	572.95	4,687,674	4,687,674

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	24.20	24.20	24.20	33.00	48.00	19.00	77	19	4
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	24.20	24.20	24.20	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCV	SBUS	MH
General Office Building	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Other Asphalt Surfaces	0.552111	0.043066	0.201891	0.118512	0.015605	0.005863	0.021387	0.031253	0.002087	0.001818	0.004803	0.000708	0.000896
Parking Lot	0.552111	0.043066	0.201891	0.118512	0.015605	0.005863	0.021387	0.031253	0.002087	0.001818	0.004803	0.000708	0.000896
Unrefrigerated Warehouse-No Rail	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOK	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	NRB-CO2	Total CO2	CH4	N2O	CO2e
Net Gas Mitigated	0.0370	0.3396	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.7400e-003	406.2880
Net Gas Unmitigated	0.0370	0.3396	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.7400e-003	406.2880

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5.2 Energy by Land Use - Natural Gas, Unmitigated

Land Use	Area sq ft	FCG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
General Office Building	190,137	2.0500e-003	0.0186	0.0157	1.1000e-004		1.4200e-003	1.4200e-003		1.4200e-003	1.4200e-003		22,399.1	22,399.1	4.3000e-004	4.1000e-004	22,502.0
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	3242,898	0.0350	0.3178	0.2877	1.9100e-003		0.0242	0.0242		0.0242	0.0242		381,528.8	381,528.8	7.3100e-003	6.5900e-003	383,789.0
Total		0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403,897.8	403,897.8	7.7400e-003	7.4000e-003	406,298.0

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

Land Use	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NRE-CO2	Total CO2	CH4	N2O	CO2e
General Office Building	0.190137	2.0500e-003	0.0186	0.0167	1.1000e-004		1.4200e-003	1.4200e-003		1.4200e-003	1.4200e-003		22.3691	22.3691	4.3000e-004	4.1000e-004	22.5020
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	3.24289	0.0360	0.3178	0.2671	1.9100e-003		0.0242	0.0242		0.0242	0.0242		381.5288	381.5288	7.3100e-003	6.9900e-003	383.7960
Total		0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.4000e-003	406.2960

6.0 Area Detail**6.1 Mitigation Measures Area**

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Eqv-DIO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Mitigated	13.6324	5.8000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Unmitigated	13.6324	5.8000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463

6.2 Area by SubCategory
Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Eqv-DIO2	NEP-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Architectural Coating	1.6120					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.3145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.8700e-003	5.8000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Total	13.5324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463

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6.2 Area by SubCategory Mitigated

	RtG	MOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	NO _x -CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
SubCategory	lb/day															
Architectural Coating	1.6120					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.3145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.6700e-003	5.6000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373		3.6000e-004	0.1463
Total	13.3324	5.3900e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373		3.6000e-004	0.1463

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Summer

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

Boilers

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

Equipment Type	Number
----------------	--------

11.0 Vegetation

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Winter

9309 Sycamore Hills Distribution Center - Passenger Cars

South Coast Air Basin, Winter

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	20.00	1000sqft	0.46	20,000.00	0
Unrefrigerated Warehouse-No Rail	583.10	1000sqft	15.54	583,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	8.18	Acre	8.18	356,320.80	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2022
Utility Company	Riverside Public Utilities				

CO2 Intensity (lb/MMBtu)	1325.65	CH4 Intensity (lb/MMBtu)	0.029	N2O Intensity (lb/MMBtu)	0.006
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1.3 User Entered Comments & Non-Default Data

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Project Characteristics - See SWAPE comment regarding CO₂, CH₄, and N₂O intensity factors.

Construction Phase - Total construction length consistent with information provided in the DEIR, but phase lengths are **proportionally** altered.

Vehicle Trips - Consistent with the DEIR's model.

Land Use - Consistent with the DEIR's model.

Grading -

Trips and VMT - See SWAPE comment regarding vendor and worker trip numbers.

Architectural Coating - See SWAPE comment regarding architectural coating emission factors.

Fleet Mix - See SWAPE comment regarding operational vehicle fleet mix. Only passenger cars. Trucks reduced to 0; passenger car percentages proportionally altered based on CalEEMod defaults. See construction calculations.

Energy Use -

Water And Wastewater - See SWAPE comment regarding indoor water use rate.

Construction Off-road Equipment Mitigation - See SWAPE comment regarding the PM₁₀ and PM_{2.5} % reductions.

Mobile Land Use Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	740.00	227.00
tblConstructionPhase	NumDays	75.00	46.00
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	PhaseEndDate	11/27/2024	6/29/2022
tblConstructionPhase	PhaseEndDate	6/26/2024	5/12/2022
tblConstructionPhase	PhaseEndDate	8/25/2021	6/29/2021
tblConstructionPhase	PhaseEndDate	9/11/2024	6/6/2022
tblConstructionPhase	PhaseEndDate	5/12/2021	4/26/2021
tblConstructionPhase	PhaseStartDate	9/12/2024	6/7/2022
tblConstructionPhase	PhaseStartDate	8/26/2021	6/30/2021
tblConstructionPhase	PhaseStartDate	5/13/2021	4/27/2021

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ConstructionPhase	PhaseStartDate	6/27/2024	5/13/2022
tblFeemMtx	HHD	0.03	0.00
tblFeemMtx	HHD	0.03	0.00
tblFeemMtx	LDA	0.55	0.60
tblFeemMtx	LDA	0.55	0.60
tblFeemMtx	LDT1	0.04	0.05
tblFeemMtx	LDT1	0.04	0.05
tblFeemMtx	LDT1	0.04	0.05
tblFeemMtx	LDT2	0.20	0.22
tblFeemMtx	LDT2	0.20	0.22
tblFeemMtx	LHD1	0.02	0.00
tblFeemMtx	LHD1	0.02	0.00
tblFeemMtx	LHD2	5.8630e-003	0.00
tblFeemMtx	LHD2	5.8630e-003	0.00
tblFeemMtx	MCY	4.8030e-003	0.00
tblFeemMtx	MCY	4.8030e-003	0.00
tblFeemMtx	MDV	0.12	0.13
tblFeemMtx	MDV	0.12	0.13
tblFeemMtx	MH	8.9600e-004	0.00
tblFeemMtx	MH	8.9600e-004	0.00
tblFeemMtx	MHD	0.02	0.00
tblFeemMtx	MHD	0.02	0.00
tblFeemMtx	MHD	0.02	0.00
tblFeemMtx	OBUS	2.0870e-003	0.00
tblFeemMtx	OBUS	2.0870e-003	0.00
tblFeemMtx	SEBUS	7.0800e-004	0.00
tblFeemMtx	SEBUS	7.0800e-004	0.00
tblFeemMtx	UBUS	1.8180e-003	0.00
tblFeemMtx	UBUS	1.8180e-003	0.00

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tbl_andUse	LatAcres	13.39	15.54
tblVehicleEmissions	CC_TL	8.40	24.20
tblVehicleEmissions	CC_TL	8.40	24.20
tblVehicleEmissions	CNW_TL	6.90	24.20
tblVehicleEmissions	CNW_TL	6.90	24.20
tblVehicleEmissions	CW_TL	16.60	24.20
tblVehicleEmissions	CW_TL	16.60	24.20
tblVehicleEmissions	ST_TR	2.46	0.95
tblVehicleEmissions	ST_TR	1.68	0.95
tblVehicleEmissions	SU_TR	1.05	0.95
tblVehicleEmissions	SU_TR	1.68	0.95
tblVehicleEmissions	WD_TR	11.03	0.95
tblVehicleEmissions	WD_TR	1.68	0.95

2.0 Emissions Summary

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9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Winter

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

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MSR-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
2021	5,9025	46,4598	47,1669	0.1659	18,2675	2,0460	20,3134	9,9840	1,8823	11,8663	0.0000	16,895,56	16,895,56	1,9484	0.0000	16,927,92
												24	24			63
2022	346,9048	42,0701	44,7715	0.1627	9,4913	0,9124	10,4037	2,5965	0,8980	3,4145	0.0000	16,574,82	16,574,82	1,2548	0.0000	16,606,19
												59	59			68
Maximum	346,9048	46,4598	47,1669	0.1659	18,2675	2,0460	20,3134	9,9840	1,8823	11,8663	0.0000	16,895,56	16,895,56	1,9484	0.0000	16,927,92
												24	24			93

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MSR-CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
2021	5,9025	46,4598	47,1669	0.1659	18,2675	2,0460	20,3134	9,9840	1,8823	11,8663	0.0000	16,895,56	16,895,56	1,9484	0.0000	16,927,92
												24	24			63
2022	346,9048	42,0701	44,7715	0.1627	9,4913	0,9124	10,4037	2,5965	0,8980	3,4145	0.0000	16,574,82	16,574,82	1,2548	0.0000	16,606,19
												59	59			68
Maximum	346,9048	46,4598	47,1669	0.1659	18,2675	2,0460	20,3134	9,9840	1,8823	11,8663	0.0000	16,895,56	16,895,56	1,9484	0.0000	16,927,92
												24	24			93
	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MSR-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Winter

2.2 Overall Operational**Unmitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Aires	13.9324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004	2.3000e-004	2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256	0.0256	0.0256	0.0256		403.8978	403.8978	7.7400e-003		406.2860
Micelle	0.9325	2.0861	23.2541	0.0608	9.7838	0.0619	9.8457	2.5936	0.0570	2.6506		9,064.188	9,064.188	0.1604		9,068.948
Total	14.9019	2.4233	23.6010	0.0929	9.7838	0.0677	9.8715	2.5936	0.0628	2.6764		9,468.223	9,468.223	0.1985	7.4000e-003	9,475.392

Mitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Aires	13.9324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004	2.3000e-004	2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256	0.0256	0.0256	0.0256		403.8978	403.8978	7.7400e-003		406.2860
Micelle	0.9325	2.0861	23.2541	0.0608	9.7838	0.0619	9.8457	2.5936	0.0570	2.6506		9,064.188	9,064.188	0.1604		9,068.948
Total	14.9019	2.4233	23.6010	0.0929	9.7838	0.0677	9.8715	2.5936	0.0628	2.6764		9,468.223	9,468.223	0.1985	7.4000e-003	9,475.392

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	4/1/2021	4/26/2021	5	18	
2	Grading	Grading	4/27/2021	6/29/2021	5	46	
3	Building Construction	Building Construction	6/30/2021	5/12/2022	5	227	
4	Paving	Paving	5/13/2022	6/6/2022	5	17	
5	Architectural Coating	Architectural Coating	6/7/2022	6/29/2022	5	17	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 115

Acres of Paving: 24.18

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 904,650; Non-Residential Outdoor: 301,550; Striped Parking Area: 63,197 (Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.28
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD,Mix	HDT,Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD,Mix	HDT,Mix	HHDT
Building Construction	9	694.00	271.00	0.00	14.70	6.90	20.00	LD,Mix	HDT,Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD,Mix	HDT,Mix	HHDT
Architectural Coating	1	139.00	0.00	0.00	14.70	6.90	20.00	LD,Mix	HDT,Mix	HHDT

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3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Site Preparation - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
	lb/day															
Fugitive Dust					18.0663	0.0000	18.0663	8.9307	0.0000	8.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	3,695.556	9	3,695.556	1.1920		3,715.457
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116		3,695.556	3,695.556	1.1920		3,715.457

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Winter

3.2 Site Preparation - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEC-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0630	0.0540	0.6118	1.8800e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547		186.8672	186.8672	5.0300e-003		186.8628
Total	0.0630	0.0540	0.6118	1.8800e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547		186.8672	186.8672	5.0300e-003		186.8628

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEC-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3.685566	3.685566	1.1920		3.715457
Total	3.8882	40.4971	21.1543	0.0380	18.0663	2.0445	20.1107	9.9307	1.8809	11.8116	0.0000	3.685566	3.685566	1.1920		3.715457

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3.2 Site Preparation - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0830	0.0540	0.6118	1.8800e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547	186.8672	186.8672	186.8672	5.0300e-003		186.8928
Total	0.0830	0.0540	0.6118	1.8800e-003	0.2012	1.4900e-003	0.2027	0.0534	1.3700e-003	0.0547	186.8672	186.8672	186.8672	5.0300e-003		186.8928

3.3 Grading - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	40.3998	30.8785	0.0020		1.9853	1.9853		1.8285	1.8285	6.007.043	6.007.043	6.007.043	1.9428		6.055.613
Total	4.1912	40.3998	30.8785	0.0020	8.6733	1.9853	10.6587	3.5965	1.8285	5.4230	6.007.043	6.007.043	6.007.043	1.9428		6.055.613

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3.3 Grading - 2021**Unmitigated Construction Off-site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
1b/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0902	0.0800	0.6787	2.0800e-003	0.2236	1.9600e-003	0.2252	0.0582	1.5200e-003	0.0608		207.6302	207.6302	5.5800e-003		207.7696
Total	0.0902	0.0800	0.6787	2.0800e-003	0.2236	1.9600e-003	0.2252	0.0583	1.5200e-003	0.0608		207.6302	207.6302	5.5800e-003		207.7696

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	WBio-CO2	Total CO2	CH4	N2O	CO2e
1b/day																
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3968	30.8785	0.0620		1.8953	1.8953		1.8265	1.8265	0.0000	6.007.043 ⁴	6.007.043 ⁴	1.9428		6.095.613 ⁴
Total	4.1912	46.3968	30.8785	0.0620	8.6733	1.8953	10.5587	3.5965	1.8265	5.4230	0.0000	6.007.043 ⁴	6.007.043 ⁴	1.9428		6.095.613 ⁴

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3.3 Grading - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
b/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0822	0.0800	0.8797	2.0800e-003	0.2238	1.8600e-003	0.2282	0.0593	1.5200e-003	0.0608		207.6302	207.6302	5.5900e-003		207.7688
Total	0.0822	0.0800	0.8797	2.0800e-003	0.2238	1.8600e-003	0.2282	0.0593	1.5200e-003	0.0608		207.6302	207.6302	5.5900e-003		207.7688

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
b/day																
On-Road	1.9009	17.4321	16.5752	0.0289		0.9598	0.9598		0.9013	0.9013		2,553.363	2,553.363	0.6190		2,568.794
Total	1.9009	17.4321	16.5752	0.0289		0.9598	0.9598		0.9013	0.9013		2,553.363	2,553.363	0.6190		2,568.794

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3.4 Building Construction - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.8010	26.8918	7.0060	0.0997	1.7341	0.0547	1.7887	0.4692	0.0523	0.5215		7.137429	7.137429	0.4849		7.149561
Worker	3.2005	2.0805	23.8867	0.0723	7.7573	0.0574	7.8147	2.0573	0.0529	2.1101		7.204780	7.204780	0.1038		7.209813
Total	4.0015	27.9723	30.8917	0.1390	9.4914	0.1121	9.6034	2.5265	0.1051	2.6316		14.34219	14.34219	0.5787		14.35916

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.8009	17.4321	18.5752	0.0298		0.8586	0.8586		0.9013	0.9013	0.0000	2.553363	2.553363	0.8160		2.568784
Total	1.8009	17.4321	18.5752	0.0298		0.8586	0.8586		0.9013	0.9013	0.0000	2.553363	2.553363	0.8160		2.568784

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3.4 Building Construction - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Bio- CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.8010	26.8918	7.0050	0.0667	1.7341	0.0547	1.7887	0.4992	0.0523	0.5515	7.137429	5	7.137429	0.4849		7.149551
Worker	3.2006	2.0606	23.5967	0.0723	7.7573	0.0574	7.8147	2.0573	0.0529	2.1101	7.204769	0	7.204769	0.1938		7.209613
Total	4.0016	27.9723	30.5917	0.1390	9.4914	0.1121	9.6034	2.5565	0.1051	2.6616	14.34219	85	14.34219	0.6787		14.35816

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Bio- CO2	Total CO2	CH4	N2O	CO2e
Off-Road	1.7062	16.6158	16.3634	0.0266		0.8090	0.8090		0.7612	0.7612	2.554333	6	2.554333	0.6120		2.569632
Total	1.7062	16.6156	16.3634	0.0266		0.8090	0.8090		0.7612	0.7612	2.554333	6	2.554333	0.6120		2.569632

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

Category	ROG	NOX	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio- CO ₂	Net Bio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO _{2e}
	lb/day											lb/day				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7916	24.5754	0.8347	0.0691	1.7341	0.0476	1.7817	0.4692	0.0465	0.5157	7,073.989	2	7,073.989	0.4679		7,085.365
Worker	3.0102	1.8791	21.7734	0.0697	7.7573	0.0658	7.8231	2.0573	0.0514	2.1087	9,846.783	1	9,846.783	0.7750		9,951.168
Total	3.7627	26.4544	28.4081	0.1386	9.4913	0.1034	9.5947	2.5565	0.0989	2.6553	14,020.49	23	14,020.49	0.6429		14,036.56

Mitigated Construction On-Site

Category	ROG	NOX	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio- CO ₂	Net Bio- CO ₂	Total CO ₂	CH ₄	N ₂ O	CO _{2e}
	lb/day											lb/day				
Off-Road	1.7062	13.6196	16.3634	0.0298		0.8090	0.8090		0.7612	0.7612	0.0000	2,564.333	2,564.333	0.6120		2,569.532
Total	1.7062	13.6196	16.3634	0.0298		0.8090	0.8090		0.7612	0.7612	0.0000	2,564.333	2,564.333	0.6120		2,569.532

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Site-CO2	NEB-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.7519	24.5754	0.5347	0.0961	1.7341	0.0476	1.7817	0.4692	0.0455	0.5147	7.073.699	2	7.073.699	0.4679		7.085.395
Worker	3.0102	1.9791	21.7734	0.0697	7.7573	0.0658	7.8231	2.0573	0.0514	2.1086	0.546.793	1	0.546.793	0.1750		0.951.183
Total	3.7621	26.5544	28.4081	0.1358	9.4913	0.1034	9.5947	2.5565	0.0969	2.6533	14,020.49	23	14,020.49	0.6429		14,036.55

3.5 Paving - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Site-CO2	NEB-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.1028	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2,207.660	3	2,207.660	0.7140		2,225.510
Paving	3.7266					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	4.8294	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	2,207.660	3	2,207.660	0.7140		2,225.510

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3.5 Paving - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Site CO2	Mobile CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0651	0.0406	0.4706	1.5100e-003	0.1677	1.2100e-003	0.1688	0.0445	1.1100e-003	0.0456		150.1468	150.1468	3.7800e-003		150.2414
Total	0.0651	0.0406	0.4706	1.5100e-003	0.1677	1.2100e-003	0.1689	0.0445	1.1100e-003	0.0456		150.1468	150.1468	3.7800e-003		150.2414

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Site CO2	Mobile CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Off-Road	1.1028	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	0.0000	2,207.660	2,207.660	0.7140		2,225.510
Paving	3.7266					0.0000	0.0000		0.0000	0.0000		0.0000	0.0000			0.0000
Total	4.8294	11.1249	14.5805	0.0228		0.5679	0.5679		0.5225	0.5225	0.0000	2,207.660	2,207.660	0.7140		2,225.510

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3.5 Paving - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0651	0.0406	0.4706	1.5100e-003	0.1677	1.2100e-003	0.1689	0.0445	1.1100e-003	0.0456		150.1468	150.1468	3.7800e-003		150.2414
Total	0.0651	0.0406	0.4706	1.5100e-003	0.1677	1.2100e-003	0.1689	0.0445	1.1100e-003	0.0456		150.1468	150.1468	3.7800e-003		150.2414

3.6 Architectural Coating - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
lb/day																
Archit. Coating	348.0674					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.6062
Total	348.2719	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062

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3.6 Architectural Coating - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
1b/day																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.6028	0.3764	4.3610	0.0140	1.5537	0.0112	1.5649	0.4121	0.0103	0.4223		1,391,360 ⁶	1,391,360 ⁶	0.0351		1,392,237 ⁰
Total	0.6028	0.3764	4.3610	0.0140	1.5537	0.0112	1.5649	0.4121	0.0103	0.4223		1,391,360 ⁶	1,391,360 ⁶	0.0351		1,392,237 ⁰

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
1b/day																
Archit. Coating	348.0674					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281,4481	281,4481	0.0163		281,6062
Total	348.2019	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281,4481	281,4481	0.0163		281,9062

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3.6 Architectural Coating - 2022**Mitigated Construction Off-site**

Category	ROG	NOC	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	Net Bio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	lb/day											lb/day				
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Worker	0.0029	0.3764	4.3610	0.0140	1.5537	0.0112	1.5649	0.4121	0.0103	0.4223	1,391,360 ⁶	1,391,360 ⁶	1,391,360 ⁶	0.0351		1,392,237 ⁰
Total	0.0029	0.3764	4.3610	0.0140	1.5537	0.0112	1.5649	0.4121	0.0103	0.4223	1,391,360 ⁶	1,391,360 ⁶	1,391,360 ⁶	0.0351		1,392,237 ⁰

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

9309 Sycamore Hills Distribution Center - Passenger Cars - South Coast Air Basin, Winter

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NRB- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.9325	2.0881	23.2641	0.0908	8.7838	0.0818	8.8657	2.8938	0.0570	2.9508	8.094.188	2	8.094.188	0.1804		8.088.948
Unmitigated	0.9325	2.0881	23.2641	0.0908	8.7838	0.0818	8.8657	2.8938	0.0570	2.9508	8.094.188	2	8.094.188	0.1804		8.088.948

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate				Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday			
General Office Building	19.00	19.00	19.00		136.850	136.850
Other Asphalt Surfaces	0.00	0.00	0.00			
Parking Lot	0.00	0.00	0.00			
Unrefrigerated Warehouse-No Rail	553.95	553.95	553.95		4,550.823	4,550.823
Total	572.95	572.95	572.95		4,687.674	4,687.674

4.3 Trip Type Information

Land Use	Miles				Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW		H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	24.20	24.20	24.20		33.00	48.00	19.00	77	19	4
Other Asphalt Surfaces	16.60	8.40	6.90		0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90		0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	24.20	24.20	24.20		59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MOV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCV	SBUS	MH
General Office Building	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Other Asphalt Surfaces	0.552111	0.043066	0.201891	0.118512	0.015605	0.005665	0.021387	0.031253	0.002067	0.001818	0.004803	0.000708	0.000896
Parking Lot	0.552111	0.043066	0.201891	0.118512	0.015605	0.005863	0.021387	0.031253	0.002067	0.001818	0.004803	0.000708	0.000896
Unrefrigerated Warehouse-No Rail	0.603018	0.047037	0.220506	0.129439	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	UBio-CO2	Total CO2	CH4	N2O	CO2e
Net/Gas Mitigated	0.0370	0.3386	0.2827	2.0200e-003		0.0296	0.0296		0.0296	0.0296		403.8878	403.8878	7.7400e-003	7.7400e-003	408.2890
Net/Gas Unmitigated	0.0370	0.3386	0.2827	2.0200e-003		0.0296	0.0296		0.0296	0.0296		403.8878	403.8878	7.7400e-003	7.7400e-003	408.2890

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5.2 Energy by Land Use - NaturalGas, Unmitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	H2O	CO2e
Land Use	kg/day	kg/day											kg/day				
General Office Building	190.137	2.0500e-003	0.0198	0.0157	1.1000e-004	1.4200e-003	1.4200e-003	1.4200e-003	1.4200e-003	1.4200e-003	1.4200e-003	22.3991	22.3991	4.3000e-004	4.1000e-004	22.8020	
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Parking Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Unrefrigerated Warehouse-No Hail	3242.89	0.0390	0.3178	0.2671	1.9100e-003	0.0242	0.0242	0.0242	0.0242	0.0242	0.0242	381.9288	381.9288	7.3100e-003	6.9900e-003	383.7980	
Total		0.0370	0.3365	0.2827	2.0200e-003	0.0256	0.0256	0.0256	0.0256	0.0256	0.0256	403.8978	403.8978	7.7400e-003	7.4000e-003	406.2980	

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5.2 Energy by Land Use - Natural Gas, Mitigated

Land Use	ROG	NOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO ₂	Unabated CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
General Office Building	0.190137	2.0500e-003	0.0186	0.0157	1.1000e-004	1.4200e-003	1.4200e-003		1.4200e-003	1.4200e-003		22.3891	22.3891	4.3000e-004	4.1000e-004	22.5020
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	3.24289	0.0360	0.3178	0.2671	1.9100e-003	0.0242	0.0242		0.0242	0.0242		381.5288	381.5288	7.3100e-003	6.9900e-003	383.7890
Total	0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.4000e-003	406.2980

6.0 Area Detail

6.1 Mitigation Measures Area

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net Bio- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	13.8324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004	0.1373	0.1373	0.1373	3.6000e-004		0.1463
Unmitigated	13.8324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004	0.1373	0.1373	0.1373	3.6000e-004		0.1463

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net Bio- CO2	Total CO2	CH4	N2O	CO2e
Architectural Coating	1.6120					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.3145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscape	5.9700e-003	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004	0.1373	0.1373	0.1373	3.6000e-004		0.1463
Total	13.8324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004	0.1373	0.1373	0.1373	3.6000e-004		0.1463

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6.2 Area by SubCategory Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Elc-CO2	DBq-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	b/day															
Architectural Coating	1.6120					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.3145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.6700e-003	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Total	13.9324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

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

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

Equipment Type	Number
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11.0 Vegetation

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	20.00	1000sqft	0.46	20,000.00	0
Unrefrigerated Warehouse-No Rail	583.10	1000sqft	15.54	583,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	8.18	Acre	8.18	356,320.80	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2022

Utility Company Riverside Public Utilities

CO2 Intensity (lb/MMBtu)	1325.65	CH4 Intensity (lb/MMBtu)	0.029	N2O Intensity (lb/MMBtu)	0.006
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1.3 User Entered Comments & Non-Default Data

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Project Characteristics - See SWAPE comment regarding CO₂, CH₄, and N₂O intensity factors.

Land Use - Consistent with the DEIR's model.

Construction Phase - Total construction length consistent with information provided in the DEIR, but phase lengths are ~~proportionally~~ altered.

Trips and VMT - See SWAPE comment regarding vendor and worker trip numbers.

Grading -

Architectural Coating - See SWAPE comment regarding architectural coating emission factors.

Vehicle Trips - Consistent with the DEIR's model.

Energy Use -

Water ~~And~~ Wastewater - See SWAPE comment regarding indoor water use rate.Construction Off-road Equipment Mitigation - See SWAPE comment regarding the PM₁₀ and PM_{2.5} % reductions.

Mobile Land Use Mitigation - See SWAPE comment regarding operational mitigation measures.

Fleet Mix - See SWAPE comment regarding operational vehicle fleet mix. Only trucks. Passenger cars reduced to 0; truck percentages proportionally altered based on CalEEMod defaults. See construction calculations.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	NumDays	75.00	46.00
tblConstructionPhase	NumDays	740.00	227.00
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	55.00	17.00
tblFleetMix	HHD	0.03	0.42
tblFleetMix	HHD	0.03	0.42
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LDT2	0.20	0.00

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tblFeedMix	LHD1	0.02	0.21
tblFeedMix	LHD1	0.02	0.21
tblFeedMix	LHD2	5.8630e-003	0.08
tblFeedMix	LHD2	5.8630e-003	0.08
tblFeedMix	MDV	0.12	0.00
tblFeedMix	MDV	0.12	0.00
tblFeedMix	MHD	0.02	0.29
tblFeedMix	MHD	0.02	0.29
tblFeedMix	MHD	0.02	0.29
tblAndUse	LdcAverage	13.39	15.54
tblVehicleTrips	CW_TL	8.40	38.70
tblVehicleTrips	CW_TL	8.40	38.70
tblVehicleTrips	CNW_TL	6.90	38.70
tblVehicleTrips	CNW_TL	6.90	38.70
tblVehicleTrips	CW_TL	16.60	38.70
tblVehicleTrips	CW_TL	16.60	38.70
tblVehicleTrips	ST_TR	2.46	0.45
tblVehicleTrips	ST_TR	1.68	0.45
tblVehicleTrips	SU_TR	1.05	0.45
tblVehicleTrips	SU_TR	1.68	0.45
tblVehicleTrips	WD_TR	11.03	0.45
tblVehicleTrips	WD_TR	1.68	0.45

2.0 Emissions Summary

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2.1 Overall Construction**Unmitigated Construction**

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
2021	0.5040	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.498	1,194.498	0.1277	0.0000	1,197.850
2022	3.2316	2.1106	2.2883	8.1000e-003	0.4525	0.0485	0.5010	0.1220	0.0455	0.1675	0.0000	747.5735	747.5735	0.0589	0.0000	749.0453
Maximum	3.2316	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.498	1,194.498	0.1277	0.0000	1,197.850

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	DBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
2021	0.5040	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.497	1,194.497	0.1277	0.0000	1,197.069
2022	3.2316	2.1106	2.2883	8.1000e-003	0.4525	0.0485	0.5010	0.1220	0.0455	0.1675	0.0000	747.5733	747.5733	0.0589	0.0000	749.0451
Maximum	3.2316	4.4881	4.0782	0.0130	0.9888	0.1353	1.1241	0.3412	0.1259	0.4670	0.0000	1,194.497	1,194.497	0.1277	0.0000	1,197.069

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOx (tons/quarter)	Maximum Mitigated ROG + NOx (tons/quarter)
1	4-1-2021	6-30-2021	1.5910	1.5910
2	7-1-2021	9-30-2021	1.6707	1.6707
3	10-1-2021	12-31-2021	1.6868	1.6868
4	1-1-2022	3-31-2022	1.5280	1.5280
5	4-1-2022	6-30-2022	3.7137	3.7137
		Highest	3.7137	3.7137

2.2 Overall Operational

Unmitigated Operational

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	USEC-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Ares	2.5423	7.0000e-005	8.0200e-003	0.0000	3.0000e-006	3.0000e-006	3.0000e-006	3.0000e-006	3.0000e-006	3.0000e-006	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166
Energy	6.7600e-003	0.0614	0.0616	3.7000e-004	4.6700e-003	4.6700e-003	4.6700e-003	4.6700e-003	4.6700e-003	4.6700e-003	0.0000	1.083.813	1.083.813	0.0236	6.8300e-003	1.084.136
Mobile	0.4469	10.9677	3.8328	0.0458	1.5784	0.0437	1.6222	0.4512	0.0418	0.4630	0.0000	4.429.392	4.429.392	0.2134	0.0000	4.434.727
Waste					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	115.0370	0.0000	115.0370	8.7866	0.0000	284.8983
Water					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	43.0068	1.085.142	1.142.046	4.8337	0.1116	1.288.804
Total	2.9990	10.7592	3.8925	0.0462	1.5784	0.0484	1.6289	0.4612	0.0466	0.4977	158.9439	6,611.364	6,770.307	11.5691	0.1173	7,094.485

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2.2 Overall Operational**Mitigated Operational**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
t/yr																
Area	2.5423	7.0000e-006	8.0200e-003	0.0000		3.0000e-006	3.0000e-006		3.0000e-006	3.0000e-006	0.0000	0.0156	0.0156	4.0000e-006	0.0000	0.0166
Energy	6.7600e-003	0.0614	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	1.083.813	1.083.813	0.0235	5.8300e-003	1.084.138
Mobile	0.4469	10.6677	3.8328	0.0458	1.5794	0.0437	1.6222	0.4612	0.0418	0.4930	0.0000	4.429.392	4.429.392	0.2134	0.0000	4.434.727
Waste						0.0000	0.0000		0.0000	0.0000	115.0370	0.0000	115.0370	0.7985	0.0000	284.8983
Water						0.0000	0.0000		0.0000	0.0000	43.9006	1.086.142	1.142.049	4.5337	0.1115	1.289.604
Total	2.9590	10.7592	3.8925	0.0462	1.5794	0.0464	1.6269	0.4612	0.0465	0.4977	156.9439	6,611.364	6,770.307	11.5691	0.1173	7,094.485
MT/yr																
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	4/11/2021	4/26/2021	5	18	
2	Grading	Grading	4/27/2021	6/29/2021	5	46	
3	Building Construction	Building Construction	6/30/2021	5/12/2022	5	227	
4	Paving	Paving	5/13/2022	6/6/2022	5	17	
5	Architectural Coating	Architectural Coating	6/7/2022	6/29/2022	5	17	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 115

Acres of Paving: 24.18

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 904,650; Non-Residential Outdoor: 301,550; Striped Parking Area: 63,197 (Architectural Coating – ~~sqft~~)~~Offroad Equipment~~

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Phase Name	Offroad Equipment Count	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation		Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation		Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading		Excavators	2	8.00	156	0.38
Grading		Graders	1	8.00	187	0.41
Grading		Rubber Tired Dozers	1	8.00	247	0.40
Grading		Scrapers	2	8.00	367	0.48
Grading		Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction		Cranes	1	7.00	231	0.29
Building Construction		Forklifts	3	8.00	89	0.20
Building Construction		Generator Sets	1	8.00	84	0.74
Building Construction		Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction		Welders	1	8.00	46	0.45
Paving		Pavers	2	8.00	130	0.42
Paving		Paving Equipment	2	8.00	132	0.36
Paving		Rollers	2	8.00	80	0.38
Architectural Coating		Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	HDJ.Mix	HDJ.Mix	HHDT
Grading	6	20.00	0.00	0.00	14.70	6.90	20.00	HDJ.Mix	HDJ.Mix	HHDT
Building Construction	9	694.00	271.00	0.00	14.70	6.90	20.00	HDJ.Mix	HDJ.Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	HDJ.Mix	HDJ.Mix	HHDT
Architectural Coating	1	139.00	0.00	0.00	14.70	6.90	20.00	HDJ.Mix	HDJ.Mix	HHDT

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3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Site Preparation - 2021Unmitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEIO-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.1626	0.0000	0.1626	0.0864	0.0000	0.0864	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0390	0.3645	0.1904	3.4000e-004		0.0184	0.0184		0.0169	0.0169	0.0000	30.0822	30.0822	9.7300e-003	0.0000	30.3355
Total	0.0390	0.3645	0.1904	3.4000e-004	0.1626	0.0184	0.1810	0.0864	0.0169	0.1063	0.0000	30.0822	30.0822	9.7300e-003	0.0000	30.3355
MT/yr																

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3.2 Site Preparation - 2021**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEB-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	6.0000e-004	5.6500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508
Total	6.7000e-004	5.0000e-004	5.6500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEB-CO2	Total CO2	CH4	N2O	CO2e
Fugitive Dust					0.1628	0.0000	0.1628	0.0894	0.0000	0.0894	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0350	0.3045	0.1804	3.4000e-004		0.0184	0.0184		0.0169	0.0169	0.0000	30.0921	30.0921	6.7300e-003	0.0000	30.3354
Total	0.0350	0.3045	0.1804	3.4000e-004	0.1628	0.0184	0.1810	0.0894	0.0169	0.1063	0.0000	30.0921	30.0921	9.7300e-003	0.0000	30.3354

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3.2 Site Preparation - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	DBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	5.0000e-004	5.6500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508
Total	6.7000e-004	5.0000e-004	5.6500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.5498	1.5498	4.0000e-005	0.0000	1.5508

3.3 Grading - 2021**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	DBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Fugitive Dust					0.1995	0.0000	0.1995	0.0827	0.0000	0.0827	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0964	1.0672	0.7102	1.4300e-003		0.0457	0.0457		0.0420	0.0420	0.0000	125.3385	125.3385	0.0405	0.0000	126.3519
Total	0.0964	1.0672	0.7102	1.4300e-003	0.1995	0.0457	0.2452	0.0827	0.0420	0.1247	0.0000	125.3385	125.3385	0.0405	0.0000	126.3519

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3.3 Grading - 2021

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0100e-003	1.4200e-003	0.0101	5.0000e-005	5.0000e-003	4.0000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4008	4.4008	1.2000e-004	0.0000	4.4026
Total	1.8100e-003	1.4200e-003	0.0101	5.0000e-005	5.0000e-003	4.0000e-005	5.0800e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4008	4.4008	1.2000e-004	0.0000	4.4026

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Fugitive Dust					0.1985	0.0000	0.1985	0.0827	0.0000	0.0827	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0864	1.0872	0.7102	1.4300e-003		0.0457	0.0457		0.0420	0.0420	0.0000	125.3383	125.3383	0.0405	0.0000	125.3517
Total	0.0864	1.0872	0.7102	1.4300e-003	0.1985	0.0457	0.2452	0.0827	0.0420	0.1247	0.0000	125.3383	125.3383	0.0405	0.0000	125.3517

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3.3 Grading - 2021**Mitigated Construction Off-site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net Bio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8100e-003	1.4200e-003	0.0161	5.0000e-005	5.0600e-003	4.0000e-005	5.0600e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4006	4.4006	1.2000e-004	0.0000	4.4036
Total	1.8100e-003	1.4200e-003	0.0161	5.0000e-005	5.0600e-003	4.0000e-005	5.0600e-003	1.3400e-003	4.0000e-005	1.3800e-003	0.0000	4.4006	4.4006	1.2000e-004	0.0000	4.4036

3.4 Building Construction - 2021**Unmitigated Construction On-site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	Net Bio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Off-Road	0.1264	1.1562	1.1023	1.7900e-003		0.0638	0.0638		0.0569	0.0569	0.0000	154.0388	154.0388	0.0372	0.0000	154.9679
Total	0.1264	1.1562	1.1023	1.7900e-003		0.0638	0.0638		0.0569	0.0569	0.0000	154.0388	154.0388	0.0372	0.0000	154.9679

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3.4 Building Construction - 2021 Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0618	1.7830	0.4430	4.5100e-003	0.1136	3.8700e-003	0.1171	0.0328	3.4100e-003	0.0992	0.0000	437.8736	437.8736	0.0282	0.0000	438.2791
Worker	0.1818	0.1424	1.8108	1.8800e-003	0.9093	3.8200e-003	0.5102	0.1346	3.5200e-003	0.1380	0.0000	441.8045	441.8045	0.0119	0.0000	441.8015
Total	0.2436	1.8963	2.0537	9.3900e-003	0.6189	7.3900e-003	0.6273	0.1672	6.9300e-003	0.1742	0.0000	879.0783	879.0783	0.0401	0.0000	880.0806

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	0.1264	1.1892	1.1023	1.7900e-003		0.0638	0.0638		0.0699	0.0699	0.0000	154.0386	154.0386	0.0372	0.0000	154.9877
Total	0.1264	1.1892	1.1023	1.7900e-003		0.0638	0.0638		0.0699	0.0699	0.0000	154.0386	154.0386	0.0372	0.0000	154.9877

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3.4 Building Construction - 2021**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	MBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Heating	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0518	1.7630	0.4430	4.5100e-003	0.1136	3.5700e-003	0.1171	0.0328	3.4100e-003	0.0352	0.0000	437.5739	437.5739	0.0282	0.0000	438.2791
Worker	0.1918	0.1424	1.8108	4.8900e-003	0.5063	3.8200e-003	0.5102	0.1345	3.5200e-003	0.1380	0.0000	441.5045	441.5045	0.0118	0.0000	441.8015
Total	0.2436	1.8953	2.0537	9.3900e-003	0.6199	7.3900e-003	0.6273	0.1672	6.9300e-003	0.1742	0.0000	879.0783	879.0783	0.0401	0.0000	880.0806

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

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	MBio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																
Off-Road	0.0802	0.7339	0.7691	1.2700e-003		0.0380	0.0380		0.0358	0.0358	0.0000	108.9109	108.9109	0.0261	0.0000	109.5632
Total	0.0802	0.7339	0.7691	1.2700e-003		0.0380	0.0380		0.0358	0.0358	0.0000	108.9109	108.9109	0.0261	0.0000	109.5632

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
tons/VY																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0344	1.1756	0.2695	3.1600e-003	0.0803	2.2000e-003	0.0826	0.0232	2.1000e-003	0.0253	0.0000	306.5308	306.5308	0.0192	0.0000	307.0116
Worker	0.1273	0.0908	1.0512	3.3300e-003	0.3578	2.6200e-003	0.3605	0.0950	2.4100e-003	0.0975	0.0000	300.8841	300.8841	7.5500e-003	0.0000	301.0537
Total	0.1617	1.2665	1.3476	6.4900e-003	0.4381	4.8200e-003	0.4429	0.1182	4.5100e-003	0.1227	0.0000	607.3949	607.3949	0.0268	0.0000	608.0656

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
tons/VY																
Off-Road	0.0802	0.7339	0.7891	1.2700e-003	0.0380	0.0380	0.0380	0.0358	0.0358	0.0358	0.0000	108.9107	108.9107	0.0261	0.0000	109.5630
Total	0.0802	0.7339	0.7891	1.2700e-003	0.0380	0.0380	0.0380	0.0358	0.0358	0.0358	0.0000	108.9107	108.9107	0.0261	0.0000	109.5630

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

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
tones/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0244	1.1798	0.2985	3.1800e-003	0.0803	2.2000e-003	0.0825	0.0232	2.1000e-003	0.0253	0.0000	308.5308	308.5308	0.0192	0.0000	307.0119
Worker	0.1273	0.0809	1.0512	3.3300e-003	0.3578	2.6200e-003	0.3605	0.0950	2.4100e-003	0.0975	0.0000	300.8841	300.8841	7.5600e-003	0.0000	301.0537
Total	0.1617	1.2685	1.3476	6.4900e-003	0.4381	4.8200e-003	0.4429	0.1182	4.5100e-003	0.1227	0.0000	607.3949	607.3949	0.0258	0.0000	608.0656
MT/yr																

3.5 Paving - 2022**Mitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEBio-CO2	Total CO2	CH4	N2O	CO2e
tones/yr																
Off-Road	9.3700e-003	0.0948	0.1239	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1911
Paving	0.0317				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0411	0.0948	0.1239	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1911
MT/yr																

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3.5 Paving - 2022**Unmitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-006	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-006	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768
Total	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-006	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-006	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NetBio-CO2	Total CO2	CH4	N2O	CO2e
tons/yr																
Off-Road	6.3700e-003	0.0940	0.1239	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611
Paving	0.0317				0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0411	0.0945	0.1239	1.9000e-004	4.8300e-003	4.8300e-003	4.8300e-003	4.4400e-003	4.4400e-003	4.4400e-003	0.0000	17.0234	17.0234	5.5100e-003	0.0000	17.1611

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3.5 Paving - 2022**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768
Total	5.0000e-004	3.6000e-004	4.1100e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.1760	1.1760	3.0000e-005	0.0000	1.1768

3.6 Architectural Coating - 2022**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net Bio-CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	2.8418					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7400e-003	0.0120	0.0154	3.0000e-005		6.6000e-004	6.6000e-004		6.6000e-004	6.6000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738
Total	2.8418	0.0120	0.0154	3.0000e-005		6.6000e-004	6.6000e-004		6.6000e-004	6.6000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738

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3.6 Architectural Coating - 2022

Unmitigated Construction Off-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6100e-003	3.2900e-003	0.0381	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.9049
Total	4.6100e-003	3.2900e-003	0.0381	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.9049

Mitigated Construction On-Site

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	MBio-CO2	Total CO2	CH4	N2O	CO2e
Archit. Coating	2.9418					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.7400e-003	0.0120	0.0154	3.0000e-005		6.9000e-004	6.9000e-004		6.9000e-004	6.9000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738
Total	2.9436	0.0120	0.0154	3.0000e-005		6.9000e-004	6.9000e-004		6.9000e-004	6.9000e-004	0.0000	2.1703	2.1703	1.4000e-004	0.0000	2.1738

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3.6 Architectural Coating - 2022**Mitigated Construction Off-Site**

Category	ROG	NOC	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	NEC-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6100e-003	3.2900e-003	0.0381	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.9049
Total	4.6100e-003	3.2900e-003	0.0381	1.2000e-004	0.0130	9.0000e-005	0.0131	3.4400e-003	9.0000e-005	3.5300e-003	0.0000	10.8980	10.8980	2.7000e-004	0.0000	10.9049

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NRB- CO2	Total CO2	CH4	N2O	CO2e
Mitigated	0.4499	10.8977	3.8328	0.0458	1.5784	0.0437	1.6222	0.4512	0.0418	0.4930	0.0000	4,429.362	4,429.362	0.2134	0.0000	4,434.727
Unmitigated	0.4499	10.8977	3.8328	0.0458	1.5784	0.0437	1.6222	0.4512	0.0418	0.4930	0.0000	4,429.362	4,429.362	0.2134	0.0000	4,434.727

4.2 Trip Summary Information

Land Use	Weekday	Saturday	Sunday	Unmitigated Annual VMT	Mitigated Annual VMT
General Office Building	9.00	9.00	9.00	103.657	103.657
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00
Unrefrigerated Warehouse-No Rail	262.40	262.40	262.40	3,447.092	3,447.092
Total	271.40	271.40	271.40	3,550.749	3,550.749

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	38.70	38.70	38.70	33.00	48.00	19.00	77	19	4
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	38.70	38.70	38.70	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCV	SBUS	MH
General Office Building	0.000000	0.000000	0.000000	0.000000	0.210000	0.080000	0.290000	0.420000	0.002087	0.001818	0.004803	0.000708	0.000896
Other Asphalt Surfaces	0.552111	0.043066	0.201891	0.118512	0.015605	0.005863	0.021387	0.031253	0.002087	0.001818	0.004803	0.000706	0.000896
Parking Lot	0.552111	0.043066	0.201891	0.118512	0.015605	0.005863	0.021387	0.031253	0.002087	0.001818	0.004803	0.000708	0.000896
Unrefrigerated Warehouse-No Rail	0.000000	0.000000	0.000000	0.000000	0.210000	0.080000	0.290000	0.420000	0.002087	0.001818	0.004803	0.000708	0.000896

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Category	POG	NDM	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	Net-CO2	Total CO2	CH4	N2O	CO2e
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,016,943	1,016,943	0.0223	4.6000e-003	1,018,871
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,016,943	1,016,943	0.0223	4.6000e-003	1,018,871
Natural Gas Mitigated	6.7600e-003	0.0614	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8868	66.8868	1.2800e-003	1.2300e-003	67,287.2
Natural Gas Unmitigated	6.7600e-003	0.0614	0.0516	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8868	66.8868	1.2800e-003	1.2300e-003	67,287.2

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5.2 Energy by Land Use - Natural Gas

Unmitigated

Land Use	Natural Gas Btu/yr	HCs	NOx	CO	SO ₂	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO ₂	Net Bio-CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
tons/yr																	
General Office Building	95400	3.7000e-004	3.4000e-003	2.8000e-003	2.0000e-005		2.6000e-004	2.9000e-004		2.6000e-004	2.6000e-004	0.0000	3.7035	3.7035	7.0000e-005	0.0000	3.7255
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Paving Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated Warehouses-No Hail	118396 +005	6.3800e-003	0.0360	0.0487	3.5000e-004		4.4100e-003	4.4100e-003		4.4100e-003	4.4100e-003	0.0000	63.1954	63.1954	1.2100e-003	1.1600e-003	63.3417
Total		6.7900e-003	0.0614	0.0515	3.7000e-004		4.6700e-003	4.6700e-003		4.6700e-003	4.6700e-003	0.0000	66.8989	66.8989	1.2800e-003	1.2200e-003	67.2672

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5.2 Energy by Land Use - Natural Gas

Mitigated

Land Use	Natural Gas Use	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Bio-CO ₂	Net Bio-CO ₂	CH ₄	N ₂ O	CO _{2e}
	MT/yr														
Total															
General Office Building	69,400	3.7000e-004	3.4000e-003	2.8600e-005	2.0000e-005	2.6000e-004	2.6000e-004	2.9600e-004	2.9600e-004	0.0000	3.7035	3.7035	7.0000e-005	7.0000e-005	3.7255
Center Assistant Surfactants	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Paving Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unsegregated Warehouse-No Rail	1,183,399 +005	6.3800e-003	0.0580	0.0487	3.5000e-004	4.4100e-003	4.4100e-003	4.4100e-003	4.4100e-003	0.0000	63,166.4	63,166.4	1.2100e-003	1.1600e-003	63,541.7
Total		6.7500e-003	0.0614	0.0516	3.7000e-004	4.6700e-003	4.6700e-003	4.6700e-003	4.6700e-003	0.0000	66,869.8	66,869.8	1.2300e-003	1.2300e-003	67,267.2

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

Land Use	Electricity Use kWh/yr	Total CO2 MT/yr	CH4 MT/yr	N2O MT/yr	CO2e MT/yr
General Office Building	190400	114.4884	2.5000e-003	5.2900e-004	114.7055
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	124712	74.5901	1.6400e-003	3.4000e-004	75.1322
Unimproved Land Warehouse-No Rail	1376126	827.4551	0.0181	3.7500e-003	829.0337
Total		1,016,543.5	0.0222	4.6100e-003	1,016,871.4

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5.3 Energy by Land Use - Electricity Mitigated

Land Use	Electricity Use kWh/yr	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
		M/yr			
General Office Building	1904.00	114.4884	2.5000e- 003	5.2000e- 004	114.7055
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	124712	74.9901	1.6400e- 003	3.4000e- 004	75.1322
Unrefrigerated Warehouse-No Rail	1.37612e +005	827.4661	0.0181	3.7500e- 003	829.0337
Total		1,016,943 6	0.0222	4.6100e- 003	1,018,871 4

6.0 Area Detail

6.1 Mitigation Measures Area

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Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
ton/yr																
Marginal	2.5423	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166
Unmitigated	2.5423	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166

6.2 Area by SubCategory

Unmitigated

SubCategory	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Biogenic CO2	Non-Biogenic CO2	Total CO2	CH4	N2O	CO2e
ton/yr																
Manufacturing	0.2942					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.2474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.5000e-004	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166
Total	2.5423	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0166

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6.2 Area by SubCategory**Mitigated**

	RO3	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bo-CO2	NBo-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2942					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.2474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	7.5000e-004	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156
Total	2.5423	7.0000e-005	8.0200e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0156	0.0156	4.0000e-005	0.0000	0.0156

7.0 Water Detail**7.1 Mitigation Measures Water**

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Category	Total CO2	CH4	N2O	CO2e
MT/Yr				
Mixed	1,142,049	4,5337	0.1115	1,288,604
Unmitigated	1,142,049	4,5337	0.1115	1,288,604

7.2 Water by Land Use

Unmitigated

Land Use	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
MT/Yr					
General Office Building	3,554,677	43,5140	0.1168	2,5300e-003	47,3051
Driver Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Paving Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unmitigated Warehouse-No Hail	134,942 / 0	1,038,535	4,4169	0.1035	1,241,299
Total		1,142,049	4,5337	0.1115	1,288,604

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7.2 Water by Land Use**Mitigated**

Land Use	Indoor/Outdoor Use	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
	Mgal	MT/yr			
General Office Building	13,554,677 / 2,178,657	43,5140	0.1168	2.9300E-003	47,305.1
Center Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	134,842 / 0	1,098,535	4.4169	0.1085	1,241,296.3
Total		1,142,049.5	4.5337	0.1115	1,288,604.4

8.0 Waste Detail**8.1 Mitigation Measures Waste**

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Category/Year

	Total CO2	CH4	N2O	CO2e
MT/yr				
Mitigated	115.0370	6.7985	0.0000	284.9953
Unmitigated	115.0370	6.7985	0.0000	284.9953

8.2 Waste by Land UseUnmitigated

Land Use	Waste Disposed tons	Total CO2	CH4	N2O	CO2e
MT/yr					
General Office Building	18.6	9.7756	0.2231	0.0000	9.3540
Center Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unmitigated Warehouses-No Flare	548.11	111.2614	6.5754	0.0000	275.6454
Total		115.0370	6.7985	0.0000	284.9953

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8.2 Waste by Land Use**Mitigated**

	Waste Disposed	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
Land Use	tons	MT/yr			
General Office Building	18.6	3.7756	0.2231	0.0000	9.3540
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouses-No HAC	548.11	111.2614	6.5754	0.0000	275.6454
Total		115.0370	6.7985	0.0000	284.9933

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

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

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

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Equipment Type

Number

11.0 Vegetation

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9309 Sycamore Hills Distribution Center - Trucks - South Coast Air Basin, Summer

9309 Sycamore Hills Distribution Center - Trucks**South Coast Air Basin, Summer****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	20.00	1000sqft	0.46	20,000.00	0
Unrefrigerated Warehouse-No Rail	593.10	1000sqft	15.54	593,100.00	0
Other Asphalt Surfaces	16.00	Acre	16.00	696,960.00	0
Parking Lot	8.18	Acre	8.18	356,320.80	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2022

Utility Company: Riverside Public Utilities

CO2 Intensity (lb/MWhr)	13.25.65	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006
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1.3 User Entered Comments & Non-Default Data

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Project Characteristics - See SWAPE comment regarding CO2, CH4, and N2O intensity factors.

Land Use - Consistent with the DEIR's model.

Construction Phase - Total construction length consistent with information provided in the DEIR, but phase lengths are proportionally altered.

Trips and VMT - See SWAPE comment regarding vendor and worker trip numbers.

Grading -

Architectural Coating - See SWAPE comment regarding architectural coating emission factors.

Vehicle Trips - Consistent with the DEIR's model.

Energy Use -

Water And Wastewater - See SWAPE comment regarding indoor water use rate.

Construction Off-road Equipment Mitigation - See SWAPE comment regarding the PM10 and PM2.5 % reductions.

Mobile Land Use Mitigation - See SWAPE comment regarding operational mitigation measures.

Fleet Mix - See SWAPE comment regarding operational vehicle fleet mix. Only trucks. Passenger cars reduced to 0; truck percentages proportionally altered based on CalEEMod defaults. See construction calculations.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	18.00
tblConstructionPhase	NumDays	75.00	46.00
tblConstructionPhase	NumDays	740.00	227.00
tblConstructionPhase	NumDays	55.00	17.00
tblConstructionPhase	NumDays	55.00	17.00
tblFleetMix	HHD	0.03	0.42
tblFleetMix	HHD	0.03	0.42
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT1	0.04	0.00
tblFleetMix	LDT2	0.20	0.00
tblFleetMix	LDT2	0.20	0.00

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td/FleetMix	LHD1	0.02	0.21
td/FleetMix	LHD1	0.02	0.21
td/FleetMix	LHD2	5.8630e-003	0.08
td/FleetMix	LHD2	5.8630e-003	0.08
td/FleetMix	MDV	0.12	0.00
td/FleetMix	MDV	0.12	0.00
td/FleetMix	MHD	0.02	0.29
td/FleetMix	MHD	0.02	0.29
td/LandUse	LoAcreage	13.39	15.54
td/VehicleTrips	CC_TL	8.40	38.70
td/VehicleTrips	CC_TL	8.40	38.70
td/VehicleTrips	CNW_TL	6.90	38.70
td/VehicleTrips	CNW_TL	6.90	38.70
td/VehicleTrips	CW_TL	16.60	38.70
td/VehicleTrips	CW_TL	16.60	38.70
td/VehicleTrips	ST_TR	2.46	0.45
td/VehicleTrips	ST_TR	1.68	0.45
td/VehicleTrips	SU_TR	1.05	0.45
td/VehicleTrips	SU_TR	1.68	0.45
td/VehicleTrips	WD_TR	11.03	0.45
td/VehicleTrips	WD_TR	1.68	0.45

2.0 Emissions Summary

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

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEIO-CO2	Total CO2	CH4	N2O	CO2e
10/day																
2021	5.5678	46.4544	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17.57239	17.57239	1.9488	0.0000	17,604.31
								35		35						29
2022	346.8476	41.9782	46.4269	0.1682	9.4913	0.9109	10.4022	2.5565	0.8566	3.4131	0.0000	17.23397	17.23397	1.2373	0.0000	17,264.90
								30		30						41
Maximum	346.8476	46.4644	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17.57239	17.57239	1.9488	0.0000	17,604.31
								35		35						29

Mitigated Construction

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NEIO-CO2	Total CO2	CH4	N2O	CO2e
10/day																
2021	5.5678	46.4544	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17.57239	17.57239	1.9488	0.0000	17,604.31
																29
2022	346.8476	41.9782	46.4269	0.1682	9.4913	0.9109	10.4022	2.5565	0.8566	3.4131	0.0000	17.23397	17.23397	1.2373	0.0000	17,264.90
																41
Maximum	346.8476	46.4644	48.9345	0.1726	18.2675	2.0460	20.3134	9.9840	1.8823	11.8663	0.0000	17.57239	17.57239	1.9488	0.0000	17,604.31
																29
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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2.2 Overall Operational**Unmitigated Operational**

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Biogenic CO ₂	Non-Biogenic CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
Area	13.9324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.4000e-003	405.2980
Mobile	2.4590	56.3797	20.8568	0.2525	8.8036	0.2400	9.0436	2.5129	0.2285	2.7423		26,928.98	26,928.98	1.2837		26,961.08
Total	16.4284	56.7169	21.2127	0.2545	8.8036	0.2400	9.0734	2.5129	0.2563	2.7681		27,333.02	27,333.02	1.2918	7.4000e-003	27,367.52

Mitigated Operational

Category	ROG	NOx	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	PM ₁₀ Total	Fugitive PM _{2.5}	Exhaust PM _{2.5}	PM _{2.5} Total	Biogenic CO ₂	Non-Biogenic CO ₂	Total CO ₂	CH ₄	N ₂ O	CO ₂ e
lb/day																
Area	13.9324	5.9000e-004	0.0641	0.0000		2.3000e-004	2.3000e-004		2.3000e-004	2.3000e-004		0.1373	0.1373	3.6000e-004		0.1463
Energy	0.0370	0.3366	0.2827	2.0200e-003		0.0256	0.0256		0.0256	0.0256		403.8978	403.8978	7.7400e-003	7.4000e-003	405.2980
Mobile	2.4590	56.3797	20.8568	0.2525	8.8036	0.2400	9.0436	2.5129	0.2285	2.7423		26,928.98	26,928.98	1.2837		26,961.08
Total	16.4284	56.7169	21.2127	0.2545	8.8036	0.2400	9.0734	2.5129	0.2563	2.7681		27,333.02	27,333.02	1.2918	7.4000e-003	27,367.52