

**Sycamore Hills Distribution Center Project**

**Draft Environmental Impact Report (DEIR)**

**Appendix A –Notice of Preparation (NOP), Initial Study (IS), NOP Comment Letters**



Community & Economic Development Department

Planning Division

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

## NOTICE OF PREPARATION

**FROM LEAD AGENCY:** Veronica Hernandez, Senior Planner  
City of Riverside  
Community and Economic Development  
Department, Planning Division  
3900 Main Street, 3<sup>rd</sup> floor  
Riverside, California 92522

**DATE:** July 28, 2020

**SUBJECT:** Notice of Preparation of a Draft Environmental Impact Report (EIR) and Scoping Meeting for the Sycamore Hills Distribution Center Project

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed industrial project known as the Sycamore Hills Distribution Center Project (Project). The City is requesting input from you or your agency or organization as to the scope and content of the environmental information that is relevant to your agency or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) identifies the Project applicant, contains the proposed Project description including Project setting and location, and identifies the potential environmental effects of the proposed Project. A vicinity map and aerial photograph with the Project site are included in this NOP.

Due to time limits mandated by State law, your response must be received at the earliest possible date, **but not later than 30 days** after receipt of this NOP. The public comment period for this NOP begins on July 28, 2020 and is set to close at 5:00 p.m. on August 27, 2020.

Please send written responses to this NOP to Veronica Hernandez at the address shown above. Please include the name and contact person in your agency. If you have any questions, please contact Veronica Hernandez at 951-826-3965 or via e-mail at [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov).

**DOCUMENT AVAILABILITY:** The Initial Study is available on the City's website at <https://riversideca.gov/cedd/planning/development-projects-and-cega-documents>, or contact Veronica Hernandez via phone at 951-826-3965 or via email at [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov) to obtain an electronic copy of the Initial Study.

**PROJECT TITLE:** Sycamore Hills Distribution Center, Planning Cases: P20-0024 (EIR), P20-0025 (PM), P19-0626 (MCUP) P20-0258 (VR), P20-0282 (GE), and P19-0627 (DR).

**PROJECT APPLICANT:** Darrell Butler and Khosoro Khaloghli.

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

**PROJECT SETTING:** The Project site is vacant and has an existing 11.6-acre Restricted Property area recorded on it. The Project site is located immediately south of the Sycamore Canyon Wilderness Park, an open space park and habitat reserve with hiking and bike trails. East of the Project site is vacant, private property. South of the Project site includes Citywide Self-Storage and commercial and residential uses across Alessandro Boulevard. A wastewater treatment plant is located west of the Project site, across Barton Street.

**PROJECT GENERAL PLAN AND ZONING DESIGNATIONS:** The General Plan designation for the site is B/OP – Business/Office Park and the zoning is BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones.

**PROJECT DESCRIPTION:** The Sycamore Hills Distribution Center Project proposes development of two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls (including retaining walls), landscaping, and water quality treatment areas. The Project proposes subdividing the site into two numbered parcels (Parcels 1 and 2) and three lettered parcels (Parcels A, B, and C).

Parcel 1 is proposed to be developed with Building A, a 400,000 square foot warehouse, and Parcel 2 with Building B, a 203,100 square foot warehouse, for a combined total of 603,100 square feet of warehouse. Both warehouse buildings are proposed for high cube transload short-term use, primarily for the short-term storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials), usually on pallet loads or larger handling products prior to their distribution to retail locations or other warehouses. A typical high cube warehouse has a high level of on-site automation and logistics management. No refrigeration use is proposed.

Parcels A and B contain the existing 11.6-acre Restricted Property that landlocks Parcel 1. The proposed Project includes modifications to the Restricted Property to create a driveway to connect Parcel 1/Building A to Alessandro Boulevard. The Project proposes to expand the Restricted Property by a net 0.77-acre, for a total acreage of 12.37 acres.

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

The following environmental review and entitlements are requested for implementation of the project:

- Environmental Impact Report (EIR) P20-0024;
- Parcel Map (PM) P20-0025 – to subdivide 48.64 acres into 5 parcels;
- Minor Conditional Use Permit (MCUP) P19-0626 – to permit an industrial building over 400,000 square feet in size;
- Variances (VR) P20-0258 – to allow Building A to be served by fewer parking spaces than required by the Zoning Code to allow combination retaining/ freestanding walls wherein

the retaining portion exceeds the City of Riverside Municipal Code's (RMC) maximum allowable height; and to allow combination retaining/ freestanding walls to exceed the maximum allowable overall height;

- Grading Exception (GE) P20-282 – to allow retaining walls higher than those allowed by the Grading Code; and
- Design Review (DR) P19-0627 – proposed site design and building elevations.

**Project Alternatives:** Identification of potential alternatives to the Sycamore Hills Distribution Center Project will be addressed as part of the EIR. Analysis of a “No Project” alternative is required by law. In addition to the “No Project” Alternative, at least two additional alternatives will be evaluated. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed development.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with the development of the Sycamore Hills Distribution Center Project, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City and Applicant's goals and objectives.

**Cumulative Impact Analysis:** The EIR will include a discussion of the potentially significant cumulative impacts of the Sycamore Hills Distribution Center Project when considered with other past, present, and reasonably foreseeable future projects in the area.

**Other Required Sections:** The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to Be Significant; 4) Environmental Impact Analysis; Growth-Inducing Impacts; 5) Significant Unavoidable Environmental Effects; 6) Significant Irreversible Changes; 7) Consistency with Regional Plans; 8) Discussion and Analysis of Energy Conservation based on Appendix F and G of CEQA Guidelines; 9) Mitigation Measures; 10) References; and 11) List of Preparers.

Based on the analysis contained in the Initial Study, the following topics have been determined to have no impact or a less than significant impact and therefore will not be analyzed further in the forthcoming Draft EIR: Agriculture & Forest Resources, Mineral Resources, Population and Housing, Public Services (except for Fire Protection, which will be analyzed in the Wildfire section of the EIR), and Recreation.

Based on the analysis contained in the Initial Study, the following topics were determined potentially significant and will be analyzed further in a forthcoming Draft EIR: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Relevant technical reports will be provided as EIR appendices.

**SCOPING MEETING:** A virtual scoping meeting will be held about this project.

**Meeting Information:** Wednesday, August 12, 2020

6:00 – 8:00 pm (Pacific Standard Time)

**View the virtual meeting live webcast at:**

<https://event.webinarjam.com/channel/SHDC>

Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. Name and email address are required to enter the broadcast room to keep track of attendees. Questions and comments will be received using the chat feature and addressed by the presenters.

**SIGNATURE:**



**TITLE:**

Veronica Hernandez, Senior Planner – City of Riverside

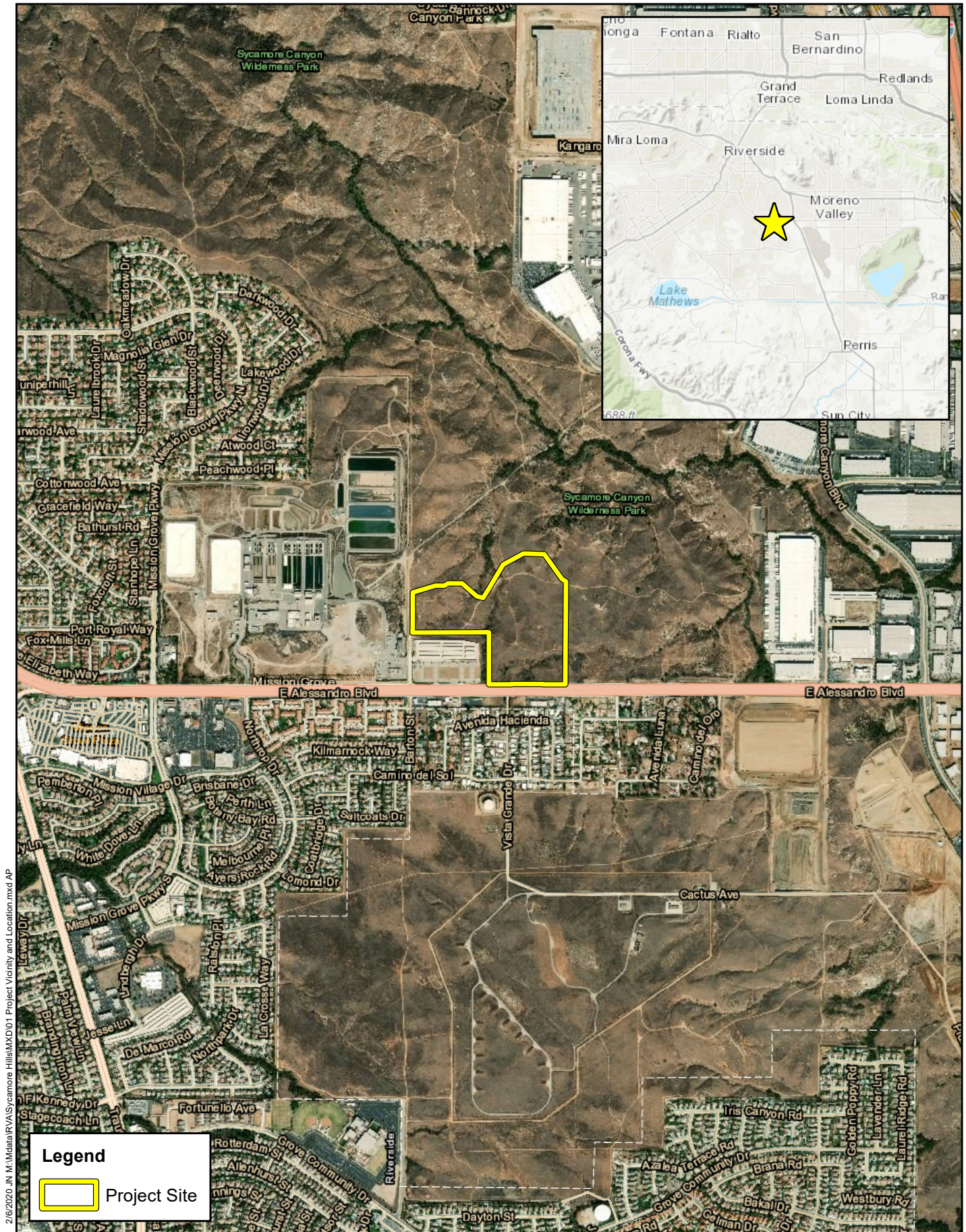
**TELEPHONE:**

951-826-3965

**DATE:**

07-28-2020





2/6/2020, JN M:\Data\RVAS\Sycamore Hills\MXD01 Project Vicinity and Location.mxd AP

#### Legend

Project Site



0 0.25 0.5  
Miles

Source: ESRI World Transportation Basemap, Esri World Imagery

## SYCAMORE HILLS DISTRIBUTION CENTER PROJECT Project Vicinity & Location

Figure 1



**INITIAL STUDY**

WARD: 2

1. **Case Number:** P20-0024 (EIR), P20-0025 (PM), P19-0626 (MCUP) P20-0258 (VR), P20-0282 (GE), and P19-0627 (DR)
2. **Project Title:** Sycamore Hills Distribution Center
3. **Hearing Date:** (TBD)
4. **Lead Agency:** City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522
5. **Contact Person:** Veronica Hernandez, Senior Planner  
**Phone Number:** 951-826-3965
6. **Project Location:** The Project site is located on the north side of Alessandro Boulevard east of Barton Street and west of San Geronio Drive (Refer to Figure 1, Project Vicinity & Location, Figure 2, Project Site Aerial Photo, and Figure 3, Project Site Topographic Map). The Project site is approximately 48.64 gross acres including Assessor Parcel Numbers (APNs) 263-060-022-7, 263-060-024-9, and 263-060-026-1. The Project site is located within the Sycamore Hills Business Park Specific Plan.
7. **Project Applicant/Project Sponsor's Name and Address:**  
  
Darrell A. Butler and Khosoro Khaloghli  
3241 Laguna Boulevard  
Laguna Beach, CA 92509
8. **General Plan Designation:** B/OP – Business/ Office Park
9. **Specific Plan:** Sycamore Canyon Business Park – Industrial Land Use
10. **Zoning:** BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones

**Description of Project:**Existing Conditions and Background

The total Project area consists of 48.64 gross acres of land. The Project site is located immediately south of the Sycamore Canyon Wilderness Park, an open space park and habitat reserve with hiking and bike trails. East of the Project site is vacant, private property. South of the Project site includes Citywide Self-Storage and commercial and residential uses across Alessandro Boulevard. A wastewater treatment plant is located west of the Project site, across Barton Street.

The Grove Community Church formerly owned the Project site property and planned to build a new church there. 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 (Refer to Figure 1, Project Vicinity & Location). Construction of the Grove Community Church at this location had impacts to a jurisdictional drainage and associated riparian habitat. To mitigate for impacts at the Grove Community Drive site, a portion of the Project site at Alessandro Boulevard and Barton Street was set aside and preserved in a legally designated "Restricted Property," recorded in 2009. The 11.6 acre 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 US Army Corps of Engineers for construction of the church at the Grove Community Drive site. 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 for inclusion into the Sycamore Canyon Wilderness Park. 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.

### Proposed Description

The proposed Sycamore Hills Distribution Center Project (herein after referred to as "Project") proposes development of two warehouse buildings and associated improvements including parking, fire lanes, fencing and walls (including retaining walls), landscaping, and water quality treatment areas. The Project proposes subdividing the site into two numbered parcels (Parcels 1 and 2) and three lettered parcels (Parcels A, B, and C).

#### *Parcels 1 and 2*

Parcel 1 is proposed to be developed with Building A, a 400,000 square foot warehouse, and Parcel 2 with Building B, a 203,100 square foot warehouse, for a combined total of 603,100 square feet of warehouse. Both warehouse buildings are proposed for high cube transload short-term use, primarily for the short-term storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials), usually on pallet loads or larger handling products prior to their distribution to retail locations or other warehouses. A typical high cube warehouse has a high level of on-site automation and logistics management. No refrigeration use is proposed.

The buildings will have nighttime lighting for security. Exterior lights will be shielded downwards and set to motion detectors and will only turn on if employees are present at either of the buildings when it is dark. Interior lights will be on motion detectors. The proposed Project includes modifications to the Restricted Property to facilitate access from Alessandro Boulevard to Building A on Parcel 1.



Table 1 and Table 2 below provide a summary of the development:

**Table 1: Parcel 1/Building A Details**

City's Site Development Standard			Parcel 1/Building A
<b>Lot Requirements (minimum)</b>	Lot Area	40,000 sq. ft.	<b>1,052,986 sq. ft.</b>
	Lot Width	140 feet	<b>&gt;140 feet</b>
	Lot Depth	100 feet	<b>&gt;100 feet</b>
<b>Max Floor Area Ratio</b>		1.50	<b>0.38</b>
<b>Building Height</b>		45 feet	<b>42-45 feet</b>
<b>Building Minimum Setbacks</b>	Front Yard (South)	20 feet	<b>520 feet</b>
	Side Yard (East & West)	0	<b>80-240 feet</b>
	Rear Yard (North)	0	<b>120-140 feet</b>
<b>Minimum Parking</b>	Office: 1 space/250 sq. ft. (10,000 sq. ft.)	40	<b>388 parking spaces</b>
	Warehouse: 1 space/1,000 sq. ft. (390,000 sq. ft.)	390	
	<b>Total:</b>	430 parking spaces	
<b>Minimum Landscape Setbacks</b>	Front:	50 feet	<b>520 feet</b>
	Side:	0 or 40 feet adjacent to Park	<b>40 feet adjacent to Park</b>
	Rear:	40 feet	<b>40 feet</b>

Parcel 1 is proposed to be developed with Building A, consisting of 400,000 square feet. It includes 10,000 square feet of office area, 390,000 square feet of warehouse area, 39 dock doors facing west, and 51 dock doors facing east. Access to Building A will be provided via a driveway that crosses the existing Restricted Property in a north-south direction connecting to Alessandro Boulevard. Installation of improvements to Alessandro Boulevard along the Project's frontage will also be completed, including curb and gutter, curb adjacent sidewalk, street widening, turn lane pockets, and the installation of a traffic signal. The new traffic signal is proposed at Vista Grande Drive and Alessandro Boulevard to facilitate access to Building A.

A Parking Variance is required for Building A as 388 parking spaces are provided, whereas 430 parking spaces are required by the Riverside Municipal Code (RMC). Justification findings in support of the Variance have been provided by the applicant.

Perimeter walls proposed on Parcel 1 include: 1) 42-inch high cable rail theme fence along the northerly, westerly, and a portion of the southwesterly property line; 2) 8-foot high concrete wall along most of the easterly property line; 3) 8-foot high tubular steel fence along a portion of the southeasterly property line; and 4) 8-foot high tubular steel fence along the southerly property line. The access road to from Alessandro Boulevard to Building A would include 42-inch high cable rail theme fence on each side of the road.

A Variance is required for Building A to allow installation of three combination retaining/freestanding walls wherein the retaining portion ranges in height from 6 feet to 7.6 feet, whereas the RMC allows a maximum retaining height of 4 feet. A Variance is also required for four combination retaining/freestanding walls ranging in overall height from 11.5 feet to 17 feet, whereas the RMC allows a maximum overall height of 10 feet. The walls requiring variances would be located at portions of the easterly property line. A Grading Exception is required to allow the installation of one retaining wall with a height of 6.4 feet, whereas the RMC allows a maximum retaining wall height of 6 feet. This wall would be located in a bio-retention basin at the west side of the property.

Parcel 1 will include 132,699 square feet of landscaping, for site coverage of 28.83 percent, located inside the northern, western, and southern boundaries. Parcel 1's landscaping will include fire resistant groundcover, shrubs and columnar trees.

**Table 2: Parcel 2/Building B Details**

City's Site Development Standard			Parcel 2/Building B
<b>Lot Requirements (minimum)</b>	Lot Area	40,000 sq. ft.	<b>449,643 sq. ft.</b>
	Lot Width	140 feet	<b>&gt;140 feet</b>
	Lot Depth	100 feet	<b>&gt;100 feet</b>
<b>Max Floor Area Ratio</b>		1.50	<b>0.45</b>
<b>Building Height</b>		45 feet	<b>42-45 feet</b>
<b>Building Minimum Setbacks</b>	Front Yard (West)	20 feet	<b>90 feet</b>
	Side Yard (North & South)	20	<b>20-182 feet</b>
	Rear Yard (East)	20	<b>57 feet</b>
<b>Minimum Parking</b>	Office: 1 space/250 sq. ft. (10,000 sq. ft.)	40	<b>235 parking spaces</b>
	Warehouse: 1 space/1,000 sq. ft. (193,100 sq. ft.)	194	
	<b>Total:</b>	234 parking spaces	
<b>Minimum Landscape Setbacks</b>	Front: (West)	20 feet	<b>20 feet</b>
	Side:	0	<b>0</b>
	Rear:	0	<b>0</b>

Parcel 2 is proposed to be developed with Building B consisting of 203,100 square feet. It includes 10,000 square feet of office area, 193,100 square feet of warehouse area, and 34 dock doors facing south. Access to Building B will be provided from Barton Street.

Perimeter walls proposed on Parcel 2 include: 1) 8-foot high tubular steel fence along the northwesterly property line; 2) 8-foot high combination screening fence/wall, consisting of 4-foot high tubular steel fence on top of 4-foot high screen wall, along the northerly property line; 3) 8-foot high concrete wall along a portion of the northeasterly and most of the easterly property line; 4) 42-inch high cable rail theme fence along a portion of the southeasterly property line; 5) 8-foot high tubular steel fence along the westerly boundary of the parcel with two separate arm gates located toward the northwesterly and southwesterly portion of the boundary; and 6) 8-foot high tubular steel fence along the southerly property line.

A Grading Exception is required for Building B to allow installation of six retaining walls, ranging in height from 6.5 feet to 10 feet, whereas a maximum height of 6 feet is permitted by the RMC. A Variance is also required to allow the installation of one combination retaining/freestanding walls wherein the retaining portion is 7.2 feet in height, whereas the RMC allows a maximum retaining height of 4 feet. A Variance is also required for two combination retaining/freestanding walls ranging in overall height from 11.6 feet to 15.2 feet, whereas the RMC allows a maximum overall height of 10 feet. The non-conforming walls would be located on portions of the northeasterly and southeasterly property line.

Parcel 2 will include 37,993 square feet of landscaping, for site coverage of 19.91 percent, located inside the northern, eastern, western, and southern boundaries. Parcel 2's landscaping will include fire resistant groundcover, shrubs and columnar trees.

#### *Parcels A, B, and C*

Parcels A and B contain the existing 11.6-acre Restricted Property that landlocks Parcel 1. Parcel C will be designated open space for a trailhead parking lot. Parcel A, B, and C are described in more detail below:

- Parcel A consists of 317,235 square feet (7.28 acres) and is designated as a Conservation Area. Parcel A will be part of the Restricted Property on the west side of the proposed access road along Alessandro Boulevard. The proposed Project includes removing 0.67 acres of the Restricted Property to create a driveway connecting Parcel 1/Building A to Alessandro Boulevard. As part of mitigation for the Project,

1.44 acres will be set incorporated into Parcel A, for a net gain of 0.77 acre of new Restricted Property. Thus, Parcel A and B will have a total of 12.37 acres of Restricted Property as part of the Project.

- Parcel B consists of 221,661 square feet (5.09 acres) and is designated as a Conservation Area. Parcel B will be part of the Restricted Property on the east side of the proposed access road along Alessandro Boulevard. The access road would include two elliptical shaped corrugated metal pipes measuring 38 inches high and 57 inches wide to allow drainage and wildlife connectivity between Parcel A and Parcel B. Parcels A and B will be managed in perpetuity by a professional conservation organization funded by the applicant as part of mitigation for the Project.
- Parcel C is proposed to be developed with a trailhead parking lot for the Sycamore Canyon Wilderness Park and will be designated as open space. It consists of 51,284 square feet (1.18 acres). The northerly terminus of Barton Street is identified as “a minor trailhead” in the *Sycamore Canyon Wilderness Park Stephens’ Kangaroo Rat Management Plan and Updated Conceptual Development Plan*. The proposed trailhead parking lot will include an improved decomposed granite parking lot, landscaping, a shade structure with benches, a bike rack, a drinking fountain (including for pets), and ADA (Americans with Disabilities Act) compliant parking spaces and sidewalk. Trail fencing, gates, and signage will also be installed to direct access, circulation and trail connection to existing trails as well as the master planned multipurpose trail on the west side of Barton Street. The proposed trailhead parking lot is not required but is being provided by the applicant as an amenity and addition to the City’s Sycamore Canyon Wilderness Park. Parcel C would be dedicated to the City and operated and managed by the City’s Parks, Recreation, & Community Services Department.

### Grading

Grading for Parcel 1/Building A and Parcel 2/Building B are described below:

- Parcel 1 is approximately 24.17 acres with undulating topography with elevations varying from approximately 1,570 to 1,615 feet above mean sea level (AMSL) (Refer to Figure 3, *Project Site Topographic Map*). 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.

Grading will result in cut areas up to 15 feet and fill areas as much as 12 feet. Over-excavation may be required to provide necessary structural support but is not expected to exceed 3 feet in depth. Total earthwork volumes, exclusive of any over-excavation are approximately 145,000 cubic yards of cut and 105,000 cubic yards of fill. The estimated 40,000 cubic yards of excess material will be moved from Parcel 1 to Parcel 2.<sup>1</sup> This excess material will be transported via the existing dirt road between the parcels (crossing through Parcel A), which will be utilized temporarily during construction and restored post-construction.

The maximum height of manufactured slopes in Parcel 1 is 16 feet and the maximum retaining wall height is 7.6-feet. As mentioned above, Variances are required for Building A to allow installation of combination retaining/freestanding walls wherein the retaining portion exceeds the RMC’s maximum allowable height of 4 feet at portions of the easterly property line, and for combination retaining/freestanding walls exceeding 10 feet in overall height. A Grading Exception is also required for a retaining wall exceeding 6 feet in height. A summary of the manufactured slopes and retaining walls for Parcel 1 is described in Table 3 below.

- Parcel 2 is approximately 10.32 acres with undulating topography with elevations varying from approximately 1,580 to 1,618 feet AMSL (Refer to Figure 3, *Project Site Topographic Map*). It is

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<sup>1</sup> Earthwork calculations provided by SDH and Associates, Inc., consultant that prepared the Preliminary Grading Plan.

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.

Grading will result in cut areas up to 16 feet and fill areas up to 8 feet. Over-excavation may be required but is not expected to exceed 3 feet in depth. Total earthwork volumes, exclusive of any over-excavation, are approximately 25,000 cubic yards of cut and 65,000 cubic yards of fill (with 40,000 cubic yards from Parcel 1 to balance). 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.

The maximum height of manufactured slopes for Parcel 2 is 13 feet and the maximum retaining wall height is 10-feet. As mentioned above, a Variance are required for Building B to allow installation of retaining walls wherein the retaining wall exceeds the RMC's maximum allowable height of 6 feet at portions of the northeasterly and southeasterly property line, and for combination retaining/freestanding walls exceeding 10 feet in overall height. A Grading Exception is also required for a retaining wall exceeding 6 feet in height. A summary of the manufactured slopes and retaining walls for Parcel 2 is described in Table 3 below.

**Table 3: Manufactured Slopes and Retaining Walls**

	<b>Parcel 1/Building A</b>	<b>Parcel 2/Building B</b>
Retaining Wall Height Range	0.1-7.6 feet	0.1-10 feet
Combination Wall (Retaining Wall + Screening Wall) Height Range	0.1-17 feet	0.1-15.2 feet
Manufactured 2:1 Slope (max height)	16 feet	6 feet
Manufactured 3:1 Slope (max height)	10 feet	7 feet
Manufactured 4:1 Slope (max height)	7.3 feet	13 feet

### Utilities

Wet and dry utility extensions will be constructed underground to serve the Project and will connect to existing utility lines in Alessandro Boulevard, for Building A, and Barton Street for Building B. It is anticipated that Building A would use the City's sewer system where electricity and sewer service will be provided by Riverside Public Utilities for Building A. Building B may require septic sewer system due to grading constraints. However, if it is feasible, Building B will be connected to Riverside's sewer system. Both Buildings would have electricity provided by Riverside Public Utilities. Water for both Building A and Building B will be provided by Western Municipal Water District and natural gas would be provided by Southern California Gas Company.

### Construction

Construction will occur in accordance with the City's Noise ordinance, during the hours of 7 am to 7 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.

### Business Operations Plan

The planned operation of Buildings A and B is high cube transload short-term warehouse use. No refrigeration use is proposed. An opening/operational year of 2023 is anticipated for this Project.

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 this Initial Study, as well as the forthcoming Environmental Impact Report (EIR), conservative assumptions utilizing the worst-case/ most intensive use is assumed as operating three 8-hour shifts, 24 hours a day, 7 days a week. The



estimated number of employees, using the County of Riverside General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology<sup>2</sup>, 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.

#### Entitlements

The following entitlements and environmental assessment are requested for implementation of the project:

- Environmental Impact Report (EIR) – P20-0024;
- Parcel Map (PM) – to subdivide 49.6 acres into 5 parcels – P20-0025;
- Minor Conditional Use Permit (MCUP) – to permit an industrial building over 400,000 square feet in size – P19-0626;
- Variance (VR) - to allow Building A to be served by fewer parking spaces than required by the Zoning Code; to allow combination retaining/freestanding walls wherein the retaining portion exceeds the RMC's maximum allowable height of 4 feet; and to allow combination retaining/freestanding walls wherein the overall height exceeds the RMC's maximum allowable height of 10 feet – P20-0258
- Grading Exception (GE) – to allow retaining walls higher than the 6-foot maximum height allowed by the Grading Code – P20-0282; and
- Design Review (DR) – for the proposed site design and building elevations –P19-0627

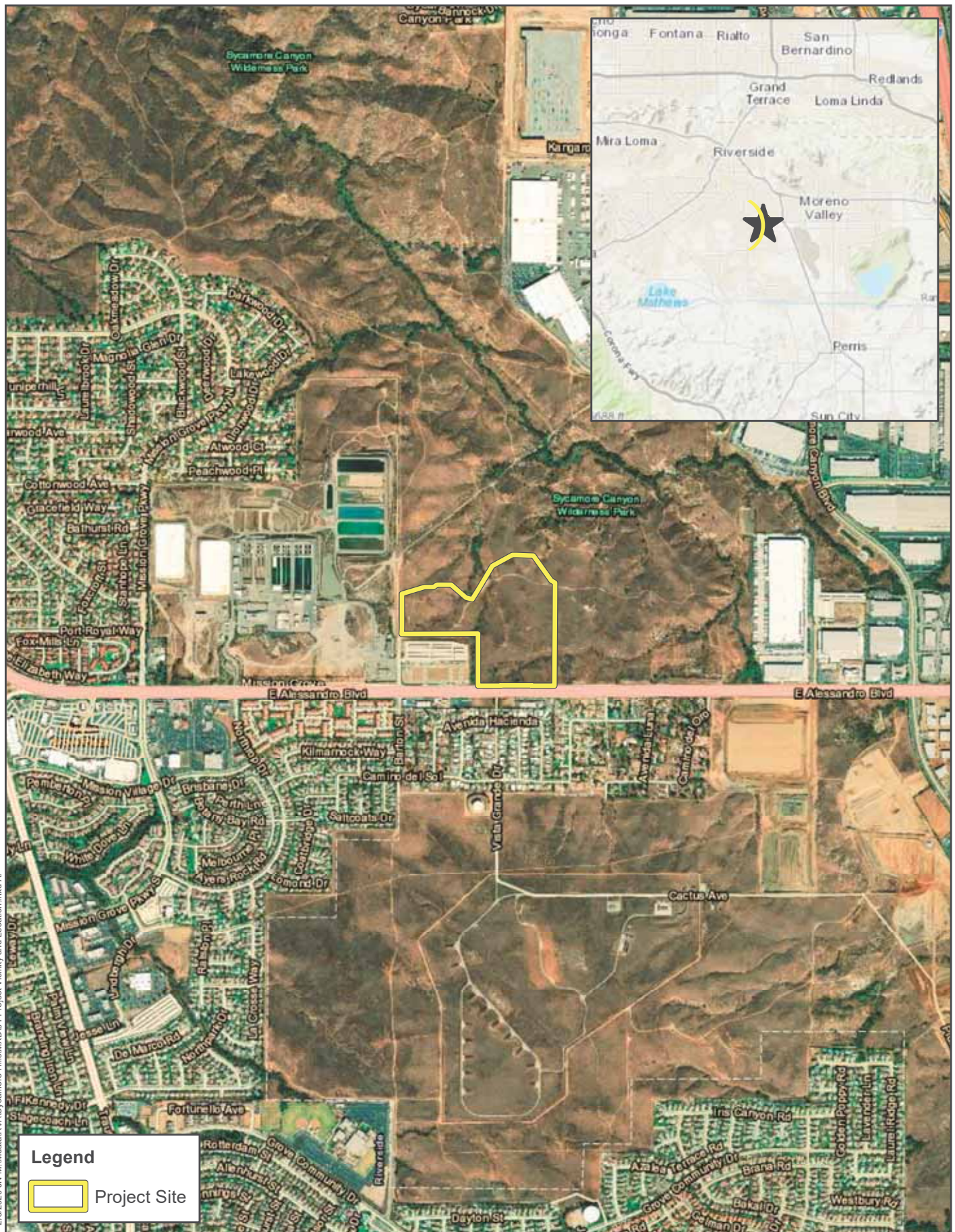
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<sup>2</sup> County of Riverside General Plan Square Feet/Employee Factor of 1,030 SF per employee for Light Industrial land use, Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology, April 11, 2017, <https://planning.rctlma.org/General-Plan-Zoning/General-Plan>


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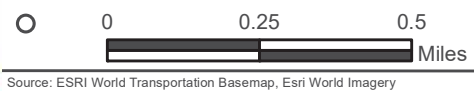


2/6/2020, JN M:\Data\RVAS\Sycamore Hills\MXD01 Project Vicinity and Location.mxd AP



**Legend**

 Project Site



Source: ESRI World Transportation Basemap, Esri World Imagery

## SYCAMORE HILLS DISTRIBUTION CENTER PROJECT

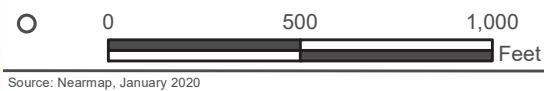
### Project Vicinity & Location

Figure 1

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2/6/2020 JN M:\Data\RVASycamore Hills\MXD02 Project Site Aerial Photo.mxd AP



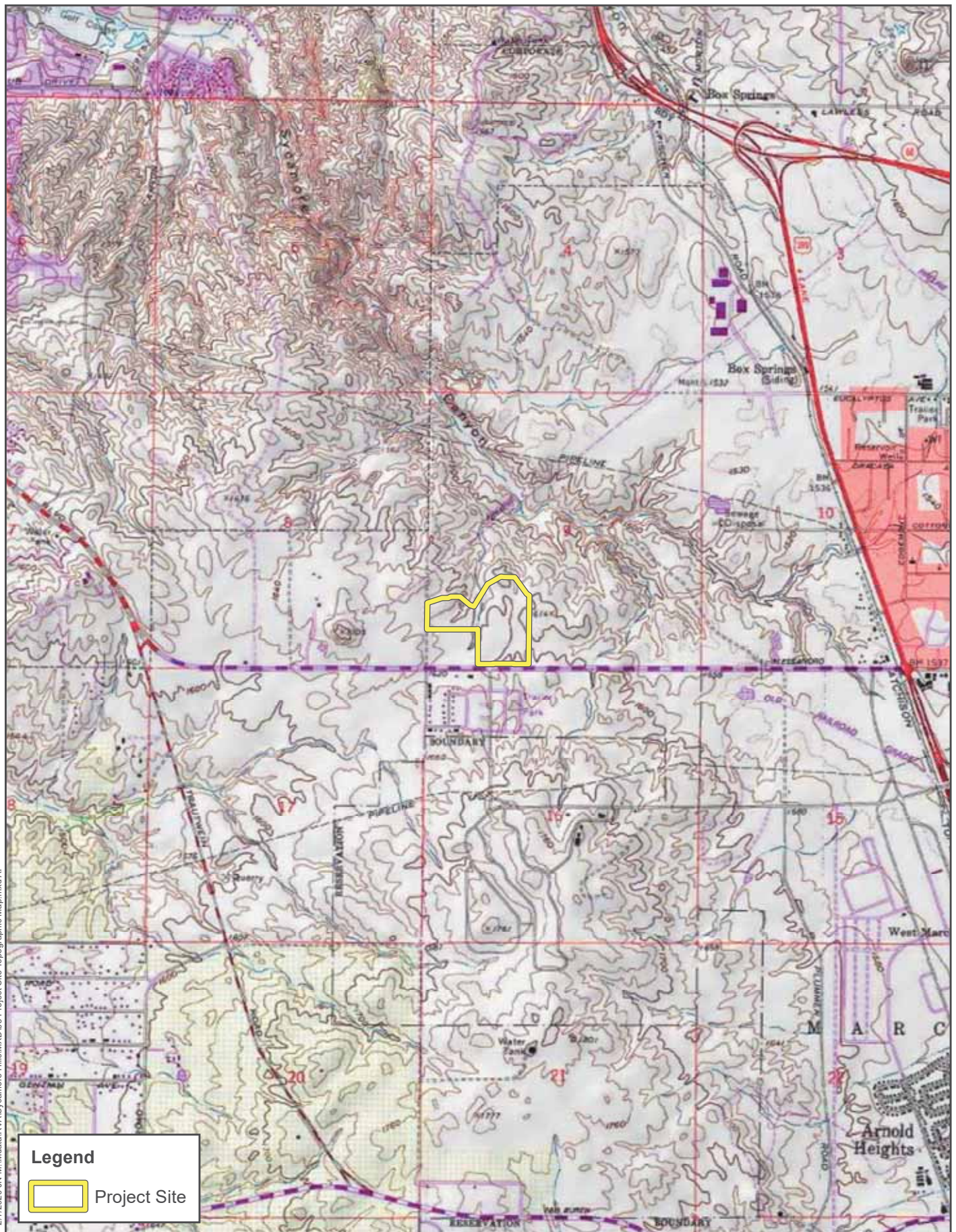
SYCAMORE HILLS DISTRIBUTION CENTER PROJECT  
**Project Site Aerial Photo**

Figure 2

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2/7/2020 JN M:\Data\RVA\Sycamore Hills\MXD03 Project Site Topographic Map.mxd AP



Source: Esri USGS Topographic Basemap

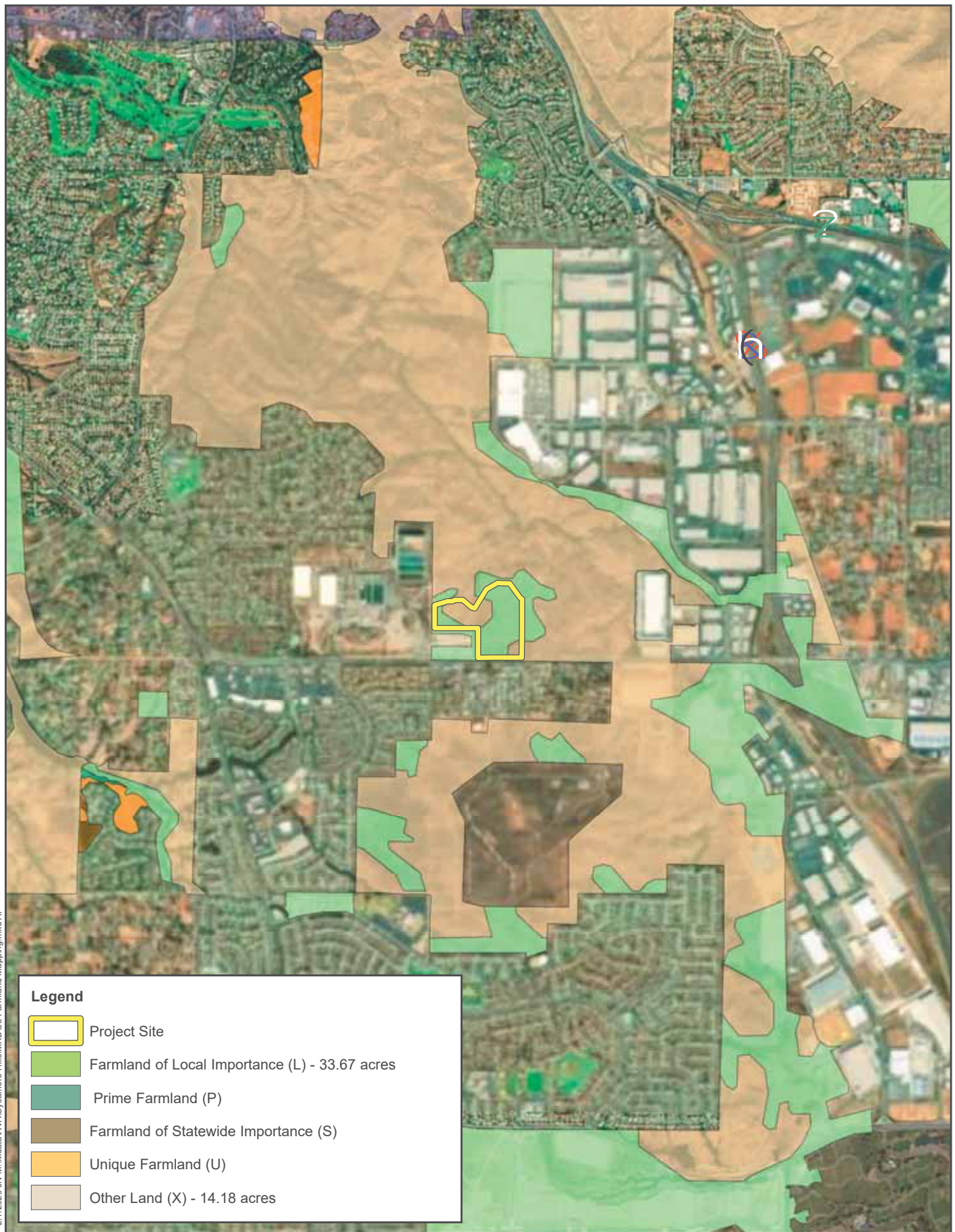
# SYCAMORE HILLS DISTRIBUTION CENTER PROJECT Project Site Topographic Map

Figure 3

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2/7/2020 JN M:\data\RVA\Sycamore Hills\MXD05 Farmland Mapping.mxd AP



0 0.5 1 Miles

Source: California Department of Conservation Farmland Mapping and Monitoring Program

## SYCAMORE HILLS DISTRIBUTION CENTER PROJECT Farmland Mapping

Figure 4

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## 11. Surrounding land uses and setting:

The existing land uses for the Project site and its immediate surroundings include:

- Project site: Vacant
- North of Project: Sycamore Canyon Wilderness Park
- East of Project: Vacant
- South of Project: Citywide Self-Storage; Commercial (Across Alessandro Boulevard); south of Alessandro Boulevard and further south of the Commercial there is residential housing that is within the County of Riverside jurisdiction (not within City of Riverside)
- West of Project: Wastewater Treatment Plant

The General Plan designations for the Project site and its immediate surroundings include:

- Project site: B/OP – Business/ Office Park
- North of Project: P - Public Park
- East of Project: B/OP – Business Office Park; and P – Public Park
- South of Project: C – Commercial
- West of Project: PF- Public Facilities/ Institutions and C - Commercial

The zoning designations for the Project site and its immediate surroundings include:

- Project site: BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
- North of Project: PF-SP - Public Facilities and Specific Plan (Sycamore Canyon Business Park) Overlay Zones
- East of Project: BMP-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 of Project: CG-X-20 - Commercial General, Building Setback (20 feet from Barton Street) Overlay Zones; CR – Commercial Retail Zone
- West of Project: PF- Public Facilities Zone; CG-X-20 - Commercial General and Building Setback (20 feet from Barton Street) Overlay Zones; and CR-X-50/20 – Commercial Retail and Building Setback (50 feet from Alessandro Boulevard and 20 feet from other streets) Overlay Zones

## 12. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):

- a. US Army Corps of Engineers
- b. Santa Ana Regional Water Quality Control Board
- c. California Department of Fish and Wildlife
- d. US Fish and Wildlife
- e. Western Municipal Water District
- f. South Coast Air Quality Management District
- g. California Department of Transportation
- h. Native American Heritage Commission

## 13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The City of Riverside sent out notices to the following tribes to initiate consultation on October 18, 2019 pursuant to Assembly Bill 52:

- Agua Caliente Band of Cahuilla Indians



- Cahuilla Band of Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Gabrielino-Tongva Tribe (San Gabriel Band of Mission Indians)
- San Manuel Band of Mission Indians
- Soboba Band of Luiseño Indians

The following California Native American tribes have requested consultation with the City of Riverside pursuant to Public Resources Code 21080.3.1:

- Agua Caliente Band of Cahuilla Indians
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Soboba Band of Luiseño Indians

The results of these consultations will be included in the forthcoming EIR.

#### 14. Other Environmental Reviews Incorporated by Reference in this Review:

- General Plan (GP) 2025
- GP 2025, Final Program Environmental Impact Report (FPEIR)
- Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP)
- Sycamore Canyon Business Park Specific Plan (SCBPSP)
- Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan (SCWP SKRMP)
- Title 17, Grading Code
- Title 18, Subdivision Code
- Title 19, Zoning Code
- Title 20, Cultural Resources
- Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

#### 15. Acronyms

ADA	Americans with Disabilities Act of 1990
AICUZ	Air Installation Compatible Use Zone Study
AICUZ	Air Installation Compatible Use Zone Study
APE	Area of potential effects
AQMP	Air Quality Management Plan
AQMP	Air Quality Management Plan
AUSD	Alvord Unified School District
B/OP	Business Office Park
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CEQA	California Environmental Quality Act
CLUP	March Air Reserve Base/March Inland Port Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level

CNPS	California Native Plant Society
CO	Carbon Oxide
CRHP	California Register of Historical Resources
dB	decibel, unit of measurement for noise
dBA	decibel measurement weighted
DMAs	Drainage management Areas
E+P	Existing plus Project
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMS	Emergency Medical Services
FPEIR	Final Program Environmental Impact Report
GHG	Greenhouse Gasses
GIS	Geographic Information System
GP	General Plan
HVAC	Heating, ventilation, and air conditioning
JLUS	Joint Land Use Study
Leq	equivalent continuous sound level
LOS	Level of service
LSTs	Localized significance thresholds
MARB/MIP	March Air Reserve Base/March Inland Port
MBMI	Morongo Band of Mission Indians
MM	Mitigation Measures
MT CO <sub>2</sub> E	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOX	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PM-10	Particulate Matter 10 micrometers
PM-2.5	Particulate Matter 25 micrometers
POD	Points of discharge
RCALUCP	Riverside County Airport Land Use Compatibility Plan
RFD	Riverside Fire Department
RMC	Riverside Municipal Code
ROG	Reactive organic gas
RRG-CAP	Riverside Restorative Growthprint and Climate Action Plan
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCBPSP	Sycamore Canyon Business Park Specific Plan
SCWP SKRMP	Sycamore Canyon Wilderness Park Stephen Kangaroo Rat Management Plan and Updated Conceptual Development Plan
Sf	Square feet
SHPs	Shovel Probes
SLF	Sacred Land Files
SWPPP	Storm Water Pollution Prevention Plan
TPZ	Timberland Production Zone
TRIP	Regional Transportation Improvement Program
VHFZ	Very High Fire Severity Zone
VMT	Vehicle miles travelled
VOC	Volatile organic compounds





## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture & Forest Resources      | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology/Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      |
| <input checked="" type="checkbox"/> Hydrology/Water Quality   | <input checked="" type="checkbox"/> Land Use/Planning        | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                  | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                           | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Wildfire                 | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐

The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☒

The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature V. Hernandez

Date 07/28/2020

Printed Name & Title: Veronica Hernandez, Senior Planner

For: City of Riverside

*INITIAL STUDY***EVALUATION OF ENVIRONMENTAL IMPACTS:**

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

- 1) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 2) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 3) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 4) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. **Earlier Analysis Used.** Identify and state where they are available for review.
  - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 5) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 6) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify:
  - a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>1a. Response:</b> (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways, Sycamore Canyon Business Park Specific Plan)  <b>Potentially Significant Impact.</b> The City’s General Plan 2025 policies aim at balancing development interests with broader community preservation objectives. The Sycamore Canyon Wilderness Park is directly north of the Project site. While there are no scenic vistas within the immediate Project vicinity, the nearby Box Springs Mountain to the northeast is visible from the Project site. This is a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>1b. Response:</b> (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Google Earth)  <b>Potentially Significant Impact.</b> The closest state highway to the Project site is I-215 and it is not designated as a state scenic highway. The City’s General Plan 2025 designates several roadways within the City as Scenic Boulevards and Parkways in order to protect scenic resources and enhance the visual character of the City. As outlined in the General Plan 2025, Circulation and Community Mobility Element, Figure CCM-4 – Master Plan of Roadways, Alessandro Boulevard is designated as a Scenic Boulevard. Thus, there is a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>1c. Response:</b> (Source: General Plan 2025, Sycamore Canyon Business Park Specific Plan, Sycamore Canyon Wilderness Park Stephens’ Kangaroo Rat Management Plan and Updated Conceptual Development Plan)  <b>Potentially Significant Impact.</b> The Project site is located within a mostly urbanized area with the Sycamore Canyon Wilderness Park located just north of the Project’s property. Construction of the proposed Project would alter the existing visual character of the currently vacant Project site. The proposed Project is located directly adjacent to and south of the Sycamore Canyon Wilderness Park, which is open to the public for passive recreation, including hiking and mountain biking. The Project would be seen by users of the park from designated trails. Alessandro Boulevard is a designated Scenic Boulevard within the City. Views of the Project from Alessandro Boulevard and Barton Street will be analyzed in the EIR. Development of this site has the potential to degrade the existing quality of the site and the visual character of the area. This is a <b>potentially significant impact</b> and this topic will be further analyzed in the EIR.				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>1d. Response:</b> (Source: General Plan 2025)  <b>Potentially Significant Impact.</b> The proposed Project will introduce new sources of lighting at the Project site. New sources of light include street, parking lot, and building lighting as well as headlights from cars and trucks traveling to and from the				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
site. The Project site is located directly adjacent to and south of the Sycamore Canyon Wilderness Park. This is a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
<b>2. AGRICULTURE AND FOREST RESOURCES:</b>				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>2a. Response:</b> (<i>Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability, General Plan 2025 FPEIR Section 5.2 – Agriculture Resources, Google Earth</i>)</p> <p><b>Less than Significant Impact.</b> The Project site is vacant, with urbanized areas to the east, south and west, and open space in the Sycamore Canyon Wilderness Park directly to the north. As outlined in General Plan 2025, <i>Figure OS-2 – Agriculture Sustainability</i> the Project site is designated as Farmland of Local Importance and Other Land. The Project site is not designated as, or in close proximity to any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the California Department of Conservation.</p> <p><b>Farmland Mapping and Monitoring Program</b></p> <p>The California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (FMMP) compiles important farmland maps utilizing data from the United States Department of Agriculture, National Resource Conservation Service, soil survey, and current land use information. These maps categorize land use into eight mapping categories and represent an inventory of agricultural soil resources. Through the FMMP, agricultural resources are separated into the following categories (GP 2025 FPEIR, pp. 5.2-4 – 5.2-5):</p> <ul style="list-style-type: none"> <li>• <b>Prime Farmland:</b> Lands with the best combination of physical and chemical features and able to sustain long-term production of agricultural crops. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.</li> <li>• <b>Farmland of Statewide Importance:</b> Lands similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.</li> <li>• <b>Unique Farmland:</b> Lands with lesser quality soils used to produce leading agricultural crops. Includes non-irrigated orchards or vineyards.</li> <li>• <b>Farmland of Local Importance:</b> Lands of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.</li> <li>• <b>Grazing Land:</b> Lands on which existing vegetation is suited to livestock grazing. This category was developed in cooperation with the California Cattlemen's Association and U.C. Cooperative Extension.</li> <li>• <b>Urban and Built-Up Land:</b> Lands occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction,</li> </ul>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.</p> <ul style="list-style-type: none"> <li>• <b>Other Land:</b> Lands not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.</li> </ul> <p>The Project site includes approximately 33.67 acres of designated Farmland of Local Importance and approximately 14.18 acres of Other Land (see Figure 5, Farmland Mapping). There is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Project site, or in the immediately surrounding area. It is important to note that CEQA's definition of "agricultural land" only includes Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, and does not include Farmland of Local Importance or Grazing Land. Under CEQA, impacts to designated Farmland of Local importance are not considered significant and do not require mitigation.</p> <p>The Project site is located within the BMP-SP – Business and Manufacturing Park and SCBPSP Overlay Zones with a land use designated for Industrial Land Use. The proposed use for the Project site is industrial, which is consistent with the designated Overlay Zones. Also, other than the Sycamore Canyon Wilderness Park, the Project site and the surrounding area is primarily developed with industrial and commercial uses. The Project would not impact any existing farmland and no surrounding land is designated for agricultural or farming use.</p> <p>Although implementation of the Project will result in the conversion of approximately 33.67 acres of Farmland of Local Importance to a non-agricultural use, the proposed Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), and therefore, the Project will have <b>a less than significant impact</b>, directly, or cumulatively, and further analysis in an EIR is not warranted.</p>				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2b. Response:</b> (Source: General Plan 2025 FPEIR – Figure 5.2-2 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)</p> <p><b>No Impact.</b> As outlined in the General Plan 2025 FPEIR, Figure 5.2-2 – Williamson Act Preserves, the Project site is not located within a Williamson Act Preserve or under a Williamson Act Contract. The nearest area under the Williamson Act Contract Land, located directly east of Overlook Parkway and Washington Street, is approximately 4.2 miles from the Project and the nearest Williamson Act Preserve, located at 15690-15600 Chicago Avenue, is approximately 2.8 miles from the Project site. The Project site is not zoned for agricultural use and is not adjacent to land zoned for agricultural use; therefore, the Project will have <b>no impact</b> directly, indirectly or cumulatively, and further analysis in an EIR is not warranted.</p>				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>2c. Response:</b> (Source: City of Riverside Zoning Map <a href="https://riversideca.gov/planning/pdf/maps/zoning.pdf">https://riversideca.gov/planning/pdf/maps/zoning.pdf</a>, California Code, Public Resources Code, Sycamore Canyon Business Park Specific Plan, Google Earth)</p> <p><b>Less Than Significant Impact.</b> The Project site and vacant land to the east is zoned BMP-SP – Business and Manufacturing Park and SCBPSP Overlay Zones. Land to the southwest is zoned Commercial General and Commercial Retail and to the west and north of the site is zoned Public Facility. The Project will not cause rezoning of or conflict with zoning of forest land or timberland. The definitions of forest land and timberland in the Public Resources Code and definition of Timberland Production in the Government Code are outlined below.</p> <p><b>Public Resources Code Section 12220(g) – Forest Land</b></p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Section 1220(g) of the Public Resources Code (PRC) defines forest land as:</p> <p><i>Land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.</i></p> <p><b>Public Resources Code Section 4526 – Timberland</b></p> <p>PRC Section 4526 defines timberland as:</p> <p><i>Land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.</i></p> <p><b>Government Code Section 51004(g) – Timberland Production</b></p> <p>Government Code Section 51104(g) defines timberland zoned as timberland production as:</p> <p><i>An area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber with compatible uses, as defined in subdivision (h).</i></p> <p>The project site does not contain timberland, is not zoned for timberland production, and is not next to land zoned for timberland. There is riparian habitat associated with a drainage feature on site and there are estimated ten trees located in the development footprint (based on review of Google Earth and the Site Plan). However, these individual trees are not great enough in number or size to be considered a forest or forest land. Thus, <b>less than significant impacts</b> to timberland or forest land will occur from this Project directly, indirectly or cumulatively.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>2d. Response:</b> (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability, City of Riverside Zoning Map, Google Earth)</p> <p><b>Less Than Significant Impact.</b> As outlined above in 2c, the Project site contains riparian habitat/vegetation associated with the drainage feature and there are an estimated ten trees located in the development footprint. However, these individual trees are not great enough in number or size to be considered a forest or forest land. The Sycamore Canyon Wilderness Park is not considered forest land and the Project site is not adjacent to any other land with forest land. The Project would not result in the conversion of any forest land. Therefore, <b>less than significant impacts</b> will occur from the Project directly, indirectly or cumulatively, and further analysis in an EIR is not warranted.</p>				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2e. Response:</b> (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, Title 19 – Article V – Chapter 19.130 – Industrial Zones BMP)</p> <p><b>No Impact.</b> The Project site is currently zoned Business and Manufacturing Park and Specific Plan Overlay Zones and does not support agricultural resources or operations, as outlined above in 2a and 2b. The proposed Project would not result in the conversion of designated Farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands, within proximity of the Project site. As discussed in 2c and 2d, the project would not result in the conversion of forest land. Therefore, since the Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use, <b>no impact</b> will occur from this Project directly, indirectly or cumulatively, and further analysis in an EIR is not warranted.</p>				
<b>3. AIR QUALITY</b>				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3a. Response:</b> (Source: South Coast Air Quality Management District’s 2016 Air Quality Management Plan (AQMP))</p> <p><b>Potentially Significant Impact.</b> The Project site is located in the South Coast Air Basin, which includes Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties. The Project is located in the South Coast Air Basin, which is a nonattainment area for the federal air quality standards for ozone and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and state ozone, PM<sub>10</sub> and PM<sub>2.5</sub> standards. The Project may conflict with or obstruct the implementation of the Air Quality Management Plan (AQMP), a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3b. Response:</b> (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 20016 Air Quality Management Plan)</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Potentially Significant Impact.</b> The Project is located in the South Coast Air Basin, which is a nonattainment area for the federal air quality standards for 8-hour ozone and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and state ozone, PM<sub>10</sub> and PM<sub>2.5</sub> standards. Emissions of ozone precursors, reactive organic gases (ROG), and oxides of nitrogen (NO<sub>x</sub>), PM<sub>10</sub> and PM<sub>2.5</sub> from construction and operation may create a net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standards. Therefore, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>c. Expose sensitive receptors to substantial pollutant concentrations?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3c. Response:</b> (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 Air Quality Management Plan)</p>				
<p><b>Potentially Significant Impact.</b> A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. The sensitive receptors nearest to the Project site include single and multi-family residences to the south of the Project site, south of Alessandro Boulevard and approximately 656 feet from the Project site. Therefore, the Project may result in a <b>potentially significant impact</b> exposing sensitive receptors to substantial pollutant concentrations, and this topic will be further analyzed in the EIR.</p>				
<p>d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3d. Response:</b> (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 Air Quality Management Plan)</p>				
<p><b>Potentially Significant Impact.</b> During construction, diesel equipment may generate some nuisance odors. The sensitive receptors nearest to the Project site include single and multi-family residences to the south of the Project site, south of Alessandro Boulevard. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p><b>4. BIOLOGICAL RESOURCES.</b> Would the project:</p>				
<p>a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4a. Response:</b> (Source: General Plan 2025 – Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages)</p>				
<p><b>Potentially Significant Impacts.</b> The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), which is a comprehensive habitat conservation/planning program for Western Riverside County. The intent of the MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP provides coverage (including take authorization for listed species) for special-status plant and animal species, as well as mitigation for impacts to special-status species and associated native habitats. The Project site is also located within the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP) and directly adjacent to (south of) the Sycamore Canyon Wilderness Park, which is part of the Sycamore Canyon-March Air Force Base Core Reserve of the SKRHCP.</p>				
<p>The Project may result in adverse effects, either directly or indirectly, on 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.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Fish and Wildlife Service. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4b. Response:</b> (Source: MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, Google Earth)</p> <p><b>Potentially Significant Impact.</b> Section 6.1.2 of the MSHCP outlines the process through which protection of riparian/riverine areas and vernal pools would occur. Projects that result in unavoidable impacts to riparian/riverine or vernal pool resources require a Determination of Biologically Equivalent or Superior Preservation (DBESP) to be made by Riverside County as the Permittee to ensure replacement of any lost functions and values of habitat as it relates to Covered Species. Conservation of these areas is intended to protect habitat that is essential to a number of listed, water-dependent amphibians, birds, fish, invertebrates, and plants.</p> <p>The Project site contains two drainages that cross the site. One of the drainage features crosses the site in a south to north direction, from which an existing culvert in Alessandro Boulevard conveys waterflows to the site (refer to <i>Figure 2, Project Site Aerial Photo</i>). The drainage feature crosses the site and continues off-site in a northerly direction into the Sycamore Canyon Wilderness Park. This drainage feature supports a riparian woodland habitat, a vegetation community dominated by willows and cottonwood trees.</p> <p>The other drainage feature is a tributary to the south-north drainage from where an existing culvert conveys waterflows to the western boundary of the site from the adjacent wastewater treatment plant site. The Project may result in adverse effects, directly and indirectly, to these drainage courses and associated riparian vegetation. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4c. Response:</b> (Source: MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)</p> <p><b>Potentially Significant Impact.</b> As outlined in 4b above, the Project site contains two drainages that cross the site and support riparian habitat (refer to <i>Figure 2, Project Site Aerial Photo</i>). The Project may have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
d. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4d. Response:</b> (Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkages)</p> <p><b>Potentially Significant Impact.</b> The Project site is located directly south of and adjacent to the Sycamore Canyon Wilderness Park which is designated as Public Quasi Public (PQP) lands and Existing Core D of the MSHCP Conservation Area. It is also a part of the Sycamore Canyon-March Air Force Base Core Reserve of the SKRHCP. The Project may</p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
interfere with the movement of native resident wildlife species or with established native resident or migratory wildlife corridors. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4e. Response:</b> (<i>Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, MSHCP Section 6.1.4 – Urban Wildlands Interface Guidelines</i>)</p> <p><b>Potentially Significant Impact.</b> Implementation of the proposed Project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the Project is required to comply with RMC Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.</p> <p>Section 6.1.4 of the MSHCP contains Urban/Wildlands Interface Guidelines. According to Section 6.1.4 of the MSHCP, the Urban/Wildlands Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area.</p> <p>The Project has the potential to conflict with local policies or ordinances projecting biological resources may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4f. Response:</b> (<i>Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools</i>)</p> <p><b>Potentially Significant Impact.</b> The proposed Project may conflict directly, indirectly and cumulatively to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p><b>5. CULTURAL RESOURCES.</b> Would the project:</p>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>5a. Response:</b> (<i>Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code</i>)</p> <p><b>Potentially Significant Impact.</b> The Project may impact historic resources directly or indirectly. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5b. Response:</b> (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity)  <b>Potentially Significant Impact.</b> The Project may impact archeological resources directly or indirectly. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5c. Response:</b> (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity)  <b>Potentially Significant Impact.</b> Where construction is proposed in undeveloped areas, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
<b>6. ENERGY</b> Would the project:				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>6a. Response:</b> (Source: City of Riverside Restorative Growth Print: Climate Action Plan)				
<b>Potentially Significant Impact.</b> The proposed Project consists of the construction of two warehouses and related site improvements. The Project would be designed and constructed in compliance with the existing land use and zoning designations of the subject property. During construction there would be a temporary consumption of energy resources required for the movement of equipment and materials. During operation of the warehouses, long term use of energy resources would be required for operations within the buildings as well as for cars and trucks for the movement of equipment and materials. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>6b. Response:</b> (Source: City of Riverside Public Utilities 2018 Integrated Resource Plan)				
<b>Potentially Significant Impact.</b> The City of Riverside Public Utilities 2018 Integrated Resource Plan provides an impact analysis of Riverside's acquisition of new power resources, specifically towards meeting the state of California's aggressive carbon reduction goals, continuing to provide the highest quality electric services at the lowest possible rates, while adhering to a diverse set of state and regional legislative/regulatory mandates. The Project incorporates a series of measures that generally reduce energy demand associated with the Project. The Project will comply with the 2019 Title 24 Standards which include incorporating contemporary design features such as photovoltaic systems or renewable energy for new homes. Electric services for the Project will be provided by Riverside Public Utilities. The proposed project's potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including General Plan policies on energy and the City of Riverside Public Utilities 2018 Integrated Resource Plan will be analyzed in the forthcoming EIR.				
<b>7. GEOLOGY AND SOILS.</b> Would the project:				
a. 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 Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>7i. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report)				
<b>Potentially Significant Impact.</b> Seismic activity is to be expected in Southern California. In the City of Riverside, there are no Alquist-Priolo zones. However, there still remains potential for fault rupture or seismic shaking. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>7ii. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, General Plan 2025 FPEIR Appendix E – Geotechnical Report)				
<b>Potentially Significant Impact.</b> The San Jacinto Fault Zone, located in the northeastern portion of the City, and the Elsinore Fault Zone, located in the southern portion of the City's Sphere of Influence, have the potential to cause moderate to large				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>earthquakes that would cause intense ground shaking. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>iii. Seismic-related ground failure, including liquefaction?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>7iii. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)</p> <p><b>Potentially Significant Impact.</b> The Project site is located in an area with very low potential for liquefaction as depicted in the General Plan 2025, Figure PS-2 – Liquefaction Zones Map. However, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>b. Result in substantial soil erosion or the loss of topsoil?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>7b. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</p> <p><b>Potentially Significant Impact.</b> Erosion and loss of topsoil could occur as a result of the Project. The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>c. 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?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>7c. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)</p> <p><b>Potentially Significant Impact.</b> The general topography of the subject site is low rolling hills on undeveloped land with a maximum topographic relief that is estimated at approximately 30 feet. The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>d. 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?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>7d. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)</p> <p><b>Potentially Significant Impact.</b> The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>e. 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 waste water?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>7e. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</p> <p><b>Potentially Significant Impact.</b> The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>7f. Response:</b> <i>(Source: General Plan 2025 Policy HP-1.3)</i>  <b>Potentially Significant Impact.</b> Activities including construction-related and earth-disturbing actions could potentially destroy a unique paleontological or geologic feature. The Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
<b>8. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>8a. Response:</b> <i>(Source: City of Riverside Restorative Growth Print: Climate Action Plan, General Plan 2025 FPEIR 5.13-18 – Greenhouse Gases and Global Warming)</i>  <b>Potentially Significant Impact.</b> GHG emissions would result from construction and operation of the Project. Construction activities emit GHGs primarily through the combustion of fuels in on- and off-road equipment and vehicles. Operational emissions include mobile, energy, area, water and wastewater, and solid waste sources. The Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>8b. Response:</b> <i>(Source: City of Riverside Restorative Growth Print: Climate Action Plan, General Plan 2025 FPEIR 5.13-18 – Greenhouse Gases and Global Warming)</i>  <b>Potentially Significant Impact.</b> The Project may conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
<b>9. HAZARDS &amp; HAZARDOUS MATERIALS.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>9a. Response:</b> <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, and Sycamore Canyon Business Park Specific Plan)</i>  <b>Potentially Significant Impact.</b> The construction associated with this Project has the potential to create a hazard to the public or environment through the routine transportation, use and disposal of construction related hazardous materials, as the Project would include the delivery and disposal of hazardous materials such as fuels, oils, solvents, and other materials. These materials are typical of materials delivered to construction sites. The future development of the site with two warehouses could include the storage and use of hazardous materials such as fuels, oils, solvents, pesticides, electronic waste,				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
and other materials. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>9b. Response:</b> (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP).</p> <p><b>Potentially Significant Impact.</b> The Project may 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. This Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>9c. Response:</b> (Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code and Sycamore Canyon Business Park Specific Plan, Google Maps).</p> <p><b>Potentially Significant Impact.</b> The Project is not located within a quarter mile of an existing or proposed school site. The schools nearest the Project site are: 1) Taft Elementary School (approximately 1.2 miles northwest of the Project site) and 2) John F. Kennedy Elementary School (approximately 1.9 miles southwest of the Project site). The Project would create emissions typical of construction, including construction dust and operational traffic emissions. However, construction emissions would not exceed South Coast Air Quality Management District localized significance thresholds. The Project may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, this Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>9d. Response:</b> (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)</p> <p><b>Potentially Significant Impact.</b> The Project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. The Project may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. This Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>9e. Response:</b> <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base August 2018)</i></p> <p><b>Potentially Significant Impact.</b> The proposed Project is located within Zone C1 (Primary Approach/Departure) of the March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (CLUP) and as depicted on Figure 5.7-2 – Airport Safety Zones and Influence Areas of the General Plan 2025 Program FPEIR for March Air Reserve Base/March Inland Port (MARB/MIP). Zone C prohibits the following uses:</p> <ul style="list-style-type: none"> <li>• Children’s schools, day care centers, libraries</li> <li>• Hospitals, congregate care facilities, places of assembly</li> <li>• Noise-sensitive outdoor non-residential uses</li> <li>• Hazards to flight</li> </ul> <p>Zone C additionally discourages critical community infrastructure facilities (such as power plants, electrical substations, and public communication facilities) and aboveground bulk storage (more than 6,000 gallons) of hazardous materials. The Project does not involve any uses prohibited by Zone C, nor does the Project propose any aboveground storage tanks.</p> <p>Building A and Building B will be subject to the intensity requirements for Zone C1. The Riverside County Airport Land Use Commission (ALUC) recommends determining land use intensity by use of the Building Code Method as provided in Appendix C of the <i>Riverside County Airport Land Use Compatibility Plan Policy Document</i>, Table C1-Occupancy Levels, <i>California Building Code, adopted December 2004</i>. The Building Code Method establishes occupancy levels based on the California Building Code’s minimum square foot per occupant to determine the maximum occupancy of particular land uses. This Project’s consistency with the Zone C1 requirements will be further analyzed in the EIR.</p>				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9f. Response:</b> <i>(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan)</i></p> <p><b>Less Than Significant Impact.</b> The Project will be served by existing, fully improved streets, Alessandro Boulevard and Barton Street as well as a network of on-site local streets. A temporary lane closures may be necessary during construction of roadway improvements to Alessandro Boulevard and Barton Street. As no full street closures would be required construction would not impede with any emergency response or evacuation plan. Therefore, the project will have a <b>less than significant impact</b> directly, indirectly and cumulatively to an emergency response or evacuation plan.</p>				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>9g. Response:</b> <i>(Source: General Plan 2025, Public Safety Element, Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan, GP 2025 FPEIR, Sycamore Canyon Wilderness Park Stephens’ Kangaroo Rat Management Plan and Updated Conceptual Development Plan)</i></p> <p><b>Potentially Significant Impact.</b> This Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the Wildfire section of the EIR.</p>				
<p><b>10. HYDROLOGY AND WATER QUALITY.</b></p> <p>Would the project:</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10a. Response:</b> <i>(Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water)</i>  <b>Potentially Significant Impact.</b> The Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure, construction of buildings, paving of roadways and parking areas, landscaping) that could have an adverse effect on water quality on- and off-site. A site-specific preliminary Water Quality Management Plan (WQMP) is required to be submitted and accepted by the Public Works Department for this Project. The Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10b. Response:</b> <i>(Source: WMWD Urban Water Management Plan)</i>  <b>Potentially Significant Impact.</b> The proposed Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure, construction of buildings, paving of roadways and parking areas, landscaping) that will increase the amount of impermeable surfaces, reducing groundwater recharge at the site. The Project will require water service from Western Municipal Water District (WMWD) for operations and landscaping, which may affect groundwaters supplies. A Will Serve letter from WMWD will be required for the Project to receive water services from WMWD. The Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10c.i Response:</b> <i>(Source: Preliminary Grading Plan EPA National Pollutant Discharge Elimination System (NPDES))</i>  <b>Potentially Significant Impact.</b> The proposed Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure, construction of buildings, paving of roadways and parking areas, landscaping) that could result in erosion or siltation on- or off-site. The Project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of runoff during construction. Erosion, siltation and other possible pollutants associated with long-term implementation of Projects are addressed as part of the WQMP that is also required for this Project. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10c.ii Response:</b> <i>(Source: Preliminary Grading Plan)</i>  <b>Potentially Significant Impact.</b> The proposed Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure, construction of buildings, paving of roadways and parking areas, landscaping) that could result in increased stormwater runoff and flooding on- or off-site. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10c.iii Response: (Source: <i>Preliminary Grading Plan</i>)</b>  <b>Potentially Significant Impact.</b> The proposed Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure, construction of buildings, paving of roadways and parking areas, landscaping) that could result in increased storm water runoff off-site. The Project is expected to generate the following pollutants: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil & grease, and pesticides. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
iv. Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10c.iv Response: (Source: <i>General Plan 2025 Figure PS-4 – Flood Hazard Areas, Preliminary Grading Plan</i>)</b>  <b>Potentially Significant Impact.</b> The proposed Project will result in direct physical alterations of the site (i.e. grading, installation of infrastructure including storm drains, construction of buildings, paving of roadways and parking areas, landscaping) that may redirect flood flows through the site. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>10d. Response: (Source: <i>General Plan 2025 Figure PS-4 – Flood Hazard Areas, General Plan 2025 Figure OS-4 – Arroyos, GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality</i>)</b>  <b>No Impact.</b> Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, <b>no impacts</b> would occur due to tsunamis. A seiche is a to-and-from vibration of a waterbody that is similar to the slopping of water in a basin. Once initiated, oscillation within the waterbody can continue independently. Seiches are often triggered by earthquakes. The most likely areas that could be subject to a seiche are the areas surrounding lakes. The Project site is not located near Lake Mathews (approximately 8 miles), Lake Evans (approximately 6.5 miles), or the Santa Ana River (approximately 6.7 miles), which transverse the City. The Project is not located within a flood hazard area or a dam inundation area. Therefore, <b>no impacts</b> related to tsunamis, seiches, or other flood hazard areas will occur directly, indirectly or cumulatively, and further analysis in an EIR is not warranted.				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>10e. Response: (Source: <i>GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, WMWD Urban Water Management Plan, Preliminary Grading Plan</i>)</b>  <b>Potentially Significant Impact.</b> A project specific WQMP is required to be submitted and accepted by the Public Works Department. The Project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a SWPPP for the prevention of runoff during construction. The Project will require water service from WMWD for operations and landscaping, which may affect groundwater supplies. A Will Serve letter from WMWD will be required for the Project to receive water services from WMWD. This Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>11. LAND USE AND PLANNING:</b> Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11a. Response:</b> <i>(Source: General Plan 2025 Land Use and Urban Design Element, Sycamore Canyon Business Park Specific Plan, Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan)</i>  <b>No Impact.</b> The Project site is currently vacant, undeveloped, and located northeast of Alessandro Boulevard and Barton Street, directly adjacent to and south of the Sycamore Hills Wilderness Park. There is a wastewater treatment plant to the west of the Project site and vacant, undeveloped land that is zoned for industrial uses to the east. Further south of Alessandro Boulevard and south of the commercial land use there is residential land use. However, this community would not be divided as a result of the Project. The northern terminus of Barton Street, along the western boundary of the Project, serves as an access point for the surrounding community to a trailhead of the Sycamore Canyon Wilderness Park. The trailhead will not be closed during construction or operation of the Project. The Project will not impede or adversely affect continued access to the park for the surrounding community's use. Rather, the Project will dedicate to the City 1.18 acres to enhance access to the park and provide a trailhead shade structure and parking lot. The Project is consistent the GP 2025 and with the SCBPSP and complies with the applicable zoning for the Project site. The Project is also consistent with surrounding land uses and would not physically divide an established community. Therefore, there are <b>no impacts</b> related to dividing an established community, directly, indirectly or cumulatively, and further analysis in an EIR is not warranted.				
b. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>11b. Response:</b> <i>(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Sycamore Canyon Business Park Specific Plan, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines)</i>  <b>Potentially Significant Impact.</b> The Project is located within the SCBPSP and is required to comply with the development standards of the Specific Plan, as amended. The Project is also subject to the <i>City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities</i> . The Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
<b>12. MINERAL RESOURCES.</b> Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>12a. Response:</b> <i>(Source: General Plan 2025 Figure – OS-1 – Mineral Resources, GP 2025 FPEIR)</i>  <b>No Impact.</b> For decades, mining operations have not been active within the City. There are scattered areas within the City and its Sphere of Influence that have deposits of feldspar, silica, limestone and other rock products. All of the known areas within the City with potential for economically feasible mining have been excavated and all that is left are the past remnants of mining activities. Moreover, the maximum potential for mineral extraction has already occurred (GP 2025 FPEIR, p. 5.10-2). As a result of the California Surface Mining and Reclamation Act of 1975, the City has designated the area located between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans as a state-classified mineral resource zone (MRZ-2). While this area was once suitable for mining operations, the surrounding urban environment establishes inappropriate conditions for extraction and transport of mineral resources. This zone now includes open space, the Camp Evans Boy Scout Camp, and a portion of Fairmount Park. (GP 2025 FPEIR, p. 5.10-2) As shown on the GP 2025				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Figure OS-1 Mineral Resources</i> the eastern half of the City is within an area designated MRZ-3. The Project site is within the MRZ-3 designation. These mineral resource zone designations are defined under State Regulations, below:</p> <p><b>Surface Mining and Reclamation Act of 1975</b></p> <p>The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that all cities incorporate into their general plans mapped mineral resources designations approved by the State Mining and Geology Board. SMARA was enacted to limit new development in areas with significant mineral deposits. The State Geologist classifies land in California based on availability of mineral resources. Because available aggregate construction material is limited, five designations have been established for the classification of sand, gravel, and crushed rock resources:</p> <ul style="list-style-type: none"> <li>• <b>SZ:</b> Scientific Resource area containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance.</li> <li>• <b>MRZ-1:</b> Mineral Resource Zone 1 – adequate information indicates that no significant mineral deposits are present or likely to be present.</li> <li>• <b>MRZ-2:</b> Mineral Resource Zone 2 – adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence and development should be controlled.</li> <li>• <b>MRZ-3:</b> Mineral Resource Zone 3 – the significance of mineral deposits cannot be determined from the available data.</li> <li>• <b>MRZ-4:</b> Mineral Resource Zone 4 – there is insufficient data to assign any other MRZ designation.</li> </ul> <p>The classification system is intended to ensure consideration of statewide or regionally significant mineral deposits by the City in planning and development administration. These mineral designations are intended to prevent incompatible land use development on areas determined to have significant mineral resource deposits. Permitted uses within a mineral resource zone include mining, uses that support mining such as smelting and storage of materials, or uses that will not hinder future mining such as grazing, agriculture, large lot rural development, recreation, silviculture and open space.</p> <p>As mentioned above, the Project site is within designated MRZ-3 Zone which indicates the significance of mineral deposits cannot be determined from the available data. The General Plan 2025 does not include specific policies regarding property identified as MRZ-3 and has not designated the Project site for mineral resource related uses. Additionally, there is no historical use of the site or surrounding area for mineral extraction purposes. The loss of known mineral resources valuable locally or regionally would not occur because of the Project and no further analysis is required. Therefore, the Project will have <b>no impact</b> on mineral resources directly, indirectly or cumulatively.</p>				
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources, GP 2025 FPEIR, Section 5.10 pp 5.10-5 to 5.10-6 – Mineral Resources)</b></p> <p><b>No Impact.</b> The GP 2025 FPEIR determined that there are no specific areas within the City or Sphere Area which have locally important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. (GP 2025 FPEIR, pp. 5.10-5 – 5.10-6) The Project is consistent with the land use designation in the General Plan. The Project site does not contain a locally important mineral resource recovery site. Therefore, the Project will have <b>no impact</b> on mineral resources directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>13. NOISE.</b> Would the project result in:				
a. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>13a. Response:</b> (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-9 – March ARB Noise Contours, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code)</p> <p><b>Potentially Significant Impact.</b> The City’s noise ordinance limits construction activities to the hours of 7:00 a.m. to 7:00 p.m. on weekdays, and to 8:00 a.m. to 5:00 p.m. on Saturdays. Construction activities would generally occur over the period between 7:00 a.m. and 5:00 p.m. on weekdays. Although the existing adjacent residences would be exposed to construction noise levels that may be heard above ambient conditions, the exposure would be temporary and would occur during the times specified in Title 7 of the City’s Municipal Code. The main source of noise at the Project site would be vehicle traffic on Alessandro Boulevard. Riverside’s Municipal Code designates 70 decibel measurement weighted (dBA) as the exterior noise standard for industrial uses. An increase in noise levels is permitted up to a certain point, as detailed in RMC Section 7.25.10.A. Additionally, allowable noise exposure standards may be increased if the existing ambient noise level exceeds the standard listed in the Municipal Code. The Project may generate 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. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>13b. Response:</b> (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-9 – March ARB Noise Contours, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions)</p> <p><b>Potentially Significant Impact.</b> Construction related activities, although short term, are the most common source of groundborne noise and vibration that could affect occupants of neighboring uses. The Project may generate excessive groundborne vibration or noise levels, and thus the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>13c. Response:</b> (Source: General Plan 2025 Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, Policies N-1.5, CCM-11.7, N-2.1, N-2.2, N-2.5, N-3.2-3.4, LU-22.3-22.5, March Air Reserve Base/ Inland Port Land Use Compatibility Plan (2014), Air Installation Compatible Use Zone Study for March Air Reserve Base (2018))</p> <p><b>Less Than Significant Impact.</b> The proposed Project is located within the March Air Reserve Base/ March Inland Port CLUP. Approximately half of the eastern portion of the Project site is located within the MARB/MIP’s Noise Impact Area. Noise from MARB/MIP’s use can be up to 60-65 decibel (dB) Community Noise Equivalent Levels (CNEL). General Plan 2025 and Sections 19.58 and 12.14 of the Municipal Code restrict noise sensitive development within areas subject to high noise levels (over 65 dB CNEL). The proposed industrial warehouse project is not considered noise sensitive.</p>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact																				
The maximum normally acceptable noise threshold for the proposed industrial warehouse use is 70 dBA. Per the MARB/IPA LUCP, Table MA-1 Compatibility Zone Factors, the C1 Primary Approach/Departure Zone is within or near 60 CNEL contour. Because the noise contour level (60 CNEL) for the Project site is found to be a normally acceptable level for the proposed use in the Noise Element of the General Plan 2025, impacts related to exposure of people working in an airport land use plan area to excessive noise is considered <b>less than significant</b> directly, indirectly and cumulatively and no further analysis in an EIR is required.																								
14. POPULATION AND HOUSING.																								
Would the project:																								
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>																				
14a. Response: <i>(Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, , Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast Technical Report, Table 14: Jurisdiction – Level Growth Forecast)</i>																								
<p><b>Less Than Significant Impact.</b> The proposed Project does not include proposed homes. The two warehouse buildings have a combined total square footage (SF) of 603,100 of planned high cube transload short-term warehouse use that may indirectly induce population growth through the provision of new employment opportunities within the City if those employment opportunities were filled by people moving to the City of Riverside from other areas.</p> <p>Construction is anticipated to last approximately 15 months. Construction of the Project would generate the demand for temporary construction jobs. However, given the availability of labor in the Riverside County and San Bernardino County region, and the southern California region as a whole, it is reasonable to assume that the construction of the Project will be completed by existing companies already doing business in the area with employees already residing in the area. Thus, construction-related growth inducement would not result from implementation of the Project.</p> <p><b>Population, Housing, and Employment Forecasts</b></p> <p>The Southern California Association of Governments (SCAG) prepares population, housing, and employment estimates as part of their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As of May 7, 2020, SCAG has adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Forecast for employment, population, and households for the City of Riverside, outlined in Table 3 below, were obtained from the Connect SoCal Demographics and Growth Forecast Technical Report, Table 14, Jurisdictional- Level Growth Forecast.<sup>3</sup></p>																								
<p style="text-align: center;"><b>Table 3: SCAG Level Growth Forecast</b></p> <table><tr><th></th><th>Actual 2016</th><th>Project 2045</th><th>% Change</th></tr><tr><td colspan="4"><b>City of Riverside</b></td></tr><tr><td>Population</td><td>325,300</td><td>395,800</td><td>+21.7 Percent</td></tr><tr><td>Households</td><td>94,500</td><td>115,100</td><td>+21.7 Percent</td></tr><tr><td>Employment</td><td>145,400</td><td>188,700</td><td>+29.7 Percent</td></tr></table>						Actual 2016	Project 2045	% Change	<b>City of Riverside</b>				Population	325,300	395,800	+21.7 Percent	Households	94,500	115,100	+21.7 Percent	Employment	145,400	188,700	+29.7 Percent
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<sup>3</sup> [https://www.connectsocal.org/Documents/Adopted/fConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocal.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The Project is a speculative development, 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 this Initial Study, as well as the forthcoming Environmental Impact Report (EIR), the anticipated number of employees for both buildings is approximately 586 using County of Riverside<sup>4</sup> generation rate.</p> <p>The operation of the Project will result in additional employment opportunities within the City. While tenants for these proposed warehouses have not been identified to date, up to approximately 586 long term employment opportunities are anticipated. The Project's potential to generate approximately 586 employment opportunities represents approximately 0.3 percent of the expected opportunities within the City by 2045. Moreover, SCAG's forecast data are based on various factors including local policies such as land use plans. As the Project is consistent with existing land use plan designations (the GP 2025 and SCBPSP), SCAG's growth Projections for the City incorporate the type of growth that would result from the Project. Per SCAG's Connect SoCal Demographics and Growth Forecast Technical Report data for the City of Riverside for 2016 the jobs to housing ratio is 1.54 and is considered housing rich. Therefore, it can reasonably be assumed that there are enough residents to fill the jobs generated by the Project.</p> <p>Because the proposed Project is consistent with the General Plan 2025 Typical Growth Scenario and population growth impacts were previously evaluated in the GP 2025 FPEIR, the Project does not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR. The employment opportunities anticipated to be generated by the Project are relatively minor and within forecasts, and the Project will not induce substantial population growth. Impacts will be <b>less than significant</b>, directly, indirectly or cumulatively, and no further analysis in an EIR is required.</p>				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>14b. Response:</b> <i>(Source: Site Visit, Google Maps)</i></p> <p><b>No Impact.</b> The Project will not displace existing people or housing, necessitating the construction of replacement housing elsewhere because the Project site is proposed on is vacant land and has no existing housing that will be removed or affected by the proposed Project. Therefore, there will be <b>no impact</b> on existing housing either directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				
<b>15. PUBLIC SERVICES.</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 any of the public services:				
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>15a. Response:</b></p> <p><b>Potentially Significant Impact.</b> This Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the Wildfire section of the EIR.</p>				
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>15b. Response:</b> <i>(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers, GP 2025 FPEIR, Section 5.13 – Public Services)</i></p>				

<sup>4</sup> 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-Initial-Study>

Initial Study 44 P19-0625, P19-0626, P19-0627

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Less Than Significant Impact.</b> The City of Riverside Police Department (RPD) provides police protection services to the City. The closest RPD station is located at the Lincoln Station, located at 8181 Lincoln Avenue, approximately 5.6 miles west of the project site. Additional police facilities are located throughout the City. (GP 2025 FPEIR, pp. 5.13-2 – 5.13-3).</p> <p>RPD employs approximately 367 sworn officers and 144 civilian personnel (GP 2025, p. PS-32). RPD’s police officers rotate through assignments rather than stay within one area. Incoming calls requesting police services are assigned by urgency. RPD seeks a balance between reactive response to immediate needs and proactive crime reduction efforts. In addition to responding to incoming calls, RPD policy encourages patrol officers to spend 40 percent of their time in the field on officer-initiated community problem solving activities. (GP 2025 FPEIR, p. 5.13-3)</p> <p>The General Plan 2025 discusses how opportunities for crime can be reduced through good architectural and environmental design. Developments that promote natural surveillance, reduce “hiding” places, and otherwise promote “defensible space” can minimize criminal activity. By emphasizing these design principles, the project’s impact on police services will be lessened. The Project includes street lighting, parking lot lights, and building lighting to deter unauthorized activities at the Project site. Additionally, the Project site will be fenced with all parking areas gated to deter and prevent unauthorized access. The Project proposes to operate 24-hours a day, which helps keep the site less inviting for crime. These site design features are anticipated to help reduce the need for police protection at the site. In addition, the project site is visible from Alessandro Boulevard, a highly traveled arterial street, and from the highly used Barton Street entrance to connecting trails in the Sycamore Canyon Wilderness Park.</p> <p>The Project is not expected to result in any unique or more extensive crime problems than other typical industrial projects in the City and would be expected to be adequately handled by the existing level of police resources. Because the proposed Project is consistent with the General Plan 2025 Typical Growth Scenario and associated growth impacts on police protection were previously evaluated in the GP 2025 FPEIR, the Project does not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR. As such, no new or expanded police facilities would need to be constructed as a result of the Project. Therefore, impacts to police protection services would be <b>less than significant</b> directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15c. Response:</b> (Source: GP 2025 FPEIR, p. 5.13-12, GP 2025 FPEIR Figure 5.13-4, Other School District Boundaries, Google Earth)</p> <p><b>No Impact.</b> While the Project site is within the City’s boundaries, the Project site is located in the Moreno Valley Unified School District (MVUSD) boundary, per GP 2025 FPEIR Figure 5.13-4, Other School District Boundaries. MVUSD serves the majority of the City of Moreno Valley, a portion of the City of Riverside, and the unincorporated areas of Riverside County, including a small portion of the Northern Sphere Area. There are 23 Elementary Schools, 6 Middle Schools, and 4 High Schools. (GP 2025 FPEIR, p. 5.13-12) The Project site is served by the following schools located within MVUSD:</p> <ul style="list-style-type: none"> <li>Edgemont Elementary School (21790 Eucalyptus Avenue; approximately 1.7 miles northeast of the Project site)</li> <li>Badger Springs Middle School (24750 Delphinium Avenue; approximately 4.5 miles east of the Project site)</li> <li>Moreno Valley High School (233000 Cottonwood Avenue; approximately 3.2 miles east of the Project site)</li> </ul> <p>The Project site is closest to the following schools within the Riverside Unified School District (RUSD)</p> <ul style="list-style-type: none"> <li>Kennedy Elementary School (19125 Schoolhouse Lane; approximately 1.9 miles southwest of the Project site)</li> <li>Taft Elementary School (959 Mission Grove Parkway North; approximately 1.2 miles northwest of the Project site)</li> <li>Earhart Middle School (20202 Aptos Street; approximately 1.9 miles south of the Project site)</li> <li>Martin Luther King High School (9301 Wood Road; approximately 2.6 miles southwest of the Project site)</li> </ul> <p>However, the Project is a non-residential use that would not involve the addition of any housing units that would directly increase numbers of school age children within the MVUSD. It is anticipated that the Project’s employment opportunities would be filled by residents that reside in the region already, and therefore the project wouldn’t indirectly induce population</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
growth, including school-aged children. Therefore, there will be <b>no impact</b> on the demand for additional school facilities or services either directly, indirectly or cumulatively and no further analysis in an EIR is required.				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15d. Response:</b> <i>(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails)</i></p> <p><b>No Impact.</b> The closest parks in proximity to the proposed Project are Sycamore Canyon Wilderness Park (directly north of Project site), Taft Park (1-mile northwest), Castlevue Park (2 miles northwest), and Orange Terrace Community Park (1.5 miles south). The Project is a non-residential use that would not involve the addition of any housing units that would directly increase the population and associated use of existing park facilities. It is anticipated that the Project's employment opportunities would be filled by residents that reside in the region already, and therefore the project wouldn't indirectly induce population growth, and associated increase in use of existing park facilities.</p> <p>As mentioned in the Project Description above, Parcel C is proposed to be developed with a trailhead parking lot for the Sycamore Canyon Wilderness Park and will be designated as open space. It consists of 51,284 square feet (1.18 acres). The northerly terminus of Barton Street is identified as "a minor trailhead" in the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan. The proposed trailhead parking lot will include an improved decomposed granite parking lot, landscaping, a shade structure with benches, a bike rack, a drinking fountain (including for pets), and ADA (Americans with Disabilities Act) compliant parking spaces and sidewalk. Trail fencing, gates, and signage will also be installed to direct access, circulation and trail connection to existing trails as well as the master planned multipurpose trail on the west side of Barton Street. The proposed trailhead parking lot is not required but is being provided by the applicant as an amenity and addition to the City's Sycamore Canyon Wilderness Park. Parcel C would be dedicated to the City and operated and managed by the City's Parks, Recreation, &amp; Community Services Department. The construction of the trailhead parking lot will result in physical impacts to that portion of the Project site. The analysis of those impacts on any sensitive resources (biological resources, cultural resources, tribal cultural resources, etc.) will be analyzed in the forthcoming EIR.</p> <p>Therefore, there will be <b>no impact</b> on the demand for additional park facilities or services either directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15e. Response:</b> <i>(Source: GP 2025 FPEIR p. 5.13-16, GP 2025 FPEIR p. 5.13-19)</i></p> <p><b>No Impacts.</b></p> <ul style="list-style-type: none"> <li> <p><b>Libraries</b></p> <p>The City of Riverside Public Library (RPL) system provides over 600,000 books and other library materials (GP 2025 FPEIR p. 5.13-16. The Main Library is located in the City's Downtown Neighborhood at 3581 Mission Inn Avenue and there are eight other branches located throughout the City. The nearest branch to the Project site is Orange Terrace Branch, located at 20010-B Orange Terrace Parkway, approximately 1.5 miles to the south of the site. The Orange Terrace Branch, which opened in 2008, encompasses 13,000 square feet and is adjacent to the Orange Terrace Community Center. This branch offers a wide variety of books, movies, CDs and audio books for all ages as well as 38 public computers and free wireless internet access. The meeting room seats 45 persons, and a quiet study room is available at the branch.</p> </li> <li> <p><b>Community Centers</b></p> <p>The City operates 9 community centers, 4 senior citizen centers, and 2 service centers throughout the City. The centers offer a wide range of services that include computer training, English as a second language classes, fitness and wellness programs, early childhood programs, aquatics, social recreation programs, specialty classes, sports programs, field trips, meeting spaces, and a variety of cultural and holiday activities. (GP 2025 FPEIR p. 5.13-19) The nearest community center to the Project site is the Stratton Center at Bordwell Park, located at 2008 Martin Luther King Boulevard, approximately 5.8 miles to the northwest. The approximately 9,617-square-foot Stratton Center includes a variety of classes including classes for senior citizens.</p> </li> </ul>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The Project does not include a residential component and would not directly increase population growth and associated increase in the use of existing library facilities or community centers. It is also anticipated that the Project's employment opportunities would be filled by residents that reside in the regional already, and therefore the project wouldn't indirectly induce population growth, or associated use of library facilities or community centers. Thus, there would be <b>no impacts</b> from the Project on the demand for additional public facilities or services, including libraries and community centers, either directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				
<b>16. RECREATION.</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>16a. Response:</b> (<i>Source: GP 2025 FPEIR p. 5.14-3, GP 2025 FPEIR Table 5.14-B, Parks Inventory and Acreage Summary, GP 2025 FPEIR p. 5.14-9, GP 2025 FPEIR Figure 5.14-2, Trails Map, Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan, p. 8 and Figure 1-3, Proposed Visitor Facility Locations, City of Riverside Comprehensive Park, Recreation &amp; Community Services Master Plan, p. 78</i>))</p> <p><b>Less Than Significant Impact.</b> There are nine categories of parks and recreational facilities in the City, which include: pocket parks, neighborhood parks, community parks, special use parks, wilderness reserve park, regional park, signature park, county and other parks, and joint use parks. Current City standards in the GP 2025 for parkland distribution recommend 3 developed acres per 1,000 residents. (GP 2025 FPEIR p. 5.14-3) The City's Comprehensive Park, Recreation &amp; Community Services Master Plan recommends a more modern goal of 5 developed acres per 1,000 residents. The closest parks in proximity to the proposed Project are Sycamore Canyon Wilderness Park (directly north of Project site), Taft Park (1-mile northwest), Castleview Park (2 miles northwest), and Orange Terrace Community Park (1.5 miles south). The approximately 1,500 acre Sycamore Canyon Wilderness Park is categorized as a reserve/open space park and includes the following amenities: wilderness reserve, core reserve for habitat for Stephens' kangaroo rat, nature center with on-site parking (off of Central Avenue), and an extensive network of hiking and bike trails. Taft Park is an approximately 7-acre neighborhood park, while Castleview Park (approx. 31.5 acres) and Orange Terrace (approx. 30 acres) are community parks. (GP 2025 FPEIR Table 5.14-B, Parks Inventory and Acreage Summary)</p> <p>In addition to developed and undeveloped park sites, the City offers a number of recreational programs and opportunities including golf courses, community centers, trails, parkways, and cultural and historic recreation sites. The City maintains trails for equestrian, off-road biking, hiking, and other pedestrian-oriented uses. The intent of the multi-purpose recreational trails is to connect the major open space and recreational sites that surround the City: specifically the Santa Ana River, Box Springs Mountain, Sycamore Canyon Wilderness Park, the Citrus State Historic Park, and the green belt and the La Sierra/Norco Hills, to ring the entire City. (GP 2025 FPEIR p. 5.14-9) Barton Road, on the western boundary of the Project site is a City designated trail, per GP 2025 FPEIR Figure 5.14-2, Trails Map.</p> <p>Increase in demand for neighborhood or regional parks or other recreational facilities generally occurs due to population increase. The Project is a non-residential use that would not involve the addition of any housing units that would directly increase the population and associated use of existing park facilities. As discussed above in Section 14 – <i>Population and Housing</i>, the Project-related employment opportunities are reasonably expected to be filled by residents that already reside in the City and surrounding areas, and therefore, the project wouldn't indirectly induce population growth, and associated increase in use of existing park facilities. Employees of the Project may utilize the adjacent Sycamore Canyon Wilderness Park trails or nearby neighborhood and community parks during the workday, however this potential increase in use is not anticipated to be significant in relation to existing number of users of these parks.</p> <p>The proposed Project will not impact nor reroute any designated trail per the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan (SCWPMP). The SCWPMP was prepared</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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 SCWPMP (p. 8 and <i>Figure 1-3, Proposed Visitor Facility Locations</i>) identifies a “Minor Trailhead” at the northerly terminus of Barton Street at the Park boundary to include a typical trailhead shade structure and to be sited in locations conducive to on-street parking. On-street parking along Barton Street will remain.</p> <p>The proposed Project includes a new trailhead that will be identified as the Barton Trailhead. Trailhead improvements include: a decomposed granite parking lot and landscaping, a shade structure with benches, ADA compliant parking spaces and sidewalk, drinking fountain (including for pets), interpretive signage and trail map. The 1.18-acre parking lot and trailhead will be dedicated to the City. Trail fencing, gates and signage will be incorporated to direct access, circulation and trail connection to existing trails as well as master planned multipurpose trail on the west side of Barton Street.</p> <p>The Project will not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project would provide a new 1.18-acre parking lot and trailhead amenities that will be dedicated to the City and an addition to the Sycamore Canyon Wilderness Park, consistent with the SCWPMP. This could facilitate additional usage of the Sycamore Canyon Wilderness Park, but not to a substantial level of physical deterioration of the facility to occur or be accelerated because the parcel is consistent with the SCWPMP. The Project would result in <b>less than significant impacts</b> on recreational facilities either directly, indirectly or cumulatively and no further analysis in an EIR is required.</p>				
<p>b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</p>	☒	☐	☐	☐
<p><b>16b. Response:</b> (<i>Source: Sycamore Canyon Wilderness Park Stephens Kangaroo Rat Management Plan and Updated Conceptual Development Plan – Figure 4-8 Existing Trails, Trail Heads &amp; Emergency Access, Site Plan</i>)</p> <p><b>Potentially Significant Impact.</b> The proposed Project will not impact nor reroute any designated trail as identified in the Sycamore Canyon Wilderness Park Stephens Kangaroo Rat Management Plan and Updated Conceptual Development Plan. Moreover, the proposed Project would provide a new 1.18-acre parking lot and trailhead amenities that will be dedicated to the City and an addition to the Sycamore Canyon Wilderness Park. The proposed Project will include a new trailhead that will be identified as the Barton Trailhead that will include a decomposed granite parking lot, landscaping, shade structure with benches, ADA compliant parking spaces and sidewalk, drinking fountain (including for pets), interpretive signage and trail map. Trail fencing, gates and signage will be incorporated to direct access, circulation and trail connection to existing trails as well as master planned multipurpose trail on the west side of Barton Street.</p> <p>The 1.18-acre parking lot and trailhead are within the Project site, and the proposed improvements are included on the Project’s site plan. Thus, the potential environmental impacts from construction of the parking lot and trailhead improvements are evaluated as part of the Project, in this Initial Study and the forthcoming EIR. As outlined in this Initial Study, the proposed Project may result in <b>potentially significant impacts</b> to the environment (aesthetics, air quality, biological resources, cultural and tribal resources, etc.), and these topics will be further analyzed in the EIR.</p>				
<p><b>17. TRANSPORTATION</b> Would the project result in:</p>				
<p>a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p>	☒	☐	☐	☐
<p><b>17a. Response:</b></p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Potentially Significant Impact.</b> The Project may conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>17b. Response:</b></p> <p><b>Potentially Significant Impact.</b> This Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>c. 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?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>17c. Response:</b> <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, March Air Reserve Base/March Inland Port Land Use Compatibility Plan (2014), March Air Reserve Base 2018)</i></p> <p><b>Potentially Significant Impact.</b> The proposed Project is located within an Airport Compatibility Zone for the CLUP as depicted on <i>Figure 5.7-2 – Airport Safety Zones and Influence Areas</i> of the General Plan 2025 Program FPEIR for March Air Reserve Base/March Inland Port (MARB/MIP). The proposed Project site is located within Compatibility Zone C1 (Primary Approach/Departure). The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>17d. Response:</b></p> <p><b>Potentially Significant Impact.</b> The Project will require site access and roadway improvements to Alessandro Boulevard and Barton Street. The Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				
<p>e. Result in inadequate emergency access?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>17e. Response:</b></p> <p><b>Less Than Significant Impact.</b> The Project will be served by existing, fully improved streets, Alessandro Boulevard and Barton Street as well as a network of on-site local streets. A temporary lane closure may be necessary during construction of roadway improvements to Alessandro Boulevard and Barton Street. As no full street closures would be required construction would not impede with any emergency response or evacuation plan. Therefore, the project will have a <b>less than significant impact</b> directly, indirectly and cumulatively to an emergency response or evacuation plan.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>18. TRIBAL CULTURAL RESOURCES.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>18a. Response: (Source: AB52 Consultation)</b>  <b>Potentially Significant Impact.</b> The Project may result in a <b>potentially significant impact</b> in regard to Tribal Cultural Resources, and this topic will be further analyzed in the EIR.				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>18b. Response: (Source: AB52 Consultation)</b>  <b>Potentially Significant Impact.</b> The City is in ongoing consultation with Native American Tribes related to tribal cultural resources, the potential significance of those resources, potential avoidance, minimization, and mitigation measures, as well as requests for additional analysis, including a Tribal Cultural Landscape analysis. The Project may result in a <b>potentially significant impact</b> in regard to Tribal Cultural Resources, and this topic will be further analyzed in the EIR.				
<b>19. UTILITIES AND SYSTEM SERVICES.</b> Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>19a. Response:</b>  <b>Potentially Significant Impact.</b> The Project will require construction of water, wastewater, electrical, natural gas, and telecommunication connections to existing utility lines outside of the Project site boundaries. The Project will also require stormwater drainage improvements. Thus, the potential environmental impacts from construction of these connections are evaluated as part of the proposed Project, in this Initial Study and the forthcoming EIR. As outlined in this Initial Study, the proposed Project may result in <b>potentially significant impacts</b> to the environment (aesthetics, air quality, biological resources, cultural and tribal resources, etc.), and these topics will be further analyzed in the EIR.				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>19b. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas)</b>				



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Potentially Significant Impact.</b> The Project is located within Western Municipal Water District's (WMWD) service area. WMWD would provide water for the operation of the Project. The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
c. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>19c. Response:</b> (Source: FPEIR Figure 5.16-5 - Sewer Service Areas)</p> <p><b>Potentially Significant Impact.</b> The City's Public Works Department provides for the collection, treatment, and disposal of all wastewater generated within the City through its Riverside Regional Water Quality Treatment Plant. The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
d. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>19d. Response:</b></p> <p><b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>19e. Response:</b></p> <p><b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
<p><b>20. WILDFIRE</b></p> <p>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</p>				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>20a. Response:</b></p> <p><b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>20b. Response:</b></p> <p><b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.</p>				
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
<b>20c. Response:</b>  <b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.				
d. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>20d. Response:</b>  <b>Potentially Significant Impact.</b> The Project may result in <b>potentially significant impacts</b> and this topic will be analyzed in the forthcoming EIR.				
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>21a. Response:</b>  <b>Potentially Significant Impact.</b> The proposed Project may have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
b. Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>21b. Response:</b>  <b>Potentially Significant Impact.</b> The proposed Project may have impacts that are individually limited, but cumulatively considerable. Thus, the Project may result in a <b>potentially significant impact</b> , and this topic will be further analyzed in the EIR.				
c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>21c. Response:</b>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Potentially Significant Impact.</b> The proposed Project may have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Thus, the Project may result in a <b>potentially significant impact</b>, and this topic will be further analyzed in the EIR.</p>				

**Note:** Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

**August 17, 2020**

**VIA EMAIL**

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

Dear Ms. Hernandez:

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

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

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

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

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



Veronica Hernandez

Page 2

August 17, 2020

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

Please note that Metropolitan does not allow any structures within its Property or easement. Development associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by emailing Metropolitan's Substructures Information Line at [Engineeringstructures@mwdh2o.com](mailto:Engineeringstructures@mwdh2o.com) or calling at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan's facilities, easements and properties, we have enclosed a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way". Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, Metropolitan requires that detailed design plans for any activities within the vicinity of our facilities, Property or rights-of way be submitted prior to construction for review and written approval. Approval of the proposed Project where it could impact Metropolitan's Property should be contingent on Metropolitan's approval of design plans for the proposed Project.

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

Very truly yours,

*Diane Doesserich*

Diane Doesserich

Interim Team Manager, Environmental Planning Section

DD:tsa

SharePoint\CityofRiverside\_SycamoreHills\_External Review

Enclosures:

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

# MARCH JOINT POWERS AUTHORITY



August 20, 2020

**Veronica Hernandez**

Senior Planner

City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street, 3<sup>rd</sup> Floor

Riverside, CA 92522

**RE: Notice of Preparation / Draft Program EIR – Sycamore Hills Distribution Center Project**

**Dear Ms. Hernandez:**

Thank you for the opportunity to comment on the above aforementioned project. March Joint Powers Authority staff has completed their review of **Notice of Preparation / Draft Program EIR – Sycamore Hills Distribution Center Project**.

While the proposed Sycamore Hills Distribution Center Project is not adjacent to the March Joint Powers Authority jurisdictional boundary, it is important the traffic analysis and Draft Program EIR also consider City/County designated truck routes on Alessandro Boulevard between State Route 91 Freeway and Interstate 215 Freeway; intersections at Alessandro Boulevard/Meridian Parkway, Meridian Parkway/Cactus Avenue, Meridian Parkway/Van Buren Boulevard; and Interstate 215 Freeway On/Off Ramps at Van Buren Boulevard, Cactus Avenue, Alessandro Boulevard and Eastridge Avenue.

The March Joint Powers Authority has no further comment at this time. Please let us know when the Draft Program EIR for the Sycamore Hills Distribution Center Project is available for public review and comment. If you have any questions regarding our comments or need additional information, please feel free to contact me at (951) 656-7000, or by email at, smith@marchjpa.com. Thank you.

Sincerely,

**Jeffrey M. Smith, AICP**

Senior Planner

March Joint Powers Authority



RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

233158

August 20, 2020

City of Riverside  
Planning Department  
3900 Main Street  
Riverside, CA 92522

Attention: Veronica Hernandez

Re: Sycamore Hills Distribution Center Project  
APNs 263-060-002, 263-060-024  
and 263-060- 026

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received July 31, 2020. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☒ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☐ This project involves District proposed Master Drainage Plan facilities, namely \_\_\_\_\_, \_\_\_\_\_. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- ☐ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted \_\_\_\_ Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.



Re: Sycamore Hills Distribution Center Project  
APN 263-060-002, 263-060-024  
And 263-060-026

233158

- ☐ This project is located within the limits of the District's \_\_\_\_\_ Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- ☐ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, \_\_\_\_\_. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- ☐ The District's previous comments are still valid.

#### **GENERAL INFORMATION**

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,



DEBORAH DE CHAMBEAU  
Engineering Project Manager

cc: Riverside County Planning Department  
Attn: John Hildebrand

SLJ:blm



## Fw: [External] Sycamore Hills Distribution Center

**From:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Sent:** Friday, August 21, 2020 1:23 PM

**To:** Sonya Hooker <shooker@rvacorp.com>; Ruth Villalobos <rvillalobos@rvacorp.com>; Charity Schiller <Charity.Schiller@bbklaw.com>; Brenes, Patricia <PBrenes@riversideca.gov>

**Subject:** Fwd: [External] Sycamore Hills Distribution Center

See comment received.

Get [Outlook for iOS](#)

**From:** Mauricio Alvarez <malvarez@riversidetransit.com>

**Sent:** Friday, August 21, 2020 12:11:49 PM

**To:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Subject:** RE: [External] Sycamore Hills Distribution Center

Thanks for the information Veronica. Now that you provided additional details, I would like to officially submit my comment.

RTA has reviewed the plans you have sent and have one comment:

1. An ADA compliant bus stop on Alessandro Blvd FS Vista Grande Dr (heading westbound)

---

Thanks for considering this comment.

### **Mauricio Alvarez, MBA**

Planning Analyst

Riverside Transit Agency

p: 951.565.5260 | e: [malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)

[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)

1825 Third Street, Riverside, CA 92507

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**From:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Sent:** Tuesday, August 18, 2020 1:36 PM

**To:** Mauricio Alvarez <malvarez@riversidetransit.com>

**Subject:** RE: [External] Sycamore Hills Distribution Center

Hi Mauricio, yes, it will include pedestrian crossings.

**Veronica Hernandez | Senior Planner**

951.826.3965 | [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

### **City of Riverside**

Community & Economic Development Department

Planning Division

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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

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**From:** Mauricio Alvarez <[malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)>  
**Sent:** Thursday, August 13, 2020 9:41 AM  
**To:** Hernandez, Veronica <[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)>  
**Subject:** RE: [External] Sycamore Hills Distribution Center

Thanks Veronica. Will the signal include pedestrian crossings?

**Mauricio Alvarez, MBA**

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

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**From:** Hernandez, Veronica <[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)>  
**Sent:** Monday, August 10, 2020 1:16 PM  
**To:** Mauricio Alvarez <[malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)>  
**Subject:** RE: [External] Sycamore Hills Distribution Center

Hi Mauricio,

Yes, the project proposes to install a signal at Alessandro and Vista Grande.

Please let me know if you have any other questions.

Best,

**Veronica Hernandez | Senior Planner**  
951.826.3965 | [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

**City of Riverside**

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

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

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**From:** Mauricio Alvarez <[malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)>  
**Sent:** Sunday, August 9, 2020 8:18 AM  
**To:** Hernandez, Veronica <[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)>  
**Subject:** [External] Sycamore Hills Distribution Center

Good Morning,

RTA has reviewed the plans you have sent and have one comment:

1. Any plans for a signalized intersection/crossing on Alessandro & Vista Grande Dr?

Thanks,

Thanks,

**Mauricio Alvarez, MBA**

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

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household.

[RiversideCA.gov/COVID-19](https://RiversideCA.gov/COVID-19)

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This email has been scanned by the Riverside Transit Agency Email Security System.

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This email has been scanned by the Riverside Transit Agency Email Security System.

SENT VIA E-MAIL:

August 25, 2020

[vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

Veronica Hernandez, Senior Planner

City of Riverside, Community and Economic Development Department

3900 Main Street, Third Floor

Riverside, CA 92522

**Notice of Preparation of a Draft Environmental Impact Report for the Proposed  
Sycamore Hills Distribution Center Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions, and that the areas in Riverside County within the South Coast Air Basin have a countywide population-weighted cancer risk of 223 in one million<sup>8</sup>. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>7</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>8</sup> South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Available at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>.



Reporting Plan for the 2016 Air Quality Management Plan<sup>9</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy<sup>10</sup>.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>11</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

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<sup>9</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>10</sup> Southern California Association of Governments' 2016-2040 RTP/SCS can be found at: [http://scagrtpsc.net/Documents/2016/peir/final/2016fP EIR ExhibitB\\_MMRP.pdf](http://scagrtpsc.net/Documents/2016/peir/final/2016fP EIR ExhibitB_MMRP.pdf).

<sup>11</sup> The CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC200728-04

Control Number



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



August 25, 2020  
*Sent via email*

Ms. Veronica Hernandez  
Senior Planner  
City of Riverside  
Community and Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522  
[vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

Subject: Notice of Preparation of a Draft Environmental Impact Report  
City of Riverside Planning Division  
Sycamore Hills Distribution Center Project  
State Clearinghouse No. 2020079023

Dear Ms. Hernandez:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from City of Riverside Community and Economic development, Planning Division (City) for the Sycamore Hills Distribution Center (Planning Cases: P20-0024 (EIR), P20-0025 (PM), P19-0626 (MCUP), P20-0258 (VR), P20-0282 (GE), and P19-0627 (DR)) Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

## **CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7,

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## **PROJECT DESCRIPTION SUMMARY**

The Project is located north of Alessandro Boulevard, east of Barton Street, and west of San Gorgonio Drive, in the City of Riverside, Riverside County, and encompasses Assessor Parcel Numbers (APNs): 263-060-022, 263-060-024, and 263-060-026. The Project proposes the development of two warehouse buildings and associated improvements, and a trailhead parking lot to access Sycamore Canyon Wilderness Park, which is located immediately north of the proposed Project site. A restrictive covenant, recorded in 2009 as a requirement of a U.S. Army Corps of Engineers permit for impacts to waters of the United States, is recorded over approximately 11.6 acres of the 48.64 acre Project site. The Project proposes to impact and modify the existing restrictive covenant lands via the construction of an access road which will bisect the conserved lands.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

CDFW recommends that the forthcoming DEIR address the following:

### **Assessment of Biological Resources**

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009<sup>2</sup>). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDB) in Sacramento should be contacted at (916) 322-2493 or [CNDDB@wildlife.ca.gov](mailto:CNDDB@wildlife.ca.gov) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

Please note that CDFW's CNDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential

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<sup>2</sup> Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>



to be effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines, § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service (USFWS), where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018<sup>3</sup>).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125[c]).
6. A full accounting of all mitigation/conservation lands within and adjacent to the Project. The Project proposes to impact and bisect an existing restrictive covenant and is located immediately south of the Sycamore Canyon Wilderness Park. The DEIR should fully address impacts to the existing restrictive covenant which was set aside to provide compensatory mitigation for impacts to waters of the United States associated with U.S. Army Corps of Engineers (ACOE) Section 404 Permit No. 199915206-RRS.

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to affect biological resources as a result of the Project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

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<sup>3</sup> California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plan Populations and Sensitive Natural Communities. State of California, Natural Resources Agency. Available for download at: <https://wildlife.ca.gov/Conservation/Plants>

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

Project-related impacts to the onsite restrictive covenant area and the adjacent Sycamore Canyon Wilderness Park should be fully described and discussed.

With respect to defensible space: please ensure that the DEIR fully describes and identifies the location, acreage, and composition of defensible space *within* the proposed Project footprint. Please ensure that any graphics and descriptions of defensible space associated with this project comply with City of Riverside/Riverside County Fire (or other applicable agency) regulations/ requirements. The City, through their planning processes, should be ensuring that defensible space is provided and accounted for *within proposed development areas*, and not transferred to adjacent open space or conservations lands, including the Sycamore Canyon Wilderness Park, and the onsite restrictive covenant lands.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or conservation/mitigation lands, including preserved lands associated with the MSHCP, the Sycamore Canyon Wilderness Park and the onsite restrictive covenant lands.
3. An evaluation of impacts to adjacent and onsite open space/conserved lands from both the Project and long-term operational and maintenance needs. CDFW is particularly concerned with Project-related impacts to the onsite restrictive covenant lands and the adjacent Sycamore Canyon Wilderness Park. The DEIR should include a complete and thorough evaluation of all potential Project-related impacts to the restrictive covenant and the Sycamore Canyon Wilderness Park.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. CDFW recommends that the DEIR analyze the cumulative effects of the Project on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis (including the onsite restrictive covenant lands and the adjacent Sycamore Canyon Wilderness Park).

## **Alternatives Analysis**

CDFW recommends that the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would “feasibly attain most of the basic objectives of the Project,” and would avoid or substantially lessen any of the Project’s significant effects (CEQA Guidelines § 15126.6[a]).

## **Mitigation Measures for Project Impacts to Biological Resources**

CDFW recommends that the DEIR identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The City should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends 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*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The Project is proposed immediately adjacent to the Sycamore Canyon Wilderness Park and will directly impact the onsite restrictive covenant lands. 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)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR

should include mitigation measures for adverse Project-related impacts to these resources. 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.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, for mitigation measures to be effective, they should be specific, enforceable, and feasible actions that will improve environmental conditions.

CDFW is particularly concerned that the Project proposes to permanently impact lands previously set aside as compensatory mitigation. The Initial Study (IS) identifies that the Project will construct an access road over approximately 0.67 acres of lands conserved under a restrictive covenant, effectively bisecting the conserved lands. The Project proposes to remove these 0.67 acres of impacted lands from the restrictive covenant and replace them with 1.44 acres. CDFW is concerned that the addition of this acreage is insufficient given that the Project will permanently bisect contiguous conservation lands, resulting in two smaller areas of conserved lands separated by a road. 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 requests that the City consider that the restrictive covenant was

recorded in 2009 to preserve the conservation values of the property, and per Section 14 of the restrictive covenant, the conservation values were to be maintained in-perpetuity via the implementation of long-term maintenance activities, which included the preparation and implementation of a Restoration Plan. 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 given that the conserved lands will be bisected by a road. Copies of the Restoration Plan and associated annual reports should be included in the DEIR as an appendix.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. If restoration and revegetation is proposed for sensitive plant communities of the Alkali Vernal Plain Ecosystem CDFW recommends that the Project retain a habitat restoration ecologist with experience successfully restoring these plant communities. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (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 mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it



unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

### **California Endangered Species Act**

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project; unless this Project is proposed to be a covered activity under the MSHCP. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

### **Western Riverside County Multiple Species Habitat Conservation Plan**

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per section 2800, *et seq.*, of the California

Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <http://rctlma.org/epd/WR-MSHCP>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. In order to be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP and its associated Implementing Agreement. The City of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The Project is located within the Cities of Riverside and Norco Area Plan and does not occur within the MSHCP Criteria Area. MSHCP policies and procedures that apply to the proposed Project include the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP section 6.1.2), Additional Survey Needs and Procedures for burrowing owl (MSHCP section 6.3.2), and the Guidelines Pertaining to the Urban/Wildlands Interface (MSHCP section 6.1.4).

Regardless of whether take of threatened and/or endangered species is obtained through the MSHCP or through a CESA ITP, the DEIR needs to address how the proposed Project will affect the policies and procedures of the MSHCP. Therefore, all surveys required by the MSHCP policies and procedures listed above to determine consistency with the MSHCP should be conducted and results included in the DEIR so that CDFW can adequately assess whether the Project will impact the MSHCP.

### **Lake and Streambed Alteration Program**

Based on review of the Project boundary, the Project may be subject to Notification to CDFW pursuant to Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify the project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code, § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

## **FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

## **CONCLUSION**

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the City of Riverside Community and Economic Development Department, Planning Division's Sycamore Hills Distribution Center Project (SCH No. 2020079023). CDFW recommends that the City address the comments and concerns identified in this

Ms. Veronica Hernandez, Senior Planner  
Sycamore Hills Distribution Center Project  
August 25, 2020  
Page 12 of 12

letter in the forthcoming DEIR. If you should have any questions pertaining to the comments provided in this letter, please contact Joanna Gibson, Senior Environmental Scientist, Specialist, at (909) 987-7449 or at [joanna.gibson@wildlife.ca.gov](mailto:joanna.gibson@wildlife.ca.gov).

Sincerely,

  
For Scott Wilson  
Environmental Program Manager

cc: California Department of Fish and Wildlife  
HCPB CEQA Coordinator

Office of Planning and Research, State Clearinghouse  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

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

Western Riverside County Regional Conservation Authority  
Tricia Campbell  
[tcampbell@wrcrca.org](mailto:tcampbell@wrcrca.org)

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**VIA U.S. MAIL & E-MAIL**

August 26, 2020

Veronica Hernandez  
City of Riverside, Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522  
Em: vhernandez@riversideca.gov

RE: Notice of Scoping Meeting & Preparation of a Draft Environmental  
Impact Report for the Sycamore Hills Distribution Center Project

Dear Ms. Hernandez,

On behalf of the Southwest Regional Council of Carpenters ( “**Commenter**” or “**Carpenters**”), my Office is submitting these comments on the City of Riverside’s (“**City**” or “**Lead Agency**”) Notice of Preparation of an Environmental Impact Report (“**NOP**”) (SCH No. 2020079023) for the Sycamore Hills Distribution Center Project, which proposes to construct two warehouse buildings on two numbered and three lettered parcels, on approximately 12.37 acres, with associated improvements, in the City of Riverside (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including in southern California, and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenter expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.



Commenter incorporates by reference all comments raising issues regarding the environmental impact report (“**EIR**”) submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 CA4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code § 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the Applicant to provide additional community benefits such as requiring local hire and paying prevailing wages to benefit the City. Moreover, it would be beneficial for the City to require the Applicant to hire workers: (1) who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program and; (2) who are registered apprentices in an apprenticeship training program approved by the State of California.

In addition, 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 mitigate the Project’s environmental impacts and to advance progress towards the State of California’s environmental goals.

A. 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 and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).<sup>1</sup>

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.<sup>2</sup>

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

In particular, based upon SWRCC's experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

**Construction Site Design:**

- The Project Site will be limited to two controlled entry points.

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<sup>1</sup> The CEQA Guidelines codified in Title 14 of the California Code of Regulations, section 150000 et seq, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given "great weight in interpreting CEQA< except when . . . clearly unauthorized or erroneous." (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal. 4th 204, 217.

<sup>2</sup> Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

**Testing Procedures:**

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]

- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

### **Planning**

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.<sup>3</sup>

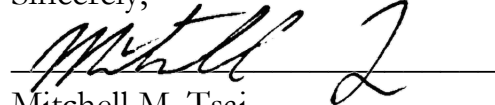
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<sup>3</sup> See also The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S Construction Sites, *available at* [https://www.cpwr.com/sites/default/files/NABTU\\_CPWR\\_Standards\\_COVID-19.pdf](https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf); Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* [https://dpw.lacounty.gov/building-and-safety/docs/pw\\_guidelines-construction-sites.pdf](https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf).

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitchell M. Tsai", is written over a horizontal line.

Mitchell M. Tsai

Attorneys for Southwest Regional  
Council of Carpenters



## Fw: [External] Case # 20-0024 / Sycamore Hills Distribution Center EIR

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**From:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Sent:** Wednesday, August 26, 2020 6:22 PM

**To:** Sonya Hooker <shooker@rvacorp.com>; Ruth Villalobos <rvillalobos@rvacorp.com>; Charity Schiller <Charity.Schiller@bbkllaw.com>; Brenes, Patricia <PBrenes@riversideca.gov>; Smith, Kristi <Ksmith@riversideca.gov>

**Subject:** FW: [External] Case # 20-0024 / Sycamore Hills Distribution Center EIR

Comment received. I spoke with Nick and let him know the TIA and VMT haven't been accepted yet but we would forward when they were complete. This is related to the previous email I sent regarding Dan DeGennaro.

**Veronica Hernandez | Senior Planner**

951.826.3965 | [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

### City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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

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**From:** nltava <nltava@nltavaconsulting.com>

**Sent:** Wednesday, August 26, 2020 5:57 AM

**To:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Subject:** [External] Case # 20-0024 / Sycamore Hills Distribution Center EIR

Ms. Hernandez,

I wanted to inform you that I have been retained by the Degennaro Family, their property may be impacted by this development, with regards to ingress and egress, existing traffic signal(s) elimination, additional traffic signal(s) added, this email can represent our official concerns and request for comment / information regarding this development. I will call you this A.M. to discuss the availability of any traffic study(s) or any other relevant traffic related reports or documents, that have been completed or any documents that justify the above mentioned traffic signal changes, thanking you in advance, Nick

Sent from my Verizon, Samsung Galaxy smartphone

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household.

[RiversideCA.gov/COVID-19](https://RiversideCA.gov/COVID-19)

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

27 Aug 2020.

Dear City of Riverside:

This letter is submitted by Friends of Riverside's Hills in connection with the proposed Sycamore Hills Distribution Center Project ("Project").

The EIR should address the following issues:

- All phases of development, as well as related developments in the area;
- An adequate discussion of the impacts associated with the Project, including a comprehensive analysis of the following impacts:
  - o Construction traffic impacts;
  - o Biological Resource impacts, including its proximity to 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");
  - o Urban/Wildlands Interface impacts, including issues outlined in the MSHCP;
  - o Aesthetic and view impacts, including its proximity to the Park;
  - o Cultural Resource impacts;
  - o Energy impacts, including mitigation options such as solar power generation;
  - o Geology and soils impacts, including the substantial amount of grading involved in the Project;
  - o Land use and planning impacts;
  - o Recreation impacts, including its proximity to the Park and the need to maintain access to the Park;
  - o Traffic impacts, including nearby streets and intersections impacts;
  - o Noise impacts, including impacts to the Park;
  - o Light impacts, including impacts to the Park;
  - o Water quality impacts, including impacts to on-site riparian areas and plans for their future management;
  - o Air quality impacts;
  - o Water supply impacts;

- o Public services impacts;
- o Wildfire impacts;
- o Utilities and services impacts;
- o Cumulative impacts; and
- o Climate Change impacts, including mitigation measures such as solar power generation;
- A reasonable range of alternatives to the Project; and
- Adequate and verifiable mitigation for impacts associated with the Project, including compliance with mitigation required by General Plan 2025 Final PEIR.

Please contact me if you have questions or need additional information.

Additionally, please ensure we are promptly provided a copy of the draft EIR and any notice regarding the Project.

Thank you for your consideration of the above.

Sincerely,

Len Nunney

Secretary, Friends of Riverside's Hills

4477 Picacho Dr, Riverside, Ca 92507.

ph: (951) 313 5386 email: [watkinshill@juno.com](mailto:watkinshill@juno.com)

## Fw: [External] Sycamore Hills Dist Center

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**From:** Hernandez, Veronica <VHernandez@riversideca.gov>

**Sent:** Tuesday, August 25, 2020 10:26 AM

**To:** Sonya Hooker <shooker@rvacorp.com>; Ruth Villalobos <rvillalobos@rvacorp.com>; Charity Schiller <Charity.Schiller@bbklaw.com>; Brenes, Patricia <PBrenes@riversideca.gov>

**Subject:** FW: [External] Sycamore Hills Dist Center

FYI email from Bill who attended the meeting.

**Veronica Hernandez** | Senior Planner

951.826.3965 | [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

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**From:** Hernandez, Veronica

**Sent:** Tuesday, August 25, 2020 10:25 AM

**To:** Bill Quisenberry <billq@lcof.net>

**Subject:** RE: [External] Sycamore Hills Dist Center

Hi Bill,

Thank you for attending the meeting. Here is the contact information for Darrell Butler:

Darrell Butler

[Dabutler128@gmail.com](mailto:Dabutler128@gmail.com)

Phone: 949-632-9892

Please let me know if you have any other questions.

Best,

**Veronica Hernandez** | Senior Planner

951.826.3965 | [vhernandez@riversideca.gov](mailto:vhernandez@riversideca.gov)

### City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street | 3<sup>rd</sup> Floor | Riverside 92522

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**From:** Bill Quisenberry <[billq@lcof.net](mailto:billq@lcof.net)>  
**Sent:** Wednesday, August 12, 2020 8:15 PM  
**To:** Hernandez, Veronica <[VHernandez@riversideca.gov](mailto:VHernandez@riversideca.gov)>  
**Subject:** [External] Sycamore Hills Dist Center

Hi Veronica:

I had just attended the scoping meeting for this project and posted a comment looking to discuss with the applicants about possible contracting. Would you be able to forward info, besides name(s) and address already disclosed in the Initial Study, regarding Mr. Butler and Mr. Khaloghli?

Much appreciated.

Regards,

**Bill Quisenberry**  
**Labor Relations Representative**

Laborers Pacific Southwest -  
Regional Organizing Coalition  
4399 Santa Anita Avenue Ste. 204  
El Monte, CA. 91731  
626-350-9403 office  
626-350-9417 fax  
626-374-7140 cell

**LiUNA!**

Laborers' International Union of North America

Protect yourself and those around you. Wear a face covering, stay home, and avoid gatherings with people outside your household.

[RiversideCA.gov/COVID-19](https://RiversideCA.gov/COVID-19)