SYCAMORE HILLS DISTRIBUTION CENTER

Draft 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

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Acronyms, Units of Measurement, Chemical Symbols

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Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
A.D.	Anno Domini
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AFB	Sycamore Canyon-March Air Force Base
AGL	Above Ground Level
AGR	Agricultural Supply
ALUC	Riverside County Airport Land Use Commission
AMSL	Above Mean Sea Level
APE	Area of Potential Effects
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials

Acronyms

BDCP	Bay Delta Conservation Plan
BCC	United States Fish and Wildlife Service Birds of Conservation Concern
BDCP	Bay Delta Conservation Plan
BMPs	Best Management Practices
BMP-SP	Business and Manufacturing Park and Specific Plan
B/OP	Business Office Park
B.P.	Before Present
BSA	Biological Study Area
BTU	British Thermal Units
BUOW	Burrowing Owl
C	Commercial
CAA	Clean Air Act
CA FID UST	Facility Inventory Database
CA MUTCD	Caltrans California Manual on Uniform Traffic Control Devices
Cal/ARP	California Emergency Management Agency's Accidental Release Prevention
CAL/EPA	California Environmental Protection Agency
Cal OES	Governor's Office of Emergency Service
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	Center for Disease Control and Prevention
CDFW	California Department of Fish and Wildlife
CDSG	Citywide Design Guidelines and Sign Guidelines
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCIS	Compensation and Liability Information System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHMIRS	California Hazardous Material Incident Report System
CHRIS	California Historical Resources Information System
CHSC	California Heath and Safety Code
CHWMP	County Hazardous Waste Management Plan

Acronyms

CLUP	Comprehensive Land Use Plans
CMA	Congestion Management Agency
CMP	Congestion Management Plan
CNDDB	California Native Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
COG	Council of Governments
CPF	Cancer Potency Factor
CPUC	California Public Utilities Commission
CR	Commercial Retail Zone
CRA	Colorado River
CRHR	California Register of Historic Resources
CRPR	California Rare Plant Rank
CSS	Cross-Street Stop
CTC	County Transportation Commissions
CWA	Clean Water Act
DAMP	Riverside County Drainage Area Management Plan
DAP	Drought Allocation Plan
DBESP	Determination of Biologically Equivalent or Superior Preservation
DCV	Design Capture Volume
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fee
DMA	Drainage Management Area
DMV	Department of Motor Vehicles
DNL	Day-Night Level
DOD	Department of Defense Sites
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substance Control
DWR	Department of Water Resources
EDR	Environmental Data Resources, Inc.
EHS	Extremely Hazardous Substance
EIA	Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMI	Emissions Inventory Data
EMFAC	Emission Factor
EMO	Emergency Management Office
EMS	Emergency Medical Services
EO	Executive Order
EOC	Emergency Operations Center
EPA	Environmental Protection Agency

Acronyms

EMR	Electromagnetic Radiation
EMS	Emergency Medical Services
ESA	Endangered Species Act
ESRP	Eastside Reservoir Project
EV	Electric vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FPEIR	Final Program Environmental Impact Report
FTA	Federal Transit Administration
GAP	Green Accountability Performance
GHG	Greenhouse Gas
GP 2025	City of Riverside General Plan 2025
GP 2025 FPEIR	City of Riverside General Plan 2025 Final Program Environmental Impact Report
GWMP	Groundwater Management Plan
GWP	Global Warming Potential
GWR	Groundwater Recharge
HBW	Home-Based Work
HCOC	Hydrologic Conditions of Concern
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HERO	Home Energy Renovation Opportunity
HHDT	Heavy-Heavy-Duty Trucks
HIST UST	Hazardous Substance Storage Container Database
HMBP	Hazardous Materials Business Plan
HMMA	California Hazardous Material Management Act
HMTA	Hazardous Materials Transportation Act
HPS	High Pressure Sodium
HRA	Health Risk Assessment
HSC	Public Health and Safety Code
HVAC	Heating, ventilating, and air-conditioning
HWCL	California Hazardous Waste Control Law
IEPC	International Electric Propulsion Conference
IEPR	Integrated Energy Policy Report
IPA	Inland Port Airport
IPM	Integrated Pest Management

Acronyms

IS/NOP	Initial Study/Notice of Preparation
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
ITE	Institute of Transportation Engineers
LBVI	Least Bell's Vireo
LDA	Light Duty Autos
LDMF	Local Development Mitigation Fee
LED	Light-Emitting Diode
LHDT	Light-Heavy-Duty-Trucks
LHMP	Local Hazard Mitigation Plan
LID	Low-Impact Development
LOS	Level of Service
LPS	Low Pressure Sodium
LQG	Large Quantity Generators
LST	Localized Significance Thresholds
LUCP	Land Use Compatibility Plan
LUST	Leaking Underground Storage Tank
MARB	March Air Reserve Base
MATES	Multiple Air Toxics Exposure Study
MAWA	Maximum Applied Water Allowance
MBTA	Migratory Bird Treaty Act
MDR	Medium Density Residential
MEIR	Maximally Exposed Individual Receptor
MEISC	Maximum Exposed Individual School Child
MEIW	Maximally Exposed Individual Worker
MGD	Maximum Extend Practicable
MHDTs	Medium-Heavy-Duty-Trucks
MJPA	March Joint Powers Authority
MLD	Most Likely Descendant(s)
MMT CO_2E	Million metric tons of carbon dioxide equivalent
MOE	Measures of Effectiveness
MOU	Memorandum of Understanding
mph	Miles per hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MUN	Municipal and Domestic Supply
MWD	Metropolitan Water District
MWP	Medieval Warm Period
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAHC	Native American Heritage Commission

Acronyms

NCCP	Natural Communities Conservation Plan
NHMLAC	National History Museum of Los Angeles County
NIMS	National Incident Management System
NOP	Notice of Preparation
NPL	National Priority List
NRC	Nuclear Regulatory Commission
NRCS	Natural Resources Conservation Service
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OHP	Office of Historic Preservation
OHWM	Ordinary high water mark
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
P	Public Park
PCBs	Polychlorinated Biphenyls
PCE	Passenger Car Equivalents
PCL	Power Content Label
PF	Public Facilities
PF-SP	Public Facilities and Specific Plant
PG&E	Pacific Gas and Electric
PHF	Peak Hour Factor
POD	Point of discharge
PPV	Peak Particle Velocity
PQP	Public Quasi Public
PRC	Public Resources Code
PRP	Potentially Responsible Parties
PV	Photovoltaic systems
PVC	Polyvinyl chloride
PWQMP	Preliminary Water Quality Management Plan
R4SBW	Riverine, Intermittent, Streambed, Intermittently Flooded/Temporary
RARE	Threatened or Endangered Species
RCA	Western Riverside County Regional Conservation Authority
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCHCA	Riverside County Habitat Conservation Agency
RCIP	Riverside County Integrated Plan
RCTC	Riverside County Transportation Commission
RCRA LQG	Resource Conservation and Recovery Act – Large Quantity Generators
RCWRD	Riverside County Waste Resources Department
RDEIR/SDEIS	Recirculated Draft Environmental Impact Report/Supplemental Draft

Acronyms

	Environmental Impact Statement
REC	Recognized Environmental Conditions
REC1	Water Contact Recreation
REC2	Non-Contact Recreation
REL	Reference Exposure Level
REMAP	Riverside Extended Mountain Area Plan
RFD	Riverside Fire Department
RGNG	City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities
RIVTAM	Riverside Transportation Analysis Model
RLC	Rivers and Lands Conservancy
RMC	Riverside Municipal Code
ROD	Records of Decisions
ROW	Right-of-way or rights-of-way
RP	Restricted Property
RPS	Renewable Portfolio Standard
RPU	Riverside Public Utilities
RRG-CAP	Restorative Growthprint Climate Action Plan
RRWQMP	Riverside Regional Water Quality Control Plant
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Authority
RTPA	Regional Transportation Plan Agency
RUWMP	Metropolitan Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
RWQCP	Regional Water Quality Control Plant
S	United States Fish and Wildlife Service Sensitive
SAF	State Alternative Fuels Plan
SAR-DAMP	Santa Ana Regional Drainage Area Management Plan
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCBPSP	Sycamore Canyon Business Park Specific Plan
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SCWP SKRMP	Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan
SDG&E	San Diego Gas & Electric
SE	Site Elevation
SE	California State Endangered
SED	Socio-Economic Data

Acronyms

SEMS	Standardized Emergency Management System
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SKR	Stephen's kangaroo rat
SKRHCP	Stephen's Kangaroo Rat Habitat Conservation Plan
SOON	Surplus Off-Road Opt-in for NO_x
SPS	Sustainability Policy Statement
SPWN	Spawning Reproduction and Development
SRR	Semi Rural Residential
SSC	CDFW Species of Special Concern
ST	California State Threatened
SVP	Society of Vertebrate Paleontology
SWANCC	Solid Waste Agency of Northern Cook County
SWEEPS UST	Statewide Environmental Evaluation and Planning System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zones
T-BACT	Best Available Control Technology for Toxics
TCR/TCP	Tribal Cultural Resource/Traditional Cultural Property
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act of the 21st Century
TMDL	Total Maximum Daily Load
TOD	Transit-Oriented Development
TPA	Transit Priority Area
TPQ	Threshold Planning Quantity
TRI	Toxics Release Inventory
TRUs	Transport Refrigeration Units
TS	Traffic Signal
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
URBEMIS	Urban Emissions Model
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	U.S. Department of Agriculture
USDOT	United States Department of Transportation
US ENG	Engineering Controls Sites List
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

Acronyms

UST	Underground Storage Tank
UWMP	Urban Water Management Plant
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WARM	Warm Freshwater Habitat
WCSSP	Water Conservation and Supply Shortage Program
WILD	Wildlife Habitat
WoS	Waters of the State
WoUS	Waters of the U.S.
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRP	Waste Recycling Plan
WSA	Water Supply Assessment
WSAP	Water Supply Allocation Plan
WSC	Waters of the State
WSDM	Water Surplus and Demand Management Plan
WUEMP	Water Use Efficiency Master Plan
WUS	Waters of the United States
WWRF	Western Water Recycling Facility

Units of Measurement and Chemical Symbols

AFY	Acre-feet per year
AnC	Arlington fine sandy loam (soil)
dB(a) L_{eq}	Decibels equivalent continuous sound level
CH_4	Methane
ChF2	Cieneba sandy loam, eroded (soil)
CkF2	Cieneba rocky sandy loam, eroded (soil)
CO	Carbon monoxide
CO_2	Carbon dioxide
CY	Cubic yards
dB	Decibels
ETo	Reference evapotranspiration
°F	Degrees in Fahrenheit
FaD2	Fallbrook sandy loam, eroded (soil)
FbC2	Fallbrook sandy loam, shallow, eroded (soil)
FkD2	Fallbrook fine sandy loam, shallow, eroded (soil)
GPM	Gallons per minute
GWh	Gigawatt hours

Units of Measurement and Chemical Symbols

HC	Hydrocarbons
HFC	Hydroflourocarbons
MGD	Million gallons per day
mpg	Miles per gallon
Mt	Metric ton
MUs	Management Units
N_2O	Nitrous oxide
NH_4N0_3	Ammonium nitrate
NO	Nitric oxide
NO_2	Nitrogen dioxide
NO_X	Oxides of nitrogen
O_3	Ozone
Pb	Lead
PCF	Pounds per cubic foot
pCi/L	Picocuries per liter
pH	Potential of hydrogen
PM	Atmospheric Particulate Matter
PM_{10}	Particulate matter 2.5 to 10 microns in diameter
$PM_{2.5}$	Particulate matter 2.5 microns or less in diameter
Ppm	Parts per million
RMS	Root Mean Square
ROG	Reactive organic gases
SF_6	Sulfur hexaflouride
SO_2	Sulfur dioxide
SO_X	Oxides of sulfur
VdB	Decibel Notation
VOC	Volatile organic compounds
VsD2	Vista coarse sandy loam, eroded (soil)
$\mu g/m^3$	Micrograms per cubic meter

1.0 Executive Summary

The purpose of this Environmental Impact Report (EIR) is to evaluate and disclose potential environmental impacts resulting from the implementation of Sycamore Hills Distribution Center Project (Project). This section summarizes the characteristics of the Project, alternatives to the proposed Project, and the environmental impacts and mitigation measures associated with the proposed Project.

1.1 Project Applicant

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1.2 Lead Agency

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1.3 Project Description

Project Location

This EIR has been prepared to examine the potential environmental effects of the Sycamore Hills Distribution Center Project. The following is a summary of the full Project description provided in Section 3.0, Project Description. The approximately 48.64 gross acre Project site is located in the eastern portion of the City of Riverside, east of Barton Street, west of Sycamore Canyon Boulevard, and north of Alessandro Boulevard, within the Sycamore Canyon Business Park Specific Plan. The Project site is within the southwestern quarter of Section 9, Township 3 South, Range 4 West, as shown on the Riverside East, California, United States Geological Survey (USGS) 7.5-minute quadrangle. The Project site includes the following Assessor's Parcel Numbers (APNs):

- APN: 263-060-022
- APN: 263-060-024
- APN: 263-060-026

The Project site is bordered on the north by the Sycamore Canyon Wilderness Park, vacant property to the east, Barton Street and a wastewater treatment plant to the west, and the Citywide Self Storage facility and Alessandro Boulevard to the south. Commercial and residential uses are

located further south (across Alessandro Boulevard), within the City and County of Riverside jurisdiction.

Existing Site Conditions

The City of Riverside General Plan 2025 (GP 2025) land use designation for the Project site is Business/Office Park (B/OP). The Project site is zoned BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. 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.

The Project site is currently undeveloped and vacant. The topography consists of natural rolling terrain descending gradually from a west to east direction. The Project site contains two drainages, that cross the site from the southwest and south to the north. The Project site contains low to moderate vegetation primarily consisting of non-native grasslands and patches of sparse Riversidean sage scrub in the upland areas, with some riparian woodland associated with the drainages. The Project site contains an existing area of approximately 11.6 acres legally designated as "Restricted Property" (see Figure 3.0-3). 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.

Discretionary Actions and Other Agency Approvals

The proposed Project would include site grading, construction, and operation of two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls (including retaining walls), landscaping, and water quality treatment areas. The proposed Project will include the following actions and approvals by the City of Riverside and other agencies[1]:

- Tentative Parcel Map No. 36734 (P20-0025) – A Tentative Parcel Map is required to subdivide the Project site into two parcels (Parcels 1 and 2) and three lettered parcels (Parcels A, B, and C).
- Design Review (P19-0627) – Implementation of the proposed Project consists of the grading, construction, and operation of two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls (including retaining walls), landscaping, and water quality treatment areas as shown on Figure 3.0-9 – Site Plan.

[1] The City of Riverside actions/approvals are based on the requirements of the Riverside Municipal Code (RMC) at the time the Project was deemed substantially complete (November 2020).

Tables 3.0-2 and 3.0-3 provide a summary of the proposed Project and consistency with the City's Site Development Standards.

- Minor Conditional Use Permit (MCUP) – A MCUP is required to allow for warehouses greater than 400,000 square feet pursuant to City of Riverside Municipal Code (RMC), Title 19 – Zoning Code, Chapter 19.150 – Base Zones Permitted Land Uses. This requirement is intended to ensure land use compatibility in terms of traffic characteristics, noise, circulation, operation, building design, and site design.
- Wall Variance for Parcel 1 – A Variance is requested for Parcel 1 to allow the installation of two combination retaining/ freestanding walls to the side of the property wherein the retaining portion exceeds the maximum allowable height of 4 feet and to allow combination retaining/ freestanding walls wherein the overall height exceeds the maximum allowable height of 10 feet, in accordance with Chapter 19.550 of Title 19 – Zoning Code.
- Parking Variance for Building A - A Variance is requested for Building A to allow 388 parking spaces, where 430 parking spaces are required by the City's Municipal Code.
- Grading Exception for Building B - A Grading Exception is needed for Building B on Parcel 2 to allow installation of three retaining walls to exceed 6 feet in vertical height, in accordance with Chapter 17.28 of Title 17 - Grading.
- Environmental Impact Report (P20-0024) for the preparation of an Environmental Impact Report for the proposed Project.
- Lake or Streambed Alteration Agreement from California Department of Fish and Wildlife per Section 1602 of the Fish and Game Code.
- National Pollutant Discharge Elimination System's California General Permit for Stormwater Discharges Associated with Construction Activity from the State Water Resources Control Board.
- Water Quality Certification from the Santa Ana Regional Water Quality Control Board per Clean Water Act Section 401.
- Section 404 Permit from the US Army Corps of Engineers, Los Angeles District for Disposal of Dredge or Fill Material per the Clean Water Act.

Construction and Grading

Construction will occur in accordance with both the City's Noise Ordinance and County's Noise Ordinance, during the hours of 7 am to 6 pm Monday through Friday, 8 am to 5 pm on Saturdays, and not on Sundays or federal holidays. 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,

architectural coatings, parking lots, roadway improvements, landscaping, storm drains and water quality basins, etc.

The Project will involve grading and earthwork within the site in order to accommodate the proposed structures, associated parking lots, drive lanes, water quality basins and landscaped areas. It is anticipated that excavation of decomposed granite may be performed utilizing conventional earthmoving equipment. Blasting will not be required and is not proposed as part of the Project site preparation activities. During the grading phase, soil quantities within the overall site will balance and no export or import of fill from the site will be needed.

Operations and Employment

The Project is a speculative development, and the tenants are unknown at this time, so the number of employees, shifts, days and hours of operation are not known at this time. However, for the purposes of the analysis in the Environmental Impact Report (EIR), the estimated number of employees, using the County of Riverside General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology[2], which uses a factor of 1,030 SF per employee, would be 388.3 employees for Building A and 197.2 employees for Building B, for a total of 586 (rounded to the nearest whole number) for both buildings.

Project Objectives

The proposed Project intends to achieve the following objectives:

- Develop the site with two warehouse buildings with a total of 603,100 square feet of building space, a conservation easement, and trailhead improvements.
- Modify the Restrictive Covenant (RC) to allow access to Parcel 1, which is currently landlocked by the RC.
- Provide trailhead improvements consistent with the *Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan* including:
    - a parking lot,
    - sidewalk,
    - shade structure with benches,
    - bike rack,
    - drinking fountains,
    - fencing, gates, signage, and a fire department access gate.

[2] 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

- Develop and operate warehouse buildings that:
    - Take advantage of existing City infrastructure.
    - Are adjacent to similar industrial logistics and distribution centers.
    - 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, while limiting traffic truck disruption to residential areas within the City and neighboring jurisdictions.
    - Will attract quality tenants and will be competitive with other similar facilities in the region.
    - Meet industry standards for operational design criteria.
- Implement the *Sycamore Canyon Business Park Specific Plan* through development of a land use allowed by the industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.
- Facilitate the development of underutilized land currently planned for industrial uses that maximizes the use of the site and responds to market demand within the *Sycamore Canyon Business Park Specific Plan* area for warehouse buildings.
- Provide and expand on-site conservation to mitigate for the loss of riparian/riverine resources.
- Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.

1.4 Alternatives

As required by the California Environmental Quality Act (CEQA), this DEIR examines alternatives to the proposed Project. Studied alternatives include the following three alternatives. Based on the alternatives analyses, Alternative 1 was determined to be the environmentally superior alternative.

- Alternative 1: No Project/No Development Alternative
- Alternative 2: Other Permitted Use/ Manufacturing
- Alternative 3: Reduced Development Alternative

Alternative 1 (No Project/ No Development):

As the Project is consistent with designated land use and zoning and the Sycamore Canyon Business Park Specific Plan, the “no project” alternative is no project development or no change from the existing use (vacant land). This alternative was selected based on CEQA requirements (Section 15126.6(e)).

Alternative 2 (Other Permitted Use/ Manufacturing):

Manufacturing is also a permitted use within the BMP-SP – Business Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zone. Alternative 2 consists of the same Project design, with manufacturing instead of warehousing as the use for the site. This alternative was selected as it is an allowable use under the existing land use, zoning, specific plan, and was anticipated to reduce potential impacts associated with trucks, including trip generation and VMT, and also associated air quality and greenhouse gas emissions. Other types of uses such as institutional (educational or religious), retail/commercial, or residential would not meet the density/intensity standards of the compatibility Zone C1 of the MARB/IPA LUCP, resulting in an increase in potential impacts related to hazards, safety, and land use compatibility, as compared to the proposed Project.

Alternative 3 (Reduced Development Alternative):

The third alternative is a reduced development consisting only of the development of Parcel 1/Building A. Alternative 3 was identified and evaluated based on its the potential to reduce or avoid significant impacts related to VMT. In addition, as there are fewer physical cultural resources/tribal cultural resources in the eastern portion of the Project site, Alternative 3 would also reduce impacts to these individual resources as well as the larger TCL and TCP/TCR.

Refer to Section 8.0, Alternatives, for the complete alternatives analyses.

1.5 Areas of Known Controversy

The City of Riverside circulated an Initial Study and a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on July 28, 2020 and ending on August 27, 2020 at 5:00 p.m. The City distributed the NOP to the State Clearinghouse, responsible agencies, and other interested parties. Due to COVID-19 restrictions, the City held a virtual EIR Public Scoping Meeting on August 12, 2020, aimed at providing information about the proposed Project and the CEQA process to members of public agencies, interested stakeholders, and residents/community members.

In addition to verbal comments from members of the public during the virtual Public Scoping Meeting, the City received letters from public agencies, and emails/letters from members of the public. Appendix A of this EIR contains the Initial Study, the NOP, and all comments received during the 30-day review period. Responses to the Notice of a Preparation of a Draft EIR and input received during the virtual EIR scoping meeting held by the City are summarized in Section 2.0, Introduction.

Primary areas of concern include the following:

- Air pollution health impacts to the community
- Potential need for applicable regulatory permits from resource agencies
- Potential impacts to drainage patterns, water quality, water supply

- Assessment of biological resources including direct, indirect and cumulative impacts, and consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
- Analysis of potential air quality impacts incorporating recommended South Coast Air Quality Management District (SCAQMD) methodology
- Potential impacts to Metropolitan properties and operations nearby
- Recommendation for City to require local hires and paying prevailing wages and exceed the current California Green Building code and 2020 County of Los Angeles Green Building Standards
- Potential substantial effects on human beings due to the COVID-19 crisis
- Justification in the traffic reports/documents for elimination of the existing traffic signal (at the intersection of private driveway south of project & Alessandro Boulevard) and proposed additional traffic signal (at the intersection of Vista Grande Drive & Alessandro Boulevard)
- Project's proximity to the nearby Sycamore Canyon Wilderness Park and its role in recreation, and preservation of the endangered Stephens' kangaroo rat
- Urban/ Wildlands interface impacts including light and noise impacts to the park
- Potential impacts to other undeveloped properties
- Analysis of all potential project impacts
- Increased traffic congestion and changes to circulation patterns, especially with truck routes
- Potential impacts to wildlife, habitat, natural drainages, and existing views
- Project in the context of other development in the area (cumulative development impacts)
- Air quality and greenhouse gas emissions impacts

Written and verbal comments from agencies and interested parties in response to the NOP are summarized in Table 2.0-1 Summary of Written Comments Received in Response to the Notice of Preparation, which also details where each is addressed in the EIR. Comments received at the scoping meeting are summarized in Table 2.0-2 Summary of Comments Received at the August 12, 2020, Virtual Scoping Meeting.

1.6 Issues Not Studied in Detail in the DEIR

The Initial Study (Appendix A) determined no substantial evidence exists that significant impacts would occur with one or more of the thresholds contained in the environmental checklist/ Initial Study for the following issue areas: Agriculture and Forestry Resources, Hazards and Hazardous

Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, and Transportation. Section 7.0 Environmental Effects Found not to be Significant, summarizes the issues determined to have no impact and issues from the environmental checklist determined to be less than significant.

1.7 Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed Project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable:** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated:** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures.
- **Less than Significant:** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table 1.0-1 – Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
Aesthetics			
Threshold A: Would the Project have a substantial adverse effect on a scenic vista?	Less than significant	None required	Less than significant
Threshold B: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	Significant without mitigation	**MM BIO-6:** Prior to issuance of occupancy permit, in order to reduce impacts to on-site Riparian/Riverine areas and suitable habitat for least Bell's vireo (an endangered bird), on-site mitigation shall include: 1. Enhancement of a total of 1.58 acres of riparian habitat: 0.01 acres in Drainage A, 1.34 acres in Drainage 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 Parcel1/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.	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		6. Revise the existing Restricted Property to include Parcel A (7.19 acres) and Parcel B (5.04 acres), with a combined total area of 12.23 acres. The revised 12.23 Restricted Property shall be managed in perpetuity by a CDFW approved 3rd party (such as Rivers and Lands Conservancy "RLC").	
Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant	None required	Less than significant
Threshold D: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant without mitigation	**MM AES-1:** To further reduce impacts related to light pollution, the Project's night lighting shall be directed away from natural open space areas within and adjacent to the Project site and directed downward and towards the center of the development. Energy efficient Low Pressure Sodium (LPS) or High Pressure Sodium (HPS) lamps shall be used exclusively to dampen glare. **MM AES-2:** Prior to the issuance of building permits, the applicant shall submit a photometric (lighting) plan for approval by the Community & Economic Development Department, Planning Division. The approved light design	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		requirements shall be included on the final building plan sheets. The lighting plan shall incorporate the following requirements and shall show that there is no light spillage into the Sycamore Canyon Wilderness Park: • The project shall be designed in such a manner as to prevent light spillage from the project to the adjacent and nearby open space areas • Project lighting shall not exceed an intensity of one foot-candle • Shielding shall be employed, where feasible • Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development • No project lights shall blink, flash, oscillate, or be of unusually high intensity or brightness • Energy-efficient LPS or HPS lamps shall be used exclusively throughout the project site to dampen glare	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		• Exterior lights shall be only "warm" LED lights (<3000K color temperature)	
Air Quality			
Threshold A: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Significant without Mitigation	**MM AIR-1:** The project applicant is required to record a covenant on the property (Parcels 1 and 2) that prohibit manufacturing use. Proof of the record of covenant shall be submitted to the City of Riverside Planning Division prior to issuance of Building Permits.	Less than significant
Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	Significant without Mitigation	**MM AIR-1** (above)	Less than significant
Threshold C: Would the Project expose sensitive receptors to substantial pollutant concentrations?	Significant without Mitigation	**MM AIR-1** (above)	Less than significant
Threshold D: Would the Project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than significant	None required	Less than significant
Biological Resources			
Threshold A: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Wildlife Service?	Significant without mitigation	**MM BIO-1:** Prior to issuance of a grading permit, a qualified biologist shall collect seed for paniculate tarplant and Robinson's pepper-grass throughout the proposed development footprint of the project. The seeds shall be stored in accordance with the biologist's recommendations until restoration efforts are commenced within the existing and additional Restricted Property/ conservation area. If seed is not collected prior to grading permit issuance then	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		topsoil, where identified by the qualified biologist, shall be salvaged and temporarily stored in accordance with the qualified biologists' recommendations until restoration efforts are commenced. On site restoration efforts shall incorporate the collected seed or salvaged topsoil. **MM NOI-1:** Prior to issuance of grading and construction activities, should least Bell's vireo be present in the Sycamore Canyon Wilderness Park within 300 feet of the Project site, in Parcel A on-site conservation area, or within Parcel B on-site conservation area within 100 feet of the development footprint, construction noise impacts shall be minimized through implementation of the following measure: • A 12-foot high temporary noise barrier shall be installed at the perimeter of the limits of disturbance between the construction activities and the adjacent Sycamore Canyon Wilderness Park to the north and east, and the on-site conservation areas as shown in Figure 5.11-5 – Construction Barrier. The barrier shall be continuous without openings, holes, or cracks, and shall reach the ground. The barrier may be constructed with 1-inch plywood and provide a	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		reduction of at least 10 dB(A) to ensure noise levels do not exceed 65 dB(A) L_{eq} at the Sycamore Canyon Wilderness Park and on-site conservation areas. Other barrier materials providing the same reduction shall also be permitted. • Heavy grade rubber mats/pads shall be used within the bed of the trucks. These mats will help attenuate initial impact noise generated when an excavator drops rock and debris into the bed of the truck. These mats must be maintained and/or replaced as necessary. • During all Project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. • The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site. • Equipment shall be shut off and not left to idle when not in use.	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		• The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project site during all Project construction. • The Project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the Project site during construction. • The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (7:00 a.m. to 6:00 p.m. on weekdays, and 8:00 a.m. to 5:00 p.m. on Saturdays). • The use of heavy equipment or vibratory rollers and soil compressors shall be limited along the Project boundaries to the greatest degree possible. It is acknowledged that some soil compression may be necessary along the Project boundaries. • Any jackhammers, pneumatic equipment and all other portable stationary noise sources shall be	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		shielded, and noise shall be directed away from sensitive receptors. • For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign should be posted at the Project site with the contact phone number. This sign shall be posted at the Alessandro Boulevard frontage as well as the Barton Street frontage. **MM BIO-2:** The Project has been designed to avoid direct construction impacts to riparian plant communities to the greatest extent feasible. Avoidance and minimization measures shall be included in the Project specifications for implementation during construction to further reduce the potential for any temporary, indirect impacts to occur to these areas during construction activities, including the following: • Trash and other debris shall be properly disposed of and not left on-site in areas where it could fall into protected habitat. • Project boundaries shall be clearly marked with fencing, or other suitable type of marking material as directed by a qualified biologist. Vehicles and other	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		Project construction personnel shall stay within these delineated Project boundaries. • Sensitive areas (i.e., jurisdictional drainage features, riparian habitats, and MSHCP Conservation Areas) in proximity to the construction footprint shall be clearly marked, with fencing or other suitable type of marking material as directed by a qualified biologist, for awareness and avoidance. • Refueling, washing, or other vehicular maintenance activities shall occur a minimum of 100 feet away from riparian areas, including the conserved riparian habitat. • Equipment would be maintained and checked at least on a daily basis for leaks. • All vehicle leaks or other hazardous material leaks shall be contained and cleaned up immediately. All contaminated soil shall be removed from the site and disposed of properly. **MM BIO-3:** During soil excavation, grading, or other subsurface disturbances, the construction contractor shall supervise provision and maintenance of all standard dust control BMPs to reduce fugitive dust	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		emissions, including but not limited to the following actions: • Water any exposed soil areas a minimum of twice per day, or as allowed under any imposed drought restrictions. On windy days or when fugitive dust can be observed leaving the construction site, additional water shall be applied at a frequency to be determined by the on-site construction superintendent. • Pave, periodically water, or apply chemical stabilizer to construction access/egress points. • Minimize the amount of area disturbed by clearing, grading, earthmoving, or excavation operations at all times. • Operate all vehicles on graded areas at speeds less than 15 miles per hour. • Cover all stockpiles that would not be utilized within three days with plastic or equivalent material, to be determined by the on-site construction superintendent, or spray them with a non-toxic chemical stabilizer. **MM BIO-4:** During construction, to address potential short-term impacts to	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		water quality within the on-site drainages from construction runoff that may carry storm water pollutants, a SWPPP shall be implemented by the construction contractor as required by the California General Construction Storm Water Permit pursuant the Regional Board regulations. The SWPPP shall identify BMPs related to the control of toxic substances, including construction fuels, oils, and other liquids. These BMPs would be implemented by the construction contractor prior to the start of any ground clearing activity, shall be subject to periodic inspections by the City and the Project's hydrological consultant, shall be maintained throughout the construction period and remain in place until all landscape and permanent BMPs are in place. BMPs shall be monitored and repaired if necessary, to ensure maximum erosion, sediment, and pollution control. • The use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within and adjacent to conserved riparian habitat shall be prohibited. • All fiber roles, straw waddles, and/or hay bales utilized	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		within and adjacent to the Project site shall be free of non-native plant materials. • Construction contractor shall comply with all litter and pollution laws. All contractors, subcontractors, and employees shall also obey these laws. • Water containing mud, silt, or other pollutants from grading, aggregate washing, or other activities shall not be allowed to enter the conserved riparian habitat or be placed in locations that may be subjected to high storm flows. • Spoil sites shall not be located within jurisdictional areas and MSHCP Conservation Areas or locations that may be subjected to high storm flows, where spoil shall be washed back into the conserved riparian habitat where it would impact streambed habitat and aquatic or riparian vegetation. • Raw cement/concrete or washings thereof, asphalt, paint, or other coating material, oil or other petroleum products, or any other substances which could be hazardous to fish and	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		wildlife resources resulting from Project related activities shall be prevented from contaminating the soil and/or entering the conserved riparian habitat. These materials, placed within or where they may enter the conserved riparian habitat or any party working under contract to the construction contractor, shall be removed immediately. • No equipment maintenance shall be done within or near the conserved riparian habitat where petroleum products or other pollutants from the equipment may enter these areas under any flow. • No broken concrete, cement, debris, soil, silt, sand, bark, slash, sawdust, rubbish, or washings thereof, oil or petroleum products, or other organic or earthen material from any construction or associated activity of whatever nature shall be allowed to enter into or be placed where it may be washed by rainfall or runoff into the conserved riparian habitat. When operations are	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		completed, any excess materials or debris shall be removed from the work area. No rubbish shall be deposited within 150 feet of the conserved riparian habitat. **MM BIO-5:** Prior to issuance of grading permit, the following measures shall be incorporated into the construction documents and specifications, and implemented by the contractor, to avoid potential construction-related impacts to the conserved riparian habitat outside of the approved disturbance limits: • Construction worker training shall be provided by a qualified biologist at the first on-site construction meeting; • Project boundaries shall be clearly marked and or signs shall be erected near the top of slope adjacent to the conserved riparian habitat to prevent accidental/unauthorized intrusions during construction; and • Staging areas for storage of materials and heavy equipment, and for fueling, cleaning, or maintenance of construction vehicles or equipment, shall be prohibited within 20 feet from	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		the top of slope adjacent to the conserved riparian habitat. **MM BIO-6:** (above) **MM BIO-7:** In order to reduce potential impacts to MSHCP covered species, payment of the MSHCP mitigation fee shall be provided to the City of Riverside prior to issuance of a grading permit for the project. **MM BIO-8:** Payment of the SKRHCP fee shall be provided to the City of Riverside prior to issuance of a grading permit for the Project. **MM BIO-9:** If construction activity is conducted between September 1st and January 31st, then this mitigation measure is required prior to issuance of a grading permit. Federal Migratory Bird Treaty Act (MBTA) and/or state code protect all native bird species - both common and special status. In most scenarios, MSHCP coverage does not override the nesting bird protections provided by these. Impacts to nesting birds, both direct and indirect, can be minimized or eliminated by conducting work activities outside of the local breeding season. Although nesting can occur in any month in southern California for some species, breeding in the study area, given the	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		habitat, would primarily be expected from about 1 February through 31 August. Work from about 1 September through 31 January would avoid most negative affects to birds and nesting activity. If work must be done during the breeding season, surveys for nesting birds should occur no more than three (3) days prior to all vegetation clearing and ground disturbance. If active nests are found, they should be avoided until young have fledged. While there is no established protocol for nest avoidance, when consulted the CDFW generally recommends avoidance buffers of about 500 feet for raptors and threatened/endangered species and 100 – 300 feet for non-raptors. Adherence to these nesting bird recommendations will also avoid and/or mitigate impacts to special status bird species known from the project site which are not covered by the MSHCP. **MM BIO-10:** A focused BUOW survey must be conducted during the breeding season (four visits between 1 March - 31 August). Regardless of the result of those surveys, because of the presence of suitable habitat that could be occupied at any time, a one-day preconstruction survey must also be conducted 30 days or less before groundbreaking.	
Threshold B: Would the Project have a substantial adverse effect on any riparian habitat	Significant without mitigation	**MM BIO-2** through **MM BIO-7** (above)	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			
Threshold C: Would the Project have a substantial adverse effect on Federally-protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Significant without mitigation	**MM BIO-2** through **MM BIO-7** (above)	Less than significant
Threshold D: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	Less than significant	None required	Less than significant
Threshold E: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant	None required	Less than significant
Threshold F: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Significant without mitigation	**MM BIO-6**, **MM AES-1**, **MM AES-2**, **MM NOI-1, MM BIO-10** (all listed above) and **MM BIO-11**. **MM BIO-11:** During construction standard BMPs from Volume I, Appendix C of the MSHCP shall be implemented to avoid impacts to biological resources of the MSHCP. The following standard BMPs shall be included as Environmental Requirement Notes on the final grading plans to be reviewed and approved by	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		City Staff prior to issuance of a grading permit. The measures are as follows: • A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished. • Water pollution and erosion control plans shall be developed and implemented	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		in accordance with RWQCB requirements. • The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible. • The upstream and downstream limits of projects disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work. • Projects should be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern. • Projects that cannot be conducted without placing equipment or personnel in	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		sensitive habitats should be timed to avoid the breeding season of riparian species identified in MSHCP Global Species Objective No. 7. • When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing or other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments offsite. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream. • Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, USFWS, and CDFW, RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas. • Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		• The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint. • The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. • Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible. • To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		shall be enclosed in sealed containers and regularly removed from the site(s). • Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.	
Cultural Resources			
Threshold A: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	Less than Significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
Threshold B: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 of the CEQA Guidelines?	Less than Significant	**MM CUL-1**: Prior to grading permit issuance, if there are any changes to Project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities. **MM CUL-2: Archaeological Monitoring**: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to	Less than significant.

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		identify any unknown archaeological resources. 1. The Project Archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a) Project grading and development scheduling; b) The development of a schedule in coordination with the developer/applicant, the project archaeologist, and for designated Native American Tribal Monitors from the consulting tribes for grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Project Archeologist and Native American Tribal Monitors' authority to stop and redirect grading activities; c) The protocols and stipulations that the Applicant, tribes, and Project Archaeologist/Paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		resources that shall be subject to a cultural resources evaluation; d) In conjunction with the Archeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. e) Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and f) The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-5. **MM CUL-3:** Native American Monitor: Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following: a) The treatment of known cultural resources; b) The treatment and final disposition of any tribal cultural resources, sacred sites, human remains or archaeological and cultural	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		resources inadvertently discovered on the Project site; c) Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and d) The designation, responsibilities, and participation of professional Tribal Monitor(s) during grading, excavation and ground disturbing activities. If the developer/permit applicant and the consulting tribe(s) are unable to reach an agreement, the mitigation measure shall be considered satisfied if the developer/permit applicant provides sufficient documented evidence that they have made a reasonable good faith effort, as determined by the City to reach an agreement with the consulting tribes with regards to items a-d, as listed above). **MM CUL-4**: **Treatment and Disposition of Cultural Resources:** In the event Native American cultural resources are inadvertently discovered during the course of grading for this Project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. **Consulting Tribes Notified:** within 24 hours of discovery, the consulting	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		tribe(s) shall be notified via email and phone. The developer shall provide the City evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site. The removal of any artifacts from the Project site shall require the approval of the Consulting Tribes and all resources subject to such removal must be thoroughly inventoried with a tribal monitor from each consulting tribe to oversee of the process; and 3. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a) Preservation-In-Place of the cultural resources, if feasible as determined through coordination between the	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		project archeologist, developer/ applicant, and consulting tribal monitor(s). Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity; b) Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on sacred items, human remains, and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filed with the City under a confidential cover and not subject to a Public Records Request. The Tribe(s) should be able to access these areas	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		in the future through enforceable agreement; c) If reburial is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/ researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; d) At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and,	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes. **MM CUL-5: Cultural Sensitivity Training:** The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report. **MM CUL-6 Fencing of the Avoided Sites:** Prior to any earthmoving activities, the current boundaries of the avoided sites (CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489) will be fenced and identified as an Environmental Sensitive Area (ESA). The project	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		applicant will ensure that appropriate temporary fencing is installed i.e., orange fabric/barrier fencing) to prevent any unintentional disturbances to CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489 during any earthmoving activities on the project site. The fencing will be installed before clearing and grubbing and will not be removed until all earthmoving activities have been completed and the wall in Parcel 4 has been constructed. The project archaeologist and Tribal Monitor(s) will be on site to monitor the fence installation and removal and will conduct daily inspections of the fencing to make sure that it is intact and has not been breached. If the project archaeologist and/or Tribal Monitor(s) identify a breach of the fence, i.e., removal, cut, depressed, driven over or intentionally breached in any way, all work within a 25-foot buffer shall cease and the Project Applicant, City, project archaeologist and the Monitoring Tribe(s) shall meet and confer as to the best method to repair the fencing. The person(s) responsible for the breach and the Construction Supervisor (or appropriate supervisory personnel) shall be required to retake the sensitivity training provided at the beginning of construction, in addition to any other remedies considered appropriate.	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		MM CUL-7 Relocation of Impacted Sites: Prior to any grading in the associated areas, the Project Applicant shall meet with the Project Archaeologist and the Consulting Tribe(s) in order to assess CA-RIV-11769, CA-RIV-2487, and two milling slicks within CA-RIV-2488 to determine the suitability for relocation to a permanent open space area. The Consulting Tribe(s) shall work with the Project Archaeologist, Project Applicant, and the grading contractor or appropriate personnel to ensure that every effort is made to relocate the Features safely and to discuss the most appropriate methods for relocation. Using professional archaeological methods, the milling slicks associated with Sites CA-RIV-11769, CA-RIV-2487, and CA-RIV-2488 shall be relocated to the planned open space area in the northern portion of the Project site. The Tribe(s) should be able to access these areas in the future through enforceable agreement. Before construction activities may resume in the affected area, any visible artifacts shall be recovered and recorded, and the features recorded using professional archaeological methods. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process taken, and updated maps using sub meter GIS technology to	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		document the new location of each feature. The relocation information shall be included in a Phase IV Monitoring Report. The site record should clearly indicate that the Features are not in their original location and why they were relocated. **MM CUL-8 Long-Term Preservation Plan:** Prior to occupancy, a Long-Term Preservation Plan (LTPP) shall be prepared among the City, Land Owner, and Consulting Tribe(s). The LTPP should include the following: a) Description of archaeological resources b) Documentation of resources of concern, such as high-resolution photographs or similar c) Listing of Preservation Actions to Date d) The determination of responsibility for care, maintenance, and guidance in the event preserved resources [CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489] should be vandalized or damaged. This section should also address responsibility for regular site condition assessments to determine if resources are being affected by project construction and later operations.	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		MM CUL-9 Controlled Grade: Sites CA-RIV-11769, CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, CA-RIV-2487, CA-RIV-2488, and CA-RIV-2489 will be impacted during grading and construction activities and the soils surrounding them will be disturbed. Prior to any grading in the associated areas, the Project Applicant, the Consulting Tribes, and the City will formalize a written agreement to identify the area that will be subject to "Controlled Grading" during construction of the Project. The Pechanga Tribe, the Project Applicant, and the City will develop an exhibit that outlines the area subject to controlled grading, and that area will be highlighted on the rough grading plans, precise grading plans or other off-site improvement plans that may impact this site. "Controlled Grading" shall include, without limitation, the slow and deliberate excavation and removal of soils employing the smallest reasonable cuts in certain areas using light scrapers (for example Caterpillar 623 or 627), dozers (for example D6- D8), front end loaders, excavators, skip loaders, dump trucks, and motor graders. A controlled grading plan will be monitored by the Project Archeologist and Tribal Monitor(s) to ensure the systematic removal of the ground surface surrounding these features are monitored to allow for the identification of resources. Results of all	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		controlled grading activities shall be included in the Phase IV monitoring report. **Consistent with State Law the Project will be required to comply with the following standard condition of approval:** **Discovery of Human Remains:** In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of	

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).	
Threshold C: Would the Project disturb any human remains, including those interred outside of formal cemeteries?	Less than significant	None required	Less than significant
Energy			
Threshold A: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, unnecessary consumption of energy resources, during project construction or operation?	Less than significant	None required	Less than significant
Threshold B: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than significant	None required	Less than significant
Threshold C: Would the Project achieve the goal of energy conservation by the following? ▪ Decreasing overall per capita energy consumption; ▪ Decreasing reliance on fossil fuels such as coal, natural gas and oil; and ▪ Increasing reliance on renewable energy sources.	Less than significant	None required	Less than significant
Geology and Soils			
Threshold A: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to	Less than significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
Division of Mines and Geology Special Publication 42; ii) strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; and/or iv) landslides?			
Threshold B: Would the Project result in substantial soil erosion or the loss of topsoil?	Less than significant	None required	Less than significant
Threshold C: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than significant	None required	Less than significant
Threshold D: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than significant	None required	Less than significant
Threshold E: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant	None required	Less than significant
Threshold F: Will the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Significant without mitigation	**MM GEO-1:** If one or more fossils are discovered during construction, all ground disturbing activities within 50 feet of the area of the find shall be ceased and the applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology (SVP) qualifications standards for Project Paleontologist to oversee the documentation of the extent and potential significance of the finds as well as recovery efforts. Ground-disturbing activities may resume in the area of the finds at the discretion of the	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
		Project Paleontologist. If the fossils are significant per the SVP's 2010 criteria, then paleontological monitoring shall be conducted on an as-needed basis for further ground-disturbing activities in the Project Area.	
Greenhouse Gas Emissions			
Threshold A: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant without mitigation	**MM AIR-1** (previously described above) is required to ensure that the actual use of the site is consistent with the use described in the Project Description and analyzed in the Project-specific greenhouse gas analysis. **MM BIO-6** (previously described above) would also reduce the Project's overall GHG impacts.	Less than significant
Threshold B: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant without mitigation	**MM AIR-1** (previously described above) is required to ensure that the actual use of the site is consistent with the use described in the Project Description and analyzed in the Project-specific greenhouse gas analysis.	Less than significant
Hazards & Hazardous Materials			
Threshold A: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Significant without mitigation	**MM AIR-1** (previously described above).	Less than significant
Threshold B: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	None required	Less than significant
Threshold C: Would the Project emit hazardous emissions or handle hazardous or acutely	Less than significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			
Threshold D: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	Less than significant	None required	Less than significant
Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than significant	None required	Less than significant
Threshold F: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than significant	None required	Less than significant
Hydrology and Water Quality			
Threshold A: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less than significant	None required	Less than significant
Threshold B: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant	None required	Less than significant
Threshold C: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i)	Less than significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
result in substantial erosion or siltation on-or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; iv) impede or redirect flood flows?			
Threshold D: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant	None required	Less than significant
Land Use and Planning			
Threshold A: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant	None required	Less than significant
Noise			
Threshold A: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant without mitigation	**MM NOI-1** (above)	Less than significant
Threshold B: Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?	None required	None required	Less than significant
Transportation			
Threshold A: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Significant and unavoidable	No feasible mitigation available. Even with implementation of feasible TDM measures, Project VMT cannot be reduced to less than significant levels and thus, the Project's VMT would still contribute to cumulative impacts and are considered significant and unavoidable.	Significant and unavoidable
Threshold C: Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less than significant	None required	Less than significant
Threshold D: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant	None required	Less than significant
Tribal Cultural Resources			
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is: • (Threshold A) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? • (Threshold B) a resource determined by the lead agency, in its discretion and supported	Less than significant	**MM CUL-1 through MM CUL-9** as previously discussed above in Cultural Resources.	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, would the lead agency consider the significance of the resource to a California Native American tribe?			
Utilities			
Threshold A: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant	None required	Less than significant
Threshold B: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than significant	None required	Less than significant
Threshold C: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant	None required	Less than significant
Threshold D: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant	None required	Less than significant
Threshold E: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant	None required	Less than significant

Impact	Significance Pre-mitigation	Mitigation Measure(s)	Residual Impact
Wildfire			
Threshold A: Would the Project Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant	None required	Less than significant
Threshold B: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Fire Protection Public Services?	Less than significant	None required	Less than Significant
Threshold C: Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than Significant	None required	Less than Significant
Threshold D: Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less than significant	None required	Less than Significant
Threshold E: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than significant	None required	Less than Significant
Threshold F: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than significant	None required	Less than Significant

2.0 Introduction

2.1 Purpose and Scope

The purpose of this Environmental Impact Report (EIR) is to evaluate and disclose potential environmental impacts resulting from the implementation of the Sycamore Hills Distribution Center Project located north of Alessandro Boulevard directly east of Barton Street and west of San Gorgonio Drive. The EIR will also evaluate potential environmental impacts along associated streets and utility improvements (hereinafter referred to as the Project), as further described in Section 3.0 – Project Description of this DEIR.

This EIR is to serve as an informational document for the public and City of Riverside (City) decision makers. The process to finalize the EIR includes public hearings before the Planning Commission and City Council to consider certification of a Final EIR and approval of the Project.

2.2 Authorization

The EIR has been prepared by the City as the "Lead Agency" in accordance with the Guidelines for the Implementation of the California Environmental Quality Act (State *CEQA Guidelines*), (Sections 15000-15387 of the California Code of Regulations), and the City's *CEQA Guidelines.* The Project considered in this DEIR is a "project," as defined by Section 15378 of the State *CEQA Guidelines*, which states that an EIR must be prepared for any project that may have a significant impact on the environment. The City, as Lead Agency, has determined that the Project may have a significant adverse impact on the environment; therefore, preparation of an EIR was required.

2.3 Lead and Responsible Agencies

CEQA defines a "Lead Agency" as the public agency that has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. Other agencies, e.g., Western Municipal Water District, California Department of Fish and Wildlife (CDFW), the Santa Ana Regional Water Quality Control Board (RWQCB), the U.S. Army Corps of Engineers (USACE) and the South Coast Air Quality Management District (SCAQMD) which also have some authority or responsibility to issue permits for project implementation, are designated as "responsible agencies." Both the Lead Agency and responsible agencies must consider the information contained in the EIR prior to acting upon or approving a project. The City, as the Lead Agency, has determined the Project may have a significant adverse impact on the environment, and, therefore, preparation of an EIR is required. The City's address is:

City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
Contact: Veronica Hernandez, Senior Planner

Responsible agencies for the Project include:

- **Santa Ana Regional Water Quality Control Board:** Issuance of a Notice of Intent prior to construction operations related to National Pollutant Discharge Elimination System (NPDES) Construction Permits, issuance of a water quality certification pursuant to Section 401 of the Clean Water Act in connection with issuance of a Section 404 Clean Water Act permit.
- **California Department of Fish and Wildlife:** Issuance of agreements under Section 1601-1602 of the Fish and Game Code related to streambed alterations and review of the Determination of Biologically Equivalent or Superior Preservation (DBESP) for impacts to riparian/riverine resources protected under the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).
- **US Army Corps of Engineers:** Issuance of a Section 404 permit under the Clean Water Act.
- **US Fish and Wildlife Service:** Review of the Determination of Biologically Equivalent or Superior Preservation (DBESP) for impacts to riparian/riverine resources protected under the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and Endangered Species Act Section 7 Consultation with US Army Corps of Engineers.
- **Western Municipal Water District:** Approval and construction of water improvements.
- **South Coast Air Quality Management District:** Review air quality modeling used to support the EIR analysis and findings.

2.4 Project Applicant

The Project Applicant is:

Darrell A. Butler and Khosro Khaloghli
3241 Alta Laguna Boulevard
Laguna Beach, CA 92651
Contact: Darrell A. Butler

2.5 Compliance with CEQA

The basic purposes of CEQA are to:

1. Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. (State CEQA Guidelines, Section 15002).

The EIR process typically consists of three (3) parts—the Notice of Preparation (NOP), DEIR, and Final EIR. Pursuant to Section 15082 of the State CEQA Guidelines, the City initiated the environmental process with a NOP. The NOP was distributed to the State Clearinghouse, responsible agencies, and other interested parties, on July 28, 2020. Pursuant to Section 15082 of the Sate *CEQA Guidelines,* recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. A scoping meeting was held on August 12, 2020; the scoping meeting was held virtually due to the Covid-19 pandemic.

Agencies and interested parties that submitted written comments in response to the NOP are identified in Table 2.0-1 – Summary of Written Comments Received in Response to the Notice of Preparation and copies of the letters received are included in Appendix A of this DEIR.

Table 2.0-1 – Summary of Written Comments Received in Response to the Notice of Preparation

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
Diane Dosserich – Metropolitan Water District of Southern California (Metropolitan) (August 17, 2020)	1. Metropolitan indicates it owns property and owns and operates facilities adjacent to the Project site (Box Springs Feeder and Mill's Treatment Plant located north and west of the Project, respectively; and Perris Valley Pipeline along the boundary of the south side of the Project beneath Alessandro Boulevard). Metropolitan expresses its concern of potential impacts to its properties, the pipeline, and associated facilities resulting from construction of the Project, and states Metropolitan must be allowed to maintain its rights-of-way and unobstructed access to its facilities. 2. Metropolitan also states it will not allow any structures within its Property or easements. Development associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Metropolitan will not permit activities that could subject the pipeline to excessive vehicle, impact, or vibratory loads. Structures within its properties or easement will also not be allowed. 3. Metropolitan requires detailed design plans for any activities within the vicinity of its facilities, properties, or rights-of way be	Comments have been noted and are addressed in Section 5.14 – Utilities. Vibration impacts from construction activities are discussed in Section 5.11 – Noise.

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	submitted prior to construction for review and approval.	
Jeffrey Smith – March JPA (August 20, 2020)	This comment letter notes that while the Project is not adjacent to the March JPA jurisdictional boundary, the traffic analysis and Draft EIR should consider: 1. City/County designated truck routes on Alessandro Boulevard between State Route 91 and Interstate 215; 2. Intersections at Alessandro Boulevard/Meridian Parkway; Meridian Parkway/Cactus Avenue; Meridian Parkway/Van Buren Boulevard; and 3. Interstate 215 On/Off Ramps at Van Buren Boulevard, Cactus Avenue, Alessandro Boulevard, and Eastridge Avenue.	Section 5.12 – Transportation
Deborah De Chambeau – Riverside County Flood Control District (District) (August 20, 2020)	1. The District's letter indicates that the Project would not be impacted by District Master Drainage Plan facilities, nor are any facilities of regional interest proposed. 2. The Project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board 3. If the Project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, the City should require the Applicant to provide all information required to meet FEMA requirements and that the Applicant should obtain a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) 4. The Project may require the Applicant to obtain a Section 1602 Agreement, a Clean Water Act Section 404 Permit, and a Clean Water Act Section 401 Water Quality Certification	Comments have been noted and are addressed in Section 5.9 – Hydrology and Water Quality
Mauricio Alvarez – Riverside Transit Authority (RTA) (August 21, 2020)	RTA comments they are requesting a sidewalk on Alessandro Blvd that is Americans with Disabilities Act (ADA) compliant with capacity to install a bus sign pole and bench in the future. RTA will install these improvements when appropriate.	Section 5.12 – Transportation

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
Lijin Sun – South Coast Air Quality Management District (SCAQMD) (August 25, 2020)	1. SCAQMD recommends that the SCAQMD's CEQA Air Quality Handbook and website be used as guidance in preparing the air quality and greenhouse gas analyses. SCAQMD additionally recommends the CalEEMod land use emissions software be used as well, and further notes the California Air Resource Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* as a general reference guide for evaluating and reducing air pollution impacts. 2. SCAQMD recommends the Project's air quality impacts be determined by comparing Project criteria pollutant emissions to SCAQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds. It is also noted that potential adverse air quality impacts from all phases of the Project should be identified, and that air quality impacts from construction and operation should be calculated. It is additionally recommended that a mobile source health risk assessment be performed if the Project generates diesel emissions. 3. The comment letter indicates that SCAQMD should be identified as a Responsible Agency should the Project require a permit from SCAQMD. 4. SCAQMD expresses its staff's concerns about potential public health impacts of siting warehouses within close proximity of sensitive land uses and cites its Multiple Air Toxics Exposure Study (MATES IV, May 2015). 5. SCAQMD provides a number of mitigation measures it recommends the City consider in the event the Project results in significant adverse air quality impacts, including measures for operational air quality impacts from mobile sources and other area sources.	Section 5.2 – Air Quality Section 5.7 – Greenhouse Gases The Air Quality Impact Analysis and Health Risk Assessment are contained in Appendix C.

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	6. SCAQMD additionally recommends design considerations to further reduce potential air quality and health risk impacts.	
Scott Wilson-CDFW (August 25, 2020)	**Assessment of Biological Resources** 1. An assessment of various habitat types and a map that identifies the location of each habitat. 2. A biological inventory of species present or have the potential to be present. 3. A complete recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint. 4. A thorough, recent, floristic-based assessment of special status plants and natural communities. 5. Information on the regional setting that is critical to an assessment of environmental impacts. 6. A full accounting of all mitigation/conversation lands within and adjacent to the Project. Include impacts to the existing restricted covenant. **Analysis of Direct, indirect, and cumulative impacts to Biological resources** 1. A discussion of potential impacts from lighting, noise, human activity, defensible space, and wildlife-human interaction etc. Changes to drainage patterns should also be discussed (water quality, volume, velocity, etc.). a. DEIR should fully describe and identify the location, acreage, and composition of defensible space. b. Defensible space should be provided and accounted for within proposed development area and not transferred to adjacent open space 2. A discussion on potential indirect Project impacts on biological resources, including areas adjacent. 3. An evaluation of impacts to adjacent and onsite open space/conserved lands from both the Project and long-term operational/maintenance needs.	Section 5.3 – Biological Resources, Section 5.9 – Hydrology and Water Quality, and Section 5.15 – Wildfire. The Biological Resources Report and MSHCP Consistency Report is contained in Appendix D.

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	a. DEIR should include an evaluation of all potential Project-related impacts to the restricted covenant and the Wilderness Park. 4. Cumulative effects analysis which includes potential direct and indirect impacts to riparian areas, wetlands, vernal pools, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands etc. **Alternatives Analysis** CDFW recommends the DEIR describes and analyzes a range of alternatives for the Project **Mitigation Measures for Project Impacts to Biological Resources** CDFW recommends the DEIR identify mitigation measures for the following topics; 1. Fully Protected Species: may not be taken or possessed at any time. CDFW recommends that the DEIR analyzes potential adverse impacts to fully protected species and that the City include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species. 2. Sensitive Plant Communities: the DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. 3. California Species of Special Concern (CSSC): CSSCs should be considered during the environmental review process. 4. Mitigation: the DEIR should include mitigation measures for adverse Project-related impacts to sensitive species and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail.	

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	a. The DEIR should include measures to perpetually protect the targeted habitat values within mitigation area from direct and indirect adverse impacts. Specific issues are restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. b. If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. c. CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA. d. CDFW is concerned of the construction of an access road over approximately 0.67 acres of lands conserved under a restricted covenant. CDFW recommends that the City conduct a thorough analysis of this proposal and include in the DEIR an in-depth discussion demonstrating that this proposal represents an appropriate and defensible mitigation strategy. CDFW recommends that the City include in the DEIR a discussion of onsite habitat values and habitat management activities conducted pursuant to the Restoration Plan. The DEIR should specifically address how the mitigation proposal will provide superior conservation values. Copies of the Restoration Plan and associated annual reports should be included as an appendix. 5. Habitat Revegetation/Restoration Plans: Plans should be prepared by persons with	

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	expertise in southern California ecosystems. Each plan should include the following; a. The location of restoration sites and assessment of appropriate reference sites; b. The plant species to be used, sources of local propagules, container sizes, and seeding rates; c. A schematic depicting the mitigation area; d. A local seed and cuttings and planting schedule; e. A description of the irrigation methodology; f. Measures to control exotic vegetation on site; g. Specific success criteria; h. A detailed monitoring program; i. Contingency measures should the success criteria not be met; and j. Identification of the party responsible for meeting the success criteria and providing for conservation of the party responsible for meeting the success criteria and providing for conservation of the mitigation site. CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposed. Onsite seed collection should be initiated. Restoration objectives should include protecting special habitat elements or recreating them. 6. Nesting Birds and Migratory Bird Treaty Act: CDFW recommends that the DEIR include specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur and measures should a nest be location. If pre-construction surveys are proposed, CDFW recommends no more than three (3) days prior to vegetation clearing or ground disturbance activities.	

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	California Endangered Species Act CDFW recommends early consultation and recommends the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program. **Western Riverside County Multiple Species Habitat Conservation Plan** 1. An assessment of the impacts to the MSHCP as a result to this Project is necessary to address CEQA requirements. 2. The permittees need to demonstrate that proposed actions are consistent with the MSHCP. The DEIR needs to address how the proposed Project will affect the policies and procedures of the MSHCP. All surveys and results shall be included in the DEIR.	
Mitchell M. Tsai – Attorneys for Southwest Regional Council of Carpenters (SWRCC) (August 26, 2020)	The commenter states the following: 1. The commenter provided comments that are more administrative, not related to the EIR or project, and these comments are noted. 2. The City should require the Applicant to provide additional community benefits such as requiring local hires and paying prevailing wages to benefit the City – comment noted. 3. It would be beneficial for the City to require the Applicant to hire workers who a. have graduated from a Joint Labor Management apprenticeship training program approved by the State, or b. have as many hours of on-the-job experience as would be required to graduate from such a program; c. are registered apprentices in an apprenticeship training program approved by the State 4. The City should require the Project to be built to standards exceeding the current 2019 California Green Building code and 2020 County of Los Angeles Green Building Standards Code to both mitigate environmental impacts and advance progress toward the State's environmental goals	Items #1-5 do not relate to the content or analysis contained in the DEIR. The Project's compliance with the California Building Code is addressed in Sections 5.2 – Air Quality, 5.5 – Energy, 5.7 – Greenhouse Gases, and 5.10 Land Use. The Air Quality Impact Analysis and Health Risk Assessment are contained in Appendix C.

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	The commenter additionally provides the following regarding COVID-19: 5. Due to the COVID-19 Crisis, the City must adopt a mandatory finding of significance that the Project may cause a substantial adverse effect on human beings a. The commenter recommends the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from Project construction activities b. The commenter recommends several work practices regarding construction site design, testing procedures, and planning as it relates to disease preparedness and response	
Nick Tavaglione – NL Tavaglione Consulting (NLTC) (August 26, 2020)	The commenter indicates NLTC's services have been retained by a party whose property may be impacted by the Project with regards to ingress and egress, existing traffic signal(s) elimination, and additional traffic signal(s) and requests traffic reports/documents that justify the changes mentioned.	Section 5.12 – Transportation and the Traffic Operations Analysis is included as Appendix L
Len Nunney - Friends of Riverside's Hills (August 27, 2020)	The Friends of Riverside's Hills comments that the following should be addressed in the DEIR: 1. All phases of development as well as developments in the area 2. Construction traffic impacts 3. Biological resource impacts, including the Project's proximity to the nearby Sycamore Canyon Wilderness Park (Park) and the role of the Park in the preservation of the endangered Stephens' kangaroo rat and as a core area in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) 4. Urban/wildlands interface impacts, including issues outlined in the MSHCP 5. Aesthetic and view impacts, including the Project's proximity to the Park 6. Cultural Resource impacts 7. Energy impacts, including mitigation options such as solar panel generation	Section 3 – Project Description Section 4 – Environmental Setting Section 5.1 – Aesthetics Section 5.2 – Air Quality Section 5.3 – Biological Resources Section 5.4 – Cultural Resources Section 5.5 – Energy Section 5.6 – Geology and Soils

Commenting Party (Date of Letter/email)	Summary of Comment	Addressed in Section(s) of the DEIR
	8. Geology and soils impacts, including the amount of grading involved in the Project 9. Land use and planning impacts 10. Recreation impacts, including the Project's proximity to the Park and the need to maintain access to the Park 11. Traffic impacts, including nearby streets and intersection impacts 12. Noise impacts, including impacts to the Park 13. Light impacts, including impacts to the Park 14. Water quality impacts, including impacts to on-site riparian areas and plans for their future management 15. Air quality impacts 16. Water supply impacts	Section 5.9 – Hydrology and Water Quality Section 5.10 – Land Use and Planning Section 5.11 – Noise Section 5.12 – Transportation/Traffic Section 5.14 – Wildfire Section 7 – Environmental Effects Found not to be Significant

Comments received at the scoping meeting are summarized in Table 2.0-2-Summary of Comments Received at the August 12, 2020, Virtual Scoping Meeting.

Table 2.0-2 – Summary of Comments Received At the August 12, 2020, Virtual Scoping Meeting

Commenting Party	Summary of Comments	Location in DEIR in which Comment is Addressed
Bill Quisenberry – Labor Relations Representative, Laborers' International Union of North America (LiUNA!)	Commenter expressed interest in possible contracting with the Project applicant and requested contact information.	Section 2 – Introduction provides Project Applicant information; comment was also noted and addressed by the City.

Copies of the NOP, Initial Study, and copies of written comments received by the City in response to the NOP are included in Appendix A.

An EIR is an informational document intended to inform decisions makers and the general public of potentially significant environmental impacts of a project. An EIR also identifies possible ways to minimize these potentially significant impacts (referred to as a mitigation) and describes alternatives to a project that may also reduce its significant impacts. Having the authority to take action on the proposed Project, the City Planning Commission and the City Council will consider the information in this EIR in their evaluations of the Project. The findings and conclusions presented in the EIR regarding environmental impacts do not control the City's discretion to approve, deny, or modify the Project, but instead are presented as information to aid the decision-making process.

As set forth in Section 15021 of the State *CEQA Guidelines*, as Lead Agency, the City has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) of the State *CEQA Guidelines* states that, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian." Other public agencies (i.e., Responsible and Trustee Agencies) that may use this EIR in their decision-making or permit processes will consider the information in this EIR along with other information that may be presented during the CEQA process. In accordance with CEQA, the public agencies will be required to make findings for each environmental impact of the Project that cannot be mitigated to below a level of significance. If the Lead Agency determines that the benefits of the proposed Project outweigh significant environmental effects, the Lead Agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting its action notwithstanding the Project's significant environmental effects.

Potentially Significant Environmental Effects

CEQA requires consideration and discussion of significant environmental effects. Section 15126 of the State *CEQA Guidelines* state that, "All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation." Section 5 of this DEIR will address each environmental effect that was determined to be potentially significant in the NOP (Appendix A). Each effect is organized into an issue area; those that will be analyzed (and the section of the DEIR in which the analysis is contained) are listed below:

- Aesthetics (Section 5.1)
- Air Quality (Section 5.2)
- Biological Resources (Section 5.3)
- Cultural Resources (Section 5.4)
- Energy (Section 5.5)
- Geology and Soils (Section 5.6)
- Greenhouse Gas Emissions (Section 5.7)
- Hazards and Hazardous Materials (Section 5.8)
- Hydrology and Water Quality (Section 5.9)
- Land Use and Planning (Section 5.10)
- Noise (Section 5.11)
- Transportation (Section 5.12)
- Tribal Cultural Resources (Section 5.13)
- Utilities (Section 5.14)
- Wildfire (Section 5.15)

Format

This DEIR has been organized in sections as follows:

Table of Contents to assist readers in locating the analysis of different subjects and issues as required by Section 15122 of the State *CEQA Guidelines*. A list of acronyms used in the EIR is included in the table of contents.

Section 1 – Executive Summary covers the summary requirements of CEQA as required by Section 15123 of the State *CEQA Guidelines* and includes: the Project location, a brief description of the Project, a matrix containing a summary of environmental impacts and mitigation measures, Project objectives, approvals related to the Project, areas of controversy, and a brief description of the Project alternatives.

Section 2 – Introduction describes the scope and purpose of the DEIR, identifies the Project Applicant and Lead Agency, provides a brief summary of the CEQA process to date, summarizes and identifies the documents incorporated by reference in the DEIR.

Section 3 – Project Description contains the information required by Section 15124 of the State *CEQA Guidelines* including: a detailed description of the Project, the Project objectives, a general description of the Project's environmental setting, the approvals needed to implement the Project, and a list of agencies expected to use the DEIR.

Section 4 – Environmental Setting provides a general overview of the environmental setting for the proposed Project and the developments considered in the cumulative impact analysis in Section 5.

Section 5 – Environmental Impact Analysis satisfies the requirements of Sections 15125, 15126, 15126.2, and 15126.4 of the State *CEQA Guidelines* by including an analysis of each environmental issue area determined to have potentially significant impacts in the NOP or as a result of comments received in response to the NOP. For each issue area analyzed, this section includes a discussion of the setting to which each issue area is analyzed against, defines the related regulations affecting the proposed Project, identifies the thresholds used to determine significance, describes any Project design features that would reduce impacts, analyzes the Project's impacts, provides a description of the mitigation measures used to reduce or lessen potential impacts, discusses the Project's impacts, if mitigation is required, and analyzes the Project's potential cumulative impacts.

Section 6 – Other CEQA Topics includes the Project's consistency with regional plans, significant irreversible impacts, and growth inducing impact discussion.

Section 7 – Environmental Effects Found Not Significant includes the topics and thresholds in which the Project would not have significant impacts.

Section 8 – Alternatives satisfies the requirements of Section 15126.6 of the State *CEQA Guidelines* by identifying and discussing the no Project alternative in addition to alternatives to the Project that lessen the severity of significant impacts and identifying the environmentally superior alternative.

Section 9 – References includes a listing of all reference materials, the organizations and persons contacted in preparing the EIR, and a list of preparers as required by Section 15129 of the State *CEQA Guidelines.*

2.6 Documents Incorporated by Reference

Section 15150 of the State CEQA Guidelines permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this EIR, where that information is relevant to the analysis of potential impacts of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside, Community & Economic Development Department, Planning Division. Technical studies cited below were specifically developed in connection with the Project. Where noted as appendices, the reports are included in their entirety.

City of Riverside General Plan 2025 Final Program Environmental Impact Report

The *City of Riverside General Plan 2025 Final Program Environmental Impact Report* (GP 2025 FPEIR) was certified in 2007. The GP 2025 FPEIR provided a first tier analysis of the potential environmental effects of the adoption and implementation of the proposed General Plan, adoption and implementation of the comprehensive update of the Zoning Code and Subdivision Code, an amendment to the Noise Code, and adoption and implementation of the Magnolia Avenue Specific Plan as well as the adoption and implementation of the Citywide Design and Sign Guidelines. The GP 2025 FPEIR contains information regarding the environmental setting within the City and is available online at http://www.riversideca.gov/planning/gp2025program.

City of Riverside General Plan 2025

The *City of Riverside General Plan 2025* (GP 2025) was adopted in 2007. The GP 2025 is a long-range plan designed to control and regulate the growth in the City and to maintain the quality of the human and natural environment. The GP 2025 is the City's planning "constitution," or a blueprint for development, and is the single-most important policy document in guiding land use and development decisions within the City (GP 2025 FPEIR, p. 2-5). To that end, the GP2025 contains goals and policies that serve as the planning framework for the City in addition to providing direction for City operations and programs and serves as a guide to public and private decision making. The GP 2025 includes the following elements: Land Use and Urban Design, Circulation and Community Mobility, Housing, Arts and Culture, Education, Public Safety, Noise, Open Space and Conservation, Air Quality, Public Facilities, and Park and Recreation Elements. The GP 2025 is available online at http://www.riversideca.gov/planning/gp2025program.

City of Riverside Municipal Code

The City's Municipal Code complements the GP 2025. The Municipal Code, which contains among other ordinances, the City's Zoning Code, is a mechanism to implement and enforce the goals, objectives, policies and programs articulated in the GP 2025. Many of the potential environmental concerns considered in this DEIR are adequately addressed through application

of regulations contained in the Municipal Code. The Municipal Code is available online at http://www.riversideca.gov/municode.

Sycamore Canyon Business Park Specific Plan and EIR

Originally known as the Box Springs Industrial Park Specific Plan, the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) was originally adopted April 10, 1984 and has been amended 14 times. The SCBPSP describes a planned industrial park consisting of approximately 920 acres of industrial and commercial uses and a 480-acre wilderness park (Sycamore Canyon Wilderness Park) within an approximately 1,500-acre area. The purpose of the SCBPSP is to assure efficient, orderly, and attractive development. To provide for orderly development, the SCBPSP was coordinated with the Sycamore Canyon Specific Plan and the General Development Plan for the Sycamore Canyon Park. The SCBPSP is available online at https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/spec-plans/syc-bus-park/plan_doc.pdf.

The SCBPSP was the result of a complex series of circumstances. As the only large, undeveloped area of land not previously subject to detailed planning analysis, the site had been identified as a potential significant opportunity in economic revitalization studies conducted in 1978. A number of studies covering the area occurred between when the Specific Plan was adopted. Important factors in these studies were preserving the land now known as Sycamore Canyon Wilderness Park and establishing land uses that would be compatible with what is now known as the March Air Reserve Base Airport Compatibility Plan available at http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700. A good portion of the property within the SCBPSP is impacted by the C1 – Primary Approach/Departure Zone and D – Flight Corridor Buffer Compatibly Criteria that limits other uses, such as residential uses, in this area.

Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan.

The *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan* was prepared with two purposes: update the park's conceptual development plan and provide a coordinated Maintenance/Management Plan for the endangered Stephens' kangaroo rat (SKR). Because the Sycamore Canyon Wilderness Park was designated as a core reserve in the Habitat Conservation Plan (HCP) for the SKR, the City was required to prepare a Maintenance/Management Plan for the core reserve. The plan is available online at the City's website:

https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/spec-plans/SycCynMnmgtPlan_UpdatedConceptualPlan.pdf

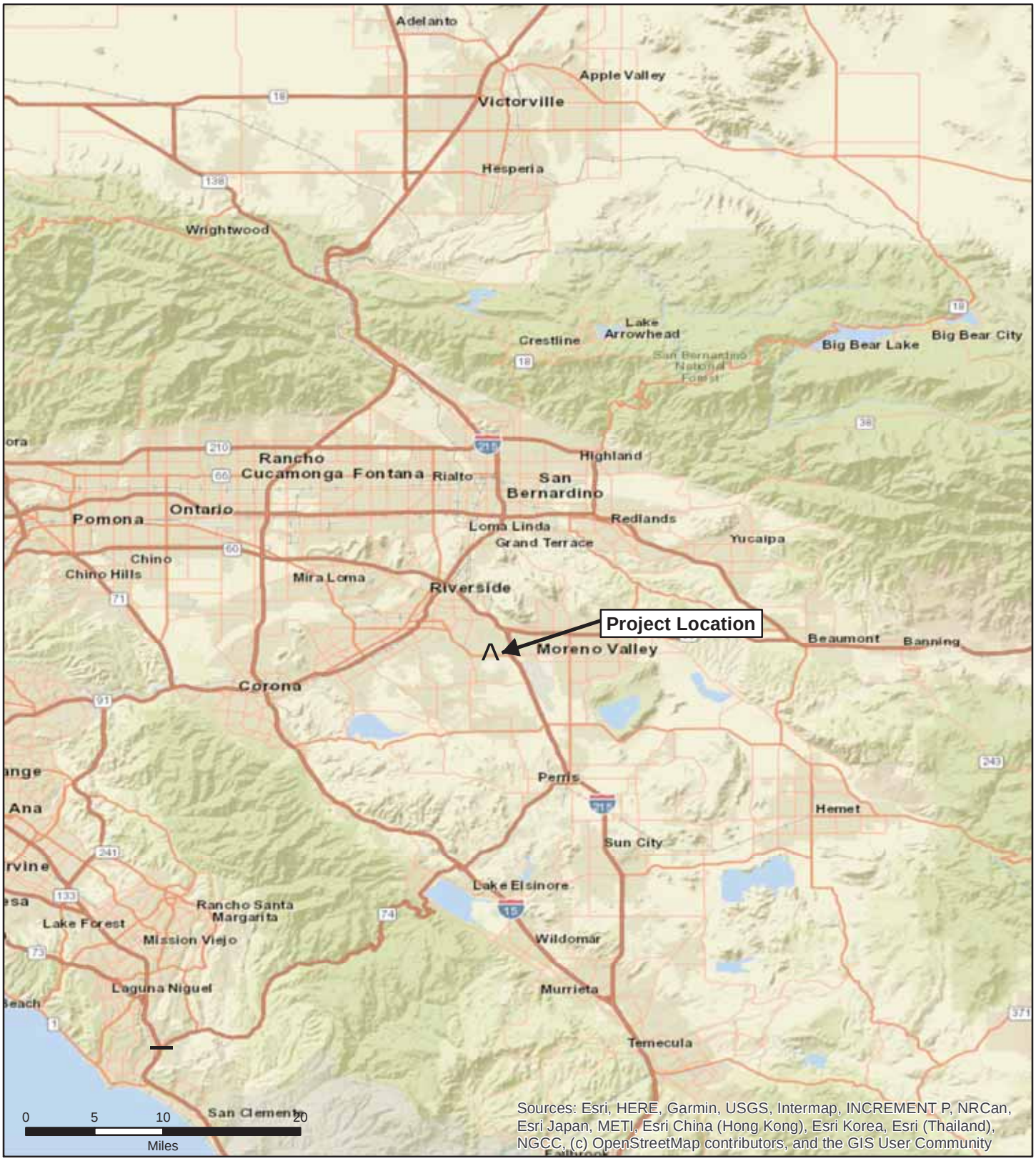
3.0 Project Description

This section describes the Project, identifies the Project location, the Project site and surrounding land uses, project characteristics, objectives, and discretionary actions needed for approval. This DEIR analyzes the potential environmental effects of the construction and operation of the proposed Sycamore Hills Distribution Center Project, and all associated on-and off-site supporting improvements, which herein collectively are referred to as the "Project."

3.1 Project Location

The regional setting of the Project is shown on Figure 3.0-1 – Regional Map. The Project is located approximately 10 miles south of Downtown Riverside. The Project site is within the southwestern quarter of Section 9, Township 3 South, Range 4 West, as shown on the Riverside East, California, United States Geological Survey (USGS) 7.5-minute quadrangle. (Figure 3.0-2 – Vicinity Map). The Project site is located in the eastern portion of the City of Riverside, east of Barton Street, west of Sycamore Canyon Boulevard, and north of Alessandro Boulevard, within the Sycamore Canyon Business Park Specific Plan. (Figure 3.0-3 – Project Location Map). The Project site is approximately 48.64 gross acres and includes the following Assessor's Parcel Numbers (APNs):

- APN: 263-060-022
- APN: 263-060-024
- APN: 263-060-026

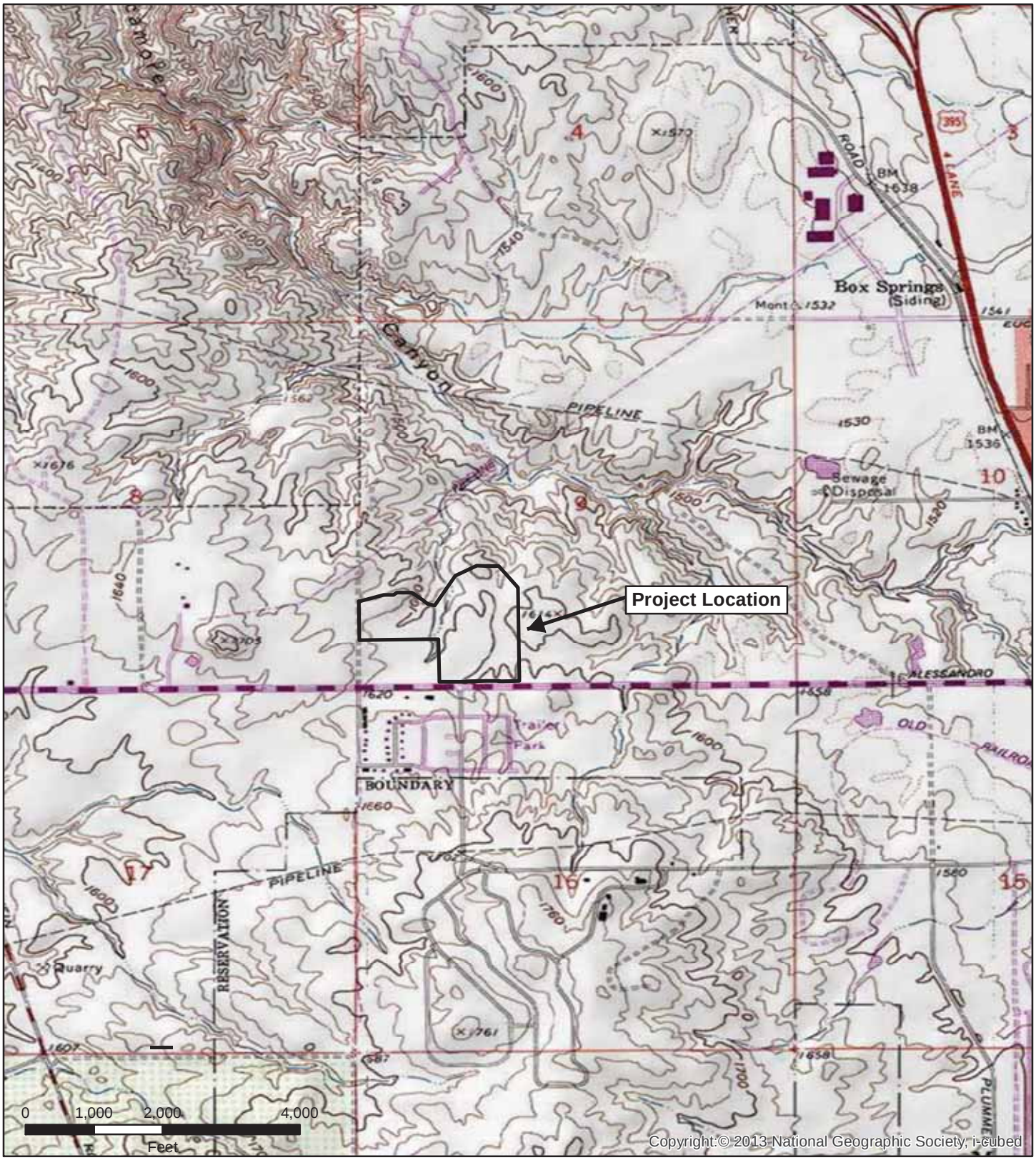


SYCAMORE HILLS DISTRIBUTION CENTER

RVA

Regional Map

Figure 3.0-1



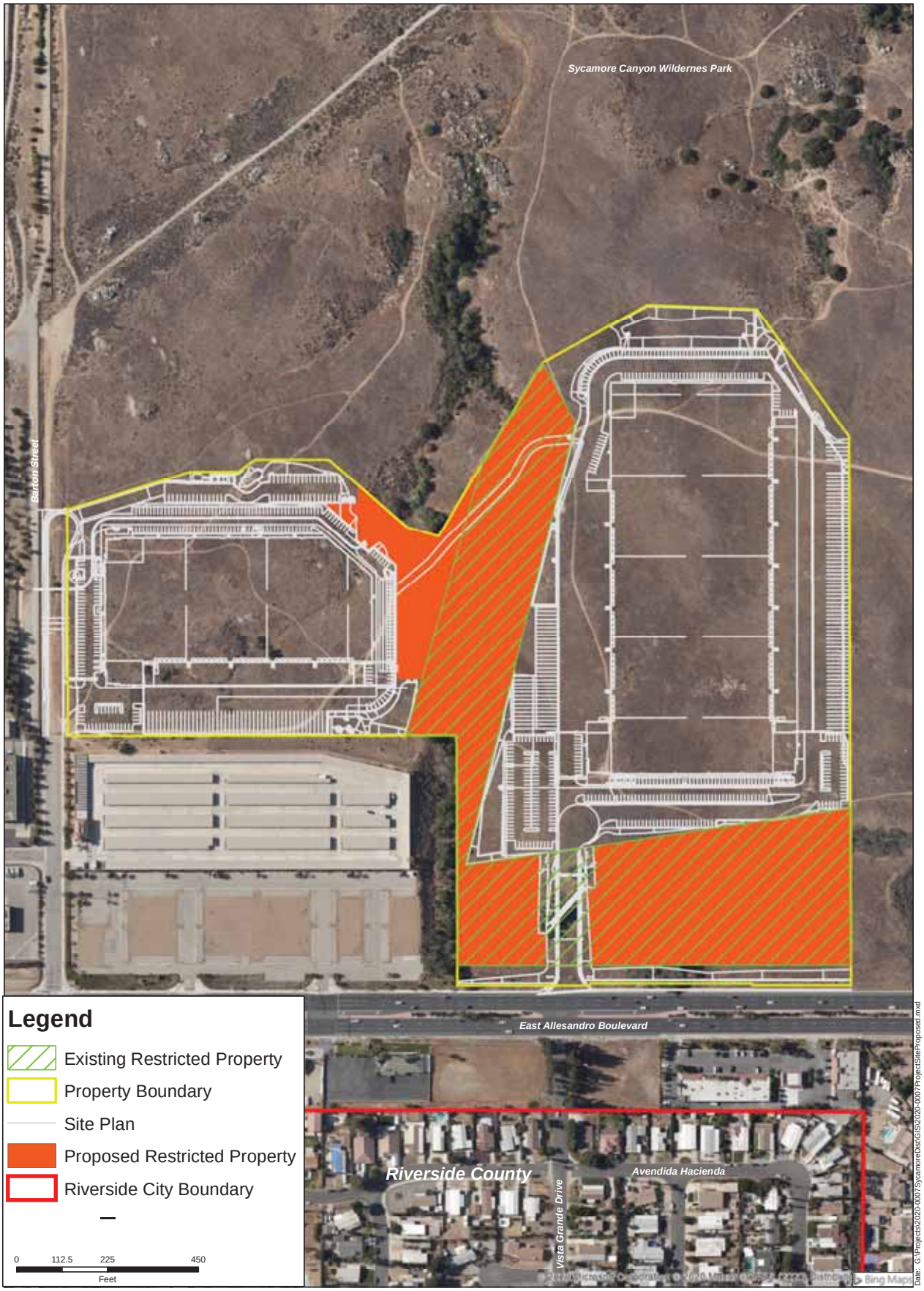
USGS 7.5 minute Quadrangle: Riverside East, Range: 4W, Section: 8, 9, Township: 3S

SYCAMORE HILLS DISTRIBUTION CENTER

RVA

Vicinity Map

Figure 3.0-2



Source: Bing Aerial Microsoft Corporation 2020, Datum: NAD 83, Coordinate Sytem: State Plane 6

SYCAMORE HILLS DISTRIBUTION CENTER

RVA

Project Location Map

Figure 3.0-3

3.1.1 Project Site – Existing Conditions

The Project site is currently undeveloped and vacant but has been used historically as open space. The topography consists of natural rolling terrain descending gradually from a west to east direction. There are granitic rock outcroppings throughout the property (see Figures 3.0-4A-E).

The Project site contains two drainages, Drainage A and Drainage B. Drainage A enters the site near the northern portion of the western boundary and flows for approximately 1,183 feet before exiting the site near the middle of the northern boundary. Drainage B enters the site near the middle of the southern boundary and flows for approximately 981 feet before exiting the site near the middle of the northern boundary.

The Project site contains low to moderate vegetation primarily consisting of non-native grasslands and weeds as well as some riparian woodland. The non-native grasslands and weeds make up approximately 41 acres of the Project site and the riparian woodland makes up approximately 5 acres. Patches of sparse Riversidean sage scrub are present in the upland areas and make up a total of approximately 2 acres. The rest of the Project site is disturbed with no vegetation or exposed rock.

Several unpaved trails cross through the Project site and the drainages. The trails are not vegetated and are used by both people and animals. Several trails lead into the Sycamore Canyon Wilderness Park just north of the Project site and a couple trails lead into the private property to the east. These on-site trails are not identified as designated trails in the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan.

The Project site contains an existing area of approximately 11.6 acres legally designated as "Restricted Property" (see Figure 3.0-3). 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.

Source: Bing Aerial Microsoft Corporation 2020, Datum: NAD 83, Coordinate Sytem: State Plane 6

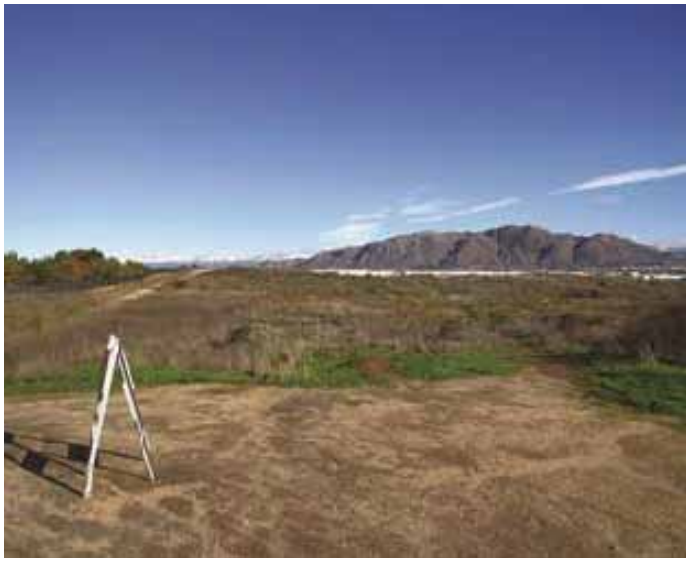
SYCAMORE HILLS DISTRIBUTION CENTER

RVA

Photo Location Map

Figure 3.0-4A

View 1



View 2

View 3

View 4

Sycamore Hills Distribution Center

RVA

Site Photos

Figure 3.0-4B

View 5

View 6

View 7

View 8

Sycamore Hills Distribution Center

RVA

Site Photos

Figure 3.0-4C

View 9

View 10

View 11

View 12

Sycamore Hills Distribution Center

Site Photos

Figure 3.0-4D

View 13

Sycamore Hills Distribution Center

Site Photos

Figure 3.0-4E

3.1.2 Project Site Background

The Project site was formerly owned by the Grove Community Church where a new church was planned to be constructed in the future. However, as the site is located within the C-1 Primary Approach/Departure Zone of the March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan, and due to restrictions regarding the height of the building and the maximum number of people allowed to congregate at any time, it was not conducive to the church's plans. March Joint Powers Authority (MJPA) assisted the church in finding a new location for the church, approximately one mile to the southwest at 19900 Grove Community Drive, Riverside.

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.

MJPA purchased the Project site property from the church with the intent to sell and to convey title of the "Restricted Property" area to the City of Riverside. However, a parcel map was not created, and the title transfer did not take place. MJPA is still the owner of the entire Project site property. The Project applicant intends to purchase the property from MJPA upon project entitlement approvals.

The Project site and surrounding area has been the subject of City planning efforts since the early 1980s. To place the Project site and surrounding land uses into context, these efforts are described below.

Amended 1979 – Air Installation Compatible Use Zones

As amended in October of 1979, the Air Installation Compatible Use Zones (AICUZ) report for March Air Force Base, identifies aircraft noise and accident potential effects of the mission at March AFB. It also recommends land use plans, policies, and ordinances which are intended to ensure compatible relationships in the local environments of the base.

The bulk of property within the Sycamore Canyon Business Park is described as impacted by aircraft noise contours of 80 CNEL or above. In addition, a large area of land along the Atchison, Topeka and Santa Fe Railway (AT&SF) railroad is exposed to accident potential resulting from aircraft operations.

April 1984 – Sycamore Canyon Business Park Specific Plan and EIR

Originally known as the Box Springs Industrial Park Specific Plan, the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) was adopted April 10, 1984 and has been amended several times since its adoption. The SCBPSP encompasses approximately 1,500 acres, consisting of a 920-acre planned industrial park with industrial and commercial uses, and a 480-acre wilderness park (Sycamore Canyon Wilderness Park). The purpose of the SCBPSP is to

assure efficient, orderly, and attractive development. To provide for orderly development, the SCBPSP was coordinated with the Sycamore Canyon Specific Plan and the General Development Plan for the Sycamore Canyon Park.

The SCBPSP was the result of a complex series of circumstances including: (i) the SCBPSP was the only large, undeveloped area of land not previously subject to detailed planning analysis; (ii) the SCBPSP area had been identified as a potentially significant development opportunity for economic revitalization; (iii) the adoption of the Arlington Heights Plan in 1979; (iv) the Southeast Study Area report adopted in 1980; and (v) the Air Installation Compatible Use Zones (AICUZ) (amended in 1979) for March Air Force Base. Important factors in these studies included preservation of the land now known as Sycamore Canyon Wilderness Park and establishment of land uses that would be compatible with what is now known as the March Air Reserve Base (MARB) Airport Compatibility Plan. Under the MARB Compatibility Plan, a good portion of the property within the SCBPSP is impacted by the C1 – Primary Approach/Departure Zone and D – Flight Corridor Buffer Compatibly Criteria that limits other uses, such as residential uses, in this area.

April 1984 – Sycamore Canyon Specific Plan (SCSP) and EIR

The *Sycamore Canyon Specific Plan* (SCSP) was adopted on April 10, 1984, to further the voter's intent shown by the passage of Proposition R with regard to protecting natural hillside and arroyo areas. Overall development levels established by Proposition R are the basis of the SCSP; however, the location and density of development was shifted within the SCSP area. This shift was made in order to protect Sycamore Canyon as a complete ecosystem, to the extent possible, within the limitations of the SCSP area and adjacent lands. The major thrust of the SCSP was to identify the area most appropriately preserved as open space in order to protect the various natural resources in and around Sycamore Canyon. The SCSP called for preservation of over 920 acres of land, of which about 450 acres are involved in the main canyon or its tributaries and the steep surrounding slopes. The remaining 470 acres to be preserved includes sensitive wildlife areas, archaeological areas, and linking areas, many of which have other special features such as rock outcroppings.

The SCSP provides for the development of perimeter portions of the site with residential and some commercial uses while protecting areas in and around Sycamore Canyon for open space. The proposed residential uses allowed under the SCSP were broken out of the SCSP and were instead covered by the Lusk Highlander Specific Plan (now known as the Sycamore Highlands Specific Plan).

April 1984 – Air Installation Compatible Use Zones

An updated *Air Installation Compatible Use Zones* (AICUZ) report for the *March ARB March Air Force Base Riverside County Comprehensive Land Use Plan* (CLUP) was adopted on April 26, 1984. The CLUP placed the newly created SCBPSP into Area II. Area II was defined to be those areas of significant safety concerns due to aircraft maneuvering, ascending, descending, turning, and changing power settings when landing or taking off from the airport. Due to safety concerns, the City chose industrial use for Area II because it would potentially expose fewer people.

The AICUZ study has been updated a number of times since its 1984 adoption, with an updated study released in 2005 and the most recent released in 2018. The March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (discussed further below) is primarily based on the 2005 AICUZ study.

March 1999 – Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan

The *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan* was prepared with two purposes: update the Sycamore Canyon Wilderness Park's (Park) conceptual development plan and provide a coordinated Maintenance/Management Plan for the endangered Stephens' kangaroo rat (SKR). The City was required to prepare a Maintenance/Management Plan because the Park was designated as a core reserve in the Habitat Conservation Plan for the Stephen's Kangaroo Rat (SKR HCP) in Western Riverside County.

Adopted November 2014 – March Air Reserve Base /Inland Port Airport Land Use Compatibility Plan

The *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan* (March ARB/IPA ALUCP) was prepared for and adopted by the Riverside County Airport Land Use Commission (RCALUC). In accordance with provisions of the California State Aeronautics Act (Public Utilities Code Section 21670 et seq.), the RCALUC has been assigned the lead responsibility for airport land use compatibility planning around each of the public-use and military airports in Riverside County, including the preparation of an ALUCP for each airport. With regard to military airports, Public Utilities Code Section 21675(b) states that Airport Land Use Commissions (ALUCs) must prepare a compatibility plan and that such plans "shall be consistent with the safety and noise standards in the Air Installations Compatible Use Zones plan prepared for that military airport" (RCALUC 2014). Accordingly, as previously mentioned, the 2014 ALUCP is based primarily on the 2005 AICUZ study.

As noted on Map MA-1 of the March ARB/IPA ALUCP, the Project site is located in Compatibility Zone C1. Per Table MA-2 – Basic Compatibility, Zone C1, the Primary Approach/Departure Zone, permits most uses, including industrial but limits the density/intensity of industrial uses and includes development conditions, such as discouraging aboveground bulk storage of hazardous materials and requiring airspace review for objects greater than 70 feet tall (MARB/IPA ALUCP, Table MA-2).

3.1.3 Land Use and Zoning

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

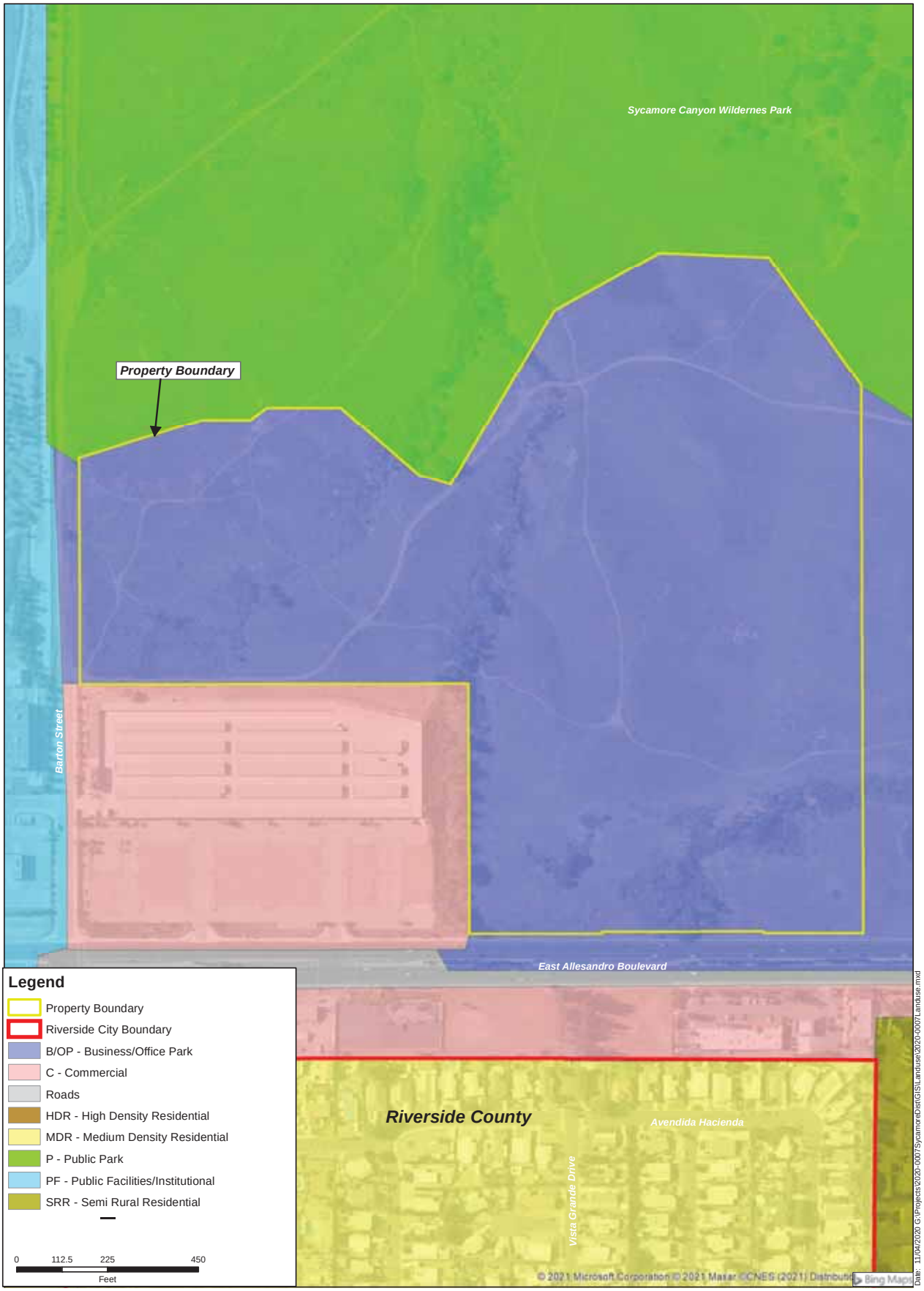
on Figure LU-4 of the GP 2025. The SCBPSP designation for the Project site is Industrial, Figure 3.0-7.

3.1.4 Surrounding Land Use and Zoning

The Project site is bordered on the north by the Sycamore Canyon Wilderness Park, vacant property to the east, Barton Street and a wastewater treatment plant to the west, and the Citywide Self Storage facility and Alessandro Boulevard to the south. Commercial and residential uses are located further south (across Alessandro Boulevard), within the City and County of Riverside jurisdictions. Table 3.0-1 details the land use and zoning of the Project site and surrounding areas.

Table 3.0-1 – Site and Surrounding Land Use/Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	B/OP – Business/Office Park	BPM-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
North	Sycamore Canyon Wilderness Park	P – Public Park	PF-SP – Public Facilities and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
East	Vacant and Citywide Self-Storage	B/OP – Business/Office Park, and P – Public Park	BPM-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones, and PF-SP – Public Facilities and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
South	Citywide Self-Storage Across Alessandro Blvd. commercial and residential (in County of Riverside)	C – Commercial	CG-X-20 – Commercial General, Building Setback (20 feet from Barton Street) Overlay Zones, and CR – Commercial Retail Zone
West	Wastewater Treatment Plant	PF – Public Facilities/Institutions and C – Commercial	PF – Public Facilities Zone, CG-X-20 – Commercial General, Building Setback (20 feet from Barton Street) Overlay Zones, and CR-X-50/20 – Commercial Retail and Building Setback (50 feet from Alessandro Blvd. and 20 feet from other streets) Overlay Zones



Source: Bing Aerial Microsoft Corporation 2020, Datum: NAD 83, Coordinate Sytem: State Plane 6

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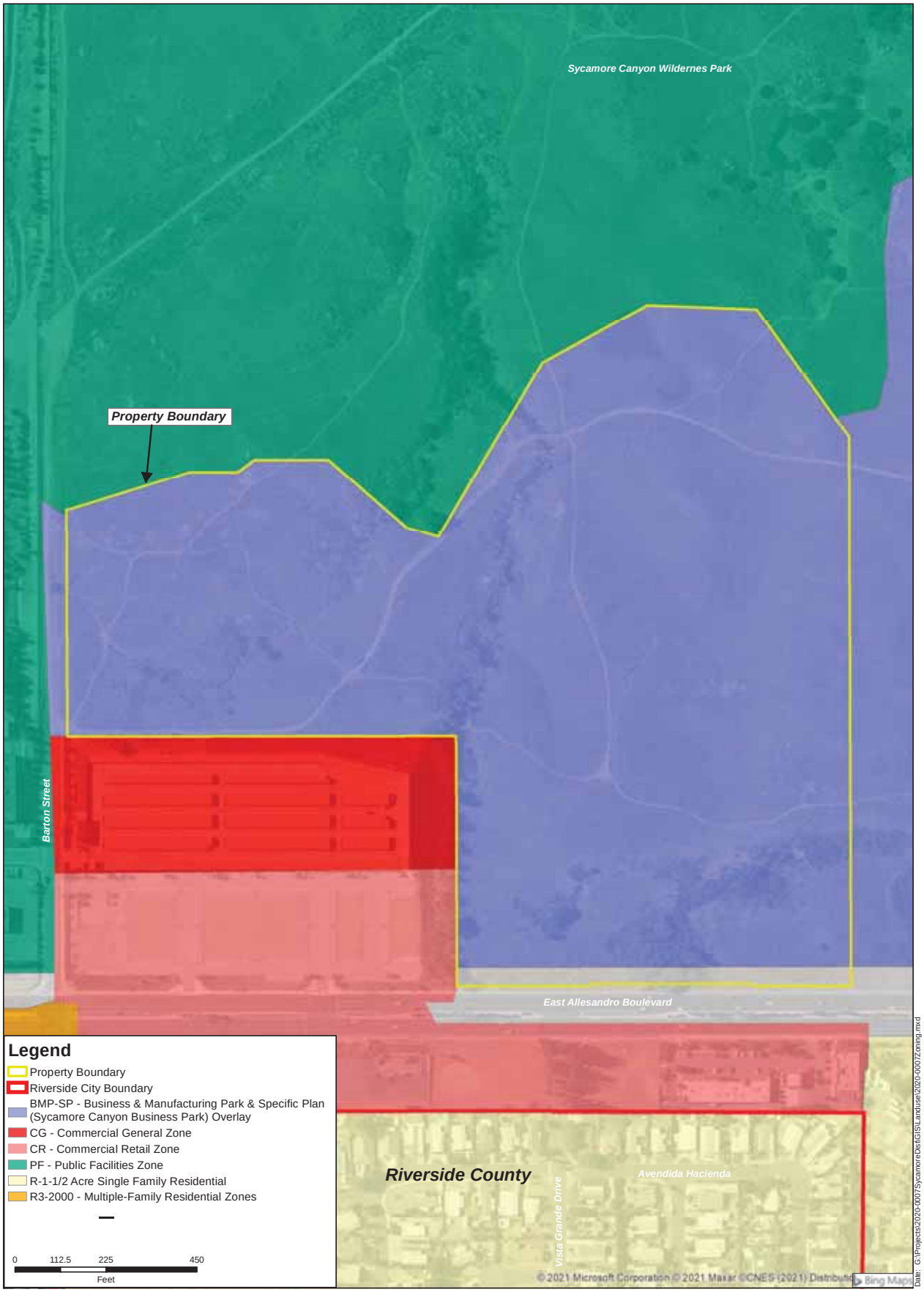
Land Use Designation Map

Figure 3.0-5



Source: Bing Aerial Microsoft Corporation 2020, Datum: NAD 83, Coordinate Sytem: State Plane 6

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Zoning Map

Figure 3.0-6