



SYCAMORE HILLS DISTRIBUTION CENTER

Vehicle Traffic Noise Contours with Project

Figure 5.11-6

Sycamore Hills Distribution Center Project

Noise

Table 5.11-7 – Traffic Noise Levels with and without Project and Ambient Noise Increase (CNEL)

Traffic Noise Levels with and without Project and Ambient Noise Increase (CNEL)												
Roadway Segment		Existing			Year 2023				Year 2040			
		Without Project	With Project	Project-Related Increase	Without Project	With Project	Project-Related Increase	Without Project	With Project	Without Project	With Project	Project-Related Increase
Alessandro Boulevard												
Barton Street to Private Driveway		76.9	76.9	0.0	77.7	77.7	0.0	79.9	79.9	0.0	0.0	0.0
Private Driveway to Vista Grande Drive		77.2	77.2	0.0	78.0	78.1	0.1	80.2	80.2	0.0	0.0	0.0
Vista Grande Drive to San Gorgonio Drive		77.3	77.5	0.2	78.2	78.3	0.1	80.5	80.6	0.1	0.1	0.1
San Gorgonio Drive to Sycamore Canyon Boulevard		78.1	78.2	0.1	78.9	79.0	0.1	81.3	81.3	0.0	0.0	0.0
Sycamore Canyon Boulevard to I-215 Southbound Ramps		78.5	78.6	0.1	79.4	79.6	0.2	81.9	82.0	0.1	0.1	0.1
I-215 Southbound Ramps to I-215 Northbound Ramps		77.7	77.8	0.1	78.8	78.8	0.0	81.2	81.2	0.0	0.0	0.0

On-Site Generated Noise

On-site generated noise levels in the City are regulated by Chapter 7.25 of Title 7 of the City's Municipal Code (see Table 5.11-5). The Project is located adjacent to the boundary between the City of Riverside and the County of Riverside, and residential uses near the Project site are located within the County of Riverside. However, the residential noise ordinance limits in the County are the same as those in the City. In addition, according to the MSHCP, the residential noise level limits are also applicable to the Sycamore Canyon Wilderness Park and on-site conservation areas.

The primary noise sources on-site would be truck activity (idling trucks, truck trailer hitching and unhitching, back up warning beepers), parking lot activities, trash compactors, and roof-mounted HVAC units. Noise levels were modeled at a series of 45 receivers located at the adjacent residential, commercial, and public facility properties, Sycamore Canyon Wilderness Park, and on-site conservation areas. Modeled noise levels took into account grading and shielding provided by the proposed buildings as well as the existing self-storage building south of the Project site. The Project would include a number of perimeter walls and screening walls throughout the Project site. The perimeter fences and walls were incorporated into the Project's design as part of standard practices for this type of development for security and visual screening and where necessary retaining walls for the Project's proposed grading. Therefore, as the perimeter walls are part of the design, they are not considered noise mitigation.

As shown on Figure 3.0-11 – Fencing Plan, several different fences and walls will be installed with the most northern being a 42-inch cable rail theme fence along the northern property line, adjacent to the Sycamore Canyon Wilderness Park. The 42-inch cable rail theme fence will also extend along the western side of Parcel 1, and the boundaries of Parcels A and B (Restricted Property/Conservation Area). An 8-foot-high concrete screen wall will be constructed around the east, north and west sides of Building A at the outer edge of the drive aisles and parking area. A 6-foot to 8-foot-high metal fence will be placed along the outer edge of the drive aisles and parking area on the south side of Building A. An 8-foot-high metal sliding gate and 15-foot high concrete screening walls will be located on both sides of the southern end of Building A that faces Alessandro Boulevard to screen views of the dock doors and loading areas from Alessandro Boulevard.

This 8-foot-high concrete screen wall will be installed around the northeast, east, and southeast sides of Building B, at the outer edge of the drive aisles and parking areas, adjacent to the Parcel A Conservation Area. A 6-foot to 8-foot-high metal fence will be placed along the northwestern, western, and southern sides of Building B at the outer edge of the drive aisles and parking areas. To separate the Building B northern parking lot/property line and the trail head parking lot an 8-foot-high combination screening fence/wall, consisting of a 4-foot high tubular steel metal fence on top of a 4-foot high screen wall, will be installed. An 8-foot-high metal sliding gate and 15-foot high concrete screening walls will be located on the south side of Building B facing west to Barton Street to screen views of the dock doors and loading area from Barton Street.

Noise levels were modeled without and with incorporation of the 4-foot-high concrete walls. As the 4-foot high walls would provide less noise attenuation than the 8-foot-high walls, they were modeled to show the worst-case noise scenario - if the 4-foot walls provide adequate noise attenuation, then the 8-foot walls would also.

Daytime on-site generated noise contours without and with the 4-foot-high barrier are shown in Figures 5.11-7A and 5.11-7B, respectively, and nighttime contours without and with the 4-foot-high barrier are shown in Figures 5.11-8A and 5.11-8B, respectively. Future noise levels are summarized in Table 5.11-8. As shown in Table 5.11-8, daytime noise levels at the residential, commercial, and public facilities land uses (Receivers 1 through 22) and business and manufacturing zone (Receivers 28 and 29) would range from 32 to 48 dB(A) L_{eq} and nighttime noise levels would range from 25 to 42 dB(A) L_{eq} . Noise levels associated with backup warning beepers were modeled at the same set of 45 receivers. Three simultaneous beepers were modeled at the dock door areas on the western and eastern sides of Building A and at the southern side of Building B. Backup beeper noise levels at the nearby residential uses would range from 19 to 37 dB(A) L_{eq} and would not exceed the Title 7 nighttime Noise Ordinance limit of 45 dB(A) L_{eq} . Thus, noise levels would be less than the applicable daytime and nighttime Title 7 Noise Ordinance limits at the nearby residential property lines.

Moreover, daytime noise levels within the Sycamore Canyon Wilderness Park and on-site conservation areas (Receivers 23 through 27 and 30 through 45) would range from 32 to 51 dB(A) L_{eq} and nighttime noise levels would range from 30 to 45 dB(A) L_{eq} . Backup beeper noise levels at the adjacent Sycamore Canyon Wilderness Park and on-site conservation areas would range from 8 to 38 dB(A) L_{eq} and would also be less than the applicable nighttime limit of 45 dB(A) L_{eq} . As operation noise levels within the Sycamore Canyon Wilderness Park and on-site conservation areas would not exceed the applicable Title 7 residential noise level limits of 55 dB(A) L_{eq} during the daytime hours and 45 dB(A) L_{eq} during the nighttime hours, noise impacts due to on-site generated noise would be **less than significant without mitigation**.

As outlined in the Setting Section 5.11.1, a 24-hour noise measurement (Measurement 4) located at the western Project boundary at the existing terminus of Barton Street improvements and current entrance to the Sycamore Canyon Wilderness Park, was taken to provide an average noise level, and to identify the quietest and loudest noise levels. The average measured noise level during the 24-hour period was 50.2 dB(A) L_{eq} . The quietest measured hourly noise level was 45.9 dB(A) L_{eq} and occurred between 3 and 4 p.m. and the loudest hourly noise level was 54.1 dB(A) L_{eq} and occurred between 5 and 6 a.m. Nighttime average hourly noise levels (10 p.m. to 7 a.m.) ranged from 46.5 to 54.1 dB(A) L_{eq} . The noisiest night-time operations would be truck activities in and around the loading docks (idling trucks, truck trailer hitching and unhitching, including backup warning beeping), trash compactors, and HVAC units. As outlined above, modeled noise from these activities at nearby sensitive receivers, including residences on the south side of Alessandro Boulevard, the Sycamore Canyon Wilderness Park to the north, and the on-site conservation areas would not exceed the nighttime limit of 45 dB(A) L_{eq} . The following site design and setting factors all contribute to reducing operational noise from the Project site operations, during daytime and nighttime hours, to or below applicable limits: orientation of the loading docks, 8-foot-high concrete walls at the perimeter of loading dock areas and drive aisles,

setbacks from the Sycamore Canyon Wilderness Park boundary, the existing City-Wide Self Storage buildings, and the distance from loading dock areas and drive aisles to the nearest residences, located across Alessandro Boulevard to the south. As shown in Table 5.11-8, operational noise levels would be less than the applicable daytime and nighttime Title 7 Noise Ordinance limits at the nearby residential property lines and potential noise impacts are **less than significant without mitigation**.

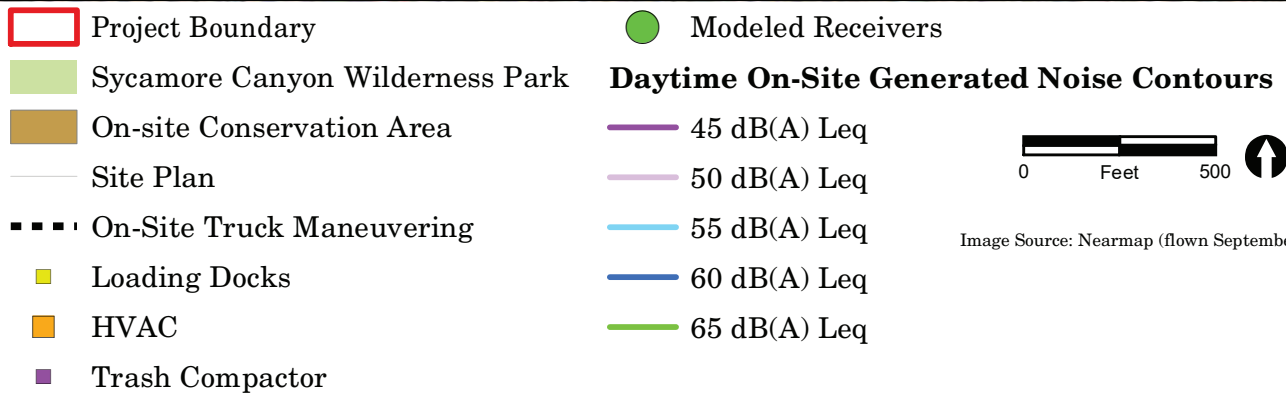
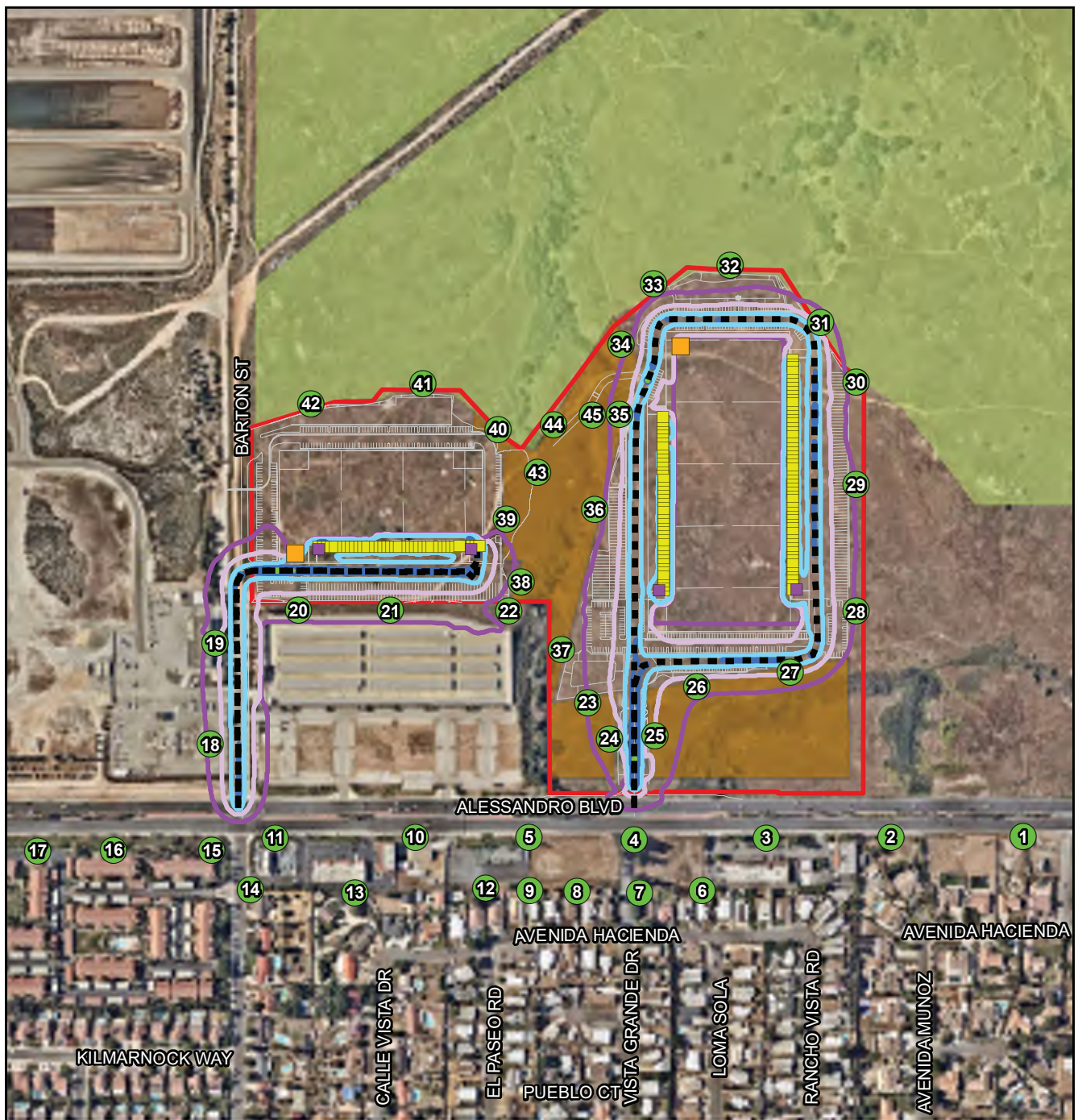
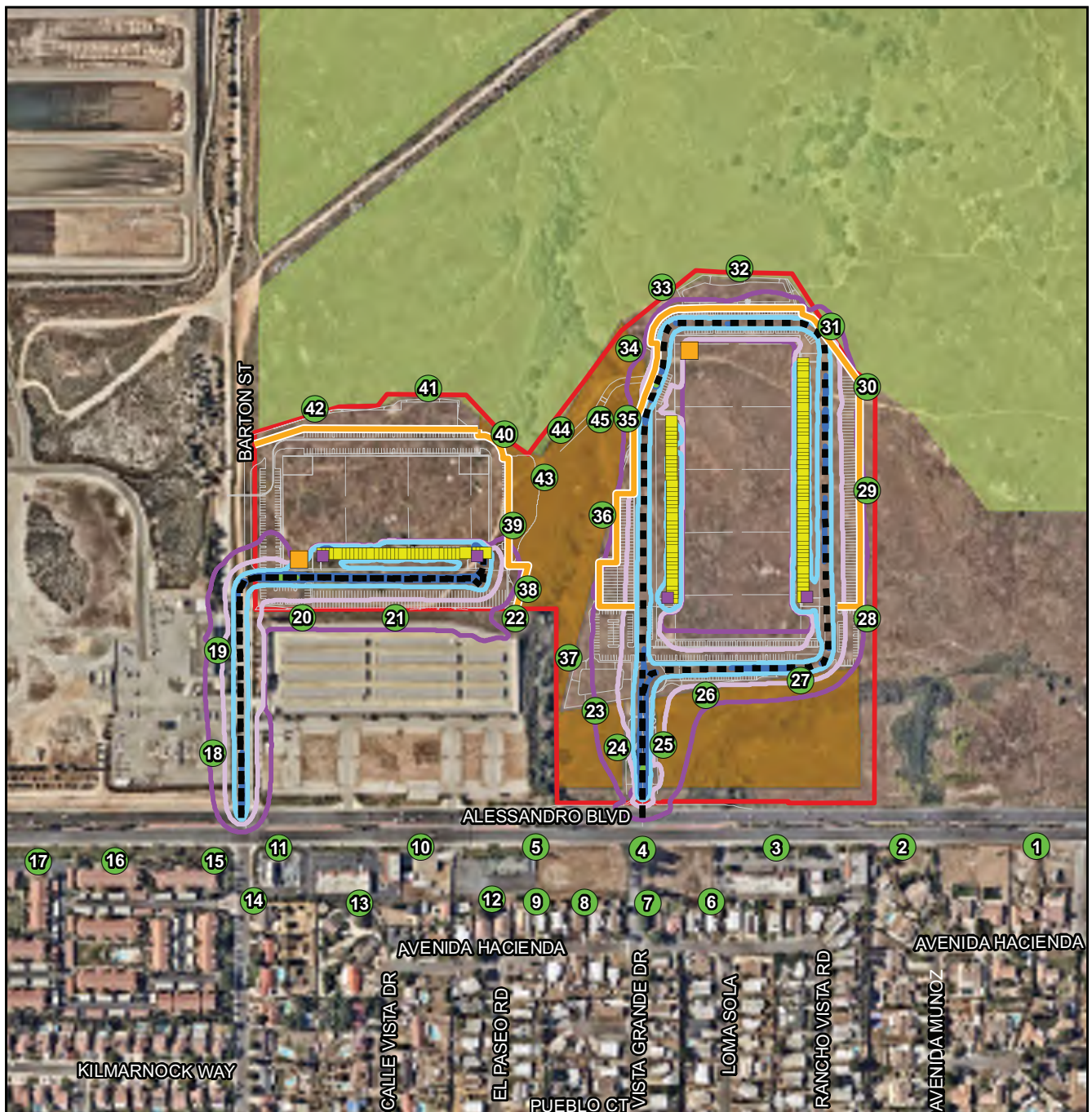


Image Source: Nearmap (flown September 2019)

SYCAMORE HILLS DISTRIBUTION CENTER

Daytime On-Site Generated Noise Contours
without 4- Foot Barrier

Figure 5.11-7A



- Project Boundary
- Sycamore Canyon Wilderness Park
- On-site Conservation Area
- Site Plan
- 4-foot Barrier
- On-Site Truck Maneuvering
- Loading Docks
- HVAC
- Trash Compactor

Modeled Receivers

Daytime On-Site Generated Noise Contours

- 45 dB(A) Leq
- 50 dB(A) Leq
- 55 dB(A) Leq
- 60 dB(A) Leq
- 65 dB(A) Leq

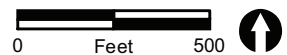
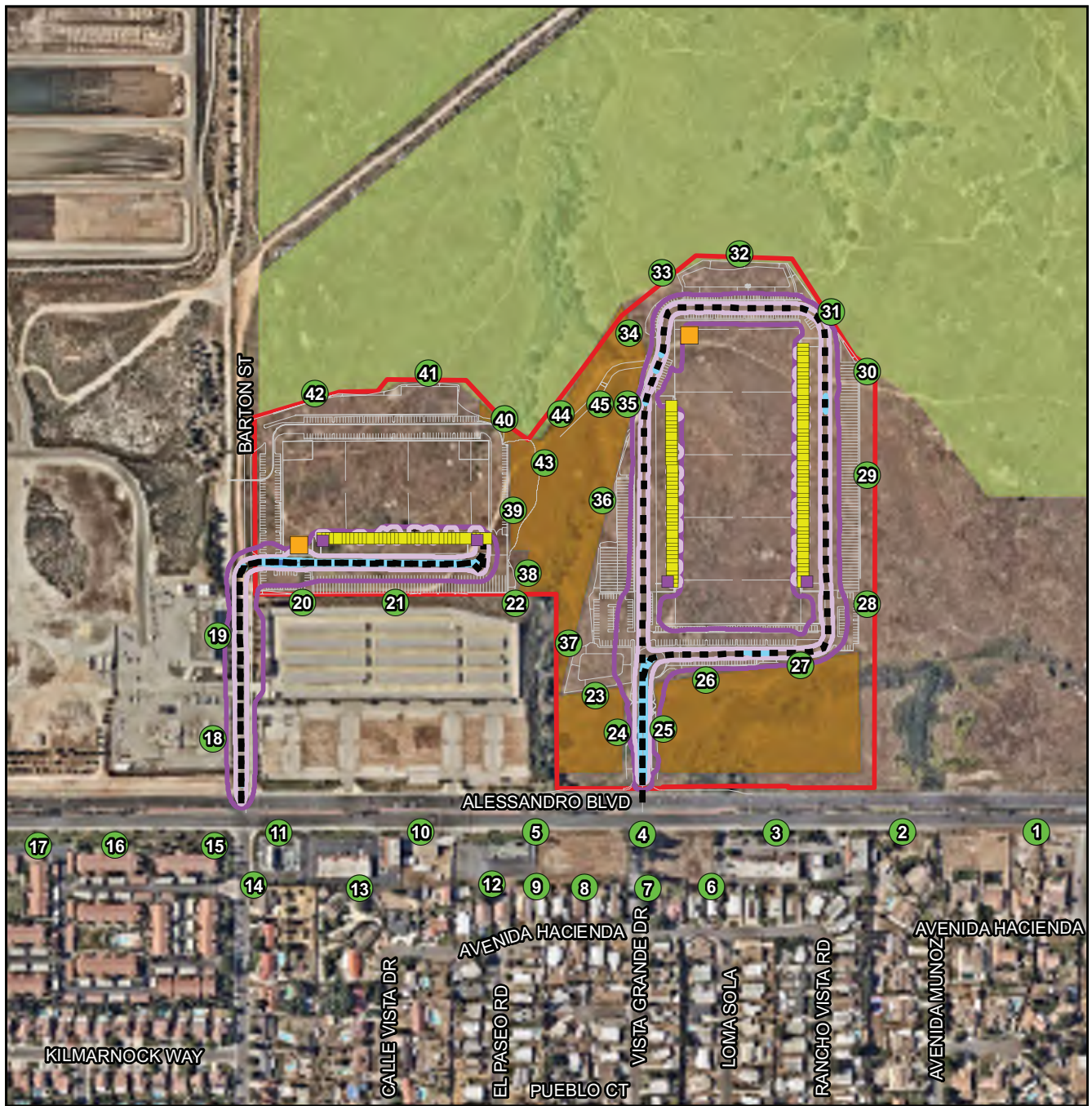


Image Source: Nearmap (flown September 2019)

SYCAMORE HILLS DISTRIBUTION CENTER

Daytime On-Site Generated Noise Contours
with 4- Foot Barrier

Figure 5.11-7B



- Project Boundary
- Sycamore Canyon Wilderness Park
- On-site Conservation Area
- Site Plan
- On-Site Truck Maneuvering
- Loading Docks
- HVAC
- Trash Compactor

● Modeled Receivers

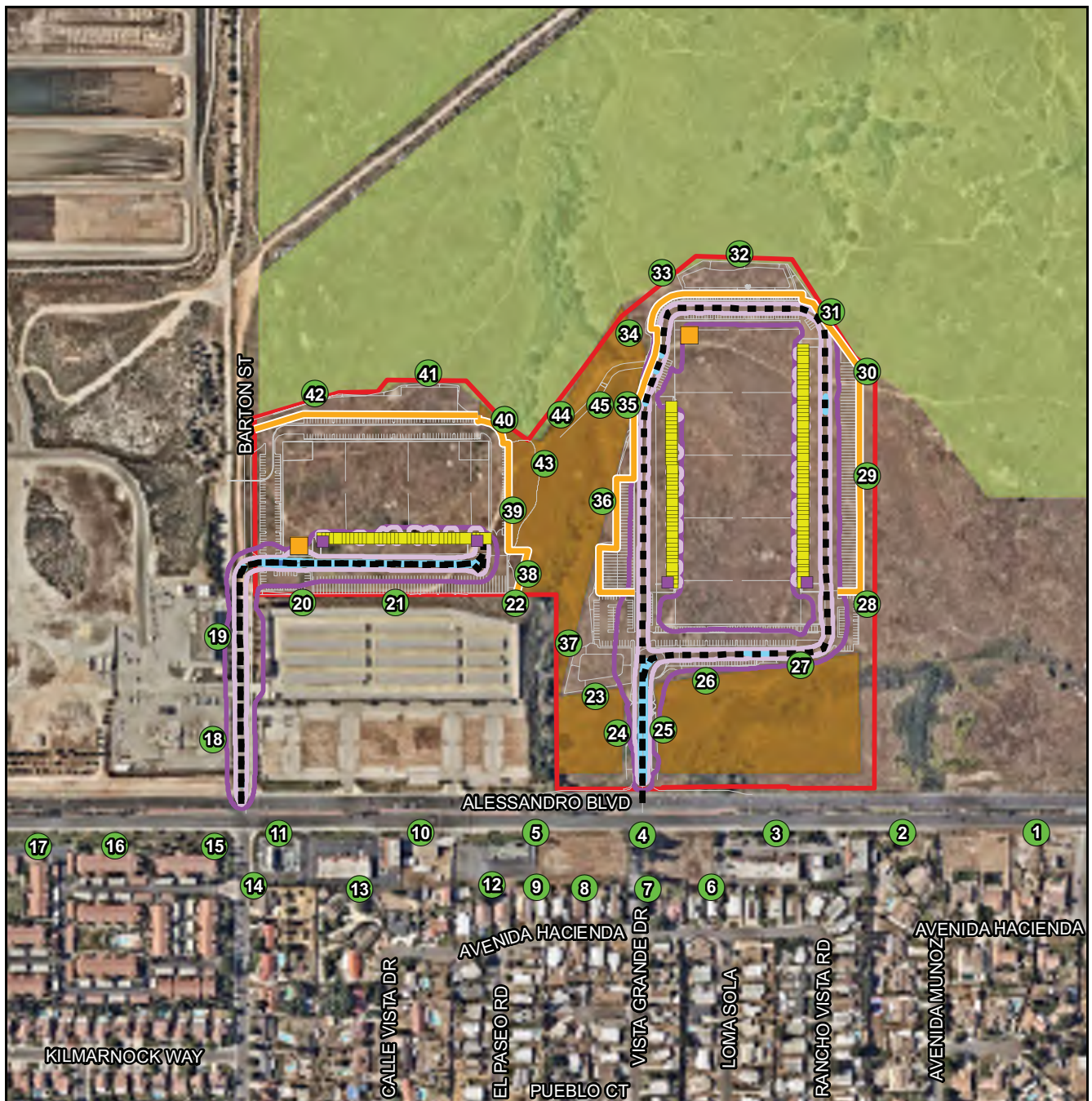
Nighttime On-Site Generated Noise Contours

- 45 dB(A) Leq
- 50 dB(A) Leq
- 55 dB(A) Leq
- 60 dB(A) Leq



Image Source: Nearmap (flown September 2019)

SYCAMORE HILLS DISTRIBUTION CENTER



- Project Boundary
- Sycamore Canyon Wilderness Park
- On-site Conservation Area
- Site Plan
- 4-foot Barrier
- On-Site Truck Maneuvering
- Loading Docks
- HVAC
- Trash Compactor

● Modeled Receivers

Nighttime On-Site Generated Noise Contours

- 45 dB(A) Leq
- 50 dB(A) Leq
- 55 dB(A) Leq
- 60 dB(A) Leq



Image Source: Nearmap (flown September 2019)

SYCAMORE HILLS DISTRIBUTION CENTER

Table 5.11-8 – Noise Levels Due to Project On-Site Operational Noise Sources

Receiver	Land Use	Daytime Noise Level [dB(A) L_{eq}]	Nighttime Noise Level [dB(A) L_{eq}]	Noise Limit Daytime/Nighttime [dB(A) L_{eq}]	Exceed Noise Limit (Daytime/Nighttime)?¹
1	Residential	32	26	55/45	No/No
2	Residential	34	28	55/45	No/No
3	Commercial	36	30	65	No/No
4	Vacant (Residential Land Use Designation)	39	33	55/45	No/No
5	Vacant (Residential Land Use Designation)	36	30	55/45	No/No
6	Residential (County)	35	29	55/45	No/No
7	Residential (County)	36	30	55/45	No/No
8	Residential (County)	35	29	55/45	No/No
9	Residential (County)	34	28	55/45	No/No
10	Commercial	34	28	65	No/No
11	Commercial	38	32	65	No/No
12	Residential (County)	34	28	55/45	No/No
13	Residential (County)	33	27	55/45	No/No
14	Residential (County)	35	29	55/45	No/No
15	Residential	37	31	55/45	No/No
16	Residential	34	28	55/45	No/No
17	Residential	32	25	55/45	No/No
18	Public Facilities	45	39	70	No/No
19	Public Facilities	47	41	70	No/No
20	Commercial	48	42	65	No/No
21	Commercial	47	40	65	No/No
22	Commercial	44	37	65	No/No
23	On-Site Conservation Area	45	39	55/45	No/No
24	On-Site Conservation Area	47	41	55/45	No/No
25	On-Site Conservation Area	50	44	55/45	No/No
26	On-Site Conservation Area	47	41	55/45	No/No
27	On-Site Conservation Area	51	45	55/45	No/No
28	Business and Manufacturing	44	39	70	No/No
29	Business and Manufacturing	45	38	70	No/No
30	Sycamore Canyon Wilderness Park	43	37	55/45	No/No
31	Sycamore Canyon Wilderness Park	46	40	55/45	No/No
32	Sycamore Canyon Wilderness Park	40	35	55/45	No/No
33	Sycamore Canyon Wilderness Park	41	35	55/45	No/No

Noise

Sycamore Hills Distribution Center Project

Receiver	Land Use	Daytime Noise Level [dB(A) L _{eq}]	Nighttime Noise Level [dB(A) L _{eq}]	Noise Limit Daytime/Nighttime [dB(A) L _{eq}]	Exceed Noise Limit (Daytime/Nighttime)? ¹
34	Sycamore Canyon Wilderness Park	42	36	55/45	No/No
35	Sycamore Canyon Wilderness Park	46	40	55/45	No/No
36	Sycamore Canyon Wilderness Park	41	35	55/45	No/No
37	Sycamore Canyon Wilderness Park	43	37	55/45	No/No
38	Sycamore Canyon Wilderness Park	43	37	55/45	No/No
39	On-Site Conservation Area	41	35	55/45	No/No
40	On-Site Conservation Area	36	30	55/45	No/No
41	On-Site Conservation Area	35	31	55/45	No/No
42	On-Site Conservation Area	32	30	55/45	No/No
43	On-Site Conservation Area	39	33	55/45	No/No
44	On-Site Conservation Area	39	33	55/45	No/No
45	On-Site Conservation Area	41	35	55/45	No/No
dB(A) = A-weighted decibels; L _{eq} = one-hour equivalent noise level					
¹ "Does the daytime/nighttime noise level exceed the daytime/nighttime noise limit?"					

Threshold B: *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction Vibration

Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and activities involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels. Vibration perception occurs primarily at structures, as people do not perceive vibrations without vibrating structures.

On-site construction equipment that would cause the most noise and vibration would be associated with the use of large bulldozers and trucks. According to Caltrans, vibration levels associated with the use of bulldozers range from approximately 0.003 to 0.089 inches per second (in/sec) PPV at 25 feet, as shown in Table 5.11-9. Per the Project's Noise Analysis, a vibration impact would generally be considered significant if it involves any construction-related or operations-related impacts in excess of 0.2 PPV. This standard is reflective of Table 2 – Reaction of People and Damage to Buildings at Various Continuous Vibration Amplitudes from the Caltrans

Transportation and Construction Vibration Guidance Manual (Caltrans 2020). Table 2 of the Guidance Manual identifies 0.2 PPV as “vibrations annoying to people in buildings” and the “threshold at which there is a risk of ‘architectural’ damage to normal dwellings – houses with plastered walls and ceilings” (Caltrans 2020).

The self-storage facility southwest of the Project site is the closest structure and is located approximately 50 feet from the Project boundary. The closest residential use is located approximately 280 feet from the southeast corner of the Project site. The groundborne vibration level at the self-storage facility due to a large bulldozer would be 0.031 PPV and the groundborne vibration level at the nearest residential use would be 0.002 PPV. As vibration levels from construction would not exceed 0.2 PPV, groundborne vibration impacts generated during construction would be **less than significant**.

Table 5.11-9 – Typical Construction Equipment Vibration Levels

Equipment	PPV at 25 feet (in/sec) ¹
Large Bulldozer	0.089
Trucks	0.076
Mounted Impact Hammer	0.089
¹ Where PPV is the peak particle velocity. Source: FTA 2006; Caltrans 2013b.	

Operational Vibration

The main source of operational groundborne vibration would be from trucks. As shown in Table 5.11-9 above, trucks generate a vibration level of 0.076 PPV at 25 feet. This vibration would attenuate to 0.027 PPV at the self-storage facility and 0.002 PPV at the nearest residential use. As vibration levels from Project operation would not exceed 0.2 PPV, groundborne vibration generated during operations would be **less than significant without mitigation**.

5.11.6 Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). As discussed in Section 5.11.5 under Threshold A above, Project construction noise levels at the adjacent Sycamore Canyon Wilderness Park and on-site conservation areas would range from 68 to 74 dB(A) L_{eq} , which would exceed the 65 dB(A) L_{eq} threshold within the Parcel A conservation area, a portion of the Parcel B conservation area, and within a portion of the Sycamore Canyon Wilderness Park. Should sensitive species be present within the Sycamore Canyon Wilderness Park and on-site conservation areas, construction noise impacts to sensitive species would be potentially significant. Thus, the following mitigation measure has been proposed to reduce potentially significant construction noise impacts to sensitive species to a less than significant level.

MM NOI-1: Prior to issuance of grading and construction activities, should least Bell’s vireo be present in the Sycamore Canyon Wilderness Park within 300 feet of the Project site, in Parcel A on-site conservation area, or within Parcel B on-site conservation area within 100 feet of the development footprint, construction noise impacts shall be minimized through implementation of the following measure:

1. A 12-foot temporary noise barrier shall be installed at the perimeter of the limits of disturbance between the construction activities and the adjacent Sycamore Canyon Wilderness Park to the north and east and the on-site conservation areas as shown in Figure 5.11-5 – Construction Barrier. The barrier shall be continuous without openings, holes, or cracks, and shall reach the ground. The barrier may be constructed with 1-inch plywood and provide a reduction of at least 10 dB(A) to ensure noise levels do not exceed 65 dB(A) L_{eq} at the Sycamore Canyon Wilderness Park and on-site conservation areas. Other barrier materials providing the same reduction shall also be permitted.
2. Heavy grade rubber mats/pads shall be used within the bed of the trucks. These mats will help attenuate initial impact noise generated when an excavator drops rock and debris into the bed of the truck. These mats must be maintained and/or replaced as necessary.
3. During all Project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.
4. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site.
5. Equipment shall be shut off and not left to idle when not in use.
6. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project site during all Project construction.
7. The Project proponent shall mandate that the construction contractor prohibit the use of music or sound amplification on the Project site during construction.
8. The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (7:00 a.m. to 6:00 p.m. on weekdays, and 8:00 a.m. to 5:00 p.m. on Saturdays).
9. The use of heavy equipment or vibratory rollers and soil compressors shall be limited along the Project boundaries to the greatest degree possible. It is acknowledged that some soil compression may be necessary along the Project boundaries.
10. Any jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded, and noise shall be directed away from sensitive receptors.
11. For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign should be posted at the Project site with the contact phone number. This sign shall be posted at the Alessandro Boulevard frontage as well as the Barton Street frontage.

5.11.7 Cumulative Environmental Effects

As discussed in Section 4.0 Environmental Setting of this DEIR, cumulative development in the City and in surrounding cities and the County would include residential development, warehouses, commercial, office, and public facilities. Each of the proposed developments would generate temporary noise during construction. Construction activities at the related projects and developments in the area would generate similar noise levels as the Project. It would be speculative to determine noise levels from construction from nearby projects because construction schedules are not known for all projects. However, construction noise and vibration are localized and rapidly attenuate within an urban environment. With implementation of mitigation measure **MM NOI-1**, the Project would not contribute to temporary cumulative construction noise impacts.

Because noise dissipates as it travels away from its sources, noise impacts associated with on-site activities and sources, including on-site truck and vehicle activity, and other stationary sources would be limited to the Project site and vicinity. Operational noise from the Project would not exceed applicable standards or significance thresholds. Therefore, on-site operation activities at the Project site, in combination with other planned and pending development, would not contribute considerable to long-term, cumulative noise or vibration impact.

Further, the primary factor affecting off-site noise levels would be increased traffic volumes, which the Project would increase on Alessandro Boulevard. However, as earlier discussed and as shown in Table 5.11-7 in Section 5.11.5 above, in opening year 2023 and horizon year 2040, direct off-site noise level increases due to the Project would be less than 1 dB in existing, year 2023, and year 2040 conditions. Thus, Project-related increases in ambient noise would not be audible and would not exceed the thresholds outlined in Section 5.11.5 as they relate to off-site traffic noise. As such, the Project would not contribute to considerable long-term cumulative noise impacts.

Because the Project and cumulative development projects will comply with current temporary and operational noise standards as identified in RMC Title 7, cumulative impacts would be **less than significant with mitigation**.

5.11.8 References

The following references were used in the preparation of this section of the DEIR:

City of Riverside 2007	City of Riverside, <i>Program Environmental Impact Report for the City of Riverside General Plan and Supporting Documents</i> , Resolution No. 21535, Certified November 2007.
Caltrans 2020	California Department of Transportation, <i>Transportation and Construction Vibration Guidance Manual</i> , April 2020. (Available at https://dot.ca.gov/programs/environmental-analysis/noise-vibration/guidance-manuals)

FTA 2006	Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment</i> , Office of Planning and Environment. FTA-VA-90-1003-06. May 2006. (Available at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf)
GP 2025	City of Riverside, <i>Riverside General Plan 2025</i> , certified November 2007 with subsequent amendments to various elements. (Available at City of Riverside and at https://www.riversideca.gov/planning/gp2025program/general-plan.asp)
GP 2025 FPEIR	City of Riverside, <i>General Plan 2025 Program Environmental Impact Report</i> (SCH #2004021108), certified November 2007. (Available at City of Riverside and at https://www.riversideca.gov/planning/gp2025program/)
MARB/IPA LUCP	Riverside County Airport Land Use Commission, <i>March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan</i> , adopted November 2014. (Available at http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)
RCALUC	Riverside County Airport Land Use Commission (Available at www.rcaluc.org)
RECON 2020	RECON, <i>Noise Analysis for the Sycamore Hills Distribution Center</i> , September 2020. (Appendix K)
Urban Crossroads 2020	Urban Crossroads, <i>Sycamore Hills Distribution Center Traffic Operations Analysis</i> , September 2020. (Appendix L)

5.12 Transportation

Based on Appendix G of the *State CEQA Guidelines*, the analysis in the Initial Study (IS/NOP) and comments received during the NOP public review comment period (Appendix A), this section describes the existing transportation network and potential effects from project implementation. The analysis in this section is based on the *Traffic Operations Analysis* (TA, Appendix L, September 2020) and the *Vehicle Miles Travelled (VMT) Analysis* prepared by Urban Crossroads (Appendix L, October 2020).

5.12.1 Setting

This section provides a summary of the existing circulation network, the City's General Plan Circulation Network, and a review of existing peak hour intersection operations, roadway segment capacities, and traffic signal warrant analyses.

Existing Circulation Network

The existing street system in the Project area consists of roadways designated in the City's General Plan 2025 (GP 2025), Circulation and Community Mobility Element, Figure CCM-4 Master Plan of Roadways as Special Boulevards, Arterial Streets, Collector Streets, and Local Streets. For streets within the Sycamore Canyon Business Park Specific Plan area, the Specific Plan Circulation Plan governs with regard to street standards. Arterial Streets provide sub-regional and local access circulation opportunities, and the Collector Streets provide connecting access from Arterial Streets with Local Streets (GP 2025, p. CCM-10). Both the I-215 and SR-60 freeways are in close proximity to the Project site. The study area includes a total of 8 existing and future intersections as shown on Figure 5.12-1. Figure 5.12-2 illustrates the study area intersections located near the proposed Project and identifies the number of through traffic lanes for existing roadways and intersection traffic controls. Table 5.12-1 indicates the location and agency jurisdiction of the intersections analyzed and shown in Figure 5.12-2. The intersections studied were those where the Project is anticipated to contribute 50 or more peak hour trips. If the Project was not anticipated to increase peak hour trips by 50 or more at other nearby intersections, they were screened out and not evaluated further in the TA.



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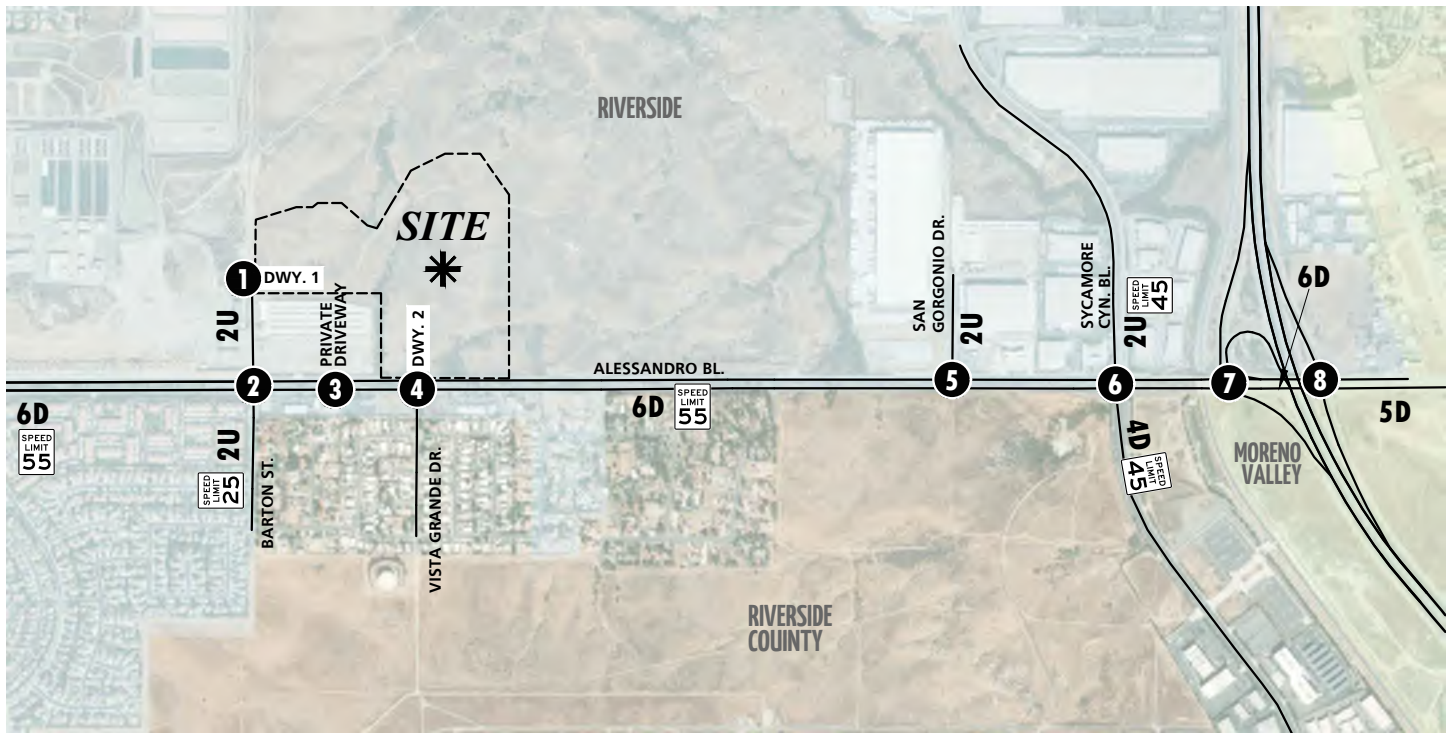
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- 0** = FUTURE INTERSECTION ANALYSIS LOCATION
- 0** = CMP INTERSECTION



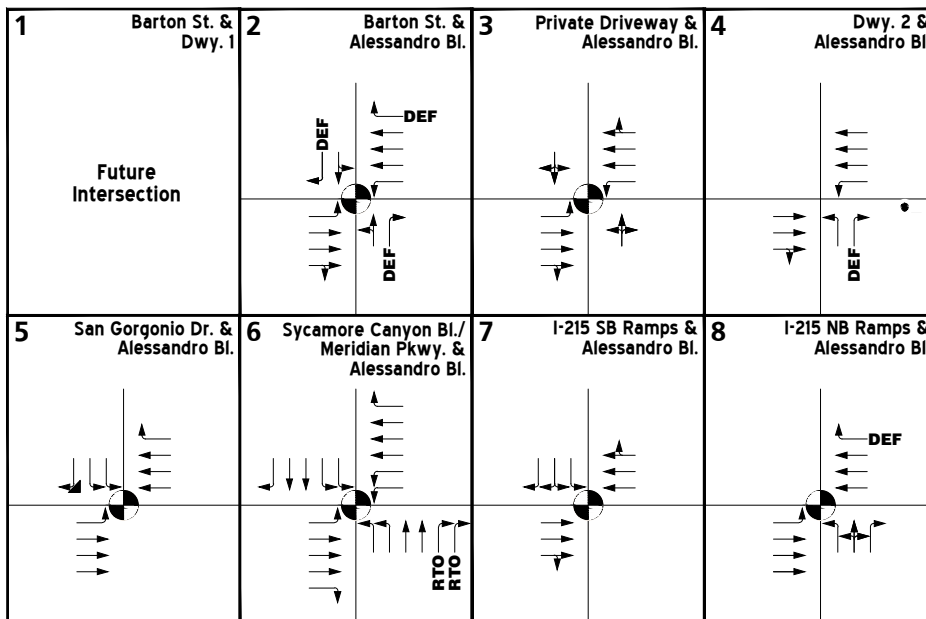
SYCAMORE HILLS DISTRIBUTION CENTER

Location Map

Figure 5.12-1



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LEGEND:

- = TRAFFIC SIGNAL
- = STOP SIGN
- 4** = NUMBER OF LANES
- D** = DIVIDED
- U** = UNDIVIDED
- RTO** = RIGHT TURN OVERLAP
- DEF** = DEFACTO RIGHT TURN
- = SPEED LIMIT (MPH)



SYCAMORE HILLS DISTRIBUTION CENTER



Existing Number of Through Lanes and
Intersection Controls

Figure 5.12-2

Table 5.12-1 – Location of the Intersection Analysis

ID	Intersection Location	Jurisdiction
1	Barton St & Driveway 1	Riverside
2	Barton St. & Alessandro Boulevard	Riverside/JPA
3	Private Driveway & Alessandro Boulevard	Riverside/JPA
4	Driveway 2/Vista Grande Dr. & Alessandro Boulevard	Riverside/JPA
5	San Gorgonio Drive & Alessandro Boulevard	Riverside/JPA
6	Sycamore Canyon Boulevard & Alessandro Boulevard	Riverside/JPA
7	I-215 SB Ramps & Alessandro Boulevard	Caltrans/Riverside/County
8	I-215 NB Ramps & Alessandro Boulevard	Caltrans/Riverside/County

City of Riverside General Plan Circulation Element

As noted previously, the Project site is located within the City of Riverside (Riverside). However, the study area includes intersections that share borders with the neighboring jurisdictions of the County of Riverside (County), the March Joint Powers Authority (March JPA), the City of Moreno Valley, and California Department of Transportation (Caltrans).

City of Riverside

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified in the City General Plan Circulation Element are shown on Figure 5.12-3 and Figure 5.12-4 illustrates the City of Riverside General Plan roadway cross-sections.

County of Riverside

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified in the County General Plan Circulation Element are shown on Figure 5.12-5 and Figure 5.12-6 illustrates the County General Plan roadway cross-sections.

March JPA

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified on the March JPA General Plan Circulation Element, are described subsequently. Figure 5.12-7 shows the March JPA General Plan Circulation Element and Figure 5.12-8 illustrates the March JPA General Plan roadway cross-sections. March JPA Resolution 16-05 had minor amendments to General Plan Transportation Element.

City of Moreno Valley

The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, as identified on the City of Moreno Valley General Plan Circulation Element are shown on Figure 5.12-9 and Figure 5.12-10 illustrates the City of Moreno Valley General Plan roadway cross-sections.

Truck Routes

While the City's General Plan recognizes the trucking industry and the importance of the region's role in the movement of goods, there are no truck routes defined within the City. The March JPA designated truck route map is shown on Figure 5.12-11. The I-215 freeway, Alessandro Boulevard, west of the I-215 freeway to San Geronio Drive, and Meridian Parkway are all identified as designated truck routes.

Transit Services

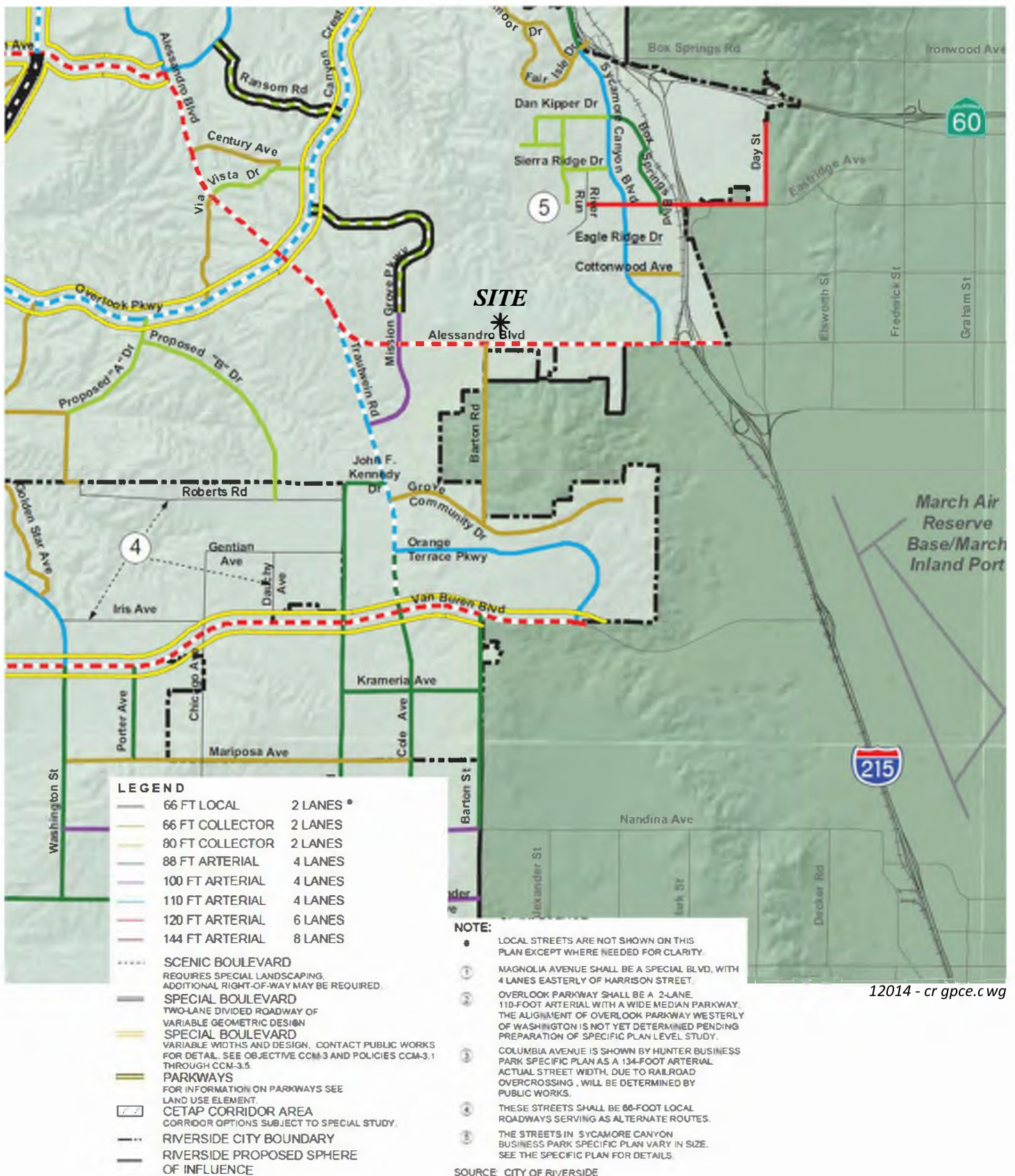
The study area within the City and the surrounding County of Riverside and City of Moreno Valley are currently served by the Riverside Transit Authority (RTA), a public transit agency serving various jurisdictions within Riverside County. The existing bus routes provided within the area by RTA are shown on Figure 5.12-12.

RTA Routes 20 and 26 could potentially serve the Project as it currently operates along Alessandro Boulevard to the south of the Project site. Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

It should also be noted that the Moreno Valley/March Field Metrolink Station is located on Meridian Parkway.

Bicycle & Pedestrian Facilities

Field observations conducted in October 2018 indicate nominal pedestrian and bicycle activity within the study area. Existing pedestrian facilities within the study area are shown on Figure 5.12-13. There are currently Class II bike lanes along Alessandro Boulevard and Meridian Parkway within the study area. Class II bikeways are bike lanes which are established adjacent to traffic lanes and share the same roadway. Existing sidewalks are currently in place along the Alessandro Boulevard on the north and south side of the street.



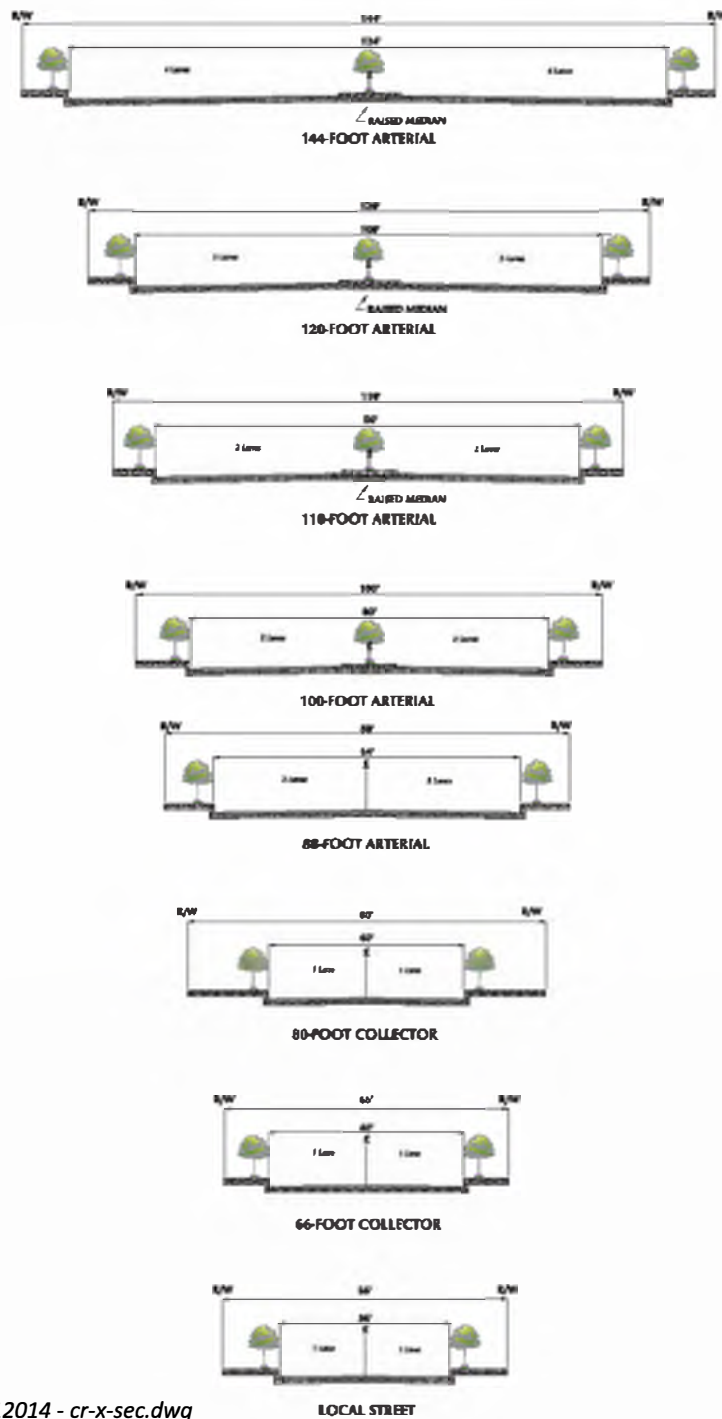
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City of Riverside General Plan
Circulation Element

Figure 5.12-3



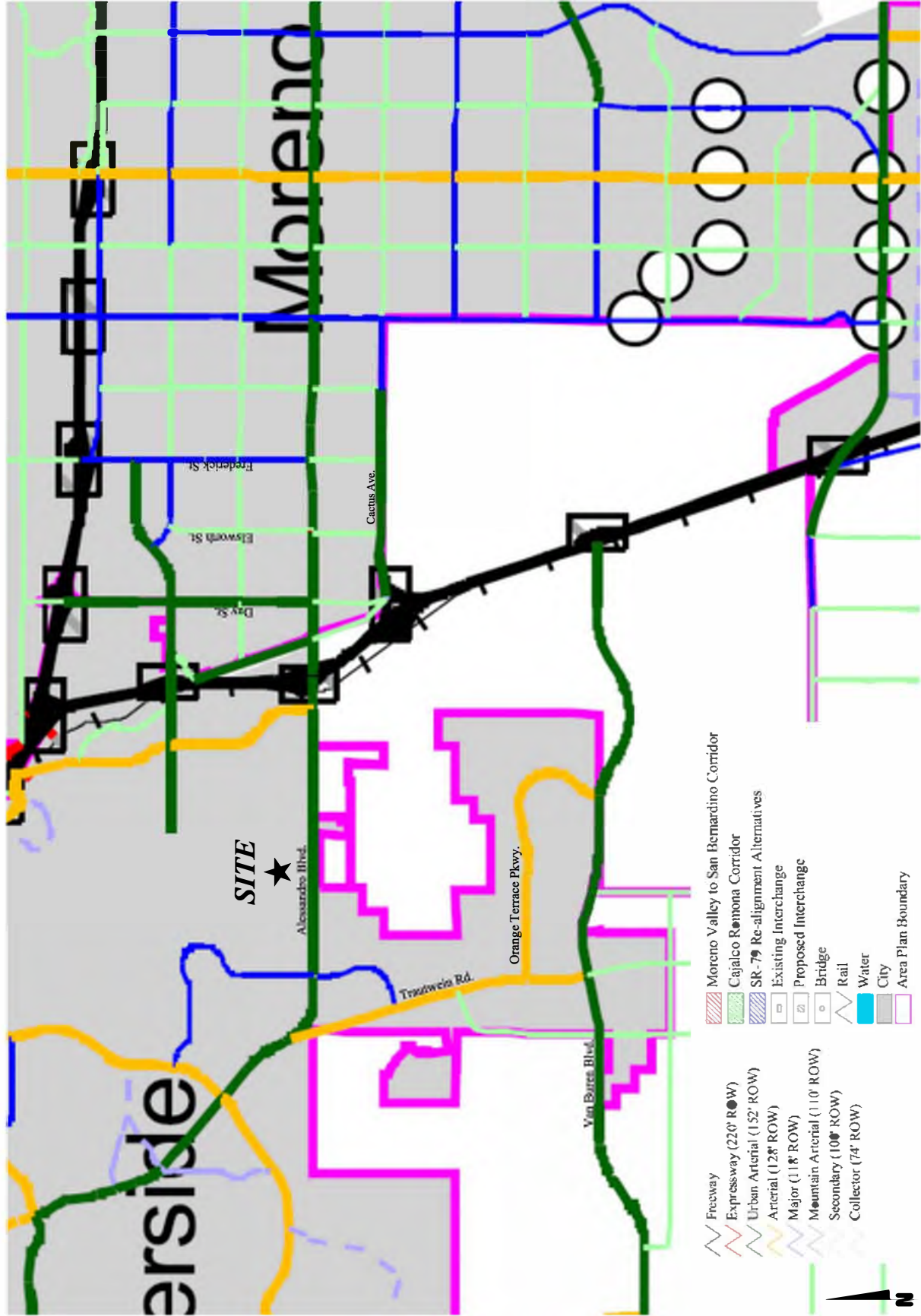
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City of Riverside General Plan Roadway
Cross-Sections

Figure 5.12-4



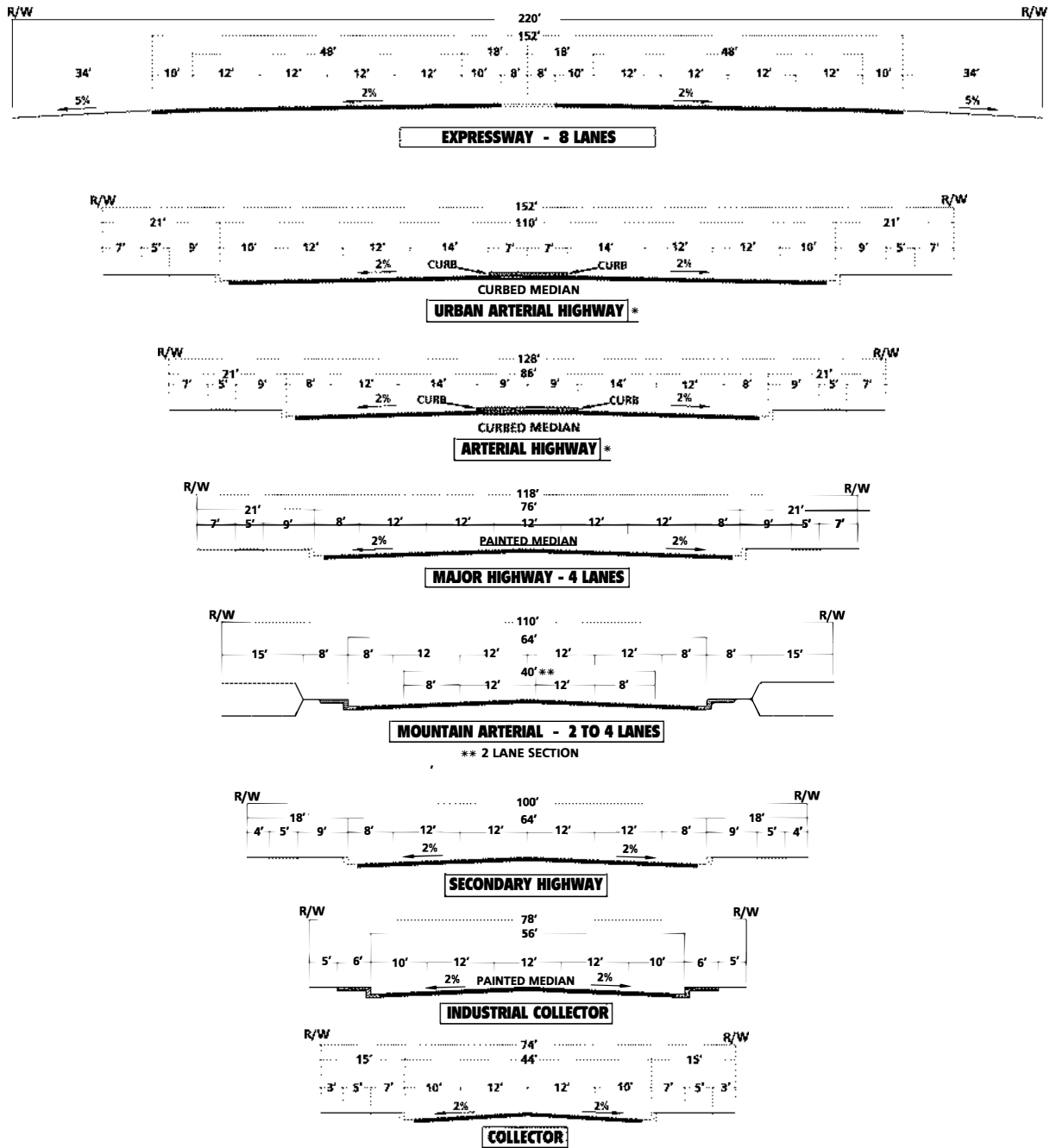
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County of Riverside General Plan Circulation Element

Figure 5.12-5



* IMPROVEMENTS MAY BE RECONFIGURED TO ACCOMMODATE EXCLUSIVE TRANSIT LANES OR ALTERNATIVE LANE ARRANGEMENTS. ADDITIONAL RIGHT OF WAY MAY BE REQUIRED AT INTERSECTIONS TO ACCOMMODATE ULTIMATE IMPROVEMENTS FOR STATE HIGHWAYS SHALL CONFORM TO CALTRANS DESIGN STANDARDS.

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NOT TO SCALE

SOURCE: COUNTY OF RIVERSIDE

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County of Riverside General Plan
Roadway Cross-Section

Figure 5.12-6



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Legend

- | | |
|---------------------------------|-----------------------|
| Arterial Highway | Roundabout |
| Arterial/Urban Arterial Highway | Enhanced Intersection |
| Emergency Access | Freeway Interchange |
| Industrial Collector | |
| Secondary Highway | |
| March JPA Planning Area | |

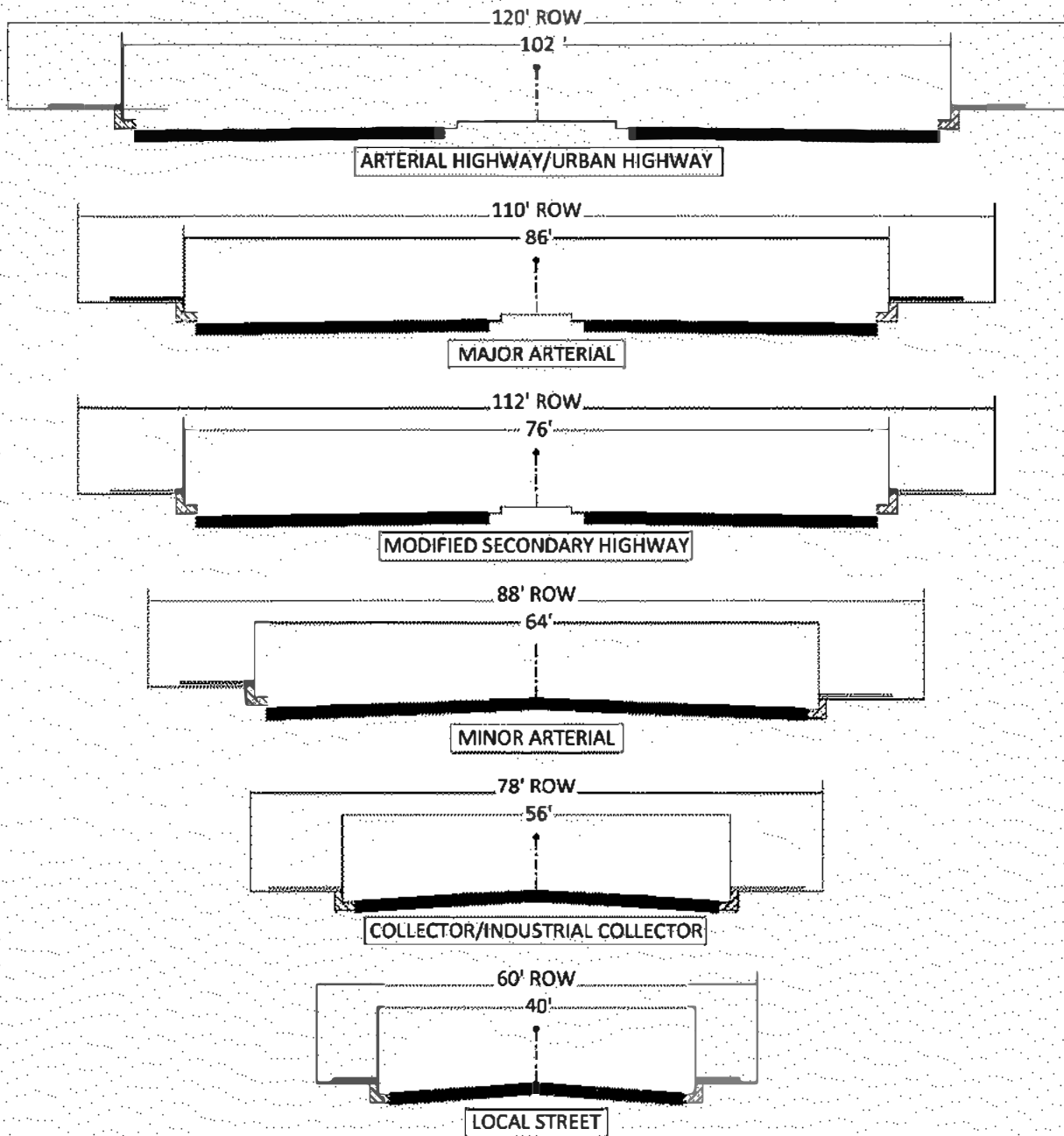


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March JPA General Plan Circulation Element

Figure 5.12-7





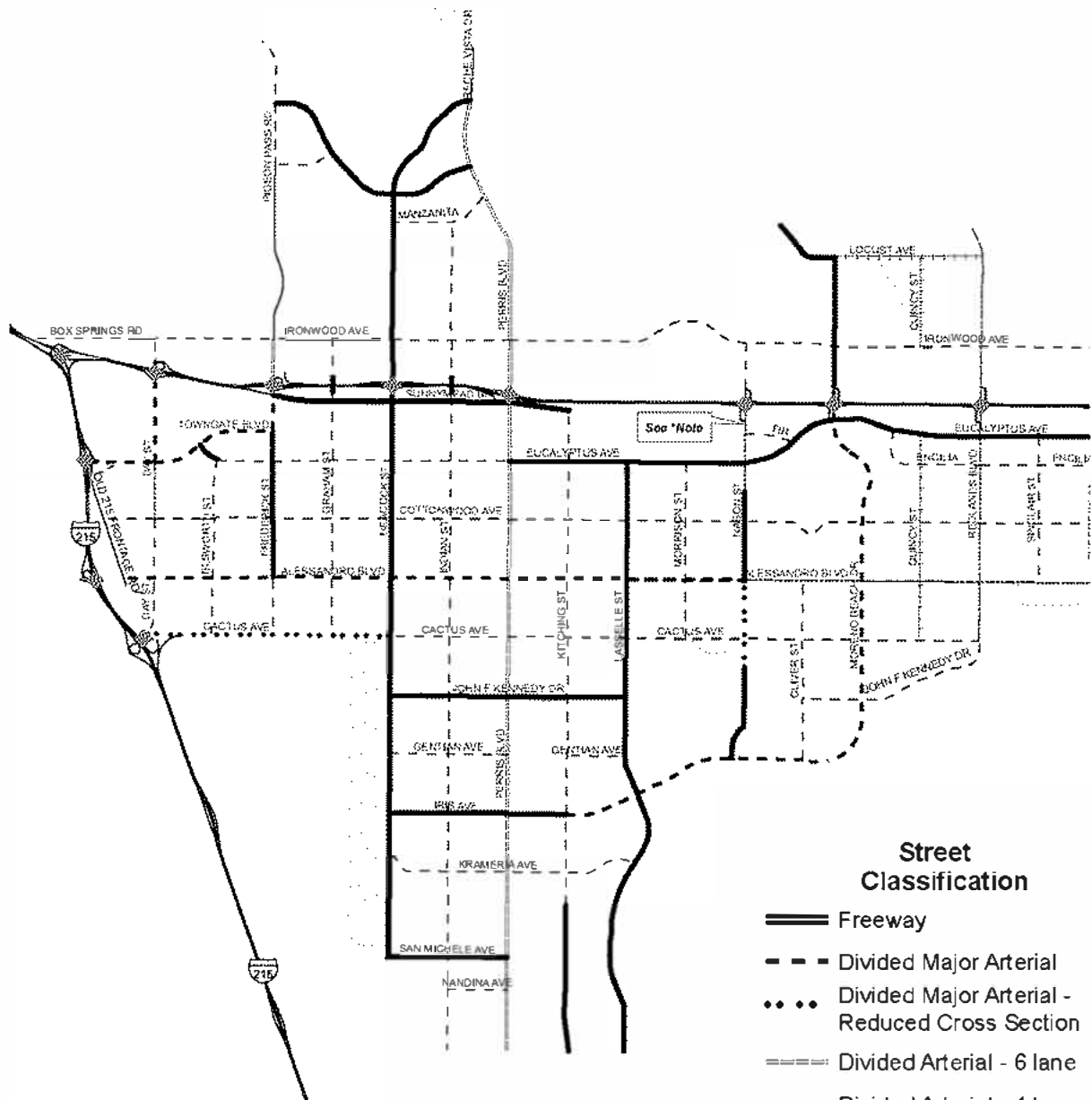
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March JPA General Plan Roadway
Cross-Section

Figure 5.12-8

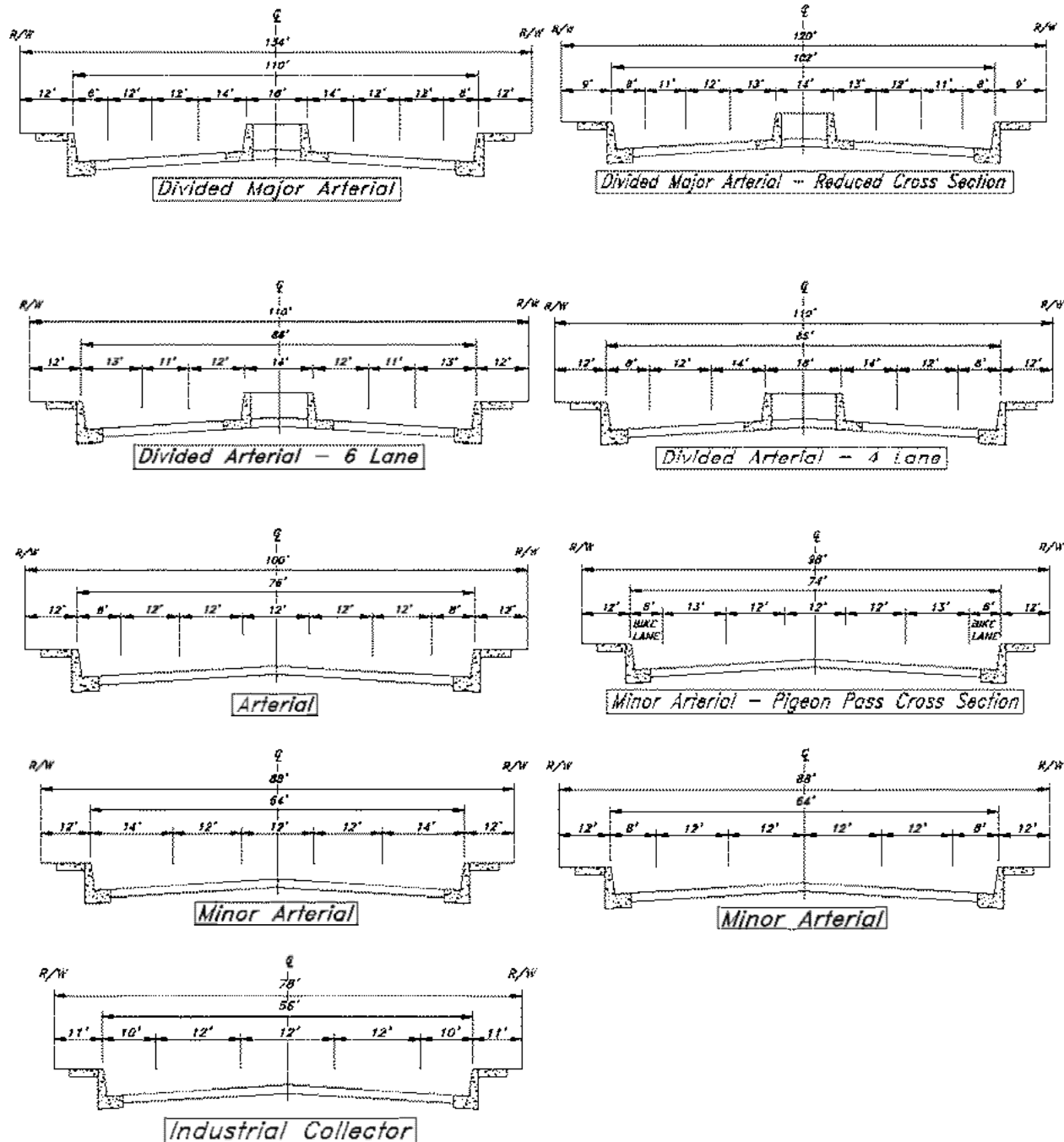


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City of Moreno Valley General Plan
Circulation Element

Figure 5.12-9



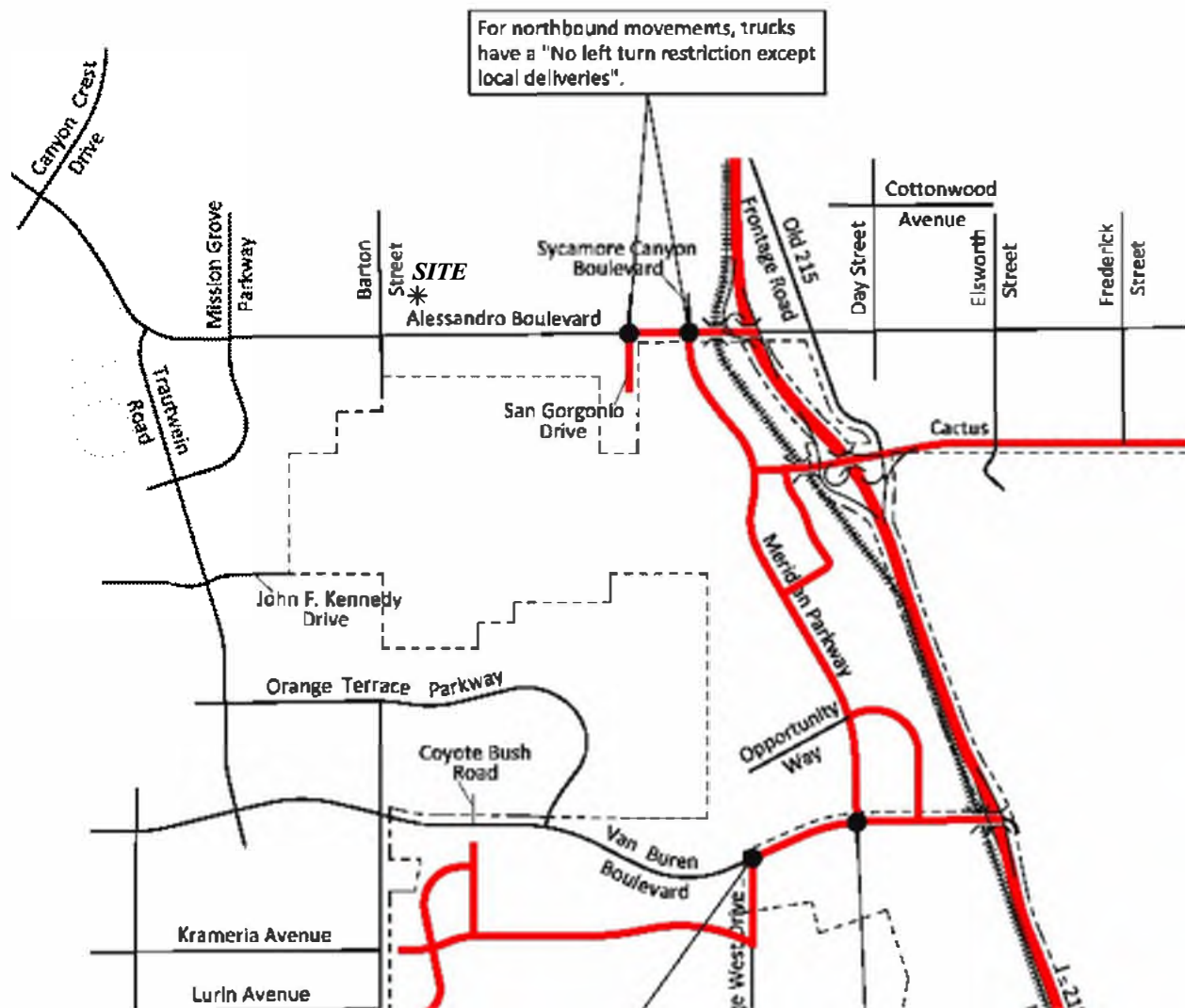
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City of Moreno Valley General Plan Roadway
Cross-Section

Figure 5.12-10



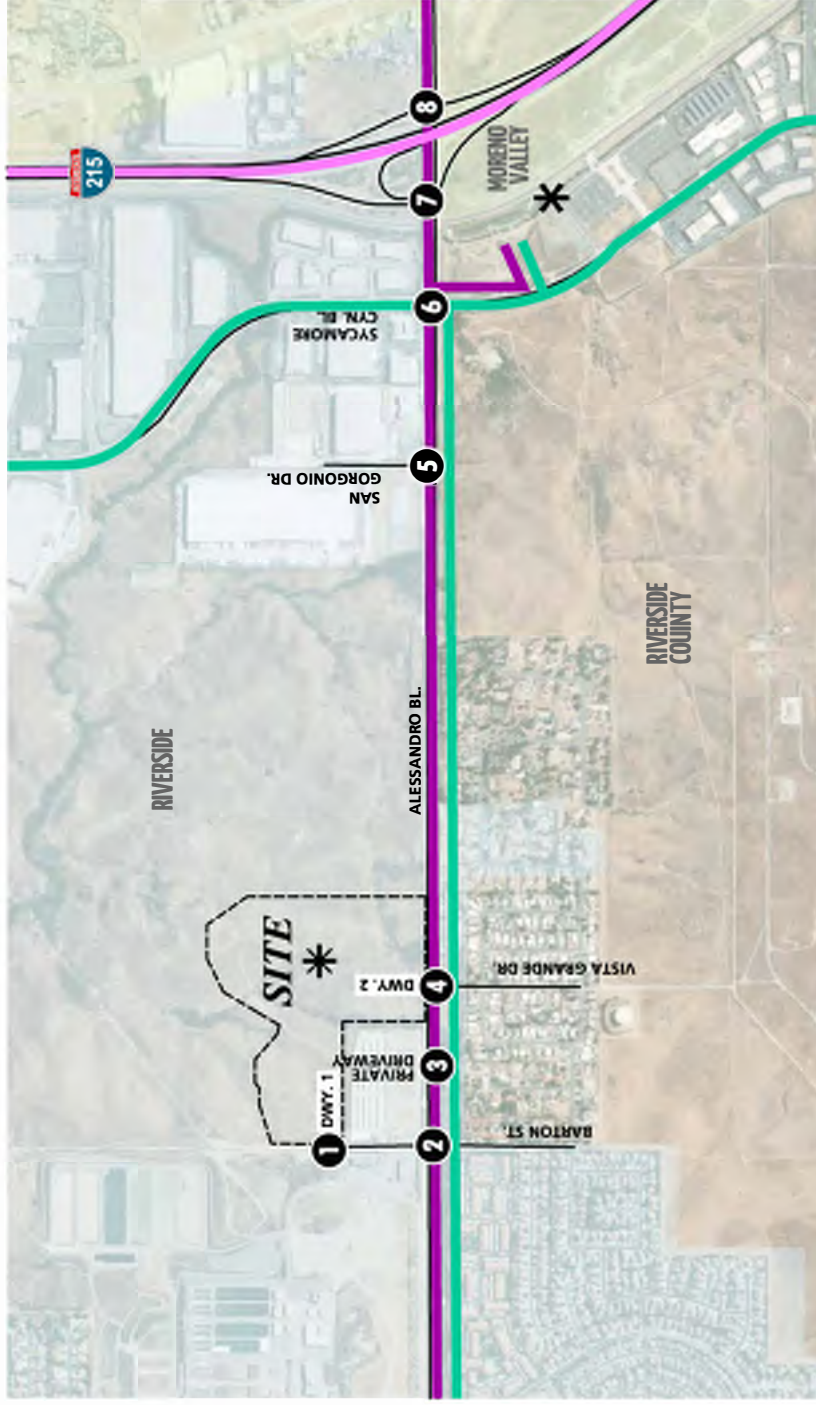


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March JPA Truck Routes

Figure 5.12-11



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LEGEND:

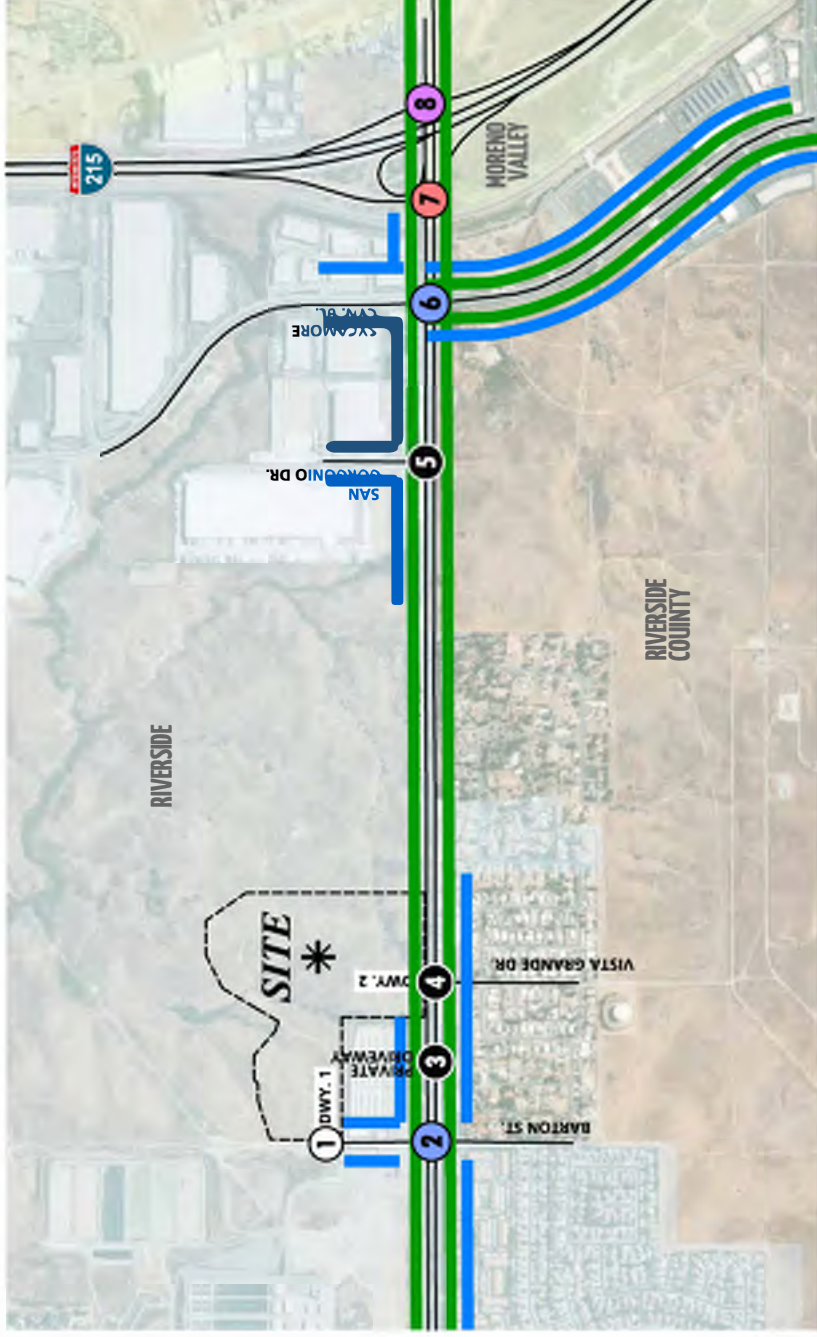
- = RTA ROUTE 22
- = RTA ROUTE 20
- = RTA ROUTE 26
- = RTA ROUTE 208/212

* MORENO VALLEY/MARCH FIELD METROLINK STATION.

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Existing Transit Routes

Figure 5.12-12



LEGEND:

- SIDEWALK
- BIKE LANE
- B BUS STOP
- NO CROSSWALK
- FUTURE INTERSECTION
- CROSSWALK ON ALL APPROACHES
- CROSSWALK ON THREE APPROACHES
- CROSSWALK ON TWO APPROACHES
- CROSSWALK ON ONE APPROACH



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Existing Pedestrian Facilities

Figure 5.12-13



5.12.2 Methodology

This section of the report presents the methodologies used to perform the traffic analyses summarized in the TA. The methodologies described are consistent with City traffic study guidelines.

Levels of Service

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

Intersection Capacity Analysis

The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The Highway Capacity Manual (HCM) methodology expresses the LOS at an intersection in terms of delay time for the various intersection approaches. The HCM uses different procedures depending on the type of intersection control. Study area intersections located within the City, County, and City of Moreno Valley have been analyzed using the software package Synchro (Version 10).

Signalized Intersections

City of Riverside, March JPA, City of Moreno Valley, County of Riverside

The City, March JPA, City of Moreno Valley, and County require signalized intersection operations analysis based on the methodology described in the HCM. Intersection LOS operations are based on an intersection's average control delay. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 5.12-2.

Table 5.12-2 – Signalized Intersection LOS Thresholds

Description	Average Control Delay (Seconds), V/C ≤ 1.0	LOS, V/C ≤ 1.0	LOS, V/C > 1.0
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A	F
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B	F
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C	F
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D	F
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E	F
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths	80.01 and up	F	F
Source: HCM			

Study area intersections located within the City, March JPA, and City of Moreno Valley have been analyzed using the software package Synchro (Version 10).

The peak hour traffic volumes have been adjusted using a peak hour factor (PHF) to reflect peak 15-minute volumes. Common practice for LOS analysis is to use a peak 15-minute rate of flow. However, flow rates are typically expressed in vehicles per hour. The PHF is the relationship between the peak 15-minute flow rate and the full hourly volume (e.g. $PHF = [Hourly Volume] / [4 \times Peak\ 15\text{-minute Flow Rate}]$). The use of a 15-minute PHF produces a more detailed analysis as compared to analyzing vehicles per hour. It is unlikely that the PHF would decrease from their current values and would more likely increase. However, in an effort to conduct a conservative analysis and overstate as opposed to understate potential traffic impacts, existing PHFs have been used for all analysis scenarios.

Caltrans

Per the Caltrans Guide for the Preparation of Traffic Impact Studies, the traffic modeling and signal timing optimization software package Synchro (Version 10) has also been utilized to analyze signalized intersections under Caltrans' jurisdiction, which include interchange to arterial ramps (i.e. I-215 freeway ramps at Alessandro Boulevard). Synchro is a macroscopic traffic software program that is based on the signalized intersection capacity analysis as specified in the HCM. Macroscopic level models represent traffic in terms of aggregate measures for each movement at the study intersections. Equations are used to determine measures of effectiveness such as delay and queue length. The level of service and capacity analysis performed by Synchro takes into consideration optimization and coordination of signalized intersections within a network. Signal timing for the freeway arterial-to-ramp intersections have been obtained from Caltrans District 8 and were utilized for the purposes of this analysis.

Unsignalized Intersections

The City, March JPA, City of Moreno Valley, and County of Riverside require the operations of unsignalized intersections be evaluated using the methodology described the HCM. The LOS rating is based on the weighted average control delay expressed in seconds per vehicle, see Table 5.12-3.

Table 5.12-3 – Unsignalized Intersection LOS Thresholds

Description	Average Control Delay Per Vehicle (Seconds)	LOS, V/C ≤ 1.0	LOS, V/C > 1.0
Little or no delays.	0 to 10.00	A	F
Short traffic delays.	10.01 to 15.00	B	F
Average traffic delays.	15.01 to 25.00	C	F
Long traffic delays.	25.01 to 35.00	D	F
Very long traffic delays.	35.01 to 50.00	E	F
Extreme traffic delays with intersections capacity exceeded.	>50.00	F	F
Source: HCM			

At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. For all-way stop controlled intersections, LOS is computed for the intersection as a whole.

Roadway Segment Capacity Analysis

Roadway segment operations have been evaluated using the City Roadway Capacity provided in the City Traffic Impact Analysis Preparation Guide. The City requires LOS D capacities to be maintained on City roadways. The daily roadway segment capacities for each type of roadway are summarized in Table 5.12-4. These roadway capacities are “rule of thumb” estimates for planning purposes and are affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic), and pedestrian bicycle traffic. As such, where the average daily traffic (ADT) based roadway segment analysis indicates a deficiency (unacceptable LOS), a review of the more detailed peak hour intersection analysis and progression analysis are undertaken. The more detailed peak hour intersection analysis explicitly accounts for factors that affect roadway capacity. Therefore, roadway segment widening is typically only recommended if the peak hour intersection analysis indicates the need for additional through lanes.

Table 5.12-4 – Roadway Segment Capacity LOS Thresholds

Facility Type	Levels of Service Capacity ¹		
	C	D	E
Local	2,500-2,799	2,800-3,099	3,100+
Collector (66' or 80')	9,900-11,199	11,200-12,499	12,500+
Arterial	14,000-16,199	16,200-17,999	18,000+
Arterial (88')	16,800-19,399	19,400-21,199	22,000+
Arterial (100')	26,200-29,599	29,600-32,999	33,000+
Arterial (120')	38,700-44,099	44,100-49,499	49,500+
Arterial (144')	50,600-57,799	57,800-64,999	65,000+
¹ Source: Exhibit D of the City of Riverside Traffic Impact Analysis Preparation Guide All capacity exhibits are based on optimum conditions and are intended as guidelines for planning purposes only.			

Freeway Off-Ramp Queuing Analysis

The study area for the TA includes the freeway-to-arterial interchange of the I-215 freeway at Alessandro Boulevard off-ramps. Consistent with Caltrans requirements, the 95th percentile queuing of vehicles has been assessed at the off-ramps to determine potential queuing impacts at the freeway ramp intersections on Alessandro Boulevard. Specifically, the queuing analysis is

utilized to identify any potential queuing and “spill back” onto the I-215 freeway mainline from the off-ramps.

Traffic Signal Warrant Analysis Methodology

The term "signal warrants" refers to the list of established criteria used by the Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. This TA uses the signal warrant criteria presented in the latest edition of the Caltrans California Manual on Uniform Traffic Control Devices (CA MUTCD) for all unsignalized study area intersections.

The signal warrant criteria for the existing study area intersections are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The CA MUTCD indicate that the installation of a traffic signal should be considered if one or more of the signal warrants are met. Specifically, the TA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing traffic conditions. Warrant 3 is appropriate to use for the TA because it provides specialized warrant criteria for intersections with urban characteristics (e.g. located in communities with populations of more than 10,000 persons or with adjacent major streets operating below 40 miles per hour). For the purposes of the study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection.

Future unsignalized intersections, that currently do not exist, were assessed regarding the potential need for new traffic signals based on future ADT volumes, using the Caltrans planning level ADT-based signal warrant analysis worksheets.

As shown on Table 5.12-5, traffic signal warrant analyses were performed for the following unsignalized study area intersections operating at LOS E or F during the peak weekday conditions wherein the Project is anticipated to contribute the highest trips:

Table 5.12-5 – Traffic Signal Warrant Analysis Location

ID	Intersection Location	Jurisdiction
1	Barton St & Driveway 1	Riverside
3	Private Driveway & Alessandro Boulevard (<i>currently signalized</i>)	Riverside
4	Driveway 2/Vista Grande Dr. & Alessandro Boulevard	Riverside

It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should

also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

Minimum LOS

The definition of an intersection deficiency has been obtained from each of the applicable surrounding jurisdictions.

City of Riverside

The City General Plan states the City will strive to maintain LOS D or better on arterial streets wherever possible. At some key locations, such as City arterial roadways, which are used as freeway bypass by regional through traffic and at heavily traveled freeway intersections, LOS E may be acceptable as determined on a case-by-case basis. Locations that may warrant the LOS E standard include portions of Arlington Avenue/Alessandro Boulevard, Van Buren Boulevard throughout the City, portions of La Sierra Avenue, and selected freeway interchanges. A higher standard, such as LOS C or better, may be adopted for Local and Collector streets in residential areas. The City recognizes that along key freeway feeder segments during peak commute hours, LOS F may be expected due to regional travel patterns. A minimum LOS utilized for the purposes of the TA analysis was LOS D.

March JPA

As identified in the City Traffic Impact Study Preparation Guide (August 3, 2011) all intersections within the City Planning Area shall operate at LOS D or better with limiting circumstances of LOS E to occur. LOS E may also be allowed to the extent that would support transit-oriented development (TOD) and walkable communities. LOS E is also acceptable during peak hours at interchange ramp intersections where ramp metering occurs. The Project is not proposed to be a TOD and neither the Alessandro Boulevard on-ramps are currently metered; as such, the minimum LOS utilized for the purposes of the analysis is LOS D.

City of Moreno Valley

The Minimum LOS for the City of Moreno Valley is LOS D for intersections that are adjacent to freeway on/off ramps, and/or adjacent to employment generating land uses. LOS C is applicable to all other intersections. Boundary intersections are assumed to be LOS D.

County of Riverside

County General Plan Policy C 2.1 states that the following minimum target levels of service have been designated for the review of development proposals in the unincorporated areas of Riverside County:

- LOS C shall apply to all development proposals in any area of the Riverside County not located within the boundaries of an Area Plan, as well those areas located within the following Area Plans: REMAP, Eastern Coachella Valley, Desert Center, Palo Verde

Valley, and those non- Community Development areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans.

- LOS D shall apply to all development proposals located within any of the following Area Plans: Eastvale, Jurupa, Highgrove, Reche Canyon/Badlands, Lakeview/Nuevo, Sun City/Menifee Valley, Harvest Valley/Winchester, Southwest Area, The Pass, San Jacinto Valley, Western Coachella Valley and those Community Development Areas of the Elsinore, Lake Mathews/Woodcrest, Mead Valley and Temescal Canyon Area Plans. LOS E may be allowed by the Board of Supervisors within designated areas where transit-oriented development and walkable communities are proposed.

Notwithstanding the forgoing minimum LOS targets, the Board of Supervisors may, on occasion by virtue of their discretionary powers, approve a project that fails to meet these LOS targets in order to balance congestion management considerations in relation to benefits, environmental impacts and costs, provided an Environmental Impact Report, or equivalent, has been completed to fully evaluate the impacts of such approval. Any such approval must incorporate all feasible mitigation measures, make specific findings to support the decision, and adopt a statement of overriding considerations.

Caltrans

Based on recent guidance from Caltrans District 8, the LOS for operating State highway facilities is based on Measures of Effectiveness (MOE) identified in the HCM. Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadways segments, and intersections is D. For undeveloped or not densely developed locations, the goal may be to achieve LOS C.

VMT Analysis Methodology

Changes to the CEQA Guidelines were adopted in December 2018, which requires all lead agencies to adopt Vehicle Miles Travelled (VMT), a replacement for automobile delay-based level of service (LOS), as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (Technical Advisory). Based on OPR's Technical Advisory, the Western Riverside Council of Governments (WRCOG) prepared a WRCOG SB 743 Implementation Pathway Document Package (March 2019) to assist its member agencies with implementation tools necessary to adopt analysis methodology, impact thresholds and mitigation approaches for VMT. To add to the previous work effort, WRCOG in February 2020 released its Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Travelled and Level of Service Assessment (WRCOG Guidelines), which provides specific procedures for complying with the new CEQA requirements for VMT analysis.

Through consultation with City staff, VMT thresholds adopted by City Council on June 16, 2020, have been used to prepare the VMT Analysis. The City's VMT Analysis Methodology includes three types of screening that can apply to effectively screen projects from project level assessment: Transit Priority Area Screening, Low VMT Area Screening, and Project Type Screening and Mixed Use and Redevelopment Projects. A land use project need only meet one of the above screening thresholds to result in a less than significant impact. Projects not screened through one of these screening types must complete VMT analysis and forecasting through the Riverside Transportation Analysis Model (RIVTAM) model to determine VMT impacts in the City. The RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. RIVTAM is a travel forecasting model that represents a sub-area of the SCAG model. The model was originally completed in 2009 and was later updated to include a 2012 base year and 2040 forecast horizon year. The model was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. Project VMT has been calculated using the most current version of RIVTAM, which includes a 2012 base year model and a 2040 horizon year model.

Based on the adopted VMT thresholds applicable to the Project, a significant impact for VMT would occur if the following condition is met:

- For new office and industrial projects, utilizing a threshold consistent with 15% below the City's current baseline VMT Per Worker/Employee.

5.12.3 Existing Conditions

Existing Traffic Counts

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in October 2018¹ plus an ambient growth rate of 2% to account for area growth. Consistent with standard traffic engineering practice, these traffic counts were conducted either on Tuesday, Wednesday, or Thursday due to potential fluctuations in traffic that typically occur on Mondays, Fridays, Holidays, or weekends. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

The weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the study area. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes, and near-by schools were in session and operating on normal schedules. The raw manual

¹ Starting in March of 2020, the COVID-19 Pandemic has drastically altered trip patterns and reduced traffic levels as a result of the California Governor's Stay at Home Order and school closures. Therefore, the October 2018 data is still considered valid for the purposes of this analysis.

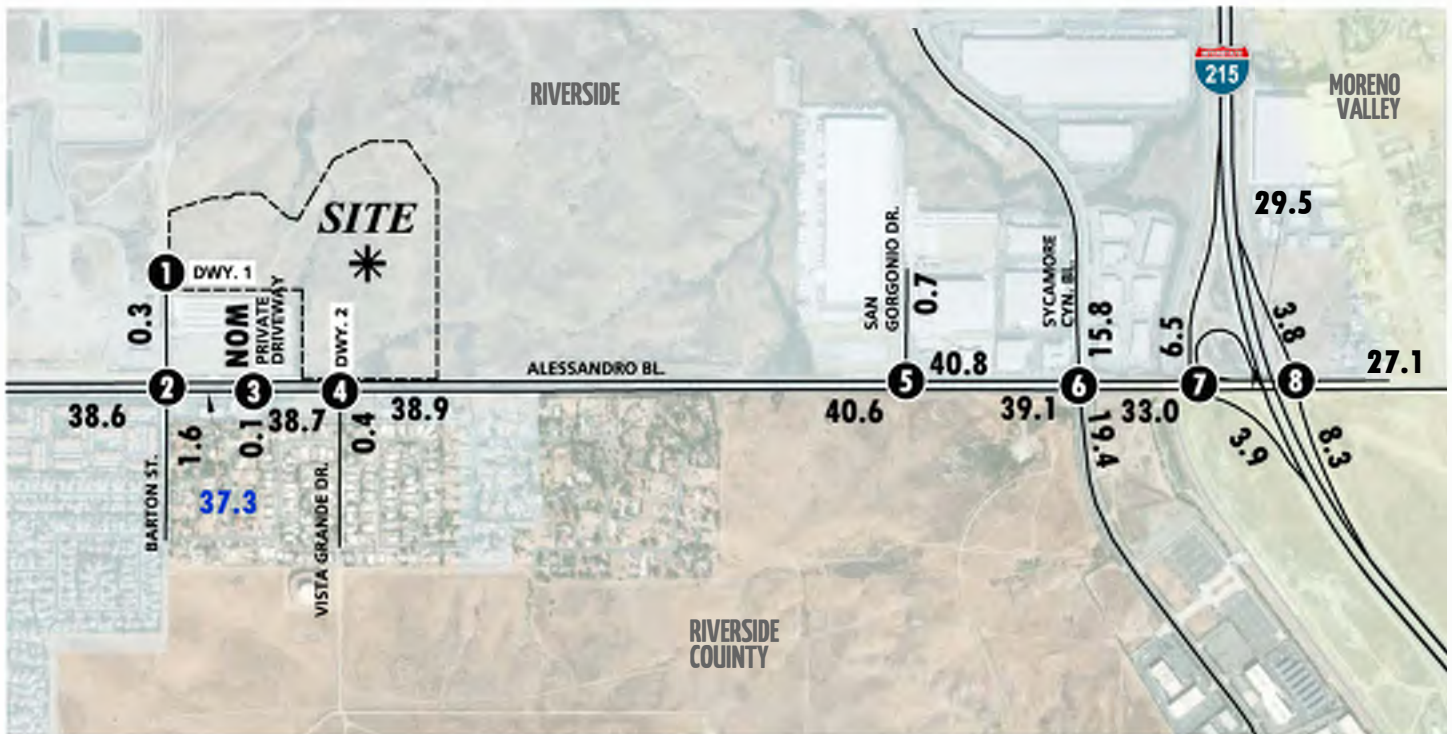
peak hour turning movement traffic count data sheets are included in Appendix 3.1 of the TA. These raw turning volumes have been flow conserved between intersections with limited access, no access and where there are currently no uses generating traffic (e.g., between ramp-to-arterial intersections, etc.). The traffic counts collected in October 2018 include the following vehicle classifications: Passenger Cars, 2-Axle Trucks, 3-Axle Trucks, and 4 or More Axle Trucks.

To represent the impact large trucks, buses, and recreational vehicles have on traffic flow, all trucks were converted into passenger car equivalents (PCE). By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slowdown is much longer than for passenger cars and varies depending on the type of vehicle and number of axles. For the purpose of this analysis, a PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks and 3.0 for 4+-axle trucks to estimate each turning movement. These factors are consistent with the values recommended for use in the San Bernardino County Congestion Management Program (CMP) and are in excess of the factor recommended for use in the County of Riverside traffic study guidelines.

Existing weekday ADT volumes on arterial highways throughout the study area are shown on Figure 5.12-14. Where actual 24-hour tube count data was not available, existing ADT volumes were based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

$$\text{Weekday PM Peak Hour (Approach Volume + Exit Volume)} \times 9.17 = \text{Leg Volume}$$

A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 10.91 percent. As such, the above equation utilizing a factor of 9.17 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 10.91 percent (i.e., $1/0.01091 = 9.17$) and was assumed to sufficiently estimate average daily traffic (ADT) volumes for planning-level analyses. Existing weekday AM and weekday PM peak hour intersection volumes are shown on Figure 5.12-14.



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1 Barton St. & Dwy. 1	2 Barton St. & Alessandro Bl.	3 Private Driveway & Alessandro Bl.	4 Dwy. 2 & Alessandro Bl.	5 San Gorgonio Dr. & Alessandro Bl.
Future Intersection	3(12) 3(0) 1(8) 1(1) 2476(1814) 42(46) 9(6) 1203(2287) 23(41) 62(55) 0(0) 36(28)	0(0) 0(0) 0(0) 0(0) 2488(1926) 2(3) 5(3) 1217(2294) 5(1) 3(5) 0(0) 3(2)	2488(1922) 12(23) 1213(2286) 7(12) 3(2) 14(9)	14(16) 20(27) 35(20) 2642(1983) 11(14) 1239(2421)
6 Sycamore Canyon Bl./ Meridian Pkwy. & Alessandro Bl.	7 I-215 SB Ramps & Alessandro Bl.	8 I-215 NB Ramps & Alessandro Bl.		
115(310) 83(654) 122(189) 522(146) 1997(1334) 110(156) 142(148) 902(1612) 208(516) 522(349) 678(279) 67(158)	311(357) 210(216) 200(131) 2412(1332) 710(1536) 324(424)	140(206) 1582(945) 63(195) 891(1501) 934(598) 0(8) 218(303)		

LEGEND:

- 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES
- 10.0 = VEHICLES PER DAY (1000'S)
- 10.0 = ACTUAL (COUNT-BASED) VEHICLES PER DAY (1000'S)
- NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY

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Existing Traffic Volumes

Figure 5.12-14

Intersection Operations Analysis

The intersection operations analysis results are summarized in Table 5.12-6 which indicates that the existing study area intersections are all currently operating at acceptable LOS during the peak hours, with the exception of the following locations:

- Driveway 2/Vista Grande Dr. & Alessandro Bl. (#4) – LOS F AM and PM peak hours
- Sycamore Canyon Bl. & Alessandro Bl. (#6) – LOS F AM and PM peak hours

Consistent with Table 5.12-6, a summary of the peak hour intersection LOS for existing conditions are shown on Figure 5.12-15. The intersection operations analysis worksheets are included in Appendix 3.2 of the TA.

Table 5.12-6 – Intersection Analysis for Existing Conditions

#	Intersection	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (secs.)		LOS		Jurisdiction
			Northbound			Southbound			Eastbound _d			Westbound							
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM	
1	Barton St. & Driveway 1	-	Future Intersection												-	-	-	-	Riverside
2	Barton St. & Alessandro Bl.	TS	0	1	d	0	1	d	1	3	0	1	3	d	40.8	36.8	D	D	Riverside
3	Private Driveway & Alessandro Bl.	TS	0	1	0	0	1	0	1	3	0	1	3	0	2.4	3.8	A	A	Riverside
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	CSS	0	1	d	0	0	0	0	3	0	1	3	0	77.3	>100.0	F	F	Riverside
5	San Gorgonio Dr. & Alessandro Bl.	TS	0	0	0	2	0	1>>	1	3	0	0	3	1	8.1	8.3	A	A	Riverside/ JPA
6	Sycamore Canyon Bl. & Alessandro Bl.	TS	2	2	2>	2	2	1	1	3	1	2	3	1	72.3	48.5	E	D	Riverside/ JPA
7	I-215 SB Ramps & Alessandro Bl.	TS	0	0	0	1	1	1	0	3	0	0	3	0	6.2	9.4	A	A	Caltrans/ Riverside/ County
8	I-215 NB Ramps & Alessandro Bl.	TS	1	1	1	0	0	0	1	3	0	0	3	d	20.2	20.4	C	C	Caltrans/ Riverside/ County

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.; L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free-Right Turn Lane; d = Defacto Right Turn Lane

²Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³CSS = Cross-street Stop; TS = Traffic Signal



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Existing Summary of LOS

Figure 5.12-15

Traffic Signal Warrants Analysis

Traffic signal warrants for existing traffic conditions are based on existing peak hour intersection turning volumes. No study area intersections currently warrant a traffic signal for existing traffic conditions. The traffic signal warrant analysis worksheets are included in Appendix 3.3 of the TA.

Roadway Segment Analysis

The City stated roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet future traffic demand.

Table 5.12-7 provides a summary of the existing plus project conditions roadway segment capacity analysis based on the City of Riverside Traffic Impact Analysis Preparation Guide identified previously on Table 5.12-4. As shown on Table 5.12-7, all roadway segments are anticipated to operate at an acceptable LOS under existing traffic conditions (e.g., LOS D or better).

Table 5.12-7 – Roadway Segment Analysis for Existing Conditions

#	Roadway	Segment Limits	Roadway Section	LOS Capacity ¹	Existing	V/C ²	LOS	Acceptable LOS
1	Alessandro Bl.	Barton St. to Private Driveway	6D	49,500	37,331	0.75	C	D
2		Private Driveway to Vista Grande Dr.	6D	49,500	38,724	0.78	C	D
3		Vista Grande Dr. to San Gorgonio Dr.	6D	49,500	40,640	0.82	D	D
4		San Gorgonio Dr. to Sycamore Canyon Bl.	6D	49,500	40,796	0.82	D	D
5		Sycamore Canyon Bl. to I-215 SB Ramps	6D	49,500	32,950	0.67	B	D
6		I-215 SB Ramps to I-215 NB Ramps	6D	49,500	29,467	0.60	A	D
¹ These maximum roadway capacities have been extracted from the following source: City of Riverside Traffic Impact Analysis Preparation Guide (Exhibit D) for each applicable roadway type. These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic. ² V/C = Volume-to-capacity								

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard interchange to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. The results of the queuing analysis show there are no existing queuing issues.

5.12.4 Related Regulations

5.12.4.1 Federal Regulations

No Federal regulations are applicable to the Project with respect to transportation/traffic.

5.12.4.2 State Regulations

State Senate Bill 743

SB 743 was signed into law by Governor Brown in 2013 and tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under the California Environmental Quality Act (CEQA). SB 743 requires the new criteria to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” It also states that alternative measures of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the Governor’s OPR to identify new metrics for identifying and mitigation transportation impacts within CEQA. In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency, which were adopted and became effective on December 18, 2018. The CEQA Guidelines promulgated under SB 743 change the way that public agencies evaluate the transportation impacts of Projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (Public Resource Code, § 21099, subd. (b)(2)). In addition to new exemptions for Projects consistent with specific plans, the CEQA Guidelines from the Office of Planning and Research replace congestion-based metrics, such as auto delay and LOS, with VMT as the basis for determining significant impacts.

Caltrans

As determined by the Caltrans, the LOS for operating State highway facilities is based upon MOEs. These MOEs describe the measures best suited for analyzing State highway facilities (i.e., freeway segments, signalized intersections, on- or off-ramps, etc.). Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is D.

5.12.4.3 Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is an association of local governments and agencies that serves as a Metropolitan Planning Organization (MPO), a Regional Transportation Planning Agency (RTPA) and a Council of Governments (COG). The SCAG region encompasses six (6) counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. SCAG is responsible for developing long-range regional transportation plans, including the regional Sustainable Communities Strategy (SCS) and

associated growth forecasts, regional transportation improvement programs, and regional housing needs allocations (SCAG 2018).

SCAG's Connect SoCal – The 2040-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2020).

Riverside County Integrated Project

In 2003, Riverside County completed a comprehensive planning program called the Riverside County Integrated Project (RCIP). The Riverside County Board of Supervisors initiated the RCIP to deal with environmental issues as part of regional land use and infrastructure planning. The RCIP comprises the Community Environmental Transportation Corridor Acceptability Process (described below), the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP; see Section 5.3 Biological Resources), and the Riverside County General Plan Update. Riverside County's Strategic Vision, which is included in its General Plan, incorporates a set of 15 consensus planning principles intended to guide the work of the RCIP.

Community Environmental Transportation Corridor Acceptability Process

The Community Environmental Transportation Corridor Acceptability Process is a coordinated regional transportation planning effort included in the RCIP. It identified potential transportation corridors in western Riverside County that would benefit commuters and serve the County's growing economy.

Riverside County Congestion Management Program

Riverside County Transportation Commission (RCTC) is designated as the Congestion Management Agency (CMA) to oversee the CMP (GP 2025, p. CCM-7). RCTC approved a modification of the CMP Land Use Coordination Element that included the elimination of the Traffic Impact Assessment report process and replaced it with an Enhanced Traffic Monitoring System. Prior to this modification of the CMP, a Traffic Impact Assessment had to be prepared consistent with the CMP/Local Agency Guidelines whenever a proposed development generated greater than 200 peak hour trips. However, as of July 1, 1997, assessing these impacts consistent with the CMP guidelines is no longer required by RCTC. Therefore, although the City's Environmental Checklist includes a reference to CMA LOS, for the purposes of this analysis, the GP 2025 will be used as the guiding document for acceptable LOS, against which impacts are measured.

Western Riverside County Transportation Uniform Mitigation Fee

In 2002, the jurisdictions of western Riverside County, including the City, agreed to participate in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multi-jurisdictional impact fee program administered by the WRCOG that funds transportation

improvements on a regional and sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development. (GP 2025, p. CCM-6)

TUMF fees are submitted to WRCOG as the program administrator. TUMF funds are distributed on a formula basis to the regional, local, and transit components of the program. Of the TUMF funds received by WRCOG, 2.6 percent is allocated to RTA for making regional transit improvements, 48.7 percent is allocated to RCTC for programming improvements to the arterials of regional significance on the Regional System of Highways and Arterials, and 48.7 percent is allocated to the five zones for programming improvements to the Regional System of Highways and Arterials (RSHA) as determined by the respective zone committees (TUMF AP, p. 7).

RSHA is the system of roadways that serve inter-community trips within western Riverside County and therefore are eligible for improvement funding with TUMF funds (TUMF Nexus 2009, p. 16). RSHA for western Riverside County was identified based on several transportation network and performance guidelines as follows:

- Arterial highway facilities proposed to have a minimum of four lanes at ultimate buildout (not including freeways);
- Facilities that serve multiple jurisdictions and/or provide connectivity between communities both within and adjoining western Riverside County;
- Facilities with forecast traffic volumes in excess of 20,000 vehicles per day by 2035;
- Facilities with forecast volume to capacity ratio of 0.90 (LOS E) or greater in 2035;
- Facilities that accommodate regional fixed route transit services;
- Facilities that provide direct access to major commercial, industrial, institutional, recreational, or tourist activity centers, and multi-modal transportation facilities (such as airports, railway terminals, and transit centers) (TUMF Nexus 2009, p. 16).

Specific transportation improvement projects are identified by WRCOG's Public Works Committee, which is responsible for developing objective criteria for project selection and prioritization including, but not limited to, the following factors: traffic safety issues potentially created by growth, regional significance, availability of matching funds, mitigation of congestion created by new development, system continuity, geographic balance, project readiness, and completed projects with reimbursement agreements (TUMF AP, p. 12). Recommendations of the Public Works Committee are then submitted to WRCOG's Technical Advisory Committee, which are then submitted to WRCOG's Executive Committee (TUMF AP, p. 18). The Executive Committee is responsible for reviewing and acting on recommendations for project selection and prioritization of the Regionally Significant Arterials, 10-year Strategic Plan, and the Transportation Improvement Program (TUMF AP, p. 11).

The City participated in the preparation of the Western Riverside County Transportation Uniform Fee Nexus Study (dated October 18, 2002) and adopted TUMF fees based on that study. The City also participated in the preparation of an updated nexus study titled Transportation Uniform

Mitigation Fee Nexus Study: 2009 Update. Due to the impacts of the economic recession on construction and development in Western Riverside County, the City determined that a temporary 50 percent reduction of the TUMF fees identified in the Transportation Uniform Mitigation Fee Nexus Study: 2009 Update would encourage development and assure that each development continues to contribute to its fair share of TUMF program costs. The reduction in TUMF fees was to be effective through December 31, 2010 (RMC Chapter 16.68, Section 16.68.020). On February 15, 2011, the City Council adopted Ordinance No. 7119 and extended the reduction in TUMF fees from January 1, 2011 through December 31, 2011, or as otherwise specified in the Ordinance (Ord. 7119). Furthermore, on April 2, 2012, the WRCOG Executive Committee decided to end the 50 percent reduction in TUMF on December 31, 2012 (Ord. 7146) and to increase the TUMF in phases over a three-month period, beginning January 1, 2013 until TUMF reached 100 percent on April 1, 2013 (Ord. 7171).

The Project will participate in the TUMF program through the payment of mitigation fees based on the current fee schedule in effect at time of payment. Payment is due prior to the final inspection for the Project (RMC Chapter 16.68, Section 16.68.060).

5.12.4.4 Local Regulations

Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact Fees

The City's local development impact fee (DIF) related to transportation improvements is set forth in Chapter 16.64 of the Riverside Municipal Code. This DIF is comprised of two fees: the traffic signal and railroad signal mitigation fee and the transportation impact fee, which together address local transportation needs throughout the City. In creating these fees, the City Council determined that new private development in the City increases the amount of traffic utilizing the City street system. This increased traffic requires the installation of additional traffic signals, railroad signals including crossing gates and associated work and street improvements at specific locations to increase or improve transportation capacity. In order to protect health, safety and welfare of the general public, the City determined that new private development should pay its fair share towards needed improvements. The traffic signal and railroad signal mitigation fee is imposed on the construction of all new nonresidential units, dwelling units, and mobile home spaces upon application for a building permit. Funds collected through payment of this fee shall be used solely for the installation of additional traffic signals and railroad signals including crossing gates and other protective devices, and all costs associated with railroad crossing protection, including, but not limited to planking, sidewalks, and curbs and gutters. (RMC, Sections 16.64.010, 16.64.030, 16.64.050) The Project will pay the traffic signal and railroad signal mitigation fee.

Funds collected through payment of the transportation impact fee shall be expended solely for construction of street improvements as designated by the City Council to increase or improve the transportation capacity of the designated streets. This fee is imposed on the construction of new dwelling units and mobile home spaces upon application for a building permit. (RMC Sections 16.64.040, 16.64.060) Because the Project does not include buildings that will be used for residential occupancy it is not subject to the transportation impact fee component (RMC Chapter 16.64).

The City is responsible for maintaining, administering, and updating the DIF program as appropriate. The City's DIF's were last updated as of August 17, 2015; there are no immediate plans to update the transportation related DIF fees.

City of Riverside General Plan 2025 Circulation and Community Mobility Element

The Circulation and Mobility Element of the GP 2025 identifies LOS D or better as the desired performance standard for arterial streets, whenever possible. The GP 2025 also indicates that LOS E may be warranted on a case-by-case evaluation at certain key locations such as City arterial roadways that are used as freeway bypass by regional through traffic and at heavily traveled freeway interchanges. The following streets are considered locations that may warrant the LOS E standards: portions of Arlington Avenue/Alessandro Boulevard, Van Buren Boulevard, portions of La Sierra Avenue, and selected freeway interchanges. (GP 2025, p. CCM-11)

The GP 2025 sets forth policies and goals for a transportation network consisting of freeways, streets, bike paths, railways, and airports that provide circulation within the City and access to areas outside the City.

Sycamore Canyon Business Park Specific Plan

The Sycamore Canyon Business Park Specific Plan (SCBPSP) is intended to guide development within its boundaries. The intent is to establish a high-quality industrial development for the City that would strengthen the City's economic base. The plan recommends development of light industrial, distribution warehousing, and/or product assembly. The basic premise of the SCBPSP in regard to transportation/traffic is to assure adequate traffic flow and safety in the Plan area by implementing circulation policies which include access controls and road improvements (SCBPSP, pp. 13-14).

Traffic Signal Warrants

The CA MUTCD states that the satisfaction of a traffic signal warrant or warrants shall not, in and of itself, require the installation of a traffic control signal. Peak-hour traffic signal warrant analysis should only be considered as an "indicator" of the likelihood of an un-signalized intersection warranting a traffic signal. Intersections that exceed the peak-hour warrant are more likely to meet one or more of the other volume-based signal warrants. CA MUTCD also advises that a traffic control signal should not be installed unless:

- One or more of the traffic signal warrants is satisfied;
- An engineering study indicates that installing a traffic control signal will improve the overall safety and/or operation of the intersection; and
- It will not seriously disrupt progressive traffic flow.

City of Riverside Bicycle Master Plan

The City's Bicycle Master Plan provides a blueprint for bicycle transportation and recreation in the city of Riverside. A Bicycle Master Plan Update, adopted May 22, 2007, enhanced and expanded the existing bikeway network, connecting gaps, addressing constrained areas and improving

intersections, providing for greater local and regional connectivity, and encouraging more residents to bicycle. In March 2012, the Riverside Bicycle Master Plan Update Addendum was published, which provides an updated inventory of all bicycle infrastructure and non-infrastructure improvements implemented over the past five (5) years, presents current and future bicycle and walking impact analysis, and contains an updated list of recommended bicycle improvements. The Bicycle Master Plan contains the following goals:

- 1) Expand and enhance Riverside's bikeway network
- 2) Plan for the needs of bicyclists
- 3) Eliminate barriers to bicycling
- 4) Increase awareness of and use of the bicycle as a viable transportation alternative
- 5) Preserve and sustain existing bicycle infrastructure

5.12.5 Project Design Considerations

The Project has been designed to facilitate traffic in an efficient manner using the existing roadway network. The majority of passenger cars and truck traffic is expected to use Barton Street and Driveway 2 to Alessandro Boulevard which will provide on-/offramp access to I-215. Vehicular access to the Project will be provided via Driveway 1 on Barton Street and Driveway 2 on Alessandro Boulevard. The Project site plan includes two driveways off of Barton Street for Building B (Figure 3.0-8); as these driveways are not existing or proposed signalized intersections, they were analyzed in the TA, and referenced herein, as one driveway. Both driveways are assumed to allow full-access turning movements. Regional access to the project site is provided via the I-215 Freeway at Alessandro Boulevard interchange. The Project is proposed to have access via the following driveways:

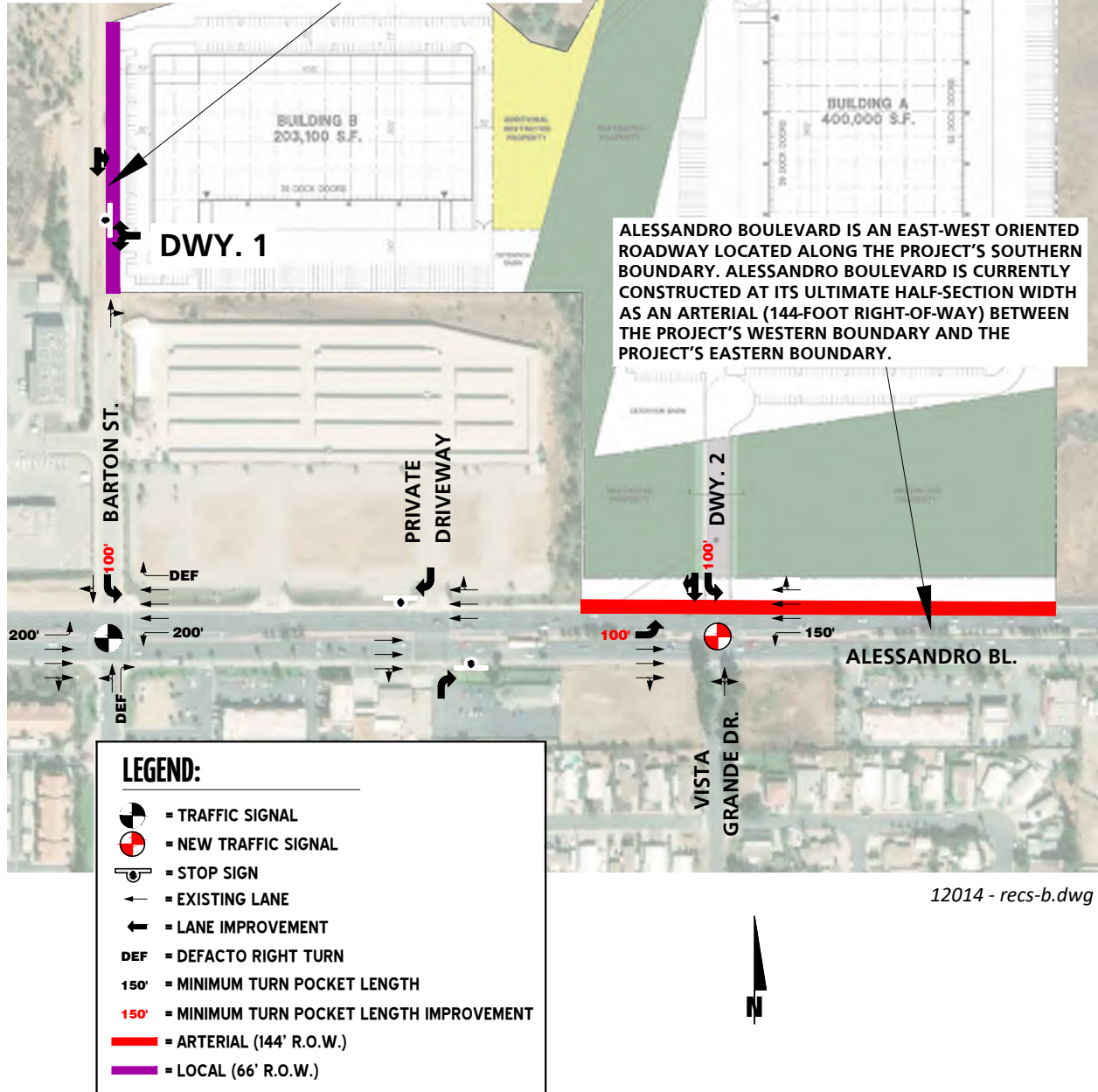
- Barton Street and Driveway 1 – Full access driveway (passenger cars only). Trucks will be restricted from heading westbound on Alessandro Boulevard.
- Driveway 2/Vista Grande Drive and Alessandro Boulevard – Full access driveway (passenger cars only). Trucks will be restricted from heading westbound on Alessandro Boulevard.

The Project will modify curb-and-gutter and sidewalk improvements along the Project's southern and western boundaries with Alessandro Boulevard accordingly based on the proposed driveway locations. The Project will construct Barton Street between the Project's northern boundary and southern boundary at its ultimate full-section pavement width as a Local Street (66-foot right-of-way). At the intersection of Barton Street and Alessandro Boulevard, the Project will construct an exclusive southbound left-turn lane and provide a minimum of 100-feet of storage, as shown on Figure 5.12-16.

BARTON STREET IS A NORTH-SOUTH ORIENTED ROADWAY LOCATED ALONG THE PROJECT'S WESTERN BOUNDARY. CONSTRUCT BARTON STREET BETWEEN THE PROJECT'S NORTHERN BOUNDARY AND THE PROJECT'S SOUTHERN BOUNDARY AT ITS ULTIMATE FULL-SECTION PAVEMENT WIDTH (WITH A SOFT SHOULDER) AS A LOCAL STREET (66-FOOT RIGHT-OF-WAY). IMPROVEMENTS ALONG BARTON STREET WOULD BE THOSE REQUIRED BY FINAL CONDITIONS OF APPROVAL FOR THE PROPOSED PROJECT AND APPLICABLE CITY OF RIVERSIDE STANDARDS.

ON-SITE TRAFFIC SIGNING AND STRIPING SHOULD BE IMPLEMENTED IN CONJUNCTION WITH DETAILED CONSTRUCTION PLANS FOR THE PROJECT SITE.

SIGHT DISTANCE AT EACH PROJECT ACCESS POINT SHOULD BE REVIEWED WITH RESPECT TO STANDARD CALTRANS AND CITY OF RIVERSIDE SIGHT DISTANCE STANDARDS AT THE TIME OF PREPARATION OF FINAL GRADING, LANDSCAPE AND STREET IMPROVEMENT PLANS.



SYCAMORE HILLS DISTRIBUTION CENTER



Site Adjacent Roadway and Site Access
Recommendations

Figure 5.12-16

Based on volume warrants, the intersection of Vista Grande Drive and Alessandro Boulevard is not warranted for a traffic signal. However, the intersection is anticipated to continue to operate at a deficient LOS. The addition of a traffic signal would improve the LOS to acceptable levels. However, the addition of a traffic signal is not currently feasible as the intersection is in close proximity to an existing signalized intersection of a private driveway at Alessandro Boulevard, as shown on Figure 5.12-16. The adjacent signalized intersection of the private driveway and Alessandro Boulevard does not currently warrant a traffic signal as the volumes on the north and south leg are nominal and are significantly less than the south leg of Vista Grande Drive and Alessandro Boulevard. Therefore, the removal of the existing traffic signal at the private driveway and Alessandro Boulevard would be required in order to install a traffic signal at Vista Grande Drive and Alessandro Boulevard. As outlined in the TA, it is recommended that the existing signal at private driveway and Alessandro Boulevard be removed and that the Project construct a new traffic signal at the intersection of Driveway 2/Vista Grande Drive and Alessandro Boulevard.

Buildings A and B will have a 26-foot wide fire lane wrapping around each buildings to provide easy fire access to the building in case of an emergency. Parcel C will have a driveway off Barton Street that will lead drivers (non-truck traffic) to the proposed trailhead parking lot.

5.12.6 Thresholds of Significance

The City has not established local CEQA significance thresholds as described in Section 15064.7 of the State CEQA Guidelines. Therefore, significance thresholds in Appendix G ("Environmental Checklist") of the State CEQA Guidelines are utilized. The Environmental Checklist prepared by the City for the Project (see Appendix A of this document) indicates that impacts related to the Sycamore Hills Distribution Center Project may be considered potentially significant if the proposed Project would:

- (Threshold A) conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- (Threshold B) conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- (Threshold 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; or
- (Threshold D) substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

5.12.7 Environmental Impacts

Threshold A: *Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Project Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development and is based upon the specific land uses planned for a given project. Trip generation rates (actual

vehicles) for the Project are shown in Table 5.12-8 and trip generation rates using PCEs for the Project are shown in Table 5.12-9. Both tables illustrate daily and peak hour trip generation estimates based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017, for High Cube Transload and Short Term Storage (ITE Land Use Code 154). Shipping containers, used on cargo ships, trains and trucks, are either standard size 40 feet long, 8-foot-wide and either 8.5-foot-high or 1 foot higher than standard for high cube. The City's zoning code does not get any more specific than warehouse use. The ITE Land Use of *High Cube Transload and Short Term Storage* is more specific to the activities occurring in the warehouse building, than the term warehouse as used in the City's Zoning Code. The proposed use within the Project's warehouse buildings is the short term storage of goods transported in high cube containers on trucks and represents a distribution center. Refrigeration, or cold storage, is not proposed. Therefore, the ITE Land Use of *High Cube Transload and Short Term Storage* is used just for the purposes of calculating the appropriate trip generation rate for the proposed Project in the Traffic Operations Analysis and is the correct land use type to use for the Project as those are the proposed uses within the warehouse buildings. For all other purposes, the project's buildings and proposed use are considered warehouse (the more general term), consistent with the City's Zoning Code.

Data regarding the truck percentage and vehicle mix have been obtained from High Cube Warehouse Vehicle Trip Generation Analysis, October 2016. The High Cube Warehouse Vehicle Trip Generation Analysis provides vehicle mix for Short-Term Storage, Transload & Non-Cold Storage, which consists of 32.2% trucks for daily trips, 30.8% trucks for AM peak hour trips and 21.7% trucks for PM peak hour trips. The South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type for high-cube warehouses were utilized for the 2-axle, 3-axle, and 4+-axle trucks.

The trip generation rates used for the TA were based upon information collected by the ITE as provided in their Trip Generation manual, 10th Edition, 2017. For purposes of the TA, ITE land use code 154 (High Cube Tra) have been used to derive site specific trip generation estimates. As noted on Tables 5.12-8 and 5.12-9, refinements to the raw trip generation estimates have been made to provide a more detailed breakdown of trips by vehicle mix. Total vehicle mix percentages were also obtained from the ITE Trip Generation manual in conjunction with the SCAQMD recommended truck mix, by axle type. Finally, PCE factors were applied to the trip generation rates for heavy trucks (large 2-axes, 3-axes, 4+-axes). PCEs allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses. The PCE factors are consistent with the recommended PCE factors in Appendix "B" of the San Bernardino County Congestion Management Program (CMP), 2016 Update. Trip generation rates with PCE factors are also shown on Table 5.12-9.

Table 5.12-8 – Trip Generation Summary (Actual Vehicles)

Project Trip Generation Rates									
Land Use¹	ITE LU Code	Units²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Transload Short-Term Warehouse without Cold Storage ^{3,4,5}	154	TSF	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.043	0.013	0.056	0.022	0.056	0.078	0.949
2-Axle Trucks (5.14% AM, 3.62% PM, 5.38% Daily)			0.003	0.001	0.004	0.001	0.003	0.004	0.076
3-Axle Trucks (6.38% AM, 4.49% PM, 6.66% Daily)			0.004	0.001	0.005	0.001	0.003	0.004	0.093
4-Axle+ Trucks (19.28% AM, 13.59% PM, 20.16% Daily)			0.012	0.003	0.015	0.004	0.010	0.014	0.282
Project Trip Generation									
Project	Quantity	Units²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Transload Short-Term Warehouse without Cold Storage	603.100	TSF							
Passenger Cars:			26	8	34	14	34	48	573
Truck Trips:									
2-axle:			2	1	3	1	2	3	46
3-axle:			3	1	4	1	2	3	57
4+-axle:			8	2	10	3	7	10	171
- Total Truck Trips (Actual Vehicles)			13	4	17	5	11	16	274
TOTAL TRIPS (Actual Vehicles)⁶			39	12	51	19	45	64	847

¹ Trip Generation Source: ITE, Trip Generation Manual, Tenth Edition (2017).
² TSF = thousand square feet
³ Vehicle Mix Source: ITE, Trip Generation Handbook, Third Edition (September 2017).
⁴ Vehicle Mix Source: ITE, High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016).
⁵ Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014). Normalized %
- Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks
⁶ TOTAL TRIPS (Actual Vehicles) = Passenger Cars + Truck Trips (Actual Trucks).

Table 5.12-9 – Trip Generation Summary (Actual PCE)

Project Trip Generation Rates									
Land Use ¹	ITE LU Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High - Cube Transload Short - Term Warehouse without Cold Storage ^{3,4,5}	154	TSF	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.043	0.013	0.056	0.022	0.056	0.078	0.949
2 - Axle Trucks (5.14% AM, 3.62% PM, 5.38% Daily)			0.005	0.002	0.007	0.002	0.005	0.007	0.114
3 - Axle Trucks (6.38% AM, 4.49% PM, 6.66% Daily)			0.008	0.002	0.010	0.002	0.006	0.008	0.186
4 - Axle+ Trucks (19.28% AM, 13.59% PM, 20.16% Daily)			0.036	0.009	0.045	0.012	0.030	0.042	0.846
Project Trip Generation									
Project	Quantity	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High - Cube Transload Short - Term Warehouse without Cold Storage	603.100	TSF							
Passenger Cars:			26	8	34	14	34	48	573
Truck Trips ⁶ :									
2 - axle (PCE=1.5):			4	2	6	2	4	6	69
3 - axle (PCE=2.0):			5	2	7	2	4	6	113
4+ - axle (PCE=3.0):			22	6	28	8	19	27	511
- Total Truck Trips (PCE)			31	10	41	13	28	39	693
TOTAL TRIPS (PCE) ⁷			57	18	75	27	62	87	1,266

¹Trip Generation Source: ITE, Trip Generation Manual, Tenth Edition (2017).
²TSF = thousand square feet
³Vehicle Mix Source: ITE, Trip Generation Handbook, Third Edition (September 2017).
⁴Vehicle Mix Source: ITE, High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016).
⁵Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014). Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks
⁶PCE rates are per San Bernardino County Transportation Authority (SBCTA).
⁷TOTAL TRIPS (PCE) = Passenger Cars + Truck Trips (PCE).

As shown on Table 5.12-9, the Project is anticipated to generate a net total of 1,266 PCE trip-ends per day with 75 net PCE AM peak hour trips and 87 net PCE PM peak hour trips. For comparison, as shown on Table 5.12-8, the Project is anticipated to generate a net total of 847 actual vehicle trip-ends per day with 51 net actual vehicle AM peak hour trips and 64 net actual vehicle PM peak hour trips.

Project Trip Distribution

The Project trip distribution and assignment process represents the directional orientation of traffic to and from the Project site. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system. The trip distribution pattern for truck traffic is also influenced by the local truck routes approved by the City, March JPA, City of Moreno Valley, and Caltrans.

Given these differences, separate trip distributions were generated for both passenger cars and truck trips.

Existing Plus Project Conditions

While the Traffic Operations Analysis examined Level of Service (LOS) within the project vicinity, a deficiency in Level of Service is no longer considered as a significant transportation related impact pursuant to updated CEQA guidelines. Instead, the assessment of LOS is intended to identify key access, circulation and operational issues within the project area, and to confirm consistency with the City's General Plan. Consistency with General Plan policies are addressed in Section 5.10 Land Use.

Consistent with the City of Riverside traffic study guidelines, the existing plus Project (E+P) analysis determines circulation system deficiencies that would occur on the existing roadway system in the scenario of the Project being placed upon existing conditions. The E+P analysis is intended to identify the project-specific traffic deficiencies associated solely with the development of the proposed Project based on a comparison of the E+P traffic conditions to existing conditions. As such, E+P traffic conditions were evaluated for each phase of development to determine the project-specific traffic deficiencies associated with each phase. For the study area intersections that lie within the City, to determine whether the addition of Project traffic (as defined through the comparison of existing traffic conditions to E+P traffic conditions) at a study intersection would result in a direct project-specific traffic deficiency, the following will be utilized:

- When the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and project-generated traffic, as measured by 50 or more peak hour trips, causes deterioration below LOS D (i.e., unacceptable LOS) or increases to the peak hour delay, a deficiency is deemed to occur.

For the study area intersections that lie within March JPA, to determine whether the addition of project traffic (as defined through the comparison of existing to E+P traffic conditions) at a study intersection would result in a direct project-specific traffic deficiency, both of the following conditions must occur:

- Peak hour project traffic plus existing traffic causes an intersection to operate at LOS E or F; and
- Peak hour project traffic comprises 2% or more of the total peak hour traffic on the intersection for LOS E and 2% or more for LOS F.

For the study area intersections that lie within the County of Riverside, to determine whether the addition of project traffic (as defined through the comparison of existing traffic conditions to E+P traffic conditions) at a study intersection would result in a direct project-specific traffic deficiency, the following will be utilized:

- When the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and project-generated traffic, as measured by 50 or more peak hour trips, causes deterioration below LOS D/LOS E (i.e., unacceptable LOS), a deficiency is deemed to occur.

The City of Moreno Valley does not have its own deficiency criteria, therefore, study intersections that lie within the City of Moreno Valley are evaluated according to either March JPA or County of Riverside deficiency criteria where intersections share the respective jurisdiction. Caltrans criteria would apply for study area intersections that are freeway facilities within the City of Moreno Valley.

However, when the pre-Project condition is already below LOS D (i.e., unacceptable LOS), the Project will be responsible for improving its deficiency to a level of service equal to or better than it was without the Project for intersections that receive 50 or more peak hour project-related trips. This is a standard protocol in many urban jurisdictions because to require a Project to improve to LOS D or better would in effect force the Project to improve beyond its Project deficiencies, which is prohibited under California law. Thus, for intersections currently operating at unacceptable LOS during either the AM and/or PM peak hour under existing traffic conditions, improvements have been identified to improve the deficiencies of the Project to an intersection LOS that is equal to or better than pre-Project conditions.

Intersection Operations Analysis

The intersection analysis results are summarized in Table 5.12-10, which indicates that two study area intersections are anticipated to operate at the same unacceptable LOS for E+P traffic conditions. The deficiencies are summarized in Table 5.12-11, which indicates that two study area intersections are anticipated to be deficient.

Table 5.12-10 – Intersection Analysis for E+P Conditions

#	Intersection	Traffic Control ²	Existing		E+P				Jurisdiction	Deficiency? ³		
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)				Level of Service	
			AM	PM	AM	PM	AM	PM			AM	PM
1	Barton St. & Driveway 1	CSS	Future Intersection				8.6	8.6	A	A	Riverside	No
2	Barton St. & Alessandro Bl.	TS	40.8	36.8	D	D	40.9	39.4	D	D	Riverside	No
3	Private Driveway & Alessandro Bl.	TS	2.4	3.8	A	A	2.4	3.9	A	A	Riverside	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	CSS	77.3	>100.0	F	F	>100.0	>100.0	F	F	Riverside	Yes
5	Alessandro Bl.	TS	8.1	8.3	A	A	10.0	8.5	A	A	Riverside/JPA	No
6	San Gorgonio Dr. & Alessandro Bl.	TS	72.3	48.5	E	D	72.8	49.3	E	D	Riverside/JPA	Yes
7	Sycamore Canyon Bl. & Alessandro Bl.	TS	6.2	9.4	A	A	6.5	9.7	A	A	Caltrans/City/County	No
8	I - 215 SB Ramps & Alessandro Bl.	TS	20.2	20.4	C	C	20.6	21.1	C	C	Caltrans/City/County	No
	I - 215 NB Ramps & Alessandro Bl.											

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control.

For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

²CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement

³See Table 5-2 for a detailed summary of deficiencies.

Table 5.12-11 – Deficient Intersection Summary for E+P Conditions

#	Intersection	Jurisdiction	Project % of Total Traffic		Change in Delay (secs.)		Project Trip Contribution		Deficiency? 1,2,3
			AM	PM	AM	PM	AM	PM	
1	Barton St. & Driveway 1	Riverside	N/A	N/A	--	--	N/A	N/A	No
2	Barton St. & Alessandro Bl.	Riverside	N/A	N/A	0.1	2.6	N/A	N/A	No
3	Private Driveway & Alessandro Bl.	Riverside	N/A	N/A	0.0	0.1	N/A	N/A	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	Riverside	N/A	N/A	>1.0	>1.0	N/A	N/A	Yes
5	San Gorgonio Dr. & Alessandro Bl.	Riverside/JPA	N/A	N/A	1.9	0.2	N/A	N/A	No
6	Sycamore Canyon Bl. & Alessandro Bl.	Riverside/JPA	1.2%	1.3%	0.5	0.8	68	80	Yes ⁴
7	I-215 SB Ramps & Alessandro Bl.	Caltrans/City/County	N/A	N/A	0.3	0.3	N/A	N/A	No
8	I-215 NB Ramps & Alessandro Bl.	Caltrans/City/County	N/A	N/A	0.4	0.7	N/A	N/A	No

BOLD = Deficient Intersection N/A = Not Applicable

¹For intersections within the jurisdiction of the City of Riverside, a deficiency occurs at a study area intersection when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:

LOS A/B = By 10.0 seconds; LOS C = By 8.0 seconds; LOS D = By 5.0 seconds; LOS E = By 2.0 seconds; LOS F = By 1.0 seconds

²For intersections within the jurisdiction of March JPA, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. However, if the pre-project condition is already below LOS D (or acceptable LOS), deficiency occurs if the Project contributes more than 2% of the total traffic.

³For intersections within the jurisdiction of Caltrans, the County of Riverside, or City of Moreno Valley, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. A deficiency also occurs if the Project contributes 50 or more peak hour trips to an already deficient intersection.

⁴The intersection currently built out to the General Plan ultimate cross-section and exceeds the General Plan target LOS. As such, the deficiency is unavoidable.

Driveway 2/Vista Grande Dr. and Alessandro Bl. (#4) – Although this intersection was found to operate at an unacceptable LOS (LOS F) during the AM and PM peak hours under existing traffic conditions, the intersection is anticipated to continue to operate at unacceptable levels during the peak hours with the addition of Project traffic. The increase in peak hour delay is anticipated to be greater than one second. Therefore, there is a deficiency based on the City's peak hour delay criteria for intersections operating at LOS F.

Sycamore Canyon Boulevard and Alessandro Boulevard (#6) – Although this intersection was found to operate at an unacceptable LOS (LOS E) during the AM peak hour under existing traffic conditions, the intersection is anticipated to continue to operate at unacceptable levels (LOS E) during the peak hours with the addition of Project traffic. The increase in peak hour delay is anticipated to be less than two seconds and the project traffic is less than 2% of the total traffic for E+P conditions. However, the intersection of Sycamore Canyon Boulevard and Alessandro Boulevard is currently built out to its General Plan ultimate cross-section and exceeds the General Plan target LOS. As such, the deficiency is considered unavoidable. As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Roadway Segment Analysis

As noted previously, the City stated roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet future traffic demand.

Table 5.12-12 provides a summary of the E+P conditions roadway segment capacity analysis based on the City of Riverside Traffic Impact Analysis Preparation Guide. As shown on Table 5.12-12 and consistent with Existing traffic conditions, all roadway segments are anticipated to operate at an acceptable LOS under E+P traffic conditions (e.g., LOS D or better).

Table 5.12-12 – Roadway Segment Analysis for E+P Conditions

#	Roadway	Segment Limits	Roadway Section	LOS Capacity ¹	Existing	V/C ²	LOS	E+P	V/C ²	LOS	Acceptable LOS
1		Barton St. to Private Driveway	6D	49,500	37,331	0.75	C	37,795	0.76	C	D
2		Private Driveway to Vista Grande Dr.	6D	49,500	38,724	0.78	C	39,188	0.79	C	D
3	Alessandro	Vista Grande Dr. to San Gorgonio Dr.	6D	49,500	40,640	0.82	D	41,792	0.84	D	D
4	Bl.	San Gorgonio Dr. to Sycamore Canyon Bl.	6D	49,500	40,796	0.82	D	41,948	0.85	D	D
5		Sycamore Canyon Bl. to I-215 SB Ramps	6D	49,500	32,950	0.67	B	34,073	0.69	B	D
6		I-215 SB Ramps to I-215 NB Ramps	6D	49,500	29,467	0.60	A	30,072	0.61	B	D

¹These maximum roadway capacities have been extracted from the following source: City of Riverside Traffic Impact Analysis Preparation Guide (Exhibit D) for each applicable roadway type. These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

²V/C = Volume to Capacity ratio

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramps at the I-215 freeway at Alessandro Boulevard interchange to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 freeway mainline. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. The anticipated vehicle queues would be accommodated by the turning lane's available storage length.

Opening Year Cumulative Traffic Conditions

Opening Year Cumulative without Project Traffic Conditions

LOS calculations were conducted for the study intersections to evaluate their operations under opening year cumulative without Project conditions with roadway and intersection geometrics. As shown in Table 5.12-13, the following intersections were found to operate at a deficient LOS:

- Driveway 2/Vista Grande Drive and Alessandro Boulevard (#4) – LOS F AM and PM peak hours
- Sycamore Canyon Boulevard and Alessandro Boulevard (#6) – LOS F AM and PM peak hours

As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Opening Year Cumulative with Project Traffic Conditions

As shown on Table 5.12-13 and illustrated on Figure 5.12-17, there are no additional study area intersections anticipated to operate at an unacceptable LOS with the addition of Project traffic during one or more peak hours, in addition to those identified under opening year cumulative without Project traffic conditions. The deficiencies are summarized in Table 5.12-14.

Table 5.12-13 – Intersection Analysis for Opening Year Cumulative Conditions

#	Intersection	Traffic Control ²	2023 Without Project				2023 With Project				Jurisdiction	Deficiency? ³
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)		Level of Service			
			AM	PM	A M	P M	AM	PM	A M	P M		
1	Barton St. & Driveway 1	CSS	Future Intersection				8.6	8.7	A	A	Riverside	No
2	Barton St. & Alessandro Bl.	TS	28.7	39.7	C	C	28.7	40.1	C	D	Riverside	No
3	Private Driveway & Alessandro Bl.	TS	2.8	4.6	A	A	2.8	4.7	A	A	Riverside	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	CSS	>100.0	>100.0	F	F	>100.0	>100.0	F	F	Riverside	Yes
5	San Gorgonio Dr. & Alessandro Bl.	TS	15.0	21.5	B	C	15.3	22.3	B	C	Riverside/JPA	No
6	Sycamore Canyon Bl. & Alessandro Bl.	TS	120.2	87.6	F	F	120.9	88.2	F	F	Riverside/JPA	Yes
7	I-215 SB Ramps & Alessandro Bl.	TS	8.9	12.5	A	B	9.4	13.0	A	B	Caltrans/Riverside/County	No
8	I-215 NB Ramps & Alessandro Bl.	TS	23.7	24.2	C	C	24.1	25.1	C	D	Caltrans/Riverside/County	No
BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).												
1Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.												
2CSS = Cross-street Stop; TS = Traffic Signal; CSS = Improvement												
3See Table 5.12-14 for a detailed summary of deficiencies.												



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LEGEND:

AM PEAK HOUR

PM PEAK HOUR

LOS A-D

LOS E

LOS F



SYCAMORE HILLS DISTRIBUTION CENTER

Opening Year Cumulative with Project
Summary of LOS

Figure 5.12-17

Table 5.12-14 – Deficient Intersection Summary for Opening Year Cumulative Conditions

#	Intersection	Jurisdiction	Project % of Total Traffic		Change in Delay (secs.)		Project Trip Contribution		Deficiency? ^{1,2,3}
			AM	PM	AM	PM	AM	PM	
1	Barton St. & Driveway 1	Riverside	N/A	N/A	--	--	N/A	N/A	No
2	Barton St. & Alessandro Bl.	Riverside	N/A	N/A	0.0	0.4	N/A	N/A	No
3	Private Driveway & Alessandro Bl.	Riverside	N/A	N/A	0.0	0.1	N/A	N/A	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	Riverside	N/A	N/A	>1.0	>1.0	N/A	N/A	Yes
5	San Gorgonio Dr. & Alessandro Bl.	Riverside/JPA	N/A	N/A	0.3	0.8	N/A	N/A	No
6	Sycamore Canyon Bl. & Alessandro Bl.	Riverside/JPA	1.0%	1.1%	0.7	0.6	68	80	Yes ⁴
7	I-215 SB Ramps & Alessandro Bl.	Caltrans/Riverside /County	N/A	N/A	0.5	0.5	N/A	N/A	No
8	I-215 NB Ramps & Alessandro Bl.	Caltrans/Riverside /County	N/A	N/A	0.4	0.9	N/A	N/A	No

BOLD = Deficient Intersection

N/A = Not Applicable

¹For intersections within the jurisdiction of the City of Riverside, a deficiency occurs at a study area intersection when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:

- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds"

²For intersections within the jurisdiction of March JPA, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. However, if the pre-project condition is already below LOS D (or acceptable LOS), deficiency occurs if the Project contributes more than 2% of the total traffic.

³For intersections within the jurisdiction of Caltrans, the County of Riverside, or City of Moreno Valley, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. A deficiency also occurs if the Project contributes 50 or more peak hour trips to an already deficient intersection.

⁴The intersection currently built out to the General Plan ultimate cross-section and exceeds the General Plan target LOS. As such, the deficiency is unavoidable.

Roadway Segment Analysis

Table 5.12-15 provides a summary of the opening year cumulative without Project conditions roadway segment capacity analysis based on the City of Riverside Traffic Impact Analysis Preparation Guide. As shown on Table 5.12-15, the following roadway segments that are anticipated to operate at an unacceptable LOS under opening year cumulative without Project traffic conditions:

- Alessandro Boulevard, from Barton Street to Private Driveway – LOS E
- Alessandro Boulevard, from Private Driveway to Vista Grande Drive – LOS E
- Alessandro Boulevard, from Vista Grande Drive to San Gorgonio Drive – LOS F
- Alessandro Boulevard, from San Gorgonio Drive to Sycamore Canyon Boulevard – LOS F

As shown on Table 5.12-15, there are no additional study area roadway segments anticipated to operate at an unacceptable LOS (LOS E or worse) with the addition of Project traffic, other than

those previously identified under opening year cumulative without Project conditions. As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Table 5.12-15 – Roadway Segment Analysis for Opening Year Cumulative Conditions

#	Roadway	Segment Limits	Roadway Section	LOS Capacity ¹	2023 NP	V/C ²	LOS ³	2023 WP	V/C ²	LOS ³	Acceptable LOS ³
1	Alessandro Bl.	Barton St. to Private Driveway	6D	49,500	45,205	0.91	E	45,669	0.92	E	D
2		Private Driveway to Vista Grande Dr.	6D	49,500	46,713	0.94	E	47,177	0.95	E	D
3		Vista Grande Dr. to San Gorgonio Dr.	6D	49,500	49,558	1.00	F	50,710	1.02	F	D
4		San Gorgonio Dr. to Sycamore Canyon Bl.	6D	49,500	49,529	1.00	F	50,681	1.02	F	D
5		Sycamore Canyon Bl. to I-215 SB Ramps	6D	49,500	41,035	0.83	D	42,158	0.85	D	D
6		I-215 SB Ramps to I-215 NB Ramps	6D	49,500	37,546	0.76	C	38,151	0.77	C	D

¹ These maximum roadway capacities have been extracted from the following source: City of Riverside Traffic Impact Analysis Preparation Guide (Exhibit D) for each applicable roadway type. These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

² V/C = Volume to Capacity ratio

³ LOS = Level of Service

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramps at the I-215 freeway at Alessandro Boulevard interchange to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 freeway mainline. Queuing analysis findings are presented in Table 5.12-16 for opening year cumulative without and with Project traffic conditions. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 5.12-16, there are no queuing issues anticipated for opening year cumulative without and with Project traffic conditions.

Table 5.12-16 – Peak Hour Freeway Off-Ramp Queuing Summary for Opening Year Cumulative Conditions

Intersection	Movement	Available Stacking Distance (Feet)	2023 Without Project				2023 With Project			
			95th Percentile Queue (Feet) ³		Acceptable? ¹		95th Percentile Queue (Feet) ³		Acceptable? ¹	
			AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
I-215 SB Ramps / Alessandro Bl.	SBL	525	264 ²	217	Yes	Yes	264 ²	217	Yes	Yes
	SBL/R	1,540	264 ²	204	Yes	Yes	283 ²	210	Yes	Yes
	SBR	525	249 ²	193	Yes	Yes	268 ²	198	Yes	Yes
I-215 NB Ramps / Alessandro Bl.	NBL	450	507 ²	325 ²	Yes ³	Yes	522 ²	333 ²	Yes ³	Yes
	NBL/T/R	1,345	558 ²	372 ²	Yes	Yes	572 ²	380 ²	Yes	Yes
	NBR	450	105	207	Yes	Yes	105	207	Yes	Yes

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.

² 95th percentile volume exceeds capacity; queue may be longer. Queue shown is maximum after two cycles.

³ Although the 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

Deficiencies at Intersections

The effectiveness of the proposed improvements described in Section 5.12.3 – Project Design Considerations for the deficient intersections of Driveway 2/Vista Grande Drive and Alessandro Boulevard (see Table 5.12-14) is presented in Table 5.12-17 for opening year cumulative traffic conditions. Based on each jurisdiction's deficiency criteria, the Project is anticipated to result in deficiencies at the following intersections, as the Project would contribute to the total opening year cumulative with Project traffic forecasts:

- Driveway 2/Vista Grande Drive and Alessandro Boulevard (#4)
- Sycamore Canyon Boulevard and Alessandro Boulevard (#6)

The proposed improvements described in Section 5.12.3 – Project Design Considerations for the deficient intersection of Driveway 2/Vista Grande Drive and Alessandro Boulevard would bring the intersection out of the deficiency designation. However, as mentioned in Section 5.12.3 above, the addition of a traffic signal is not currently feasible as the intersection is too close in proximity to an existing signalized intersection of a private driveway at Alessandro Boulevard. The adjacent signalized intersection of the private driveway and Alessandro Boulevard does not currently warrant a traffic signal as the volumes on the north and south leg are nominal and are significantly less than the south leg of Vista Grande Drive and Alessandro Boulevard. Therefore, the removal of the existing traffic signal at the private driveway and Alessandro Boulevard would be required in order to install a traffic signal at Vista Grande Drive and Alessandro Boulevard. As outlined in the TA, it is recommended that the existing signal at private driveway and Alessandro Boulevard be removed and that the Project construct a new traffic signal at the intersection of Driveway 2/Vista Grande Drive and Alessandro Boulevard.

The intersection of Sycamore Canyon Boulevard and Alessandro Boulevard is currently built out to its General Plan ultimate cross-section and exceeds the General Plan target LOS. Until additional right-of-way beyond those designated in the General Plan is obtained, there are no anticipated feasible improvements. As such, the deficiency at this existing built out intersection is considered unavoidable. As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Table 5.12-17 – Intersection Analysis for Opening Year Cumulative Conditions with Project Design Improvements

#	Intersection	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (secs.)		Level of Service	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
3	Private Driveway & Alessandro Bl.																	
	- Without Improvements	TS	0	1	0	0	1	0	1	3	0	1	3	0	2.8	4.7	A	A
	- With Improvements	CSS ⁴	0	0	1	0	0	1	0	3	0	0	3	0	11.6	17.6	B	C
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.																	
	- Without Improvements	CSS	0	1	d	0	0	0	0	3	0	1	3	0	>100.0	>100.0	F	F
	- With Improvements	TS	0	1	d	1	1	0	1	3	0	1	3	0	7.8	9.5	A	A

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.
L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; d = Defacto Right Turn Lane; 1 = Improvement

² Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ CSS = Cross-street Stop; TS = Traffic Signal; TS = Improvement

⁴ Recommended improvement includes the elimination of the existing traffic and restricting the driveway access to right-in/right-out access only.

Bicycle Master Plan

Alessandro Boulevard, along the Project's frontage, has an existing Class II Bike Lane, which is identified in the City of Riverside Bicycle Master Plan. Barton Street, along the Project's frontage, does not have an existing bike lane. The Project will modify curb-and-gutter and sidewalk improvements along the Project's southern and western boundaries with Alessandro Boulevard accordingly based on the proposed driveway locations. The Project will construct Barton Street between the Project's northern boundary and southern boundary at its ultimate full-section pavement width as a Local Street (66-foot right-of-way). The proposed street improvements along Alessandro Boulevard would not prohibit the Class II Bike Lane.

The Project is required to provide sidewalk with the capability for RTA to install an Americans with Disabilities Act (ADA) compliant RTA bus stop bench and pole marker in the future along Alessandro Boulevard, near the Alessandro Boulevard/ Vista Grande Drive intersection. A trailhead parking lot is proposed on Parcel C for access to the Sycamore Canyon Wilderness

Park, which will include improvements consisting of a parking lot, sidewalk, shade structure, bike rack, drinking fountain, fencing, and a Fire Department and access gate. The trailhead parking lot will help achieve the goals of the Bicycle Master Plan as it will provide a space for bicycle users that may want to park their vehicle carrying a bicycle or park their bicycle at one of the bicycle lock racks and utilize the Sycamore Canyon Wilderness Park trails. The trailhead parking lot helps plan for the needs of bicyclists by providing bicycle parking and helps eliminate barriers to bicycling by improving safety for bicyclists. The Project will not conflict with the Bicycle Master Plan or a program, plan, or policy addressing bicycle and pedestrian facilities.

Conclusion

The Project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; potential impacts are **less than significant** and no mitigation is required.

Threshold B: *Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Based on the adopted VMT thresholds applicable to the Project, a significant impact for VMT would occur if the following condition is met:

- For new office and industrial projects, utilizing a threshold consistent with 15% below the City's current baseline VMT Per Worker/Employee is required.

Project Screening

The City Guidelines provide details on appropriate "screening thresholds" that can be used to identify when a proposed land use Project is anticipated to result in a less-than-significant impact without conducting a more detailed VMT analysis. Screening thresholds are broken into three types:

- Project Type Screening
- Map Based Screening based on Low VMT Area
- Transit Priority Area (TPA) Screening

A land use Project need only to meet one of the above screening thresholds to result in a less than significant impact.

Project Type Screening

The City Guidelines identify that local serving retail or other types of local serving land use projects that are consistent with the current SCS or General Plan are presumed to have a less than significant impact. City Guidelines also states projects that generate or attract fewer than 110 trips per day are assumed to cause a less than significant impact. The Project is consistent with the current General Plan; however, the Project is estimated to generate in excess of 110 daily trips and would therefore not be eligible for the project type screening threshold. The Project Type screening threshold is not met.

Map Based Screening based on Low VMT Area

As described in the City Guidelines, “residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary.” The Screening Tool uses the sub-regional Riverside Transportation Analysis Model (RIVTAM) to measure VMT performance within individual traffic analysis zones (TAZ) within the City. The Project’s physical location based on parcel number is input into the Screening Tool to determine project-generated VMT as compared to the City threshold. Based on the Screening Tool results (see Attachment A), the Project is not located within a low VMT generating zone. The Low VMT Area screening threshold is not met.

TPA Screening

Consistent with guidance identified in the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within 0.5 mile of an existing “major transit stop” or an existing stop along a “high-quality transit corridor”) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Based on the Screening Tool results, the Project site is not located within 0.5 mile of an existing major transit stop, or along a high-quality transit corridor. The TPA screening threshold is not met.

Project VMT Analysis

The RIVTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households and employment. RIVTAM is a travel forecasting model that represents a sub-area of the SCAG model. The model was originally completed in 2009 and was later updated to include a 2012 base year and 2040 forecast horizon year. The model was designed to provide a greater level of detail and sensitivity in the Riverside County area as compared to the regional SCAG model. The City Guidelines identifies RIVTAM as the appropriate tool for conducting VMT analysis for land use projects in the City of Riverside. Project VMT has been calculated using the most current version of RIVTAM, which includes a 2012 base year model and a 2040 horizon year model. Adjustments in socio-economic data (SED) (i.e., employment) for the Project have been made to a separate traffic analysis zone (TAZ) within the RIVTAM model to reflect the Project’s proposed land use (i.e., industrial/warehouse type use). A separate TAZ has been utilized in order to isolate trips to/from the Project. Table 5.12-18 summarizes the employment factors and employment estimates for the Project.

Table 5.12-18 – Employment Density Factors

	Project
Building Square Footage	603,100
Employment Density Factor ¹	1 employee/1,030 SF
Employment	586
¹ Employee Density Factor was obtained from the County of Riverside General Plan Appendix E-2: Socioeconomic Build-Out Assumptions and Methodology (see Table E-5, Commercial Employment Factors, Page 3).	

Adjustments to employment for the Project's TAZ were made to both the RIVTAM base year model (2012) and the cumulative year model (2040). Project-generated home-based work (HBW) VMT was then calculated for both the base year model (2012) and cumulative year model (2040). The VMT is then normalized by dividing by the number of Project employees. As shown in Table 5.12-19, the Project base year VMT per employee is 15.71 and the Project cumulative year VMT per employee is 17.34.

Table 5.12-19 – Project VMT Per Employee

	Baseline 2012	Cumulative 2040 Project
VMT	9,206	10,159
Employment	586	586
VMT / Employee	15.71	17.34

Table 5.12-20 illustrates the comparison between the Project generated VMT per employee to the City's current baseline VMT per employee. As shown, the Project would exceed the threshold of 15% below the current City of Riverside VMT per employee for both the baseline and cumulative Project generated VMT. As such, the Project's impact based on VMT is **significant and unavoidable**.

Table 5.12-20 – VMT Per Employee Comparison

	2012 VMT/Employee	2040 VMT/Employee
City of Riverside Current VMT/Employee	13.24	13.24
Project VMT/Employee	15.71	17.34
Percent Change	+18.66%	+30.97%
Potentially Significant?	Yes	Yes

Project's Effect on VMT

Consistent with City Guidelines, projects that are found to have a potentially significant impact using efficiency-based metrics (such as VMT per employee) should also provide an additional assessment to evaluate a project's effect on VMT. The Project would have a significant impact to

VMT if the Project were to increase VMT per employee under baseline and cumulative scenarios when compared to VMT conditions without the Project. This varies from the City's VMT threshold that requires a Project to be 15% below the City's current baseline VMT per worker/employee. As noted in the City Guidelines, this analysis is performed using the boundary method, which includes all vehicle trips with one or both trip-ends within a specific geographic area of interest (i.e., the City of Riverside). As shown on Table 5.12-21, the Project is anticipated to result in a base year (2012) net decrease of 0.200 VMT per employee and a cumulative year (2040) net decrease of 0.091 VMT per employee. The Project's effect on the City's VMT is **less than significant**.

Table 5.12-21 – Project's Effect on City VMT

	2012 Without Project	2012 With Project	2040 Without Project	2040 With Project
VMT	5,730,358	5,734,341	8,723,408	8,724,916
Employment	119,544	120,130	228,619	229,205
VMT/Employee	47.935	47.735	38.157	38.066
Change in VMT	-0.200		-0.091	
Potentially Significant?	No		No	

Transportation demand management (TDM) strategies have been evaluated for the purpose of reducing VMT. The purpose of TDM strategies is to reduce the need for single occupancy automobile trips. The effectiveness of TDM strategies available to individual land use projects in Riverside County was thoroughly evaluated by the SB 743 Implementation TDM Strategy Assessment (February 26, 2019, Fehr & Peers) (WRCOG Report) prepared for WRCOG, which evaluated the TDM measures identified in the Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010) (CAPCOA) for their relevance to projects in the WRCOG area.

The WRCOG Report indicates that of the 50 transportation measures presented by CAPCOA, only 41 are applicable at a building and site level. Aside from the 41 measures applicable at a building and site level, the remaining 9 measures are functions of, or depend on, site location and/or actions by local and regional agencies or funders.

Based on a review of the 41 transportation measures identified by CAPCOA, the WRCOG Report identifies that seven (7) of those measures have the potential to be effective at the project level in the predominantly suburban context of the WRCOG area. Evaluation of the potentially applicable TDM strategy in the context of the Project is summarized below.

- **Measure 1: Increase Diversity of Land Uses (LUT-3).** Having different types of land uses near one another can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transportation. For example, when residential areas are in the same neighborhood as retail and office buildings, a resident does not need to travel outside of the neighborhood to meet his/her trip needs.

Remarks: The Project proposes the construction of two high-cube short-term transload warehouse buildings, totaling 603,100 square feet. In order for the above measure to apply, at

least three of the following must be located on-site, or off-site within ¼ mile of the Project: Residential Development, Retail Development, Park, Open Space, or Office. There is residential and limited retail located off-site within ¼ mile south of the Project, and park/open space (Sycamore Canyon Wilderness Park) within a ¼ mile north of the Project. However, as the proposed Project does not include a mix of land uses within the development site, but is instead located within a sphere of influence to a mix residential and retail uses (i.e., ¼ mile radius), this particular TDM measure would provide a low reduction and is therefore not evaluated further as a means of providing a reduction in Project VMT.

- Measure 2: Provide Pedestrian Network Improvements (SDT-1). Providing a pedestrian access network to link areas of the Project site encourages people to walk instead of drive assuming that desirable destinations are within walking distance of the Project. This mode shift results in people driving less and a reduction in VMT.

Remarks: There are existing sidewalks along Alessandro Boulevard and Barton Street. The Project is proposing to improve the pedestrian network along the Project frontage and at the intersection of Vista Del Grande & Alessandro Boulevard. As noted in the WRCOG Report and by CAPCOA, this measure would provide a nominal reduction in Project VMT due to the limited new pedestrian connections created.

- Measure 3: Provide Traffic Calming Measure (SDT-2). Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift will result in a decrease in VMT. Traffic calming features may include: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others.

Remarks: The Alessandro Boulevard corridor provides for sidewalk and bike lane enhancements. There is limited opportunity for the Project to implement meaningful enhanced mitigation in this area. This measure is therefore not evaluated further as means of providing a reduction in Project VMT.

- Measure 4: Implement Car-Sharing Program (TRT-9). Implementing a car-sharing program would allow individuals to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees.

Remarks: It is possible that employers within the Project site could implement car-sharing programs. This may provide car access for employees on an as-needed basis, and thereby alleviate some of the costs and responsibilities of individual car ownership. The effectiveness of this measure is dependent on the ultimate building tenant(s) which are unknown currently. As such, this measure is therefore not evaluated further as means of providing a reduction in Project VMT.

- Measure 5: Increase Transit Service Frequency and Speed (TST-4). This measure serves to reduce transit-passenger travel time through more reduced headways and increased speed

and reliability. This makes transit service more attractive and may result in a mode shift from auto to transit which reduces VMT.

Remarks: The study area is currently served by Riverside Transit Agency (RTA), a public transit agency serving various jurisdictions within Riverside County. RTA Routes 20 and 26 currently provide proximate service (within one-quarter mile) of the Project site. Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. It is recommended that the Applicant work in conjunction with the Lead Agency and RTA to coordinate potential bus service to the Project site. Since implementation of this strategy would require agency implementation it is not applicable for individual development projects. This measure is therefore not evaluated further as means of providing a reduction in Project VMT.

- **Measure 6: Encourage Telecommuting and Alternative Work Schedule (TRT-6).** Encouraging telecommuting and alternative work schedules reduces the number of commute trips and therefore VMT traveled by employees. Alternative work schedules could take the form of staggered starting times, flexible schedules, or compressed work weeks.

Remarks: The effectiveness of this measure is dependent on the ultimate building tenant(s) which are unknown currently. As such, this measure is therefore not evaluated further as means of providing a reduction in Project VMT.

- **Measure 7: Provide Ride-Sharing Programs (TRT-3).** This strategy focuses on encouraging carpooling and vanpooling.

Remarks: The effectiveness of this measure is dependent on the ultimate building tenant(s) which are unknown currently. As such, this measure is therefore not evaluated further as means of providing a reduction in Project VMT.

The effectiveness of the above-noted TDM measures would be dependent in large part on future Project occupancies, which are unknown at this time. Beyond Project tenancy considerations, land use context is a major factor relevant to the potential application and effectiveness of TDM measures. More specifically, the land use context of the Project is characteristically suburban center. Of itself, the Project's suburban center context acts to limit the range of feasible TDM measures and moderates their potential effectiveness.

Conclusion

Even under the most favorable circumstances, projects located within a suburban center context, such as the proposed Project evaluated here, could realize a maximum 15 percent reduction in VMT through implementation of feasible TDM measures. The Project is estimated to exceed the current City of Riverside VMT per employee by 18.66% in base year (2012) and 30.97% in cumulative year (2040). Given that the maximum percent reduction is 15% through feasible TDM measures, the Project cannot reduce the Project-generated VMT to below the threshold of 15% below the current City of Riverside VMT per employee. The Project VMT impact is therefore **considered significant and unavoidable**.

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

As discussed in Section 5.8 Hazards and Hazardous Materials, the Project is located approximately 3.4 miles northwest of the March Air Reserve Base (MARB) and is located within Zone C1 of the MARB/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). The Project will consist of light industrial activities, which are uses permitted within Zone C1. Further, as discussed, the Project would not require Zone C1 airspace review for structures over 70 feet in height as both Building A and Building B would maximum building heights of 45 feet, including parapets. Moreover, the Project would not require Federal Aviation Administration (FAA) review for structures with top of roof exceeding 124 feet as the Project's maximum building height will be 45 feet. Thus, as the Project would not conflict with the compatibility requirements of Zone C1 of the MARB/IPA LUCP, the Project is not expected to 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. Potential impacts would be **less than significant**.

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

Vehicle access, including emergency vehicle access to the Project site would be accessible from Barton Street and Alessandro Boulevard. The Project would include the extension of Barton Street northward to connect Building B with two driveways (TA Driveway 1) with a fire department access gate. Access to Building A from Alessandro Boulevard would require the construction of an access road/driveway (TA Driveway 2). The driveways and internal roadways would comply with California Building Code standards and would not include design features that would increase circulation hazards. The Project proposes a trailhead parking lot at Parcel C, which would include a decomposed granite parking lot, landscaping, shade structure with benches, bike rack, drinking fountain, ADA-compliant parking spaces, and sidewalk. As a condition of approval, the applicant will be required to provide signage, traffic control measures, and a protected route for park users during construction. Safe public access to Sycamore Canyon Wilderness Park during construction and any closures to park access at Barton Avenue must be approved by the City and posted 48-hours in advance and shall not exceed 1 week duration. The parking lot and trail will provide safe access for Park users reducing the potential conflict between Park users and commercial vehicles within the Project site.

For the reasons set forth above, Project impacts with regard to increased hazards due to a geometric design feature would be **less than significant**.

5.12.8 Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Implementation of the Project will result in significant impacts related to transportation and conflict with GP policies and VMT, and therefore, potential mitigation measures were evaluated. As discussed in Threshold B above, there are no feasible mitigation measures that would reduce impacts to less than significant levels.

5.12.9 Cumulative Environmental Effects

Cumulative Development Traffic

The TA evaluated a Horizon Year (2040) conditions, which represents the cumulative traffic conditions for this EIR. This section discusses the methods used to develop Horizon Year (2040) without and with Project traffic forecasts, and the resulting intersection operations, roadway segment operations, and traffic signal warrant analyses.

Horizon Year Without Project Traffic Conditions

The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Horizon Year (2040) Without Project traffic conditions are shown on Figure 5.12-18.

Horizon Year With Project Traffic Conditions

The weekday ADT and weekday AM and PM peak hour volumes which can be expected for Horizon Year (2040) with Project traffic conditions are shown on Figure 5.12-19.

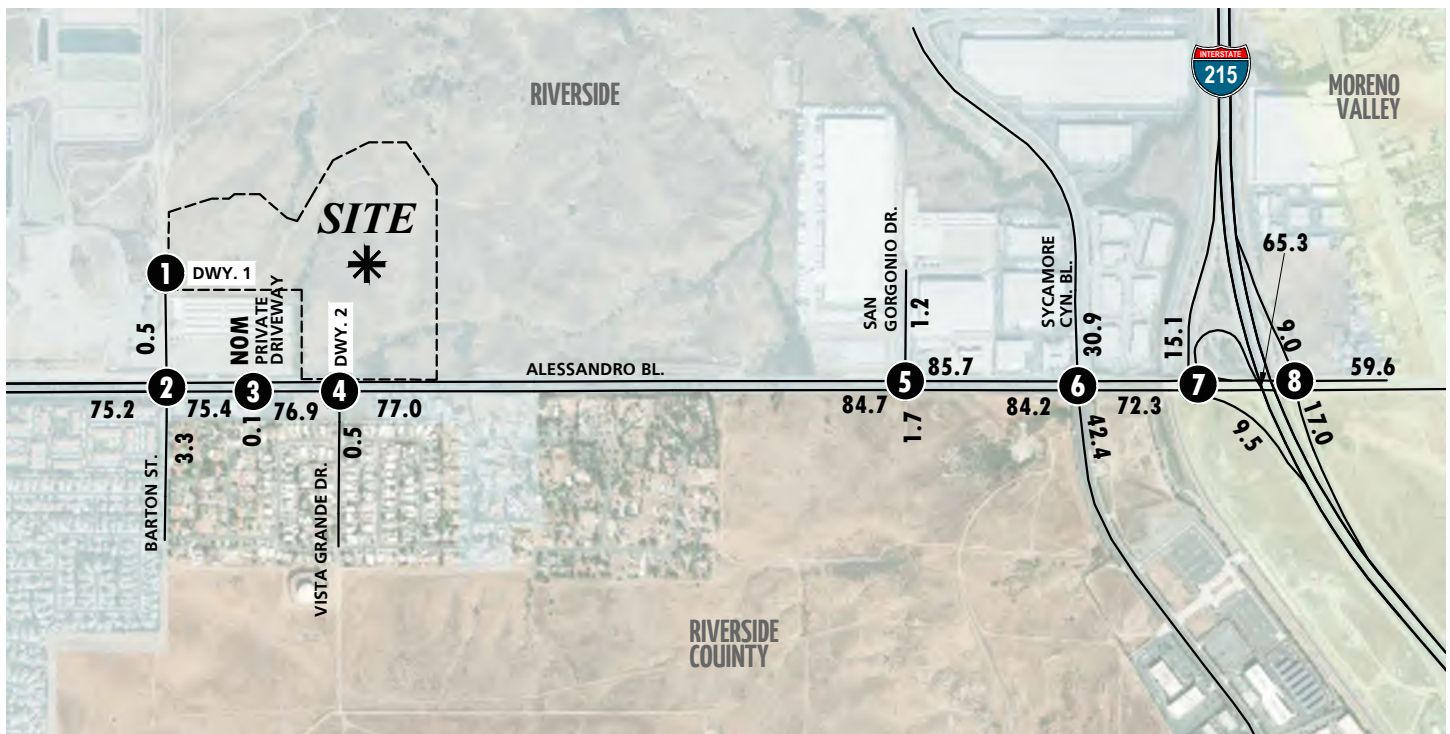
Intersection Operations Analysis

Horizon Year Without Project Traffic Conditions

LOS calculations were conducted for the study intersections to evaluate their operations under Horizon Year (2040) without Project conditions with intersection geometrics consistent with Figure 5.12-2. As shown in Table 5.12-22, the following study area intersections are anticipated to operate at an unacceptable level of service (e.g., LOS E or worse):

- Driveway 2/Vista Grande Drive and Alessandro Boulevard (#4) – LOS F AM and PM peak hours
- Sycamore Canyon Boulevard and Alessandro Boulevard (#6) – LOS F AM and PM peak hours
- I-215 NB Ramps and Alessandro Boulevard (#8) – LOS E AM and PM peak hours

A summary of the peak hour intersection LOS for Horizon Year Without Project conditions are shown on Figure 5.12-20.



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1 Barton St. & Dwy. 1 Future Intersection	2 Barton St. & Alessandro Bl. <div> <div>4(9)</div> <div>0(0)</div> <div>7(10)</div> <div>6(19)</div> <div>3377(2775)</div> <div>47(72)</div> </div> <div> <div>4(12)</div> <div>1809(3282)</div> <div>18(41)</div> <div>76(59)</div> <div>0(0)</div> <div>69(58)</div> </div>	3 Private Driveway & Alessandro Bl. <div> <div>0(0)</div> <div>0(0)</div> <div>0(0)</div> <div>0(0)</div> <div>3430(2866)</div> <div>2(4)</div> </div> <div> <div>6(4)</div> <div>1873(3345)</div> <div>6(1)</div> <div>4(6)</div> <div>0(0)</div> <div>4(2)</div> </div>	4 Dwy. 2 & Alessandro Bl. <div> <div>3432(2870)</div> <div>14(27)</div> </div> <div> <div>1877(3347)</div> <div>8(14)</div> <div>4(2)</div> <div>17(11)</div> </div>	5 San Geronio Dr. & Alessandro Bl. <div> <div>16(21)</div> <div>0(0)</div> <div>25(34)</div> <div>46(25)</div> <div>3760(2859)</div> <div>175(101)</div> </div> <div> <div>13(18)</div> <div>1869(3683)</div> <div>35(20)</div> <div>13(36)</div> <div>0(0)</div> <div>68(186)</div> </div>
6 Sycamore Canyon Bl./ Meridian Pkwy. & Alessandro Bl. <div> <div>258(494)</div> <div>175(855)</div> <div>174(245)</div> <div>607(232)</div> <div>2984(2352)</div> <div>315(273)</div> </div> <div> <div>256(332)</div> <div>1709(2688)</div> <div>367(716)</div> <div>672(536)</div> <div>859(416)</div> <div>111(295)</div> </div>	7 I-215 SB Ramps & Alessandro Bl. <div> <div>587(537)</div> <div>350(333)</div> <div>270(183)</div> <div>3319(2318)</div> </div> <div> <div>1513(2582)</div> <div>481(647)</div> </div>	8 I-215 NB Ramps & Alessandro Bl. <div> <div>211(300)</div> <div>2487(1765)</div> </div> <div> <div>91(252)</div> <div>1736(2613)</div> <div>1165(751)</div> <div>35(68)</div> <div>274(382)</div> </div>	LEGEND: 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES 10.0 = VEHICLES PER DAY (1000'S) NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY	

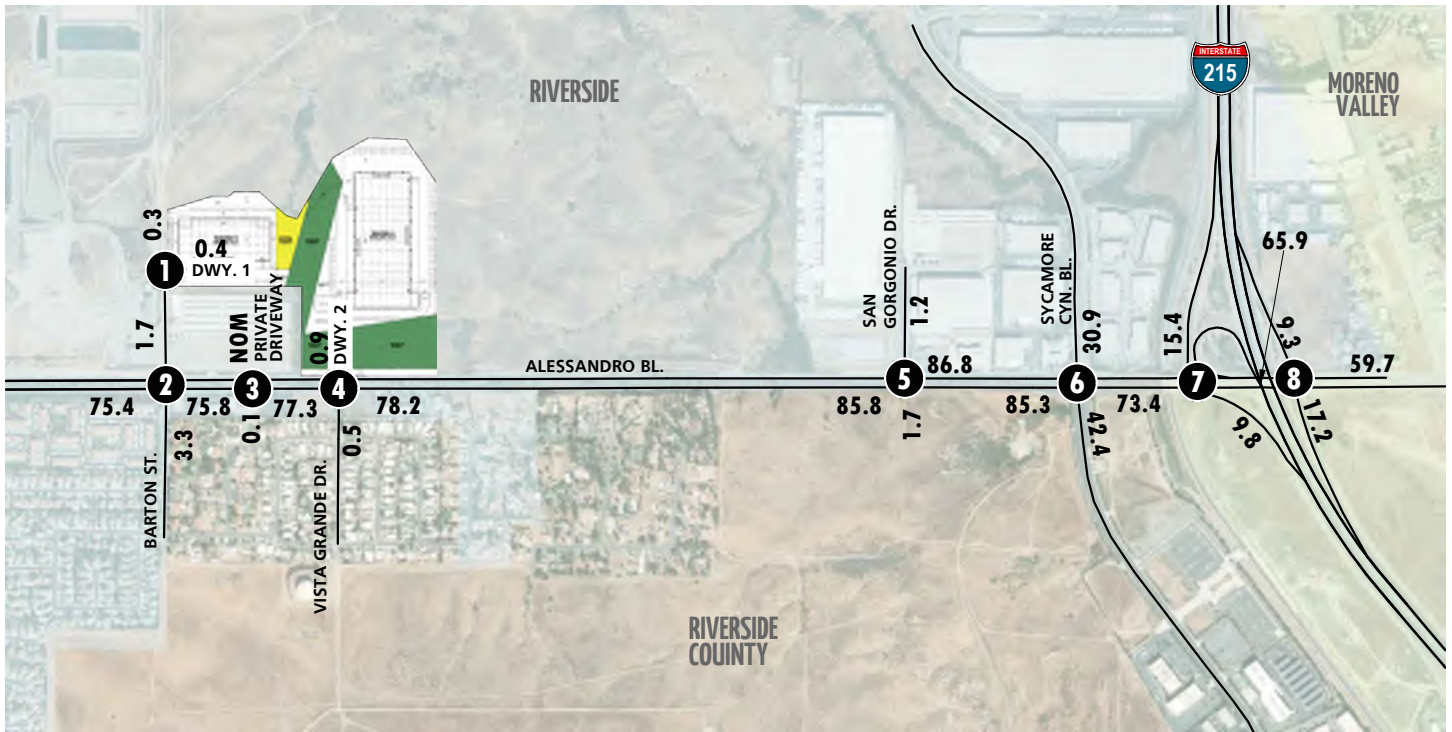


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Horizon Year without Project Traffic Volumes



Figure 5.12-18



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1 Barton St. & Dwy. 1 	2 Barton St. & Alessandro Bl. 	3 Private Driveway & Alessandro Bl. 	4 Dwy. 2 & Alessandro Bl. 	5 San Geronio Dr. & Alessandro Bl.
6 Sycamore Canyon Bl./ Meridian Pkwy. & Alessandro Bl. 	7 I-215 SB Ramps & Alessandro Bl. 	8 I-215 NB Ramps & Alessandro Bl. 	LEGEND: 10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES 10.0 = VEHICLES PER DAY (1000'S) NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY	

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Horizon Year with Project Traffic Volumes

Figure 5.12-19



LEGEND:

- = AM PEAK HOUR
- = PM PEAK HOUR
- = LOS A-D
- = LOS E
- = LOS F
- = NOT AN ANALYSIS LOCATION FOR THIS SCENARIO



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Horizon Year without Project Summary of LOS

Figure 5.12-20

Table 5.12-22 – Intersection Analysis for Horizon Year Conditions

#	Intersection	Traffic Control ²	2040 Without Project				2040 With Project				Jurisdiction	Deficiency? ³
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)		Level of Service			
			AM	PM	A M	P M	AM	PM	A M	P M		
1	Barton St. & Driveway 1	CSS	Future Intersection				8.6	8.7	A	A	Riverside	No
2	Barton St. & Alessandro Bl.	TS	49.8	48.5	D	D	51.2	48.6	D	D	Riverside	No
3	Private Driveway & Alessandro Bl.	TS	4.9	13.2	A	B	5.0	13.4	A	B	Riverside	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	CSS	>100.0	>100.0	F	F	>100.0	>100.0	F	F	Riverside	Yes
5	San Gorgonio Dr. & Alessandro Bl.	TS	48.4	51.4	D	D	49.2	53.4	D	D	Riverside/JPA	No
6	Sycamore Canyon Bl. & Alessandro Bl.	TS	213.6	148.5	F	F	213.9	149.0	F	F	Riverside/JPA	Yes
7	I-215 SB Ramps & Alessandro Bl.	TS	23.9	27.3	C	C	27.2	30.6	C	C	Caltrans/Riverside/County	No
8	I-215 NB Ramps & Alessandro Bl.	TS	68.7	58.5	E	E	69.5	59.8	E	E	Caltrans/Riverside/County	No

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹ Per the Highway Capacity Manual 6th Edition, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

² CSS = Cross-street Stop; TS = Traffic Signal; CSS = Improvement

³ See Table 5.12-23 for a detailed summary of deficiencies.

Horizon Year With Project Traffic Conditions

As shown on Table 5.12-22 and illustrated on Figure 5.12-21, there are no additional study area intersections anticipated to operate at an unacceptable LOS (LOS E or worse) with the addition of Project traffic, other than those previously identified under Horizon Year Without Project conditions. The deficiencies are summarized in Table 5.12-23. As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.



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LEGEND:

- AM PEAK HOUR
- PM PEAK HOUR
- LOS A-D
- LOS E
- LOS F

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Horizon Year with Project Summary of LOS

Figure 5.12-21

Table 5.12-23 – Deficient Intersection Summary for Horizon Year Conditions

#	Intersection	Jurisdiction	Project % of Total Traffic		Change in Delay (secs.)		Project Trip Contribution		Deficiency? 1,2,3
			AM	PM	AM	PM	AM	PM	
1	Barton St. & Driveway 1	Riverside	N/A	N/A	--	--	N/A	N/A	No
2	Barton St. & Alessandro Bl.	Riverside	N/A	N/A	1.4	0.1	N/A	N/A	No
3	Private Driveway & Alessandro Bl.	Riverside	N/A	N/A	0.1	0.2	N/A	N/A	No
4	Driveway 2/Vista Grande Dr. & Alessandro Bl.	Riverside	N/A	N/A	>1.0	>1.0	N/A	N/A	Yes
5	San Gorgonio Dr. & Alessandro Bl.	Riverside/JPA	N/A	N/A	0.8	2.0	N/A	N/A	No
6	Sycamore Canyon Bl. & Alessandro Bl.	Riverside/JPA	1.0 %	1.1%	0.3	0.5	68	80	Yes ⁴
7	I-215 SB Ramps & Alessandro Bl.	Caltrans/Riverside/County	N/A	N/A	3.3	3.3	N/A	N/A	No
8	I-215 NB Ramps & Alessandro Bl.	Caltrans/Riverside/County	N/A	N/A	0.8	1.3	33	43	No

BOLD = Deficient Intersection

N/A = Not Applicable

¹ "For intersections within the jurisdiction of the City of Riverside, a deficiency occurs at a study area intersection when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak hour delay to increase as follows:

- LOS A/B = By 10.0 seconds
- LOS C = By 8.0 seconds
- LOS D = By 5.0 seconds
- LOS E = By 2.0 seconds
- LOS F = By 1.0 seconds"

² For intersections within the jurisdiction of March JPA, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. However, if the pre-project condition is already below LOS D (or acceptable LOS), deficiency occurs if the Project contributes more than 2% of the total traffic.

³ For intersections within the jurisdiction of Caltrans, the County of Riverside, or City of Moreno Valley, if the pre-project condition is at or better than LOS D (or acceptable LOS) and the project-generated traffic causes deterioration below acceptable levels, a deficiency is deemed to occur. A deficiency also occurs if the Project contributes 50 or more peak hour trips to an already deficient intersection.

⁴ The intersection currently built out to the General Plan ultimate cross-section and exceeds the General Plan target LOS. As such, the deficiency is unavoidable.

Traffic Signal Warrants Analysis

No study area intersections are anticipated to meet traffic signal warrants for Horizon Year (2040) without and with Project traffic conditions.

Roadway Segment Analysis

As noted previously, the City of Riverside stated roadway segment capacities are approximate figures only and are used at the General Plan level to assist in determining the roadway functional classification (number of through lanes) needed to meet future traffic demand.

Table 5.12-24 provides a summary of the Horizon Year (2040) without Project conditions roadway segment capacity analysis based on the City of Riverside Traffic Impact Analysis Preparation Guide identified previously on Table 5.12-4. As shown on Table 5.12-24, all roadway segments are anticipated to operate at an unacceptable LOS under Horizon Year (2040) without and with Project traffic conditions. As auto delay, on its own, is no longer an environmental impact pursuant

to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Table 5.12-24 – Roadway Segment Analysis for Horizon Year Conditions

#	Roadway	Segment Limits	Roadway Section	LOS Capacity ¹	2040 NP	V/C ²	LOS ³	2040 WP	V/C ²	LOS ³	Acceptable LOS ³
1	Alessandro Bl.	Barton St. to Private Driveway	6D	49,500	75,352	1.52	F	75,816	1.53	F	D
2		Private Driveway to Vista Grande Dr.	6D	49,500	76,860	1.55	F	77,324	1.56	F	D
3		Vista Grande Dr. to San Gorgonio Dr.	6D	49,500	84,666	1.71	F	85,818	1.73	F	D
4		San Gorgonio Dr. to Sycamore Canyon Bl.	6D	49,500	85,687	1.73	F	86,839	1.75	F	D
5		Sycamore Canyon Bl. to I-215 SB Ramps	6D	49,500	72,308	1.46	F	73,431	1.48	F	D
6		I-215 SB Ramps to I-215 NB Ramps	6D	49,500	65,293	1.32	F	65,898	1.33	F	D

¹ These maximum roadway capacities have been extracted from the following source: City of Riverside Traffic Impact Analysis Preparation Guide (Exhibit D) for each applicable roadway type. These roadway capacities are "rule of thumb" estimates for planning purposes. The LOS "E" service volumes are estimated maximum daily capacity for respective classifications. Capacity is affected by such factors as intersections (spacing, configuration and control features), degree of access control, roadway grades, design geometrics (horizontal and vertical alignment standards), sight distance, vehicle mix (truck and bus traffic) and pedestrian and bicycle traffic.

² V/C = Volume to Capacity ratio

³ LOS = Level of Service

Off-Ramp Queuing Analysis

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Alessandro Boulevard interchange to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 5.12-25 for Horizon Year (2040) without and with Project traffic conditions. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 5.12-25, there are no queuing issues anticipated for Horizon Year (2040) without and with Project traffic conditions.

Table 5.12-25 – Peak Hour Freeway Off-Ramp Queuing Summary for Horizon year Conditions

Intersection	Movement	Available Stacking Distance (Feet)	2040 Without Project						2040 With Project					
			95th Percentile Queue (Feet) ³				Acceptable? ¹		95th Percentile Queue (Feet) ³				Acceptable? ¹	
			AM Peak Hour	PM Peak Hour	AM	PM	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM	AM	PM
I-215 SB Ramps / Alessandro Bl.	SBL	525	349 ²	281 ²	Yes	Yes	349 ²	281 ²	Yes	Yes	Yes	Yes	Yes	Yes
	SBL/R	1,540	360 ²	279 ²	Yes	Yes	378 ²	287 ²	Yes	Yes	Yes	Yes	Yes	Yes
	SBR	525	341 ²	261 ²	Yes	Yes	360 ²	270 ²	Yes	Yes	Yes	Yes	Yes	Yes
I-215 NB Ramps / Alessandro Bl.	NBL	450	588 ²	409 ²	Yes ³	Yes	602 ²	453 ²	Yes ³	Yes	Yes	Yes	Yes	Yes
	NBL/T/R	1,345	624 ²	446 ²	Yes	Yes	636 ²	490 ²	Yes	Yes	Yes	Yes	Yes	Yes
	NBR	450	123	244	Yes	Yes	123	257	Yes	Yes	Yes	Yes	Yes	Yes

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown in this table, where applicable.

² 95th percentile volume exceeds capacity; queue may be longer. Queue shown is maximum after two cycles.

³ Although the 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

Horizon Year Deficiencies

Based on each jurisdiction's deficiency criteria, the Project is anticipated to result in deficiencies at the following intersections, as the Project would contribute to the total Horizon Year (2040) with Project traffic forecasts:

- Driveway 2/Vista Grande Drive and Alessandro Boulevard (#4)
- Sycamore Canyon Boulevard and Alessandro Boulevard (#6)

The deficiencies and Project Design Consideration (Section 5.12.3) improvements consistent with E+P and Opening Year Cumulative (2023) conditions are also consistent with Horizon Year (2040) conditions.

The intersection of Sycamore Canyon Boulevard and Alessandro Boulevard is currently built out to its General Plan ultimate cross-section and exceeds the General Plan target LOS. Until additional right-of-way beyond those designated in the General Plan is obtained, there are no anticipated feasible improvements. As auto delay, on its own, is no longer an environmental impact pursuant to CEQA guidelines, the Project will have **no impacts** to transportation, as a result of LOS deficiency.

Cumulative VMT Impacts

The Project is estimated to exceed the current City of Riverside VMT per employee by 30.97% in cumulative year (2040). Given that the maximum percent reduction is 15% through feasible TDM measures, the Project cannot reduce the Project-generated VMT to below the threshold of 15% below the current City of Riverside VMT per employee. Cumulatively, the Project VMT impact is therefore considered **significant and unavoidable**.

Conclusion

The Project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; cumulatively considerable potential impacts are **less than significant** and no mitigation is required.

Even with implementation of feasible TDM measures, Project VMT cannot be reduced to less than significant levels and thus, the Project's VMT would also contribute to cumulative impacts and are **considered significant and unavoidable**.

5.12.10 References

The following references were used in the preparation of this section of the DEIR:

Bicycle Master Plan	City of Riverside Bicycle Master Plan Update: Addendum. March 2012. (Available at https://www.riversideca.gov/traffic/pdf/Plan-Update.pdf)
GP 2025	City of Riverside, General Plan 2025, November 2007
GP 2025 FEIR	City of Riverside, General Plan 2025 Program Environmental Impact Report, November 2007
RCMC	City of Riverside, Municipal Code. (Available at http://www.riversideca.gov/municode/ , accessed May 2020)
SCAG 2020	Southern California Association of Governments. Connect SoCal – the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. (Available at https://www.connectsocial.org/Pages/What-Is-Connect-SoCal.aspx)
TA	Urban Crossroads, <i>Sycamore Hills Distribution Center prepared Traffic Operations Analysis</i> , June 2019. (Revised October 2020)
VMT	Urban Crossroads, <i>Sycamore Hills Distribution Center Vehicle Miles Travelled (VMT) Analysis</i> , October 2020.

5.13 Tribal Cultural Resources

Based on Appendix G of the *State CEQA Guidelines*, the analysis in the Initial Study (IS/NOP) prepared for this Project (Appendix A), and comments received during the NOP public comment period, this section evaluates potential impacts to tribal cultural resources. The analysis is based on the *Phase I and Phase II Cultural Resource Investigations for the Sycamore Hills Distribution Center Project* (September 2020, contained in Appendix E) prepared by Applied Earthworks (AE), a Traditional Cultural Landscape (TCL) Study prepared by AE (February 2021; confidential), a Traditional Cultural Property (TCP) Study prepared by AE (March 2021; confidential), as well as the City's consultation with Native American Tribes.

5.13.1 Setting

Environmental Setting

As discussed in Section 5.4 Cultural Resources, the Project is within the northeastern part of the geologically complex Peninsular Ranges geomorphic province. The Peninsular Ranges are bounded to the east by the Colorado Desert and range in width from 30 to 100 miles. The Project is approximately 3.5 miles northeast of Lake Mathews and 1.5 miles southwest of Box Springs Mountain, within the central part of the Perris Block, a relatively stable rectangular structural unit positioned between the Elsinore and San Jacinto fault zones.

The geology in the vicinity of the proposed Project consists largely of Cretaceous plutonic rocks that are part of the composite Peninsular Ranges batholith. East of the proposed Project, very old alluvial fan deposits flank the west side of the San Jacinto Valley and form a low relief and nearly level plain, which are likely derived from the Val Verde Pluton and the Box Spring Mountains. Similarly, to the west is a very old alluvial fan forming the eastern side of the Santa Ana Valley that is likely also derived from the Val Verde Pluton and the western slopes of the Box Spring Mountains.

Much of the Project consists of biotite-hornblende tonalite, the principal plutonic rock type of the Val Verde Pluton. The tonalite is a relatively weathered, homogeneous, gray granitic rock that is mostly massive and occasionally foliated.

Soils within the Project, as mapped by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), are all derived from alluvium from granitic bedrock, which is usually deeply weathered. Mapped soil series with a buried A (Ab) horizon are considered to have a higher probability of a cultural resource. None of the mapped soil series has a buried A (Ab) horizon; therefore, intact and significant buried cultural deposits are unlikely. The majority of the Project site consists of Ramona and Fallbrook soils. Ramona fine sandy loams are nearly level to moderately steep on terraces and fans at elevations of 250 to 3,500 feet AMSL. Fallbrook soils are gently rolling to very steep on round hills at elevations of 200 to 3,000 feet AMSL or as high as 3,500 feet AMSL on south-facing slopes. Bedrock outcrops are common in some areas. As the climate of the region is largely determined by topographic features, climate, in turn, largely dictates the character of the biotic environment exploited by native populations. The climate of the Project is characterized as Mediterranean, with hot, dry summers and cool,

moist winters. It has a semi-arid precipitation regime; significant changes in temperature and moisture occur based on elevation and exposure, particularly in the nearby mountains. The average annual rainfall ranges from 9 to 16 inches and the mean annual temperature varies from 59 to 65 °F.

Cultural Resources Investigation and Known Historical Resources

According to 36 CFR § 800.16(d), the Area of Potential Effect (APE) is the geographic area within which a federal undertaking may directly or indirectly cause alterations to the character or use of historic properties. The Project qualifies as a federal undertaking because it is under direct or indirect jurisdiction of a federal agency (36 CFR § 800.16[y]). The APE for this Project is limited to all proposed features within the 48.64-acre vacant Project area investigated by AE for CEQA purposes, and belowground where ground disturbance may reach a maximum depth of 16 feet below the current grade within the APE. For the purposes of documenting all potential archaeological resources, the APE is part of a larger Study Area, which is comprised of the APE and a 1-mile-radius of the APE.

Archival and published reports suggest the Project area is situated where the traditional use territories of the Serrano, Cahuilla, Luiseño, and Gabrielino overlap. All of these cultural groups spoke languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock. Specific aspects of Serrano, Cahuilla, Luiseño, and Gabrielino ethnography and ethnohistory are explored in section 5.4.1 (AE 2020b).

A California Native American Heritage Commission (NAHC) Sacred Lands File search indicated the presence of Native American cultural sites within the immediate Project area. The NAHC recommended that other sources of cultural resources be contacted to solicit any information pertinent to cultural or tribal resources within the Project site, and they provided a list of regional Native American tribal representatives who may have knowledge of cultural resources within the Project area. Tribal communities listed on the NAHC list included the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Mission Indians, Cabazon Band of Cahuilla Mission Indians, Cahuilla Band of Indians, Los Coyotes Band of Cahuilla and Cupeño Indians, Morongo Band of Mission Indians, Ramona Band of Cahuilla Indians, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseño Indians, and the Torres-Martinez Desert Cahuilla Indians. All of these tribes were contacted by AE on October 2, 2018. (AE 2020b)

Review of previously recorded resources and results of a pedestrian field survey by AE archaeologists revealed findings of tribal cultural resources present on the Project site.

On September 19, 2018, AE archaeologists completed an intensive pedestrian surface survey for cultural resources in the 48.64-acre Project site. All of the prehistoric archaeological resources documented within a 1-mile radius of the Project site are bedrock milling sites (some with ground stone, such as manos, and other lithics). The Project site contains a total seven bedrock milling sites. These sites are comprised of granitic boulders with multiple milling slicks, described in detail below. Four of the sites (CA-RIV-2486, CA-RIV-2487, CA-RIV-2488, and CA-RIV-2489) were previously recorded, and AE identified and documented three more archaeological milling sites (CA-RIV-11772, CA-RIV-11770, and CA-RIV-11769) within the Project site.

During the September 2018 pedestrian survey, AE survey personnel attempted to re-identify any cultural resources within the Project's APE, which included the entire approximately 48.64 acres of land constituting the Project site. All areas likely to contain or exhibit archaeologically or historically sensitive cultural resources were inspected carefully to ensure that visible, potentially significant cultural resources were discovered and documented (AE 2020b). In addition to the four previously documented sites, AE identified another three sites. AE evaluated each identified archaeological resource within the Project site for significance and eligibility for listing in the National Register of Historic Places (NRHP) and/or the California Register of Historic Resources (CRHR) and recommended that all seven sites are individually ineligible for listing in the NRHP (see section 5.13.2.1 below for listing criteria), CRHR, or as a City of Riverside Cultural Resource. (AE 2020b).

CA-RIV-2486 (33-002486)

AE found CA-RIV-2486 to be a 58 by 35-meter bedrock milling site consisting of two granitic boulder outcrops with a total of 10 milling slicks. The two outcrops are located approximately 30 meters north-south from each other. At the time of the original 1982 recordation, CA-RIV-2486 included two granitic boulders with seven grinding slicks. When the site was revisited in 2008 for an archaeological site relocation survey for the City's Burn Training Project, a total of eight slicks on three granitic boulders within the two outcrops was recorded. This current update identified a total of eight milling slicks on one of the granitic boulder outcrops (the 6 original slicks and 2 new slicks) and two on the other granitic boulder outcrop. The west side of the site is situated flush with the ground surface and the location of milling slicks 6 and 7 appear to have been exposed by rain. Weed abatement activities in the area surrounding the bedrock milling outcrops have removed the native plant communities that would have been found prehistorically. Further, the site's integrity has been further impaired by recreational hiking/biking trail use which has disturbed the native sediments in the immediate area south of the bedrock milling features.

CA-RIV-2487 (33-002487)

AE documented another three milling slicks, for a total of eight milling slicks, across three granitic boulder outcrops approximately 24 meters southwest of the presumed southern boundary of CA-RIV-2486. The three rock outcrops are approximately 19 and 22 meters apart from north to south. At the time of its 1982 recordation, CA-RIV-2487 included a single granitic boulder with five grinding slicks. AE's current update identified that five milling slicks are on one granitic boulder outcrop, two of the milling slicks are on the second granitic boulder outcrop, and one of the milling slicks is on the third granitic boulder outcrop at this 75 by 31-meter bedrock milling site. To the east and north the terrain is relatively unaltered. Moreover, weed abatement activities in the area surrounding the bedrock milling outcrops have removed the native plant communities that would have been found prehistorically.

CA-RIV-2488 (33-002488)

CA-RIV-2488 is a 73 by 63-meter bedrock milling site consisting of four granitic boulder outcrops with a total of 17 milling slicks. This site is approximately 33 meters southeast of the presumed south boundary of CA-RIV-2486 and approximately 48 meters east-northeast of the presumed

east boundary of CA-RIV-2487. As originally recorded (McCarthy 1982c), the milling slicks are distributed in clusters across at CA-RIV-2488. Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by industrial development to the west and south. To the east and north the terrain is relatively unaltered. Furthermore, weed abatement activities have removed the native plant communities and disturbed the ground surface of the area surrounding the bedrock milling feature.

CA-RIV-2489 (33-002489)

CA-RIV-2489 is a 21 by 17-meter bedrock milling site approximately 59 meters east-southeast of the presumed east boundary of CA-RIV-2488. As originally recorded (McCarthy 1982d), this site consists of one granitic boulder outcrop with a total of three milling slicks. Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by industrial development to the west and south. To the east and north the terrain is relatively unaltered. Furthermore, weed abatement activities have removed the native plant communities and disturbed the ground surface of the area surrounding the bedrock milling feature.

CA-RIV-11772 (33-028956)

CA-RIV-11772 is an 18 by 25-meter bedrock milling site approximately 80 meters southeast of the south tip of CA-RIV-2487. This site consists of two granitic boulder outcrops six meters apart with a total of four milling slicks (3 on one granitic boulder outcrop and 1 on the second granitic boulder outcrop). The two rock outcrops are aligned east-west from each other. Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by industrial development to the west and south. To the east and north, the terrain is relatively unaltered. Further, weed abatement activities have removed the native plant communities and disturbed the ground surface of the area surrounding the bedrock milling feature.

CA-RIV-11770 (33-028955)

CA-RIV-11770 is a 19 by 16.5-meter bedrock milling site consisting of one granitic boulder outcrop with a total of two milling slicks. CA-RIV-11770 is approximately 28 meters southwest of the presumed west boundary of CA-RIV-11769 and approximately 99 meters west of the presumed west boundary of CA-RIV-2487. Some previous disturbance is evident and modern refuse is present in the area. In addition, soils around the boulder appeared somewhat loose and the boulder may not be in its original location. The integrity of setting, feeling, and association has been impaired by industrial development to the west and south. To the east and north the terrain is relatively unaltered. In addition, weed abatement activities have removed the native plant communities and disturbed the ground surface of the area surrounding the bedrock milling feature. Further, the site's integrity has been further impaired by use of the recreational hiking/biking trail to the south and a dirt road to the west, which has disturbed the native sediments in the immediate area of the site.

CA-RIV-11769 (33-028954)

CA-RIV-11769 is another bedrock milling site approximately 28 meters northeast of the presumed south boundary of CA-RIV-11770, approximately 75 meters northwest of the presumed north boundary of CA-RIV-2487, and approximately 79 meters southwest of the presumed west boundary of CA-RIV-2486. This site is 21 by 21 meters in size and consists of one granitic boulder outcrop with one milling slick. Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by industrial development to the west and south. To the east and north, the terrain is relatively unaltered. In addition, weed abatement activities have removed the native plant communities and disturbed the ground surface area surrounding the bedrock milling feature.

Bedrock milling features likely represent one of an unknown number of site types that made up the subsistence-based procurement and processing ensemble. Bedrock milling sites were used in the collection and processing of local resources, and related tasks may have included the gathering of small seeds, grasses, and possibly small game for processing on the bedrock features and ground stone metates using hand grinding or pounding stones. Lithic-reduction activities to produce tools used in food gathering and processing and the packaging of processed and unprocessed materials for transport back to the residential site may also have been tasks integrated into the subsistence regime at bedrock milling sites. (AE 2020b)

Site distribution data suggest subsistence-based procurement and processing tasks involving bedrock milling features may have been centered on the area immediately surrounding Sycamore Canyon. Specifically, the examination of known bedrock milling sites within the two-mile-wide Study Area (comprised of the APE and a 1-mile-radius of the APE) indicates that the highest densities of outcrop features are found within a half-mile of Sycamore Canyon Creek with the highest concentrations located on the terraces that border the creek. While the current Project is located along a secondary drainage, it is still within a half-mile of Sycamore Canyon Creek. The majority of the grinding slicks at the seven sites within the Project site exhibit moderate-to-heavy polish, which implies long-term and/or repeated use of the bedrock milling features, unlike other bedrock milling sites elsewhere which exhibit signs of minimal use. The locations of the seven sites within a half-mile of Sycamore Canyon Creek suggest the processing activities that occurred at these loci were an integral part of a larger subsistence regime centered on the canyon. Additionally, the area may have also served residential, economic, and ceremonial functions as well. While industrial development to the west and south of the sites has somewhat impacted the integrity of setting, feeling, and association of the seven resources, the area to the north and east is open vacant land. (AE 2020b)

A Tribal Cultural Landscape (TCL) Study was prepared by AE (February 2021, confidential), as requested by the Soboba Band of Luiseño Indians, and a Tribal Cultural Resource and Traditional Cultural Property (TCR/TCP) Study, prepared by AE (March 2021, confidential), as requested by the Pechanga Band of Luiseño Indians. The reports indicated that both the TCL and TCR/TCP identified in the respective studies are potentially eligible for listing in the National Register.

5.13.2 Related Regulations

5.13.2.1 Federal Regulations

Native American Involvement

Several federal and state laws address Native American involvement in the development review process. The most notable of these are the federal Native American Graves Protection and Repatriation Act (1990) and the California Native American Graves Protection and Repatriation Act (2001). These acts ensure that Native American human remains and cultural items be treated with respect and dignity.

NRHP Listing

For a property to qualify for the NRHP, it must meet one of the NRHP Criteria for Evaluation by being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance. It must be at least 50 years old and must meet one or more of the four NRHP criteria of historical significance (36 CFR 60):

- A. associated with events that have made a significant contribution to the broad patterns of our history;
- B. associated with the lives of persons significant in our past;
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded, or may be likely to yield, information important to prehistory or history.

Traditional Cultural Properties

The *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* provides guidance on the most effective process for identifying whether a property can qualify for listing on the NRHP. The preferred sequence when evaluating historic properties is:

1. Categorize the property. A property must be classified as a district, site, building, structure, or object for inclusion in the National Register.
2. Determine which prehistoric or historic context(s) the property represents (American history, architecture, archaeology, engineering, or culture).
3. Determine whether the property is significant under the four National Register Criteria (A-D, above).
4. Determine if the property represents a type usually excluded from the National Register. If so, determine if it meets any of the Criteria Considerations.
5. Determine whether the property retains integrity.

When evaluating TCPs Bulletin 15 refers to guidance provided in the *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties*, which states that tradition is defined as “those beliefs, customs, and practices of a living community of people that

have been passed down through the generations, usually orally or through practice.” Thus, a TCP “can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in the community’s history, and (b) are important in maintaining the continuing cultural identity of the community.”

Applying Bulletin 38 guidance to identify the properties eligible for listing on NRHP associated with traditional practices and that serve as TCPs normally involves gathering information from knowledgeable tribal informants. Conducting ethnographic studies concerning traditional tribal values, beliefs, worldview, and circular notions of time and space and their associated implications for the tangibility and integrity of historic places and landscapes and cultural resources is vital to develop how such places, landscapes, and resources are essential for tribe historical and geographical identity and ongoing traditional religious and cultural beliefs and practices. It is vital that lead agencies and cultural resource practitioners who are evaluating properties thought to have traditional cultural significance do so from the viewpoint of the community that attaches significance to them and be cautious not to ascribe their own belief system or values to the property or properties. Furthermore, agencies and practitioners must take into account prior evaluations, or lack thereof, when applying NRHP criteria to potential traditional properties:

In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified properties and guided by the Secretary’s standards and guidelines for evaluation, the agency official shall apply the National Register criteria (36 CFR part 63) to properties identified within the area of potential effects that have not been previously evaluated for National Register eligibility. The passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible. The agency official shall acknowledge that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.

The NRHP and guidance bulletins do not address cultural resources that are entirely “intangible” by nature. However, many intangible resources are tied to a tangible referent and it is such attributes that give the properties their significance. Such attributes cannot be ignored in evaluating and managing historic properties; properties and their intangible attributes of significance must be considered together.

For decades, the regulatory community has struggled to find ways to apply NRHP criteria as well as NPS (National Park Service) and ACHP (Advisory Council on Historic Preservation) guidance to Native American TCLs. Complicating matters more, is that access to many of these landscapes was taken away from Native Americans many generations ago: tribes and people were relocated or components of these landscapes have been drastically altered by modern development, exploitation, or removal of natural resources, such as water. How to identify, evaluate and incorporate these landscapes into the Section 106 process is still a work in progress. The ACHP summed the situation: “The consideration of Native American traditional cultural landscapes in Section 106 review has challenged federal agencies, Indian tribes, and Native Hawaiian

organizations for some time. There has been confusion regarding what makes a place a traditional cultural landscape, whether they can be considered historic properties, and whether the size of such places influences their consideration under the National Historic Preservation Act.” The California State Historic Preservation Officer (SHPO) recognizes the need to better understand and evaluate landscapes and has identified several themes that need additional research. Identification of significant themes form the basis for landscape-specific contexts. For the pre-1769 period, the SHPO has identified deficiencies in pre-contact Settlement and Subsistence Patterns; Special Adaptations and Environmental Management; Trade and Movement (e.g., trails, trade networks and nodes on trails, seasonal migration areas); and, Ideology (which includes sacred sites, petroglyphs, pictographs and intaglios).

Traditional Cultural and Ethnographic Landscapes

According to the NPS, “A cultural landscape is defined as “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.” There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes. The NPS Cultural Resource Management Guidelines provides guidance for management of these four broad categories:

Historic designed landscapes – a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates.

Historic vernacular landscapes – a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.

Historic sites – a landscape significant for its association with a historic event, activity, or person. Examples include battlefields and president’s house properties.

Ethnographic landscapes – a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites and massive geological structures. Small plant communities, animals, subsistence and ceremonial grounds are often components.

Ethnographic landscapes differ from the historic landscape categories in a key way that parallels procedures for investigating and accounting for TCPs and echoes guidelines of Bulletin 38: it is the people for whom ethnographic landscapes hold value and importance who are the primary authorities on them. The NPS definition of an ethnographic landscape parallels the ACHP definition of a traditional cultural landscape. The NPS notes that:

an ethnographic landscape is composed of “a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites and massive geological structures. Small plant communities, animals, subsistence and ceremonial grounds are often components.”

Whereas the ACHP defines a TCL as:

There are no single defining feature or set of features that comprise a traditional cultural landscape. Such places could be comprised of natural features such as mountains, caves, plateaus, and outcroppings; water courses and bodies such as rivers, streams, lakes, bays, and inlets; views and view sheds from them, including the overlook or similar locations; vegetation that contributes to its significance; and, manmade features including archaeological sites; buildings and structures; circulation features such as trails; land use patterns; evidence of cultural traditions, such as petroglyphs and evidence of burial practices; and markers or monuments, such as cairns, sleeping circles and geoglyphs.

Agencies are encouraged to identify and manage traditional cultural landscapes early in the planning process, treating them as they would TCPs. ACHP guidance also states that ‘... *frequently the only entities aware of these landscapes are either an Indian tribe or a Native Hawaiian organization. Since such places are often comprised of related locations across some distance and for which the connections may not be obvious to those outside of the culture that holds them significant, it stands to reason that the most appropriate entity to inform such identifications and evaluations are either Indian tribes or Native Hawaiian organizations.*’

The NPS notes that cultural landscapes are a category of cultural resource that can be determined eligible for inclusion on the NRHP. Ethnographic landscapes do not depend on NRHP eligibility criteria for their existence, and importantly, are identified and defined by the cultural groups associated with them rather than by historic preservation professionals.

In a recently released guidance paper on cultural landscapes and potential adverse effects to them, the ACHP notes that “in addition to the physical, on the ground components, visual and audio aspects of place are often important to how they are defined.” For example, impacts to rock art would affect the visual and physical integrity of the TCP by diminishing or destroying a key ceremonial component of the religious and ceremonial nature of the TCP.

Section 800.4(c)(1) of 36 CFR Part 800, thus, takes a central role in ethnographic landscape identification, NRHP eligibility evaluations, and assessment of potential adverse effects, as it requires acknowledgment on the part of agencies “that Indian tribes and Native Hawaiian organizations possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them.” According to the ACHP:

There are very different views [between Federal agencies and Native American tribes] on the treatment of effects to traditional cultural landscapes. Non-native people tend to think in a linear fashion while native peoples tend to think cyclically. This difference in world view affects not only whether or not the significance of sacred places is understood but also how such places should be treated. These places are part of living communities and are their actual history.

Only tribal descendants can assign significance to the nature of the space and place, within the relationship of culture and belief systems to the environment. Cultural landscapes within the NPS are defined as a category of cultural resource that can be determined eligible for inclusion in the NRHP. Ethnographic landscapes within the NPS context are broader, do not depend on NRHP eligibility criteria for their existence, and importantly, are identified and defined by the cultural groups associated with them rather than by historic preservation professionals.

5.13.2.2 State Regulations

CRHR Listing

Discretionary City approval is required for Project development to proceed and is therefore, applicable to the procedures and policies of the CEQA, as amended, regarding historical resources. Therefore, cultural resource management work conducted as part of the proposed Project shall comply with the CEQA Statutes and Guidelines, which directs lead agencies to first determine whether cultural resources are “historically significant” resources. A project that may result in a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment (Title 14, California Code of Regulations §15064.5[b]). The CEQA Statute and associated guidelines direct lead agencies to evaluate whether a project will have a significant impact on historical resources and provides guidance on how to manage the resources. Generally, a cultural resource shall be considered historically significant if the resource is 45 years old or older; possesses integrity of location, design, setting, materials, workmanship, feeling, and association; and meets the requirements for listing on the CRHR under any one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The CEQA adopted similar criteria to assess eligibility for listing of historic resources on the CRHR as the NHPA. For clarification, the term “historical resources” is used in CEQA terminology as “historic properties” is used in NHPA terminology.

Senate Bill 18, California Tribal Consultation Guidelines

The State of California Governor's Office of Planning and Research developed these guidelines in order to provide guidance to cities and counties on the process for consulting with Native American tribes during the adoption or amendment of local general plans or specific plans (defined in Government Code Section 65450 *et seq.*). SB 18 requires local agencies to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process, thereby providing tribes an opportunity to participate in local land use decisions at an early planning stage. SB 18 does not apply in this case because the Project does not propose any amendments to the GP 2025 or Sycamore Canyon Business Park Specific Plan, as the Project is consistent with the General Plan, Specific Plan, and zoning.

Assembly Bill 52, Impacts to Tribal Cultural Resources

AB 52 adds a new requirement to CEQA regarding tribal cultural resources. PRC Section 20184.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe." In brief, in order to be considered a TCR, a resource must be either 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

Assembly Bill 52 Consultation Process

The Project requires discretionary review by the City of Riverside; therefore, notification of Native American tribes in the vicinity of the Project site was required for this Project under Assembly Bill (AB) 52. Pursuant to AB 52 consultation, the City sent letters on October 18, 2019 to the nine (9) tribes who identified their affiliation with the area requesting for information on the Project site and government-to-government consultation. Five Tribes requested actual government-to-government consultation: the Morongo Band of Mission Indians, the Rincon Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, and

the Soboba Band of Luiseño Indians. As noted on Table 5.13-1 – AB 52 Response Log, other tribes did request tribal monitors on site during ground disturbance.

Table 5.13-1 – AB 52 Response Log

Native American Tribe (Individual Responding)	Comment
Morongo Band of Mission Indians	<ul style="list-style-type: none"> • In a letter dated October 22, 2019, the Tribe indicated its office would like to initiate government-to-government consultation. • The Tribe requested a search be conducted at the appropriate California Historical Resources Information Center (CHRIS) and for copies of the search reports for the Tribe to compare with their records to begin consultation. • The City consulted with the Tribe through January 2020. • The Tribe requested to be included in monitoring activities. • Consultation with the Tribe concluded on January 22, 2020.
Rincon Band of Luiseño Indians	<ul style="list-style-type: none"> • In a letter dated October 25, 2019, the Tribe requested consultation to learn more about the Project and any potential impacts to cultural resources. • The Tribe requested a copy of the archaeological record search and assessment. • The City consulted with the Tribe including multiple virtual consultation meetings and email updates. Consultation closed October 7, 2020. • The Tribe has requested to remain informed on the process.
Pechanga Band of Luiseño Indians	<ul style="list-style-type: none"> • In a letter dated November 4, 2019, the Tribe indicated the Tribe intends to assist the City in identifying potential tribal cultural resources. • In an additional letter dated February 14, 2020, the Tribe formally requested government-to-government consultation. • The City consulted with the Tribe including multiple virtual consultation and email updates from December 2019 through April 2021. • The Tribe requested an EIR and Tribal Cultural Resource and Traditional Cultural Property (TCR/TCP) Study be prepared. • A TCR/TCP Study was prepared (confidential). • The Tribe accepted the EIR Mitigation Measures on April 29, 2021. • Consultation with the Tribe remains open at time of publishing this DEIR.
Agua Caliente Band of Cahuilla Indians	<ul style="list-style-type: none"> • In a letter dated November 18, 2019, the Tribe requested formal government-to-government consultation under AB 52. • The Tribe requested a cultural resources inventory of the Project area and copies of any cultural resource documentation generated in connection with the Project. • In an additional letter dated January 27, 2020, the Tribe requested formal government consultation under Section 106 of the National Historic Preservation Act with the lead agency. • The City consulted with the Tribe including virtual consultation meetings and email updates. • The Tribe requested monitoring be conducted. • Consultation with the Tribe concluded August 31, 2020.

Native American Tribe (Individual Responding)	Comment
Soboba Band of Luiseño Indians	<ul style="list-style-type: none"> • In a letter dated November 18, 2019, the Tribe requested to initiate formal consultation with the City. • In an additional letter dated December 24, 2019, the Tribe indicated the Project area falls within what the Tribe considers to be a Traditional Cultural Landscape (TCL) and defined as a Tribal Cultural Resource (TCR) as defined under AB 52. • The City consulted with the Tribe including multiple virtual consultation meetings and email updates from December 2019 through April 2021. • The Tribe requested an EIR, a City Historic District Study, and a TCL Study be prepared. • A TCL Study was prepared (confidential). • Consultation with the Tribe remains open at time of publishing this DEIR.
San Manuel Band of Mission Indians	<ul style="list-style-type: none"> • The Tribe declined the opportunity to consult via letter dated October 24, 2019.
Gabrielesño Band of Mission Indians - Kizh Nation	<ul style="list-style-type: none"> • The Tribe did not respond.
Cahuilla Band of Indians	<ul style="list-style-type: none"> • The Tribe did not respond to the City's letter regarding consultation; however, the Tribe responded to AE during the Native American Consultation aspect of the Phase I and Phase II Cultural Resources Investigations report, which occurred outside of the AB 52 process. The Tribe requested the consultant include monitoring as part of their recommendation.
San Gabriel Band of Mission Indians	<ul style="list-style-type: none"> • The Tribe did not respond.

5.13.2.3 Local Regulations

City of Riverside General Plan 2025

The Historic Preservation Element of the General Plan 2025 contains policies related to the historic and prehistoric cultural resources in the City of Riverside (City). The following policies of the Historic Preservation Element would apply to the Project:

Objective HP-1: To use historic preservation principles as an equal component in the planning and development process.

Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Objective HP-2: To continue an active program to identify, interpret and designate the City's cultural resources.

Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.3: The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting, and development activities.

Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Objective HP-7: To encourage both public and private stewardship of the City's cultural resources.

Policy HP-7.4: The City shall promote the preservation of cultural resources controlled by other governmental agencies, including those related to federal, state, county, school district, and other agencies.

Riverside Municipal Code

Title 20 of the Riverside Municipal Code (RMC) is the primary body of local historic preservation laws. The purpose of Title 20 is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features, and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic, or artistic value in the City. Title 20 establishes procedures for preserving, protecting, and designating significant cultural resources should the resource be considered a historic/cultural resource.

Chapter 20.50 defines eligible cultural resources as:

A cultural resource or historic district which has been determined by the Historic Preservation Officer or Qualified Designee, Board, or City Council to meet the City's designation criteria pursuant to a survey prepared by a professional meeting the Secretary of the Interior's standards which either documents the resource, records the resource on the State Department of Parks and Recreation survey forms or has been so designated by the California State Historic Preservation Officer.

Applications for eligible cultural resources are reviewed by the City's Cultural Heritage Board and ultimately approved by City Council. Further, in accordance with Title 20, a Certificate of Appropriateness is required to alter, demolish or relocate properties that are designated or determined eligible for designation as a City Cultural Resource. A Certificate of Appropriateness is also required for new construction within historic districts and neighborhood conservation areas. The Project does not meet these criteria, and as such, a Certificate of Appropriateness is not required for this Project.

Chapter 20.50 defines a landmark as:

Any Improvement or Natural Feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

- 1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;*
- 2. Is identified with persons or events significant in local, state, or national history;*
- 3. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;*
- 4. Represents the work of a notable builder, designer, or architect, or important creative individual;*
- 5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;*
- 6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;*
- 7. Is one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or*
- 8. Has yielded or may be likely to yield, information important in history or prehistory.*

An Improvement or Natural Feature meeting one or more of the above criteria, yet not having the high degree of integrity to qualify as a Landmark, may qualify as a Structure or Resource of Merit (see subsection below).

An Improvement or Natural Feature meeting one or more of the above criteria, yet not formally designated as a Landmark by the City Council, may be an eligible Landmark.

Chapter 20.50 defines a Structure or Resource of Merit as:

Any Improvement or Natural Feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains sufficient integrity, and:

- 1. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the City;*
- 2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;*
- 3. Is connected with a business or use which was once common but is now rare;*

4. *A Cultural Resource that could be eligible under Landmark Criteria no longer exhibiting a high level of integrity, however, retaining sufficient integrity to convey significance under one or more of the Landmark Criteria;*
5. *Has yielded or may be likely to yield, information important in history or prehistory; or*
6. *Is an improvement or resource that no longer exhibits the high degree of integrity sufficient for Landmark designation, yet still retains sufficient integrity under one or more of the Landmark criteria to convey cultural resource significance as a Structure or Resource of Merit (Ord. 7248 §5, 2014; Ord. 7206 §24, 2013; Ord. 7108 §1, 2010).*

Chapter 20.50 defines a Historic District as:

1. *A concentration, linkage, or continuity of cultural resources, where at least fifty percent of the structures or elements retain significant historic integrity (a 'geographic Historic District'), or*
2. *A thematically related grouping of cultural resources which contribute to each other and are unified aesthetically by plan or physical development, and which have been designated or determined eligible for designation as a historic district by the Historic Preservation Officer, Board, or City Council, or is listed in the National Register of Historic Places or the California Register of Historic Resources, or is a California Historical Landmark or a California Point of Historical Interest (a 'thematic Historic District').*

In addition to either 1 or 2 above, the area also:

3. *Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;*
4. *Is identified with persons or events significant in local, State, or national history;*
5. *Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;*
6. *Represents the work of notable builders, designers, or architects;*
7. *Embodies a collection of elements of architectural design, detail, materials or craftsmanship that represent a significant structural or architectural achievement or innovation;*
8. *Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;*
9. *Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship or association; or*

10. Has yielded or may be likely to yield, information important in history or prehistory.

Sycamore Canyon Business Park Specific Plan

The Project site is located within the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) area. Originally adopted in 1984, the SCBPSP stipulates the development of a planned industrial park consisting of approximately 920 acres of industrial and commercial uses within a 1,400-acre Specific Plan area. The SCBPSP calls for a multipurpose use of the area that includes industrial, industrial support, retail business and offices, and open space. The Project site is designated “Industrial” within the Specific Plan. Since its approval, the Specific Plan has been subject to a number of amendments.

5.13.3 Project Design Considerations

The Project site contains a total of seven milling sites, containing a total of 14 bedrock outcrops. Seven of these bedrock outcrops are located in the western portion of the Project site. These sites are comprised of granitic boulders with multiple milling slicks and are described in detail in Section 5.13.1 above, and also in Section 5.4.1 of Section 5.4 Cultural Resources.

Project design considerations have been made in efforts to minimize and/or avoid potential impacts to the tribal cultural resources identified on site. Figure 3.0-8 Tentative Parcel Map and Figure 3.0-9 Site Plan, in Section 3.0 Project Description, provide visual references for the locations of Project parcels and Project features (i.e., the proposed warehouse buildings) described below. The Project, as described below, has been designed in order to be least impactful to tribal cultural resources.

There are 14 bedrock outcrops with milling features located on Parcel 2 and Parcel C. The Project has been designed to minimize the removal of these resources to the greatest extent possible, while accommodating the construction of Building B and associated parking, and the trailhead parking lot. No bedrock outcrops with milling features, or other cultural resources, were identified that would require removal for the construction of Building A or associated parking.

These Project design considerations include the following:

- Car and vanpool parking spaces along the west side of Building B has been designed to avoid and preserve the single bedrock outcrop and a total of two milling slicks that comprise feature CA-RIV-11770.
- The detention basin area at the southeast side of Building B has been designed to avoid and preserve a total of two bedrock outcrops with a total of three milling slicks that comprise CA-RIV-11772.
- The northeast side of Building B is angled and the parking along the northeast portion of Building B has been designed to avoid two of four bedrock outcrops and three of 17 milling slicks that comprise feature CA-RIV-2488.

- The proposed trailhead parking lot (Parcel C) has been designed with a curved drive aisle and parking along the northern portion of Building B has been designed to avoid and preserve two bedrock outcrops and 10 milling slicks that comprise feature CA-RIV-2486.
- The Parcel Map has been designed to include one bedrock outcrop and a total of three milling slicks that comprise feature CA-RIV-2489 within the conservation area (Parcel A), which will be avoided and preserved.

In summary, a total of eight out of fourteen bedrock outcrops, 22 of 36 milling slicks, and four of seven complete milling sites will be avoided and preserved.

5.13.4 Methodology

Potential impacts on tribal cultural resources are analyzed based on the potential for the Project to impact any tribal cultural resources during construction or operation. The significance of a tribal cultural resource and subsequent significance of any impact is determined by, among other things, consideration of whether or not that resource has heritage value to California Native Americans. Further, this impact analysis is also based on consultations with the interested tribe leaders.

As previously stated, review of previously recorded resources and results of a pedestrian field survey by AE archaeologists revealed findings of tribal cultural resources present on the Project site. The Project requires discretionary review by the City of Riverside; therefore, notification of Native American tribes in the vicinity of the Project site was required for this Project under AB 52.

On October 18, 2019, the City of Riverside sent out AB 52 consultation notices to nine Native American tribes. The following tribes requested to consult with the City pursuant to AB 52:

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

The discussion of TCRs is based on consultations with interested Native American tribal leaders and on the results of the TCR/TCP Study for the Pechanga Tribe and the TCL Study for the Soboba Tribe. In an effort to prevent vandalism or other potential negative impacts of the resources discussed and mapped in the studies, the studies are confidential and will not be made publicly available but will remain as part of the City's internal administrative record. The TCL study was requested by Soboba as a result of consultation, as was the TCR/TCP study by Pechanga.

Traditional Cultural Landscape Approach

"Cultural landscape" refers broadly to culturally constructed space, the creation of meaningful places, and the manifestations of these interactions through time. It not only includes natural

resource distributions and the relationship of human groups to those resources, but also how natural resources and landmarks are incorporated into the cultural landscape as meaningful places to the people who lived there. Places are perceived, experienced, contextualized, and given meaning by people and their actions and these actions are both constrained and enabled by the natural and cultural resources composing the landscape. The cultural landscape is therefore, created by human activity and structured by the distribution of resources on the land and the cultural perceptions of human relationships to those resources.

Cultural landscapes may be divided into three basic dimensions: formal, historical, and relational. The lines among the dimensions are often blurred, especially for locations remembered within the creation stories or events of the first people, and it is not uncommon for a place to demonstrate qualities of all three.

- *The formal dimension of the cultural landscape is the natural or physical dimension attributed by tangible characteristics and properties* such as the material correlates of a site, landscape topography, hydrology, and vegetation. Archaeological analysis tends to focus on this dimension because it is tangible, subject to empirical observation, and quantifiable, leading to the identification of patterns that may explain traits in human behavior.
- *The historical dimension is what has happened on and with a landscape through time*—the sequential associations among places, resources, and communities. It is embedded within the transformation of natural to cultural landscape and is encapsulated in oral history, song, and memory. This dimension survives in the collective memory of Native Americans, as well as in the ethnographic and ethnohistoric records.
- *The relational dimension is what links material and conceptual realities*—the social and symbolic connections that make landscapes meaningful. It draws from the interplay among humans, their physical environment, and the intangible qualities (e.g., social, behavioral, and symbolic meanings) woven into the landscape. The information contained within the relational dimension communicates public or private information, marks village territories, rights to use land, or areas of communal use, retells stories and events surrounding the creation and first peoples and is imbued with moral and spiritual symbolism, or warns of great power that should be revered or be avoided. It is captured in places, landmarks, and features on the physical landscape and is retained in the oral histories, songs, and memories of the Native people. The relational dimension is also represented at landscape features, some of which contain no clear evidence of cultural modification. Natural features, such as mountain peaks, springs, boulders, and bodies of water, may communicate symbolic information that relates to the history of the Native people, and also perpetuate moral, religious, or cautionary behaviors.

In addition to assessing cultural landscapes under the three basic dimensions listed above, NPS provides guidance for the consideration of component landscapes as well. For this study, it would be appropriate to consider assessment of Q'axall'pah as a component landscape.

A component landscape is physical area within the boundaries of a landscape that is listed on, or eligible for listing on, the National Register of Historic Places. It contributes to the significance of the landscape and may also be individually eligible for the National Register. A component landscape warrants individual documentation to adequately record the physical character or assemblage of related features. By using the dimension and component landscape approach when assessing TCLs, multiple layers of significance can be presented and developed to better understand the relationship of the people to the landscape.

When viewing this process through the lens of existing federal and state regulations, identification of significance of a landscape is easily comprehended as it is clear that cultural landscapes are not one dimensional. Often, cultural landscapes are examined singularly for their archaeological value, with emphasis placed on the tangible, remaining “artifacts” to identify significance. Alternatively, if significance is assessed using as many available aspects as possible, including but not limited to cultural, historical, geographical, sociological, and archaeological (the varied layers of interaction between humans and their environment), an improved understanding of cultural landscapes would emerge. Further, the discipline of archaeology should not be entirely excluded from the assessment; rather, it should be viewed as one facet of the overall whole of the importance of cultural landscapes.

Two significant issues are at odds with the Native American view of a landscape. The first relates to the need to define a specific *geographic area* or boundary. Defining landscape boundaries is difficult from a tribal perspective; however, it is necessary from a management perspective. The second problematic issue is the integrity requirement. The Luiseño and Cahuilla people, respectively, do not feel that their traditional homelands, ancestral resource gathering areas, traditional or religious areas are no longer significant, sacred, or important because of unwanted development built upon them. Tribes are affected by any development, land alteration, or destruction of unceded lands used by their ancestors for resource procurement, associated with a traditional event, or ancestral being etc. However, these landscape scars do not reduce or remove the *feeling* or *association* that living people have with the past events or ancestral people in these geographic locations.

5.13.5 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds as described in Section 15064.7 of the *State CEQA Guidelines*. The City of Riverside generally utilizes the CEQA significance thresholds in Appendix G (“Environmental Checklist”) of the *State CEQA Guidelines*. The Environmental Checklist prepared by the City for the Project (see Appendix A of this document) indicates that impacts related to the Sycamore Hills Distribution Center Project may be considered potentially significant if the proposed Project:

- Would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is:

- (Threshold A) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- (Threshold 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.

5.13.6 Environmental Impacts

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is:

- Threshold A: *listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*
- Threshold B: *a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, would the lead agency consider the significance of the resource to a California Native American tribe?*

Bedrock Milling Sites

As discussed in Section 5.4 Cultural Resources, four previously recorded archaeological sites were re-identified and three newly identified resources were documented during the 2018 survey. The 2018 report that evaluated these seven resources found that none of the resources individually appeared to meet eligibility requirements for listing on the CRHR, NRHP, or as a City Cultural Resource.

Archaeological data from the earlier work at the four previously documented sites, along with archaeological information obtained during the recent cultural resource survey and testing, indicate that each of the seven sites do not individually meet any of the criteria for listing on the NRHP (see 5.13.2.1 above) or CRHR (see 5.13.2.2 above). None of the individual sites appear to meet the criteria as a City Designated Cultural Resource and would not be considered a City Landmark as they are not individually “exceptional examples” of an archaeological resource. Furthermore, each individual site appears to also lack the data potential to individually contribute important information to the “broader understanding” of the archaeological heritage of the City. Finally, protein residue analysis conducted on bedrock milling sites approximately 1.4 miles to the northeast yielded inconclusive results regarding chronology (AE 2020b). While none of the individual sites meet any of the aforementioned eligibility criteria, as discussed in Section 5.4.4

Project Design Considerations above, the Project's site plan has been designed to avoid to the greatest extent possible, both directly and indirectly, the boulder outcrops with milling features. A total of eight out of fourteen bedrock outcrops, 22 of 36 milling slicks, and four of seven complete milling sites will be avoided and preserved.

As the preceding paragraphs discuss, the seven sites individually were not found to be eligible for listing under NRHP Criterion A-D, CRHR criterion 1-4, or as a City Cultural Resource, and impacts to these tribal cultural resources individually would not have significant impacts.

Traditional Cultural Property (TCP), Tribal Cultural Resource (TCR), and Traditional Cultural Landscape (TCL)

Pursuant to AB 52, representatives of nine Native American tribes were contacted on October 18, 2019 to initiate the consultation process. See Table 5.13-1 – AB 52 Response Log for a summary of the consultation process for all nine tribes. The following is a summary of the more extensive consultation process with the Pechanga Tribe Band of Luiseño Indians and the Soboba Band of Luiseño Indians.

The Pechanga Band of Luiseño Indians consulted with the City through multiple virtual consultation and email updates. Through consultation, the Tribe indicated that the Project area lies within '*Atáaxum* (Luiseño), and therefore the Tribe's aboriginal territory, as evidenced by the existence of cultural resources, place names, *tóota yixélval* (rock art, pictographs, petroglyphs), and an extensive '*Atáaxum* artifact record in the vicinity of the undertaking. This culturally sensitive area is affiliated with the Pechanga Band of Luiseño Indians because of the Tribe's cultural ties to this area as well as an extensive documentation of the Tribe's ancestors living in the Riverside area." Based on this history, the Tribe requested tribal monitoring be conducted, an EIR be prepared, and later requested a Traditional Cultural Property (TCP) Study be prepared. A TCP is defined as a property that is eligible for inclusion in the National Register of Historic Places (NRHP) based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community.

A TCP Study was prepared (March 2021, confidential) to identify the resources within the Project site and determine the eligibility for listing under the state and national registers of historic places. The study determined that the project site is within the general boundary of the TCP/TCR, and that the bedrock milling features on the site are collectively considered contributing features. The study also found that the TCP/TCR is potentially eligible for listing in the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP), 3/C, and 4/D and retains sufficient integrity for listing (criteria are listed in sections 5.13.2.1 and 5.13.2.2 above).

For the purpose of analysis of impacts in this EIR, and to be conservative, it is assumed that the TCP/TCR is eligible for CRHR and NRHR listing. However, based on the information included in the TCP/TCR Study, it was determined that listing of the TCP/TCR is not required as a mitigation

measure for the Project, as the Project affects a relatively small area (35.81¹ acres) of the TCP/TCR, and listing would be outside the scope of the Project.

The Soboba Band of Luiseño Indians indicated that the Project area falls within what the Tribe considers to be a Traditional Cultural Landscape (TCL) with religious and cultural significance to the Tribe, and is defined as a TCR under AB 52. The Tribe formally requested preparation of a City Historic District Study and a TCL Study. A TCL is defined as “any place in which a relationship, past or present, exists between a spatial area, resource, and an associated group of indigenous people whose cultural practices, beliefs, or identity connects them to that place. A TCL is determined by and known to a culturally related group of indigenous people with relationships to that place.” The Tribe asserts that, while none of the bedrock milling sites on or adjacent to the Project site qualify *individually* as historic properties, collectively they are part of an unevaluated archaeological district and TCL. The bedrock milling sites and Sycamore Canyon are “part of a TCP known as *Q’axall’pah* (Cahuilla word for ‘Quail Place’) and the Cahuilla people attach specific oral histories to said landscape. These oral histories specific to this TCP are kept in the stories and song,” (Soboba Tribe Formal Comments to the Phase I and Phase II Cultural Resource Investigations for the Sycamore Hills Distribution Center Project, May 20, 2020). A TCL Study was prepared (March 2021, confidential). However, a City Historic District Study, was not prepared as it was determined the TCL Study and previously completed Cultural Resources Assessment (Appendix E), were adequate to address potential impacts to tribal cultural resources found on the site.

Results of the TCL Study found that the TCL is potentially eligible for listing in the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP) and 4/D and retains sufficient integrity for listing (criteria are listed in sections 5.13.2.1 and 5.13.2.2 above).

For the purpose of analysis of impacts in this EIR, and to be conservative, it is assumed that the TCL is eligible for CRHR and NRHR listing. However, based on the information included in the TCL Study, it was determined that listing of the TCL is not required as a mitigation measure for the Project, as the Project affects a relatively small area (35.81² acres) of the TCL, and listing would be outside the scope of the Project.

Although the specific area or location of the TCL and TCP/TCR is confidential, for context, the TCL roughly stretches from the Box Springs area in Riverside, south into the City of Perris. The TCP/TCR is smaller in area than the TCL, but they generally overlap in their central portions. Large portions of the TCL and TCP/TCR have already been impacted with development. However, regional development has not removed or impacted the tribes’ connections to these TCL and TCP/TCR.

¹ Total of Parcels 1, 2 and C, collectively the development footprint, excluding the Restricted Property/Conservation Areas

² Total of Parcels 1, 2 and C, collectively the development footprint, excluding the Restricted Property/Conservation Areas

The proposed Project will impact the TCL and TCP/TCR by developing two warehouse buildings and associated improvements within the overall TCL and TCP/TCR and converting vacant/undeveloped natural land to developed land. However, the Project's development footprint of 35.81 acres is a relatively small area within the larger TCP/TCR/TCL and is located on the periphery of the TCP/TCR/TCL. The Project has also been designed to avoid the majority of bedrock milling sites within the project site, preserving them in perpetuity. The number of bedrock milling sites affected by the Project (three, out of the seven located on-site) is small in relation to the other outcroppings within the much larger TCP/TCR/TCL.

Additionally, Parcels A and B within the Project encompass 12.23 acres and include onsite preserved bedrock milling sites as well as a drainage course and associated habitat that will be preserved under a conservation easement and managed in perpetuity. Therefore, this 12.23 conservation area would retain and preserve undeveloped natural land within the TCP/TCR/TCL. Therefore, the Project's impacts to the identified TCP/TCR and TCL are considered **less than significant** with the Project design considerations outlined above as well as the Project's small size and location on the periphery of the TCP/TCR/TCL. Nonetheless, mitigation measures **MM CUL-1** through **MM CUL-9**, as outlined in Section 5.13.7 below, are required to further reduce potential impacts to tribal cultural resources, including to potentially undiscovered/unknown tribal cultural resources. Soboba and Pechanga have reviewed the proposed mitigation measures and are in agreement with them. Impacts to onsite tribal cultural resources will be **less than significant** with Project design considerations.

5.13.7 Proposed Mitigation Measures

MM CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

MM CUL-2 Archaeological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:

- a. Project grading and development scheduling;
- b. The development of a schedule in coordination with the developer/applicant, the project archaeologist, and for designated Native American Tribal Monitors from the consulting tribes for grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and project archeologist and Native American Tribal Monitors' authority to stop and redirect grading activities;
- c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;
- d. In conjunction with the Archeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.
- e. Treatment and final disposition of any archeological and cultural and paleontological resources, sacred sites, if discovered on the project site; and
- f. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-5.

MM CUL-3: Native American Monitor: Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following:

- a. The treatment of known cultural resources;
- b. The treatment and final disposition of any tribal cultural resources, sacred sites, human remains or archaeological and cultural resources inadvertently discovered on the Project site;
- c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and
- d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during grading, excavation and ground disturbing activities.

If the developer/permit applicant and the consulting tribe(s) are unable to reach an agreement, the mitigation measure shall be considered satisfied if the developer/permit applicant provides sufficient documented evidence that they have made a reasonable good faith effort, as determined by the City, to reach an agreement with the consulting tribes with regards to items a-d, as listed above).

MM CUL-4 Treatment and Disposition of Cultural Resources: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently

discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site. The removal of any artifacts from the project site shall require the approval of the Consulting Tribes and all resources subject to such removal must be thoroughly inventoried with a tribal monitor from each consulting tribe to oversee the process; and
3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - a. Preservation-In-Place of the cultural resources, if feasible as determined through coordination between the project archeologist, developer/applicant, and consulting tribal monitor(s). Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity.
 - b. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded. No cataloguing, analysis, or other studies may occur on sacred items, human remains, and grave goods. Any reburial process shall be culturally appropriate. List of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV report shall be prepared by the project archeologist and shall be filed with the City under a confidential cover and not subject to a Public Records Request. The Tribe(s) should be able to access these areas in the future through enforceable agreement;
 - c. If reburial is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
 - d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such

resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

MM CUL-5 Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

MM CUL-6 Fencing of the Avoided Sites: Prior to any earthmoving activities, the current boundaries of the avoided sites (CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489) will be fenced and identified as an Environmental Sensitive Area (ESA). The project applicant will ensure that appropriate temporary fencing is installed i.e., orange fabric/barrier fencing) to prevent any unintentional disturbances to CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489 during any earthmoving activities on the project site. The fencing will be installed before clearing and grubbing and will not be removed until all earthmoving activities have been completed and the wall in Parcel 4 has been constructed. The project archaeologist and Tribal Monitor(s) will be on site to monitor the fence installation and removal and will conduct daily inspections of the fencing to make sure that it is intact and has not been breached.

If the project archaeologist and/or Tribal Monitor(s) identify a breach of the fence, i.e., removal, cut, depressed, driven over or intentionally breached in any way, all work within a 25-foot buffer shall cease and the Project Applicant, City, project archaeologist and the Monitoring Tribe(s) shall meet and confer as to the best method to repair the fencing. The person(s) responsible for the breach and the Construction Supervisor (or appropriate supervisory personnel) shall be required to retake the sensitivity training provided at the beginning of construction, in addition to any other remedies considered appropriate.

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

of each feature. The relocation information shall be included in a Phase IV Monitoring Report. The site record should clearly indicate that the Features are not in their original location and why they were relocated.

MM CUL-8 Long-Term Preservation Plan: Prior to occupancy, a Long-Term Preservation Plan (LTPP) shall be prepared among the City, Land Owner, and Consulting Tribe(s). The LTPP should include the following:

- a. Description of archaeological resources
- b. Documentation of resources of concern, such as high-resolution photographs or similar
- c. Listing of Preservation Actions to Date
- d. The determination of responsibility for care, maintenance, and guidance in the event preserved resources [CA-RIV-11770, CA-RIV-11772, CA-RIV-2486, two milling slicks within CA-RIV-2488, and CA-RIV-2489] should be vandalized or damaged. This section should also address responsibility for regular site condition assessments to determine if resources are being affected by project construction and later operations.

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

A STANDARD CONDITION OF APPROVAL WILL INCLUDE THE FOLLOWING – CONSISTENT WITH STATE LAW:

Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a

Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

5.13.8 Cumulative Environmental Effects

Similar to cultural resources, the geographic scope for cumulative impacts to tribal cultural resources is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. Western Riverside County was part of the territory of the Cahuilla and Luiseno people. Cumulative projects in the Project area and other development in western Riverside County could result in the progressive loss of as-yet unrecorded archaeological resources. This loss, without proper mitigation, would be an adverse cumulative impact.

Cumulative projects within the City have the potential to impact tribal cultural resources; however, to reduce impacts to significant historical, archeological, and tribal cultural resources, the City's General Plan and General Plan EIR incorporate policies and programs to protect and/or document these resources as part of the City's development review process and mitigation measures that require preparation of technical studies, coordination with native American tribes, and the presence of monitors if necessary.

As outlined in Section 5.13.6 above, the bedrock milling sites individually do not meet all of the four criteria for listing on the NRHP or the CRHR. Therefore, as none of the sites are eligible for listing, impacts to each site individually from implementation of the Project would be less than significant.

Results of the TCP Study found that the TCP/TCR is potentially eligible for listing in the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP), 3/C, and 4/D and retains sufficient integrity for listing. Similarly, the TCL Study found that the TCL is potentially eligible for listing under the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP) and 4/D and retains sufficient integrity for listing.

The studies determined that the Project site is within the general boundary of the respective TCP/TCR and TCL and the bedrock milling features on the site are considered contributing features. For the purpose of analysis of impacts in this EIR, and to be conservative, it is assumed that the TCP/TCR and TCL are eligible for CRHR and NRHR listing. However, based on the information included in the TCP/TCR and TCL Studies, it was determined that listing of the TCP/TCR and TCL are not required as a mitigation measure for the Project, as the Project affects a relatively small area (35.81³ acres) of the TCP/TCR and TCL, and listing would be outside the scope of the Project.

The City and the Pechanga and Soboba Tribes, respectively, have agreed on mitigation measures (MM CUL-1 through MM CUL-9) for the Project in addition to the avoidance and preservation of resources outlined in Section 5.13.3 Project Design Considerations.

Although the specific area or location of the TCL and TCP/TCR is confidential, for context, the TCL roughly stretches from the Box Springs area in Riverside, south into the City of Perris. The TCP/TCR is smaller in area than the TCL, but they generally overlap in their central portions. Large portions of the TCL and TCP/TCR have already been impacted with development. However, regional development has not removed or impacted the tribes' connections to these TCL and TCP/TCR.

The proposed Project will impact the TCL and TCP/TCR by developing two warehouse buildings and associated improvements within the overall TCL and TCP/TCR and converting vacant/undeveloped natural land to developed land. However, the Project's development footprint of 35.81 acres is a relatively small area within the larger TCP/TCR/TCL and is located on the periphery of the TCP/TCR/TCL. The Project has also been designed to avoid the majority of bedrock milling sites within the project site, preserving them in perpetuity. The number of bedrock milling sites affected by the Project (three, out of the seven located on-site) is small in relation to the other outcroppings within the much larger TCP/TCR/TCL.

Additionally, Parcels A and B within the Project encompass 12.23 acres and include onsite preserved bedrock milling sites as well as a drainage course and associated habitat that will be preserved under a conservation easement and managed in perpetuity. Therefore, this 12.23 conservation area would retain and preserve undeveloped natural land within the TCP/TCR/TCL.

Finally, the Sycamore Canyon Wilderness Park is a 1,500-acre open space park and core reserve for the federally endangered, state threatened Stephens' kangaroo rat. Both the TCL and TCP/TCR encompass the entire Sycamore Canyon Wilderness Park. As an open space park and endangered species reserve, the park will not be developed and will be preserved and maintained in perpetuity. Thus, a large area of the TCL and TCP/TCR will be protected in place and would not be impacted by future development.

³ Total of Parcels 1, 2 and C, collectively the development footprint, excluding the Restricted Property/Conservation Areas

Although the project will result in an incremental impact to the TCL and TCP/TCR, these impacts are not considered cumulative considerable based on the following reasons:

- 1) Individually the bedrock milling sites are not eligible for listing on the CRHR or NRHP and are not significant losses;
- 2) More bedrock milling sites are being avoided and preserved onsite in perpetuity than are being adversely impacted or lost (a total of eight out of fourteen bedrock outcrops, 22 of 36 milling slicks, and four of seven complete milling sites);
- 3) The City and the Pechanga and Soboba Tribes have agreed on mitigation measures to further reduce potential adverse impacts to known onsite tribal cultural resources (including the fencing of avoided sites, relocation of impacted sites, controlled grading, and implementation of a Long-Term Preservation Plan), and those to reduce potential adverse impacts to unknown resources (including archaeological and native American monitoring, treatment and disposition procedures, and cultural sensitivity training);
- 4) The Project's development footprint of 35.81 acres is a relatively small land area within a larger TCL and TCR/TCP and impacts to a small number (six) of bedrock milling slicks within a larger TCL and TCR/TCP that could potentially include up to thousands of bedrock milling slicks would not be significant;
- 5) In addition to there being many more resources in the area, all resources within 2 miles of the project site are bedrock milling sites, so those impacted are not unique, and many more of the same type are being preserved;
- 6) Onsite preservation of 12.23 acre area of undeveloped natural land protects the TCP/TCR/TCL; and
- 7) The City's 1,500-acre Sycamore Canyon Wilderness Park is located within the TCL and TCP/TCR and will also protect tribal cultural resources within it from future development and associated cumulative losses.

With the project designed to avoid the majority of bedrock milling sites, both directly and indirectly, and with implementation of the mitigation measures **MM CUL-1 through MM CUL-9** described above, the Project will have a less than significant cumulative impacts on tribal cultural resources. Cumulative impacts will be **less than significant with mitigation** incorporated.

5.13.9 References

The following references were used in the preparation of this section of the DEIR:

AE 2020b	Applied EarthWorks, <i>Phase I and Phase II Cultural Resource Investigations for the Sycamore Hills Distribution Center Project</i> , September 2020.
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GP 2025 FPEIR	City of Riverside, <i>General Plan 2025 Program Environmental Impact Report</i> (SCH# 2004021108), certified November 2007. (Available at https://www.riversideca.gov/planning/gp2025program/)
TCP Study	Applied EarthWorks, <i>Sycamore Hills Traditional Cultural Property Study for the Sycamore Hills Distribution Project</i> , March 2021. (Confidential)
TCL Study	Applied EarthWorks, <i>Sycamore Hills Traditional Cultural Landscape Study for the Sycamore Hills Distribution Project</i> , February 2021. (Confidential)

5.14 Utilities and Service Systems

Based on Appendix G of the *State CEQA Guidelines* and comments received during the Notice of Preparation (NOP) public review comment period, and comments received during the NOP public review comment period (Appendix A), this section evaluates the Project's impacts on utilities and service systems such as water, wastewater, stormwater drainage facilities, and solid waste.

The following analysis of potential impacts is based, in part, on the Preliminary Water Quality Management Plan ([PWQMP] Appendix J) revised March 2020 and the *Report of Preliminary Deep Percolation Testing, Proposed Commercial Building, APN 263-060-022, Riverside, California* prepared by GeoMat Testing Laboratories, Inc., July 2019 (Appendix H).

5.14.1 Setting

Stormwater Drainage

The storm drain system within the City is managed and maintained by both the City and the Riverside County Flood Control and Water Conservation District (RCFCWCD). RCFCWCD is responsible for the operation and maintenance of regional flood control facilities such as dams, flood basins, levees, open channels, and regional underground storm drains. Smaller drainage facilities, consisting mostly of underground closed pipelines and storm drains located primarily in developed areas, are typically maintained by the City. The City's local facilities collect stormwater and convey it to regional facilities, including RCFCWCD facilities, the Santa Ana River, and the many arroyos located in the City. (GP 2025 FPEIR, p. 5.16-4)

The majority of stormwater flows collected within the City discharge to the Santa Ana River, which ultimately drains into the Pacific Ocean near Newport Beach. The Santa Ana River watershed is over 2,700 square miles and includes Orange County, the northwestern corner of Riverside County, the southwestern corner of San Bernardino County, and a small portion of Los Angeles County. In the City, there are 11 principal drainage areas for which Master Drainage Plans have been completed; 10 of these drainage areas eventually flow into the Santa Ana River. A Master Drainage Plan addresses the current and future drainage needs of a given community or area, usually following regional watershed limits. (GP 2025 FPEIR, pp. 5.16-3 – 5.16-4) The Project Site, however, is not located within a Master Drainage Plan area, but is located in an area where the stormwater flows to Sycamore Creek then to Reach 3 of the Santa Ana River followed by Reach 2 and 1 until reaching the Pacific Ocean (PWQMP, p. 10).

The City is located in the Santa Ana River Region, which is within the Riverside County Drainage Area Management Plan (DAMP). DAMP addresses the requirements of the municipal separate storm sewer system (MS4) permits issued to the Riverside County Co-Permittees by the Santa Ana Regional Water Quality Control Board. The City is a Permittee under the MS4 Permit, and as such, the City is required to enforce and comply with stormwater discharge requirements. (GP 2025 FPEIR, p. 5.16-4)

The existing hydrology of the Project site is shaped by the existing topography of the site as well as the size of tributary area (areas that are at a higher elevation or upland to and drain to the site) and how stormwater runoff is conveyed from the tributary area to the site (i.e. via sheet flow or in stormwater drainage pipes or channels). As outlined in Section 5.9 Hydrology and Water Quality, the existing Project site is comprised of five (5) drainage management areas (DMAs), which each drain to their respective points of discharge (POD), along the northern and eastern Project site boundary. The planned onsite storm drain system for the site will convey stormwater runoff that drains onto the site from upland areas, as well as stormwater runoff from the site itself, to existing natural drainage courses that extend north into the Sycamore Canyon Wilderness Park, and an existing low lying area that extend east to adjacent private property. As the Project's stormwater runoff is not conveyed uphill and towards Alessandro Boulevard or Barton Street, the Project site would not connect to the existing public storm drain system or require the construction of stormwater management facilities in the public right of way.

Water Services

Potable water service to the Project is provided by Western Municipal Water District (Western) (GP 2025, Figure PF-1). Urban water purveyors such as Western are required to prepare and update an Urban Water Management Plan (UWMP) every five years. Western's 2015 UWMP was adopted on June 1, 2016. The UWMP addresses water supply, water supply reliability, water shortage contingency plans, and demand management measure. Western coordinated preparation of its UWMP with its wholesale supplier, the Metropolitan Water District of Southern California (Metropolitan); however, Western's UWMP reports solely on its service area and as such is considered an "Individual UWMP." (UWMP, p.2-4)

According to its 2015 UWMP, Western has both retail and wholesale customers. One of Western's retail areas is the Riverside Retail Service Area, which includes a portion of the City of Riverside in addition to unincorporated portions of Riverside County. Fourteen local retail agencies, referred to as wholesale customers, within Western's service area currently receive, or can receive water from Western. Western serves eight of its 14 wholesale customers with water from the Colorado River, the State Water Project, and groundwater desalters. (UWMP, P.3-1)

Western serves water directly to approximately 23,500 domestic and 760 irrigation (landscaping, agricultural, and Western's sites) connections in its retail service area (approximately 95,000 persons) (UWMP, p. 3-1). Western's general district (wholesale and retail areas combined) consists of a 527-square-mile area of western Riverside County and has an estimated population of more than 860,000 people. The 2015 UWMP provides a summary of anticipated supplies and demands for the years 2010 to 2035. (UWMP, p. 3-7)

Water Supply and Demand

Western relies on three existing water sources: groundwater, imported water, and recycled water to meet its wholesale and retail demands. Planned supplies include new groundwater production and expanded recycled water use. Western obtains approximately 71 percent of its total supply through imported water sources from Metropolitan. About one-quarter of the water Western purchases from Metropolitan comes from the Colorado River Aqueduct and about three-quarters

from the State Water Project (SWP). However, SWP deliveries were dramatically reduced, leading to a greater proportion of Colorado River supplies in Metropolitan's deliveries. Western also purchases water from the City of Riverside, Riverside Highland Water Company, and the Meeks and Daley Water Company (UWMP, p. 6-2). Western's local supplies come from groundwater in the Arlington, Chino, and Murrieta basins, as well as the San Bernardino Basin Area. Western also provides recycled water supply from its own water recycling facility. Future supplies will be developed locally to increase groundwater recharge, encourage conjunctive and recycled water use, and improve the Chino desalters (UWMP, p. 6-21).

Although Western's overall historical total water demands have generally increased, demands have decreased in recent years due to the 2008 economic recession and subsequent conservation measures. Although the State is no longer in drought, the Water Board continues to develop permanent prohibitions on wasteful water use (CalGov). By year 2035, forecasted demand will increase by approximately 60 percent. At build-out (estimated sometime near year 2040), total demands on Western water supplies would be approximately 131,954 acre-feet per year (AFY) (UWMP, p. ES-4). Western's 2015 UWMP demonstrates that Western anticipates adequate water supplies for years 2020 to 2035 under normal hydrological conditions, single-dry year hydrological conditions, and multiple-dry year hydrological conditions as shown below in Tables 5.14-1 through 5.14-6, respectively (UWMP, Tables 7-5 through 7-8, pp. 7-6 – 7-7).

Table 5.14-1: Retail Supply and Demand Comparison for a Normal Year

	2020	2025	2030	2035	2040
Supply totals	69,718	76,264	79,672	92,030	90,400
Demand totals	30,814	33,714	39,170	39,170	41,704
Difference	38,904	42,550	52,257	52,860	48,696

Table 5.14-2: Wholesale Supply and Demand Comparison for a Normal Year

	2020	2025	2030	2035	2040
Supply totals	152,491	159,389	169,372	178,155	184,095
Demand totals	110,787	114,039	123,515	122,895	132,999
Difference	41,704	45,350	45,857	55,260	51,096

Table 5.14-3: Retail Single-Dry Year Supply and Demand Comparison

	2020	2025	2030	2035	2040
Supply totals	69,718	76,264	79,672	92,030	90,400
Demand totals	30,814	33,714	39,170	39,170	41,704
Difference	38,904	42,550	52,257	52,860	48,696

Table 5.14-4: Wholesale Single-Dry Year Supply and Demand Comparison

	2020	2025	2030	2035	2040
Supply totals	152,491	159,389	169,372	178,155	184,095
Demand totals	110,787	114,039	123,515	122,895	132,999
Difference	41,704	45,350	45,857	55,260	51,096

Table 5.14-5: Retail Supply and Demand Comparison in Multiple-Dry Years

		2020	2025	2030	2035	2040
First year	Supply totals	69,718	76,264	79,672	92,030	90,400
	Demand totals	30,814	33,714	36,415	39,170	41,704
	Difference	38,904	42,550	43,257	52,860	48,696
Second year	Supply totals	69,718	76,264	79,672	92,030	90,400
	Demand totals	30,814	33,714	36,415	39,170	41,704
	Difference	38,904	42,550	43,257	52,860	48,696
Third year	Supply totals	69,718	76,264	79,672	92,030	90,400
	Demand totals	30,814	33,714	36,415	39,170	41,704
	Difference	38,904	42,550	43,257	52,860	48,696

Table 5.14-6: Wholesale Supply and Demand Comparison in Multiple-Dry Years

		2020	2025	2030	2035	2040
First year	Supply totals	152,491	159,389	169,372	178,155	184,095
	Demand totals	110,787	114,039	123,515	122,895	132,999
	Difference	41,704	45,350	45,857	55,260	51,096
Second year	Supply totals	152,491	159,389	169,372	178,155	184,095
	Demand totals	110,787	114,039	123,515	122,895	132,999
	Difference	41,704	45,350	45,857	55,260	51,096
Third year	Supply totals	152,491	159,389	169,372	178,155	184,095
	Demand totals	110,787	114,039	123,515	122,895	132,999
	Difference	41,704	45,350	45,857	55,260	51,096

As the Project's buildings are both less than 500,000 square feet of industrial use a Water Supply Assessment (WSA) is not required pursuant to Senate Bill 610 and no WSA was conducted. Per email communication on January 15, 2020 with Western, no WSA is required.

Groundwater

In addition to its routine use of imported water supplies (discussed below), Western currently has the capability to purchase local groundwater supplies from Meeks and Daily Water Company, Riverside Highlands Water Company, and the City when available (UWMP, p. ES-3). These local groundwater resources have become increasingly important to Western's water supply because SWP and Colorado River deliveries are less reliable due to drought conditions. Therefore, additional groundwater supplies are pumped by Western from the Temecula Valley Groundwater

Basin, the San Bernardino Basin Area, and the Arlington Subsection of the Riverside-Arlington Groundwater Basin (UWMP, p. ES-3).

In 2015, groundwater represented 21 percent of Western's total supply. Western plans to develop additional local groundwater sources including programs to use recycled and storm water to recharge groundwater basins, and to participate in the Chino Desalter expansion to treat more local Chino Basin Groundwater to usable standards.

Imported Water

Western's water supply consists primarily of purchased or imported water from Metropolitan under normal circumstances. Metropolitan obtains its supply primarily from the SWP or Colorado River Aqueduct.

Uncertainty arising from extended dry conditions, pending environmental and regulatory mandates, pending and potential litigation concerning water supplies, and long-term water supply planning efforts all affect the reliability and sustainability of imported water from the SWP and the Colorado River. During the current drought, SWP water allocations were significantly cut, leading to a greater proportion of Colorado River water in the supply and increased efforts to develop local groundwater supplies.

State Water Project

As noted, Western receives potable water from the delta region via the SWP. The availability of this water supply may be highly variable depending on environmental and regulatory conditions. The Department of Water Resources' *State Water Project Delivery Capability Report* was prepared to address uncertainty in availability of SWP water. Most notably, the Federal biological opinions requiring a reduction in the amount of water pumped from the Delta to protect several endangered fish species covered by the Endangered Species Act (ESA) have impacted the availability of SWP water (DWR, p. 5). The Delta Stewardship Council has developed a Delta Plan to balance competing agricultural and biological interests in the delta region. Additionally, the U.S. Environmental Protection Agency published the *San Francisco Bay Delta Action Plan* in August 2012 that identifies priority activities to advance the protection and restoration of aquatic resources and ensure a reliable water supply in the Bay Delta Estuary watershed (EPA Plan).

State and Federal resource agencies and various environmental and water user entities engaged in the development of the California WaterFix project which evolved from the Bay Delta Conservation Plan (BDCP) to support the issuance of a 50-year incidental take permit under Section 10 of the Endangered Species Act (ESA). The California WaterFix goals are aimed at addressing the basic elements that include the Delta ecosystem restoration, water supply conveyance, and flood control protection and storage development. On July 10, 2015, the California Department of Water Resources published its Public Review Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) by posting it on the public web site for the Bay Delta Conservation Plan (BDCP, <http://baydeltaconservationplan.com>). State and Federal agencies proposed a new preferred sub-alternative which will separate the conveyance facility and habitat restoration

measures identified in the California WaterFix. As such, addressing the environmental issues of the Bay Delta remains an ongoing process to date.

Colorado River Water

Metropolitan-allocated water from the Colorado River is conveyed through the Colorado River Aqueduct to Metropolitan's member agencies, subject to availability of water for delivery. Other California users, as well as users from Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, also possess water rights to Colorado River water, resulting in supply competition and the need for cooperation among these right holders. This competition for resources has intensified because the Colorado River has been in drought conditions for much of the past 15 years. As with the SWP, environmental laws protecting endangered species have the potential to restrict Metropolitan's Colorado River water supplies. However, it should be noted that under the Colorado River Basin Project Act of 1968, other states that receive Colorado River water are subordinate to California's apportionment, meaning California's allocation takes precedence.

Recycled Water

In addition to its water supply operations, Western also provides wastewater services to portions of Riverside County. In 2014, the Western Water Recycling Facility (WWRF) was upgraded to produce 2,200 AFY of tertiary treated wastewater. Treated water from the WWRF is provided to the Riverside National Cemetery and General Archie Old Golf Course as well as parks, schools, groves and nurseries in place of imported potable water so as to better manage long-term water supplies. In 2015, Western delivered approximately 1,300 acre feet per year (AFY) tertiary treated water to its retail customers. (UWMP, p. 6-15) Recycled water service is not available in the Sycamore Canyon Business Park.

Water Conservation

Given the constraints on imported water supplies, water conservation strategies are being implemented at the State, regional, and local levels. At the State level, CALGreen, California's building code imposes mandatory measures for water efficiency and conservation. To meet the State-mandated goal of a 20 percent reduction in per capital water usage by 2020, Western is expanding its water conservation project by developing a Water Use Efficiency Master Plan (WUEMP) (UWMP, p. 9-1). The WUEMP includes a number of programs to achieve its conservation goals, with a specific focus on improving the efficiency of outdoor irrigation because this sector provides the opportunity for the largest and most cost effective savings (UWMP, Appendix P). Additionally, both a Water Conservation and Supply Shortage Program (WCSSP) and a Drought Allocation Plan (DAP) have been prepared by Western in conjunction with its retail agencies (UWMP, p. 8-1). The DAP provides Westerns and its wholesale customers with a means of allocating limited imported water supplies from Metropolitan under shortage conditions (UWMP, p. 8-1). The WCSSP addresses the retail area and describes size stages of water supply shortages and provides a set of strategies to ensure that water is beneficially used at the customer level (UWMP, P. 8-2).

Statewide Drought

In January 2014, Governor Brown issued a drought State of Emergency Proclamation. The Emergency Proclamation urged local urban water supplier and municipalities to implement their local water shortage contingency plans (CalGov). In addition to the Emergency Proclamation, Governor Brown issued subsequent Executive Order B-26-14 which provided local government assistance as it deemed appropriate for the purpose of providing temporary water supplies to households (CalGov). In December 2014, Governor Brown issued Executive Order B-28-14 which extended the length of the 2014 Proclamation by two years (CalGov). In the face of the current five-year drought, every water agency in California must implement measures to comply with Governor Brown's April 1, 2015 Executive Order B-29-15. Executive Order B-29-15 proclaimed that Executive Order B-26-14 and B-28-14 will remain in full effect. The 2015 executive order also increased enforcement against water waste.

For Western customers, compliance entails severely limiting outdoor water use, which was effective immediately. On May 20, 2015, Western's Board of Directors approved moving into a more restrictive stage of the WCSSP and adoption of a DAP that identifies the method that will be used to allocate limited imported supplies among Western's retail agencies if Metropolitan reduces water deliveries. Moreover, the State Water Resources Control Board has mandated that Western achieve a 32 percent reduction in water use from 2013 levels. Through July 2015, Western has achieved a 24 percent reduction.

In May 2016, Governor Brown issued Executive Order B-17-16 to modify the 2014 Emergency Proclamation and subsequent Executive Orders to develop new targets for water use reduction and to make certain water use restrictions permanent (EO B-17-16). The 2016 Executive Order gives more control to local agencies to develop targets appropriate to the unique conditions within their jurisdiction. In April 2017, Governor Brown terminated the January 2014 Drought State of Emergency for all counties in California except the Counties of Fresno, Kings, Tulare, and Tuolumne. Although the drought has been lifted, Govern Brown contained the orders and provisions to Executive Order B-37-16, Making Water Conservation a California Way of Life which allows the Water Board to continue development of permanent prohibitions on wasteful water use (CalGov).

Wastewater Services

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 Control Plant (RRWQCP) and complies with state and federal requirements governing the treatment and discharge of wastewater. Primary, secondary and tertiary treatment of wastewater from the Jurupa, Rubidoux and Edgemont Community Services Districts is also provided by the RRWQCP. (GP 2025 FPEIR, p. 5.16-11)

The City's wastewater collection system includes over 776 miles of gravity sewers ranging in size from 6-inch to 54-inch diameter pipelines. The system also includes 18 wastewater pump stations. Most of the wastewater lift stations are designed for flows of 100 to 400 gallons per minute (GPM).

There are two large lift stations with design capacities in excess of 2,000 GPM. The Public Works Department installs and maintains the wastewater system.

According to Riverside Public Utilities' 2015 UWMP, the RWQCP has recently been expanded to have a capacity of 46 million gallons per day (MGD) (RPU, p. 7-7). The RWQCP expansion included the incorporation of various new technologies designed to produce high-quality effluent water that can be reused throughout the region. The RRWQCP currently discharges tertiary-treated effluent to the Santa Ana River and delivers recycled water to irrigation customers.

Solid Waste Services

The proposed Project will be served by Burrtec Waste Industries Inc (Burrtec) for solid waste collection. All non-hazardous solid waste collected by Burrtec will be taken to Robert A. Nelson Transfer Station (also known as Agua Mansa Material Recovery Facilities), which is owned by the County of Riverside and operated under a 20-year franchise by Burrtec. Burrtec then transfers the waste to Badlands Landfill and other county landfills in the area such as Lamb Canyon or the El Sobrante landfill (GP 2025 FPEIR, p. 5.16-15). These three landfills have a combined remaining capacity of 178,969 million tons as shown on Table 5.14-7 – Existing Landfills.

Table 5.14-7–Existing Landfills

Landfill	Maximum Permitted Daily Load (tons/day)	Maximum Permitted Capacity (tons)	Current Remaining Capacity (tons)	Cease Operation Date
Badlands	4,800	34,400,000	15,748,799	1/1/2022
Lamb Canyon	5,000	38,935,653	19,242,950	4/1/2029
El Sobrante	16,054	209,910,000	143,977,170	1/1/2051

Source: CalRecycle

As the Project site is currently vacant, no solid waste is being generated in the existing conditions.

Utilities Services

Wet and dry utility extensions will be constructed underground to serve the Project and will connect to existing utility lines located along Alessandro Boulevard, for Building A and along Barton Street for Building B. Electric-power service will be provided by Riverside Public Utilities. Natural gas service will be provided by Southern California Gas Company. Water will be provided by Western Municipal Water District. Metropolitan Water District of Southern California (Metropolitan) will not provide the Project with any utilities, however it has facilities located near the Project site, including the Box Springs Feeder to the north, the Mill's Treatment Plant to the west, and the Perris Valley Pipeline to the south in (beneath) Alessandro Boulevard. The Project will not obstruct access to or impact these facilities.

5.14.2 Related Regulation

5.14.2.1 Federal Regulations

Clean Water Act

In 1972, the Federal Water Pollution Control Act (Clean Water Act) was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act (CWA) focused on tracking point sources, primarily from wastewater treatment facilities and industrial waste dischargers, and required implementation of control measures to minimize pollutant discharges. The CWA was amended again in 1987, adding Section 402(p), to provide a framework for regulating municipal and industrial stormwater discharges. In November 1990, the U.S. Environmental Protection Agency (EPA) published final regulations that establish application requirements for specific categories of industries, including construction projects that encompass greater than or equal to 5 acres of land. The Phase II Rule became final in December 1999, expanding regulated construction sites to those greater than or equal to 1 acre. The regulations require that stormwater and non-stormwater runoff associated with construction activity, which discharges either directly to surface waters or indirectly through MS4s, must be regulated by an NPDES permit.

5.14.2.2 State Regulations

California Water and Government Code

The California Water Code (CWC) was established to regulate the use and conservation of water for the public benefit. Under the CWC, urban water suppliers are obligated to prepare urban water management plans (UWMPs), which include a description of all water supply projects and programs that might be undertaken to meet total projected water use over the next 20 years. Metropolitan's Regional Urban Water Management Plan (RUWMP) assesses water supply and demand for all Metropolitan member agencies, whereas Western's UWMP is concerned only with Western's service area. Both documents meet the requirements of the California Water Code and the abovementioned legislation.

Senate Bills 610 (which amended CWC 10910 et. seq.) and 221 (which added Government Code Section 66473.7), adopted in 2003, were passed to ensure sufficient water supplies to meet demand associated with proposed development in California. Section 10910 et seq. of the CWC requires that a WSA be prepared if the proposed project has certain use and size characteristics (if, for example, the residential development is greater than 500 dwelling units). The WSA must evaluate the anticipated water demands of the project and determine if the local water supplier has adequate supplies to serve the project and meet existing and projected obligations. Section 66473.7 requires water supply verification when a project's tentative map, parcel map, or development agreement is submitted for a land use agency for approval. This determination requires an analysis of whether the total water supply available during normal, single-dry, and multiple-dry years within a 20-year horizon will meet the projected demand associated with the proposed project, in addition to existing and planned future uses.

For the purposes of SB 610, a “project” is a proposed development with water demand of 500 dwelling units or more. For industrial development, a “project” is a proposed development larger than 650,000 square feet or 40 acres. For commercial development, a “project” is a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space. The Project entails the construction and operation of a total of 603,100 square feet of warehouse space on approximately 34.49 acres and therefore a WSA was not required under SB 610 as confirmed with Western in January 2020.

Sections 13550-13556 of the Water Code states that local, regional, or State agencies shall not use water from any source of quality for non-potable uses if suitable recycled water is available as provided in Section 13550 of the Water Code.

California State Water Resources Control Board

In the State of California, the State Water Resources Control Board (SWRCB), and nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the CWA and the state Porter-Cologne Water Quality Control Act. The Porter-Cologne Water Quality Control Act, Section 13000, directs each RWQCB to develop a Water Quality Control Plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB’s regulatory programs. The proposed Project is located within the purview of the Santa Ana RWQCB (Region 8) and must comply with applicable elements of the region’s Basin Plan, as well as the Porter-Cologne Water Quality Control Act.

Water Conservation in Landscaping Act

The Water Conservation Act of 2009, or Senate Bill X7-7, which was enacted in November 2009, set a requirement for water agencies to reduce their per capita water use by 2020. The overall goal is to reach a statewide reduction of per capita urban water use of 20 percent by December 31, 2020, with an intermediate 10 percent reduction by December 31, 2015. Demand reduction can be achieved through both conservation and the use of recycled water as a potable demand offset. Since July 2009, customers and residents in Western’s general service area have achieved a water use reduction of roughly 30 percent. Western has accomplished full compliance with this act.¹

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989, also known as Assembly Bill (AB) 939, requires that each city or county prepare a new integrated waste management plan. The act further required each city to prepare a Source Reduction and Recycling Element by July 1, 1991. Each Source Reduction and Recycling Element includes a plan for achieving a solid waste goal of 25 percent by January 1, 1995, and 50 percent by January 1, 2000. A number of changes to the municipal solid waste diversion requirements under the Integrated Waste Management Act were adopted, including a revision to the statutory requirement for 50 percent diversion of solid

¹ Western’s website *Water Use Regulations & Restrictions*, <https://wmwd.com/208/Water-Use-Regulations-Restrictions>

waste. In 2011, AB 341 was passed, requiring the California Department of Resources Recycling and Recovery to require local agencies to include strategies to enable the diversion of 75 percent of all solid waste by 2020. Since the passing of AB 341, California has actually seen a decrease in recycling rates from 49 percent (49%) in 2010 to 44 percent (44%) in 2016 (CalRecycle, <https://www.calrecycle.ca.gov/75percent/recyclerate>).

Moreover, as set forth by AB 341, all businesses in the state are required to recycle as of July 2012. A business is defined as including any commercial or public entity that generates more than 4 cubic yards of solid waste per week. The law requires that such businesses source separate their recycling and/or compostable materials and donate or haul the material to recycling facilities.

5.14.2.3 Regional Regulations

Riverside County Waste Resources Department Design Guidelines

The Riverside County Waste Resources Department (RCWRD) Design Guidelines for Refuse and Recyclables Collection and Loading Areas are intended to assist project proponents in identifying space and other design considerations for refuse/recyclables collection and loading areas per the California Solid Waste Reuse and Recycling act of 1991. The Design Guidelines require one 4-cubic-yard refuse bin and one 4-cubic-yard recyclables bin per each 20,000 square feet of office, general commercial, or industrial space. Compliance with the Design Guidelines is necessary for obtaining a RCWRD clearance for issuance of a building permit. Prior to building permit issuance, a site plan that indicates the location and capacity of solid waste and recycling collection and loading areas must be submitted to the RCWRD for review and approval.

Riverside County Waste Resources Department Construction and Demolition Recycling

The RCWRD also requires that projects that have the potential to generate construction and demolition waste complete a Waste Recycling Plan (WRP) to identify the estimated quality and location of recycling of construction and demolition waste from the project. A waste recycling report is then required upon completion of the project that demonstrates that the project recycled a minimum of 50 percent of its construction and demolition waste per its WRP.

5.14.2.4 Local Regulations

Water Efficient Landscaping and Irrigation (Riverside Municipal Code Chapter 19.570)

The City of Riverside Zoning Code establishes minimum landscape and irrigation standards for all land uses. This ensures the enhancement of developments, reduction of heat and glare, control of soil erosion and conservation of water. It also provides recreation areas, cleaner air and water, and fire protection standards and establishes a buffer between residential and non-residential land use.

Chapter 19.570 includes setting a Maximum Applied Water Allowance (MAWA) as an upper limit for water use and reducing water use to the lowest practical amount, and assures the attainment of water efficient landscape goals by requiring that landscapes not exceed a maximum water demand of seventy percent (70%) of its reference evapotranspiration (ET_o). Plant selection for projects in fire-prone areas shall address fire safety and prevention. When a project is located in

adjacent to the Sycamore Canyon Wilderness Park, a part of the MSHCP Conservation area, Table 6-2 (*Plants That Should be Avoided Adjacent to the MSHCP Conservation Area*) of the Multiple Species Habitat Conservation Plan shall be consulted to avoid the use of invasive plant species. The Code also promotes the use of recycled water for landscaping, and all irrigation systems shall be designed to prevent runoff, over-spray, lowhead drainage and other similar conditions where water flows off-site on to adjacent property, non-irrigated areas, walk, roadways, or structures.

Chapter 19.570 applies to private development projects with a landscape area equal to or greater than 2,500 square feet requiring a building permit, plan check, or design review. An applicant proposing any new or rehabilitated landscape subject to Chapter 19.570 will prepare and submit an application to the Planning Division for review and approval by the Community & Economic Development Director. The planting plan, irrigation plan, and soils management plan will be reviewed to ensure that all components of the plans adhere to the requirements of this Chapter. No certificate of occupancy or other final City approval shall be issued until the City reviews and approves the landscape and irrigation plans and the landscape and irrigation are installed in accordance with the approved plans.

The City shall consult with Western during the development review process to ensure the Project's proposed landscape plans comply with the applicable standards, approvals, and implementation requirements of Ordinance 375.

Landscape Water Use Efficiency Program (Ordinance 375)

Western's Ordinance 375 establishes a Landscape Water Use Efficiency Program providing compliance measures in support of State Landscape Model Ordinance requirements. The program includes the following:

- Establish provisions for water management practices and water waste prevention;
- Establish a structure for planning, designing, installing, maintaining, and managing water efficient landscapes in new construction and rehabilitated projects;
- To reduce the water demands from landscapes without a decline in landscape quality or quantity;
- To retain flexibility and encourage creativity through appropriate design;
- To assure the attainment of water-efficient landscape goals by requiring that landscapes not exceed a maximum water demand of seventy percent (70 percent) of its reference evapotranspiration or any lower percentage as may be required by Western policy or state legislation, whichever is stricter;
- To eliminate water waste from overspray and/or runoff;
- To achieve water conservation by raising the public awareness of the need to conserve water through education and motivation to embrace an effective water demand management program; and

- To implement the requirements to meet the state of California Water Conservation in Landscaping Act 2006 and the California Code of Regulations Title 23, Division 2, Chapter 2.7.

Water Conservation and Supply Shortage Program (Ordinance 374)

Western's Water Conservation and Supply Shortage Program is designed to eliminate outdoor water waste at all stages of water supply for Western's retail customers. The purpose of the program is to ensure the highest beneficial use of Western's water supplies and to provide sufficient water supplies to meet the basic needs of human consumption, sanitation, and fire protection within Western's direct retail service area. The Project will be required to comply with this program.

Subdivision Code Title 18

The City's Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by the RCFCWCD. Section 18.48.020 also complies with the California Government Code (Section 66483), which provides for the payment of fees for construction of drainage facilities. Fees are required to be paid as part of the conditions of approval/waiver for filing of a final map or parcel map. Pursuant to the City's Subdivision Code (Title 18, Section 18.48.020), the Project Applicant would be required to pay all sewer connection fees and facilities fees. The Project will also be required to comply with all rules, regulations, and other requirements of the City for use of stormwater facilities.

Riverside Municipal CodeTitle 6

The City's Health and Sanitation Code (Municipal Code Title 6, Section 6.04 et seq.) specifies the requirements for handling solid waste and recycling materials.

Title 14

Under Title 14 of the City's Municipal Code, Section 14.08.030 (Connection to Public Sewer Required), states all homes and any other structures must be properly connected to a public sewer whenever the property abuts upon a right-of-way in which there exists a public sewer to which connection may be made. However, Parcel 2 abuts upon a right of way to which a public sewer is not able to connect. The elevation of Barton Street drops from Alessandro Boulevard going north to the Project site; as such, there is no existing gravity wastewater/ sewer pipeline in Barton Street or the option to construct one (the flows would be going away from Alessandro Boulevard, not towards it). Therefore, Building B on Parcel 2 will have a septic system and leach lines. Building A on Parcel 1 will connect to the existing public sewer system in Alessandro Boulevard.

Riverside General Plan 2025

The GP 2025 contains objectives and policies related to utilities and service systems in Public Facilities and Infrastructure Element. Applicable GP 2025 Public Facilities and Infrastructure Element policies to the Project include:

Objective PF-1: Provide superior water service to customers

Policies PF-1.1: Coordinate the demands of new development with the capacity of the water system.

Policies PF-1.2: Support the efforts of the Riverside Public Utilities Department, Eastern Municipal Water District and Western Municipal Water District to work together for coordination of water services.

Policies PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.

Policies PF-1.4: Ensure the provision of water services consistent with the growth planned for the General Plan area, including the Sphere of Influence, working with other providers.

Policies PF-1.5: Implement water conservation programs aimed at reducing demands from new and existing development.

Objective PF-3: Maintain sufficient levels of wastewater service throughout the community.

Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.

Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.

Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic, or which would obstruct flows.

Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

5.14.3 Project Design Considerations

Project design considerations refer to ways in which a project will reduce or avoid potential impacts through design. On-site pollutant sources will be minimized through the implementation of four (4) standard bioretention basins and four (4) flow based basins which will then drain to one (1) combined underground detention system in accordance with standards set forth by the RWQCB and the County of Riverside's Best Management Practice (BMP) Design Manual. The Project also proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project would not be inherently energy intensive and Project energy demands would be comparable to, or less than, other industrial projects of similar scale and configuration. The Project's design

features with regard to solid waste includes: reusing and recycling construction and demolition waste; interior and exterior storage areas for recyclables and green waste; recycling containers in public areas; education materials about reducing waste and available recycling services.

5.14.4 Thresholds of Significance

The City has not established local CEQA significance thresholds as described in Section 15064.7 of the State CEQA Guidelines. The City generally utilizes the CEQA significance thresholds in Appendix G (“Environmental Checklist”) of the State CEQA Guidelines. The Environmental Checklist prepared by the City for the Project (Appendix A) indicates that impacts related to the Sycamore Hills Distribution Center Project may be considered potentially significant if the proposed project would:

- (Threshold A) require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- (Threshold B) have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- (Threshold 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;
- (Threshold 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;
- (Threshold E) comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

5.14.5 Environmental Impacts

Threshold A: *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

As discussed in Section 5.9, Hydrology and Water Quality, the existing site is comprised of five (5) drainage management areas (DMAs) and two (2) sub areas which each drain to their respective points of discharge (POD). The Project site will contain ten DMAs and three (3) sub areas (PWQMP, p. 6). Per the site’s geotechnical analysis (Appendix F) infiltration was determined to be infeasible and therefore four (4) standard bioretention basins and four (4) flow based treatment basins will be constructed to remove pollutant sources (PWQMP, p. 9). Per the hydromodification study discussed in the PWQMP, first flush runoff will be treated via the bioretention basins which drain to one (1) combined underground detention system in accordance

with standards set by the RWQCB and the County of Riverside's BMP Design Manual. (REC, p. 5). Bioretention basins will be constructed as BMPs within the Project site to address the Project's storm water runoff. No off-site storm water drainage facilities are required.

As discussed in the IS (Appendix A), 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, respectively. Electricity will be provided by Riverside Public Utilities. Natural gas would be provided by Southern California Gas Company. Water to Buildings A and B will be provided by Western Municipal Water District via Project constructed connections or laterals to existing lines located in Alessandro Boulevard and Barton Street.

Building A will connect to the City's wastewater (sewer) collection system via a gravity flow lateral to be constructed across Alessandro Boulevard. As Building A is at a lower elevation than the existing wastewater pipeline in Alessandro Boulevard, a pump is required to get wastewater from Building A up to the gravity flow lateral connection. The wastewater flow factor for industrial land uses in the City's 2019 Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities (Volume 3, Chapter 5, Table 5.4) is 670 gallons per day per acre (gpd/ac). Parcel 1 at 24.31 acres is anticipated to generate approximately 16,288 gallons per day (mgd) and Parcel 2 at 10.32 acres is anticipated to generate approximately 6,914 mgd. As outlined above in Section 5.14.1, the RWQCP has recently been expanded to have a capacity of 46 mgd, and the Project would not require RPU to expand wastewater treatment facilities.

It is not feasible for Building B to connect to the City's wastewater system. The elevation of Barton Street drops from Alessandro Boulevard going north to the Project site; as such, there is no existing gravity wastewater/ sewer pipeline in Barton Street or the option to construct one (the flows would be going away from Alessandro Boulevard, not towards it). Therefore, Building B will have a septic system and leach lines. To determine septic feasibility for Building B, Deep Percolation Testing (Appendix G) was conducted on July 18, 2019. Two deep percolation tests were conducted for the proposed septic system. Boreholes were tested at 20 feet and 15 feet below existing ground surface for test holes P-1 and P-2, respectively. Based on the percolation test results, the onsite soils have favorable percolation rates. Based on the Deep Percolation Report, there is sufficient area on the Project site to support a primary and expansion of the onsite wastewater system that will meet the current standards of the Department of Environmental Health, County of Riverside and Regional Quality Control Board (RWQCB).

Per the Project's *Energy Analysis* (Appendix F), the Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project would not be inherently energy intensive and Project energy demands would be comparable to, or less than, other industrial projects of similar scale and configuration. Further, per the Project's Energy Analysis, the energy demands of the Project can be accommodated within the context of available resources and delivery systems. The Project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, impacts are **less than significant**.

Threshold B: *Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

As discussed in Section 5.14.3.1, *State Regulations*, certain types of development projects are required to provide detailed WSAs to planning agencies. The primary purpose of a WSA is to determine if the identified water supply or water supplier will be able to meet projected demands for the project, in addition to existing and planned future uses, over a 20-year projection and with consideration to normal, dry, and multi-dry water years. For industrial development, a WSA would be required if the “project” consists of a development larger than 650,000 square feet or 40 acres. The proposed Project entails the construction and operation of a total of 603,100 square feet of warehouse space on approximately 34.49 acres. Therefore, the Project does not meet the threshold for requiring a WSA.

As discussed in Section 5.14.1, *Setting/Water Supply and Demand*, Western is a member agency of the Metropolitan Water District which obtains water under normal water year conditions, and relies entirely on imported SWP and Colorado River (CRA) water supplies (GP 2025, p. 5.16-37). Water supplies from the SWP and CRA are increasingly constrained due to California’s current drought situation and Metropolitan has developed a Water Supply Allocation Plan (WSAP) and Water Surplus and Demand Management Plan (WSDM) to provide guidance on managing regional water supply actions. When the WSAP is in effect Metropolitan member agencies, including Western, do not lose their ability to receive imported water but instead are limited in the amounts that they can purchase without being assessed a surcharge. Nevertheless, Western has developed a Drought Contingency Plan and an Emergency Response and Recovery Plan to address catastrophes (GP 2025 PEIR, p. 5.16-38).

Metropolitan’s 2015 RUWMP evaluated single dry-year and multiple dry-year hydrological conditions as well as average year hydrologic conditions. Metropolitan has supply capabilities to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year conditions as shown below.

Table 5.14-8 Metropolitan Regional Water Demands Single Dry-Year (Acre-Feet)

	2020	2025	2030	2035	2040
A. Total Demands¹	5,234,000	5,409,000	5,549,000	5,679,000	5,808,000
Retail Municipal and Industrial	4,739,000	4,874,000	5,016,000	5,148,000	5,279,000
Retail Agricultural	131,000	168,000	164,000	162,000	160,000
Seawater Barrier	72,000	72,000	72,000	72,000	72,000
Storage Replenishment	292,000	295,000	297,000	297,000	297,000
B. Total Conservation	1,056,000	1,127,000	1,200,000	1,263,000	1,339,000
Existing Active (through 2015) ²	210,000	196,000	184,000	166,000	159,000
Code-based	381,000	423,000	462,000	497,000	532,000
Price-Effect ³	215,000	258,000	304,000	350,000	398,000
Pre-1990 Conservation	250,000	250,000	250,000	250,000	250,000
C. Total Local Supplies	2,447,000	2,497,000	2,523,000	2,538,000	2,550,000
Groundwater	1,304,000	1,302,000	1,302,000	1,302,000	1,302,000
Surface Water	107,000	107,000	107,000	107,000	107,000
Los Angeles Aqueduct	127,000	127,000	127,000	127,000	127,000
Seawater Desalination	56,000	56,000	56,000	56,000	56,000
Groundwater Recovery	143,000	157,000	163,000	165,000	167,000
Recycling ⁴	436,000	466,000	486,000	499,000	509,000
Other Imported Supplies ⁵	274,000	282,000	282,000	282,000	282,000
D. Total Metropolitan Demands	1,731,000	1,784,000	1,826,000	1,878,000	1,919,000
Consumptive Use	1,560,000	1,616,000	1,658,000	1,710,000	1,751,000
Seawater Barrier	5,000	2,000	2,000	2,000	2,000
Replenishment	166,000	166,000	166,000	166,000	166,000

Notes:

All units are acre-feet unless specified, rounded to the nearest thousand. Totals may not sum due to rounding.

¹Growth projections are based on SCAG 2012 Regional Transportation Plan and SANDAG Series 13 2050 Regional Growth Forecast.

²Does not include future active conservation savings. 1990 is base year.

³Includes un-metered water use savings.

⁴Excludes Santa Ana River base flow, which is used for recharge of Orange County groundwater basin and reflected in the Groundwater production numbers.

⁵IID/SDCWA transfer and canal linings.

Table 5.14-9 Metropolitan Regional Water Demands Multiple Dry-Years

(in Acre-Feet)

	2020	2025	2030	2035	2040
A. Total Demands¹	5,199,000	5,450,000	5,601,000	5,732,000	5,865,000
Retail Municipal and Industrial	4,701,000	4,920,000	5,063,000	5,197,000	5,332,000
Retail Agricultural	128,000	164,000	169,000	166,000	164,000
Seawater Barrier	72,000	72,000	72,000	72,000	72,000
Storage Replenishment	298,000	294,000	297,000	297,000	297,000
B. Total Conservation	1,056,000	1,127,000	1,200,000	1,263,000	1,339,000
Existing Active (through 2015) ²	210,000	196,000	184,000	166,000	159,000
Code-based	381,000	423,000	462,000	497,000	532,000
Price-Effect ³	215,000	258,000	304,000	350,000	398,000
Pre-1990 Conservation	250,000	250,000	250,000	250,000	250,000
C. Total Local Supplies	2,416,000	2,487,000	2,511,000	2,535,000	2,550,000
Groundwater	1,305,000	1,302,000	1,302,000	1,302,000	1,303,000
Surface Water	102,000	102,000	102,000	102,000	102,000
Los Angeles Aqueduct	113,000	129,000	125,000	131,000	133,000
Seawater Desalination	56,000	56,000	56,000	56,000	56,000
Groundwater Recovery	139,000	155,000	162,000	165,000	167,000
Recycling ⁴	427,000	461,000	482,000	497,000	507,000
Other Imported Supplies ⁵	274,000	282,000	282,000	282,000	282,000
D. Total Metropolitan Demands	1,727,000	1,836,000	1,889,000	1,934,000	1,976,000
Consumptive Use	1,547,000	1,668,000	1,721,000	1,766,000	1,808,000
Seawater Barrier	6,000	2,000	2,000	2,000	2,000
Replenishment	174,000	166,000	166,000	166,000	166,000

Notes:

All units are acre-feet unless specified, rounded to the nearest thousand. Totals may not sum due to rounding.

¹Growth projections are based on SCAG 2012 Regional Transportation Plan and SANDAG Series 13 2050 Regional Growth Forecast.²Does not include future active conservation savings. 1990 is base year.³Includes un-metered water use savings.⁴Excludes Santa Ana River base flow, which is used for recharge of Orange County groundwater basin and reflected in the Groundwater production numbers.⁵IID/SDCWA transfer and canal linings.

Table 5.14-10 Metropolitan Regional Water Demands Average Year

(in Acre-Feet)

	2020	2025	2030	2035	2040
A. Total Demands¹	5,219,000	5,393,000	5,533,000	5,663,000	5,793,000
Retail Municipal and Industrial	4,725,000	4,859,000	5,001,000	5,133,000	5,264,000
Retail Agricultural	130,000	167,000	163,000	161,000	160,000
Seawater Barrier	72,000	72,000	72,000	72,000	72,000
Storage Replenishment	292,000	295,000	297,000	297,000	297,000
B. Total Conservation	1,056,000	1,127,000	1,200,000	1,263,000	1,339,000
Existing Active (through 2015) ²	210,000	196,000	184,000	166,000	159,000
Code-based	381,000	423,000	462,000	497,000	532,000
Price-Effect ³	215,000	258,000	304,000	350,000	398,000
Pre-1990 Conservation	250,000	250,000	250,000	250,000	250,000
C. Total Local Supplies	2,578,000	2,631,000	2,657,000	2,674,000	2,689,000
Groundwater	1,303,000	1,301,000	1,301,000	1,301,000	1,302,000
Surface Water	110,000	110,000	110,000	110,000	110,000
Los Angeles Aqueduct	261,000	264,000	264,000	266,000	268,000
Seawater Desalination	51,000	51,000	51,000	51,000	51,000
Groundwater Recovery	143,000	157,000	163,000	165,000	167,000
Recycling ⁴	436,000	466,000	486,000	499,000	509,000
Other Imported Supplies ⁵	274,000	282,000	282,000	282,000	282,000
D. Total Metropolitan Demands	1,586,000	1,636,000	1,677,000	1,726,000	1,765,000
Consumptive Use	1,415,000	1,468,000	1,509,000	1,558,000	1,597,000
Seawater Barrier	5,000	2,000	2,000	2,000	2,000
Replenishment	166,000	166,000	166,000	166,000	166,000

Notes:

All units are acre-feet unless specified, rounded to the nearest thousand. Totals may not sum due to rounding.

¹Growth projections are based on SCAG 2012 Regional Transportation Plan and SANDAG Series 13 2050 Regional Growth Forecast.²Does not include future active conservation savings. 1990 is base year.³Includes un-metered water use savings.⁴Excludes Santa Ana River base flow, which is used for recharge of Orange County groundwater basin and reflected in the Groundwater production numbers.⁵IID/SDCWA transfer and canal linings.

Additionally, Metropolitan has comprehensive plans to address up to a 50 percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans (RUWMP, p. ES-5).

Per the Sycamore Canyon Business Park Specific Plan, Western has stated that there is adequate water volume available to serve any potential industrial development within the Specific Plan Area. Additionally, per Metropolitan's 2015 UWMP report, Western will have sufficient water supply available to serve the Project including any reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, sufficient water supplies exist to serve the Project, and **impacts are less than significant**.

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

The City's Public Works Department provides for the collection, treatment, and disposal of all wastewater generated within the Riverside Regional Water Quality Control Plant (RRWQCP). In 2015, RRWQCP's plant capacity expanded to 46 million gallons per day (mgd) (City of Riverside Public Works, 2016). Per the UWMP, the RRWQCP serves approximately 295,000 people, who generate approximately 18 mgd, indicating the RRWQCP currently has excess capacity. As outlined above under Threshold A, Parcel 1 is anticipated to generate approximately 16,288 gallons per day (mgd) and will connect to the City's wastewater/sewer collection system and will be treated at RRWQCP. Parcel 2 is anticipated to generate approximately 6,914 mgd but will not connect to City sewer, as it will be served by a septic system. As outlined above in Section 5.14.1, the RWQCP has recently been expanded to have a capacity of 46 mgd, and the Project would not require RPU to expand wastewater treatment facilities. Therefore, **impacts are less than significant**.

Threshold D: *Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The proposed Project will generate solid waste during construction and operation. The Project's estimate construction waste is shown below in Table 5.14-11. As shown in Table 5.14-11 the proposed Project is anticipated to generate approximately 1,173 tons of construction related solid waste. Given the limited contribution of construction related solid waste anticipated to be generated by the Project over and estimated 15 month construction period (a negligible percent of the annual landfill capacity), Project construction will not substantially contribute to the exceedance of the permitted capacity of the designated landfills.

Table 5.14-11 – Estimated Project Construction-Related Solid Waste Generation

Proposed Land Use	Size (Square Feet)	Generation Factor^a (lbs/SF)	Projected Project Total (tons)^b
Building A	400,000	3.89	778
Building B	203,100	3.89	395
Total Construction Waste			1,173
Disposal Facility	Disposal Capacity (tons/year)^c	Projected Project Construction Waste^b	Projected Project Contribution to Yearly Intake
Badlands Landfill	1,752,000	1,173	0.07%
Lamb Canyon	182,500	1,173	0.64%
El Sobrante Landfill	5,859,710	1,173	0.02%
Total	7,794,210	1,173	0.02%

Notes:

- a. Source: USEPA
- b. 1 ton = 0.0005 lbs. Proposed Project Tons = (SF X 3.89 lbs/SF X 0.0005 lbs)
- c. Daily Disposal capacity multiplied by 365 days per year.

Additionally, should the construction-related solid waste be processed at the Robert A. Nelson Transfer Station before being sent to a landfill, the proposed Project's construction-related solid waste would constitute a negligible percent of the annual permitted intake capacity of the transfer station. Further, the California Green Building Standards Code (CalGreen) requires projects involving construction and demolition to recycle, reuse, compost, and/or salvage a minimum of 50 percent by weight of material or waste generated on site. Projects that have the potential to generate construction and demolition waste are required to complete a Waste Recycling Plan to identify the estimated quantity and location or recycling for construction and demolition waste resulting from the project to meet this goal. Thus, impacts to the existing landfills during construction are **less than significant**.

After construction, the Project would generate 1,113.4 tons per year of operational solid waste over its lifetime. The estimated operational-related solid waste generation for the Project is reflected below in Table 5.14-11 – Estimated Operational Project-Related Solid Waste Disposal.

As shown in Table 5.14-12, the operation of the Project is anticipated to result in the disposal of approximately 1,113.4 tons of solid waste per year assuming 586 employees. Having calculated the anticipated solid waste to be disposed of by the proposed Project, implementation of the proposed Project would not substantially contribute to the exceedance of the permitted capacity of the designated landfills. Thus, operational impacts are **less than significant**.

Table 5.14-12 – Estimated Operational Project-Related Solid Waste Disposal

Proposed Land Use	Total Number of Employees	Disposal Factor (tons/employee/year)	Proposed Project Total (tons/year)
Building A and B	586	1.9	1,113.4
Total Projected Operational Waste Disposal			1,113.4
Disposal Facility	Disposal Capacity (tons/year)		Projected Project Contribution of Yearly Intake
Badlands Landfill	1,752,000		0.06%
Lamb Canyon	182,500		0.61%
El Sobrante Landfill	5,859,710		0.02%

Further, the Project would be required to comply with all Federal, State, and Local solid waste-related statutes and regulations. If the Project participates in source reduction programs, the yearly solid waste generated by the Project could be reduced over time. Regardless, all three (3) landfills have the capacity to accommodate the Project's construction and operational related solid waste. Thus, the Project is served by a transfer station and landfill(s) with sufficient permitted capacity to accommodate the Project's solid waste disposal needs. Therefore, operational impacts are **less than significant**.

Threshold E: *Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to assure adequate landfill capacity through mandatory reductions in solid waste quantities (for example, through recycling and composting of green waste) and the safe and efficient transportation of solid waste. The Project will comply with all regulatory requirements regarding solid waste including AB 939 and AB 341. AB 939, which is administered by the California Department of Resources Recycling and Recovery required local governments to achieve a landfill diversion rate of at least 50 percent by January 1, 2000, through source reduction, recycling, and composting activities. Moreover, AB 341 increases the minimum solid waste diversion rate to 75 percent by 2020, and mandates multi-family residential uses of five dwelling units or more and commercial or public entities that generate more than four cubic yards of commercial solid waste per week to recycle. Since the passing of AB 341, California has actually seen a decrease in recycling rates from 49 percent (49%) in 2010 to 44 percent (44%) in 2016 (CalRecycle, <https://www.calrecycle.ca.gov/75percent/recyclerate>). However, such regulations will be applicable to this Project and compliance is mandatory. Further, mandates set forth by the California Green Building Standards Code (CALGreen Code) aim to reduce solid waste generation and promote recycling and diversion design and activities, to which this Project is required to comply (California Code of Regulations, Title 24, Part 11). As outlined above in 5.14.3 Project Design Considerations, the Project's features include: reusing and recycling construction and demolition waste; interior and exterior storage areas for recyclables and green waste; recycling containers in public areas; education materials about reducing waste and

available recycling services. The Project will comply with Federal, State, and local statutes and regulations related to solid waste and impacts are **less than significant**.

5.14.6 Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measure that could minimize significant adverse impacts (State CEQA Guidelines Section 15126.4). Implementation of the Project will not result in any potentially significant impacts to utilities and service systems, and therefore, no mitigation measures are necessary, and no mitigation measures are required.

5.14.7 Cumulative Environmental Effects

Utilities and service systems include water, wastewater, storm drains, landfills, and solid waste disposal services. Drainage is discussed in Section 5.9 Hydrology and Water Quality.

Water Supply

Potable water service to the Sycamore Canyon Business Park, which includes the Project site, is provided by Western Municipal Water District (Western); thus, the geographic scope for water service is Western's Riverside Retail Area. As described in Section 3 – Project Description, the proposed Project will include water-efficient landscaping to conserve water, thus reducing the amount of water required and the amount of wastewater generated. Although the Project will have water efficient landscaping, the proposed Project when combined with the cumulative development projects within Western's Riverside Retail Area will increase the demand for water. Pursuant to SB 610 a Water Supply Assessment is prepared for certain projects to determine the project water supply. As the proposed Project is less than 650,000 square feet of industrial use, a WSA is none required and was not conducted. Email communication with Western in January 2020 confirmed no WSA was required.

According to Table 5.14-1 through 5.14-6 Western will be able to provide a sufficient amount of water to its service area based on current and project future water use. Thus, Western has the ability to serve the proposed Project, as well as the cumulative development projects for the next 15 years. Because cumulative water supplies exceed water demand, **cumulative impacts to water supply are less than significant** and the proposed Project will not contribute to a cumulatively considerable impact on water supply.

Wastewater Services

The City's Public Works Department provides for the collection, treatment, and disposal of all wastewater; thus, the geographic scope for these services is the City. The Riverside Public Works Department operates a comprehensive wastewater collection, treatment, and disposal system. Wastewater generated by the proposed Project and the cumulative development projects will be collected in facilities owned and maintained by the Public Works Department and conveyed to the Riverside Regional Water Quality Control Plant (RWQCP). In January 2020 the City prepared an *Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities* for to facilitate planning through a 20-year horizon for the City's RWQCP and collection system. The recommended plan is intended to enable the RWQCP to continue to reliably provide wastewater

treatment for the City and surrounding communities as the wastewater flow and loading increase due to projected population growth. The RWQCP has a capacity of 40 million gallons per day (MGD) and can provide sufficient capacity to treat the wastewater generated by Parcel 1/Building A of the proposed Project, as well as cumulative development projects, and overall buildout in the City per the GP 2025. Parcel 2/Building B will be on septic with leach lines, and will not need to be treated at the RWQCP. For these reasons, **cumulative impacts to wastewater collection and treatment are less than significant** and the proposed Project will not contribute to a cumulatively considerable impact in this regard.

Solid Waste

The geographic context for cumulative impacts regarding solid waste collection and disposal is Riverside County. Development of the proposed Project and cumulative development projects will increase the amount of solid waste entering the waste stream. All non-hazardous solid waste collected in the City is transported to the Robert A. Nelson Transfer Station, which is owned by the County of Riverside and operated under a 20-year franchise agreement by a private company. Waste is then transferred to the Badlands, El Sobrante, or Lamb Canyon landfills for disposal; however, local trash haulers may use other Riverside County landfills. All Riverside County landfills are Class II disposal sites that are permitted to receive nonhazardous municipal solid waste.

As discussed in Threshold D, the predicted total maximum load is 1,113.4 tons per year at buildout of which a maximum of 556.7 tons per year would be conveyed to local landfills for disposal, as at least 50% is required to be recycled. This projected Project contribution of yearly intake ranges between approximately 0.02% - 0.61% for the 3 local landfills. Due to the Project's small percentage of total yearly intake for each landfill, the Project's operational impacts associated with solid waste would be less than cumulatively considerable. Additionally, the Project and other cumulative developments in the landfills' service areas would be required to comply with all applicable solid waste statutes and regulations, including the requirement to divert at least 50 percent of solid waste materials from landfills. Accordingly, the Project and other cumulative developments have are not expected to conflict with federal, state, and local statutes and regulations related to solid waste, and impacts would be **less than significant** on a cumulative basis, and the Project's contribution would be less than cumulatively considerable.

5.14.8 References

The following references were used in the preparation of this section of the DEIR:

CalGov	<p>Governor Brown Declares Drought State of Emergency (Available at https://www.ca.gov/archive/gov39/2014/01/17/news18368/index.html, accessed December 30, 2020)</p> <p>Governor Brown Streamlines Relief Efforts for Families with Drinking Water Shortages Due to Drought (Available at https://www.ca.gov/archive/gov39/2014/09/19/news18713/index.html, accessed December 30, 2020)</p> <p>Executive Order B-28-14 (Available at https://www.ca.gov/archive/gov39/2014/12/22/news18815/index.html, accessed December 30, 2020)</p> <p>Executive Order B-40-17 (Available at https://www.ca.gov/archive/gov39/wp-content/uploads/2017/09/4.7.17_Attested_Exec_Order_B-40-17.pdf, accessed December 30, 2020)</p>
CalRecycle	<p>Solid Waste Information System, Badlands Sanitary Landfill (Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367, accessed September 4, 2020)</p> <p>Solid Waste Information System, Lamb Canyon Sanitary Landfill (https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368, accessed September 4, 2020)</p> <p>Solid Waste Information System, El Sobrante Landfill (https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402, accessed September 4, 2020)</p> <p>California's Statewide Recycling Rate (Available at https://www.calrecycle.ca.gov/75percent/recyclerate, accessed December 30, 2020.)</p>
DWR	<p>Department of Water Resources, State Water Project Delivery Capability Report 2015, July 1, 2015. (Available at https://data.cnra.ca.gov/dataset/dcr2015/resource/fe29da65-f2dd-4811-a4a6-2a0b0b9d09fe, accessed February 3, 2020)</p>
EPA Plan	<p>U.S. Environmental Protection Agency, San Francisco Bay Delta, Bay Delta Action Plan, August 2012. (Available at http://www2.epa.gov/sfbay-delta/baydelta-action-plan, accessed February 3, 2020)</p>
GP 2025 FPEIR	<p>City of Riverside, General Plan 2025 Program Environmental Impact Report (SCH#2004021108), certified November 2007. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0, accessed February 2020)</p>

PWQMP	Project Specific Water Quality Management Plan, Revised March 5, 2020. (Appendix J)
RPU	City of Riverside Public Utilities, 2015 Urban Water Management Plan, June 2016. (Available at http://www.riversideca.gov/utilities/water-umwp.asp , accessed February 3, 2020)
Master Plan	Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities. (Available at https://riversideca.gov/publicworks/sewer/masterplan-wastewater.asp , accessed January 9, 2021)
Specific Plan	Specific Plan/EIR Sycamore Canyon Business Park. (Available at https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/spec-plans/syc-bus-park/plan_doc.pdf , accessed January 2021)
USEPA	United States Environmental Protection Agency Report No. EPA530-R-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998. (Available at https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf , accessed September 9, 2020)
RUWMP	Regional Urban Water Management Plan, June 2016. (Available at http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf , accessed September 9, 2020)
UWMP	Western Municipal Water District, 2015 Urban Water Management Plan Update, Adopted June 1, 2016. (available at http://www.wmwd.com/215/Urban-Water-Management-Plan , accessed February 3, 2020)
Water Education Foundation	Bay Delta Conservation Plan, 2020. (Available at https://www.watereducation.org/aquapedia/bay-delta-conservation-plan , accessed February 3, 2020)

5.15 Wildfire

Based on Appendix G of the *State CEQA Guidelines*, the analysis in the Initial Study (IS/NOP) prepared for this Project (Appendix A), and comments received during the NOP public comment period, this section evaluates potential impacts related to wildfire and fire protection service.

5.15.1 Setting

A wildfire is a nonstructural and unplanned fire that occurs in vegetative fuels. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. Wildfires burn in many types of vegetation - forest, woodland, scrub (including chaparral, sage scrub, and desert scrub), and grassland. Many species of native California plants are adapted to fire (Cal Fire 1999).

Areas of dense, dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. An urban/wildland interface is an area where urban development is in proximity to open space or "wildland" areas. The potential for wildland fires represents a hazard where development is adjacent to open space or within close proximity to wildland fuels or designated fire severity zones. Figure PS-7, "Fire Hazard Areas," of the GP 2025 identifies areas of fire hazard with hazard ratings ranging from moderate, high, and very high. The major urban/wildland interface areas identified in GP Figure PS-7 closest to the Project site are from *Hills and Canyons*, partially within the site, and nearest the site, which includes Box Springs Mountain to the north and Sycamore Canyon Wilderness Park adjacent to the project directly to the north. These two areas include areas with fire hazard ratings of very high.

The City's undeveloped hillsides are visually appealing but can provide fuel for a wildfire and subsequently mudslides in heavy rains. The Project site is bordered by urbanized and industrial areas to the south across Alessandro Boulevard, and to the west, and vacant land and the Sycamore Canyon Wilderness park to the north and east. Urban fires and wildfires both pose a risk to the immediate area. Wildfires in the Sycamore Canyon Wilderness Park can easily spread into the urban areas and start urban fires. Additionally, structure and car fires can have the potential to spread to other structures or areas, particularly if not extinguished promptly. Proactive efforts, such as fire sprinkler systems, fire alarms, fire resistant roofing and construction methods, can collectively lessen the likelihood and reduce the severity of urban fires.

Wildfire Regional Trends

In the past decades, wildfire season in the west lengthened from an average of five months to an average of seven months, and the number of large wildfires (>1,000 acres) has increased from 140 to 250 per year. And more recently, wildfires now burn year-round in California (SBFFP and Cal Fire 2018). This is occurring as average annual temperatures in the west have risen by nearly two degrees Fahrenheit since the 1970s, and the winter snowpack has declined.

The latest large wildfire near the Project site was the 2006 Esperanza Fire in Cabazon and the San Jacinto Mountains (approximately 30 miles east). The fire was started by arson but was also wind-driven resulting in the fire being designated as a wildfire. The fire burned an estimated

40,200 acres before containment resulting in the death of 5 firefighters and destroying 54 structures that included 34 homes. Due to the fire's close proximity to the surrounding chaparral biome vegetation, the fire spread rapidly in moderate Santa Ana winds and flammable brush, charring 24,000 acres (97 km²) in 18 hours. This was the largest fire in Riverside County, since 1994.

Topography

The review of previous site documentation, as well as observation of the current surface topography, indicates that the on-site topography consists of rolling undeveloped land. Maximum topographic relief is estimated at 30 feet. There are several dirt trails traversing the Project. The northern unimproved extension of Barton Street forms the western boundary of the Property. The Project site is bordered by undeveloped open space to the north and east, Alessandro Boulevard and commercial and residential uses border to the south, and Commercial/Industrial uses border to the west.

Weather

Weather conditions influence the potential for fire ignition and rates of spread, intensity, and the direction(s) toward which a fire burn. Wind, temperature of the wind and humidity levels are the variables used to predict fire behavior. According to the California Department of Forestry and Fire Protection (Cal Fire), the fire season is starting earlier and ending later each year. Climate Change has been considered an important influence on California fire season. Warmer spring and summer temperatures, reduced snowpack, and earlier spring snowmelt create longer and more intense dry seasons that increase moisture stress on vegetation and make forests more susceptible to severe wildfire (Cal Fire 2020).

Vegetation

Vegetation usually provides most of the fuel that feeds wildfire, along with other flammable materials on site (such as human-built structures). The volume, character, distribution, and arrangement of vegetation, the relative presence of volatile oils, and the moisture content of fuels all greatly influence fire behavior. The Project area is covered with non-native grassland crossed by several drainages, some of which contain riparian woodland. Patches of sparse Riversidean sage scrub are present in the uplands. Several unpaved trails cross the uplands and drainages.

Wind

Wind plays a role in the flammability of fuels by removing moisture through evaporation, preheating fuels in a fire's path, and increasing spotting distances (the distance at which a spot fire might be ignited by a flying ember). Winds blowing more than 20 feet above the ground can carry embers downwind, causing spot fires. As outlined in the GP 2025 FPEIR, Section 5.3 – Air Quality, the City lies within the South Coast Air Basin, which consists of Orange County together with the coastal and mountain portions of Los Angeles, Riverside and San Bernardino counties. The interaction of land (offshore) and sea (onshore) breezes control local wind patterns in the area. Daytime winds typically flow from the coast to inland areas, while the pattern typically reverses in the evening, flowing from the inland areas to the ocean. (FPEIR, pp. 5.3-3 – 5.3-4)

Therefore, prevailing daytime winds at the Project site are from west to east and during the night are east to west.

City of Riverside Fire Department

Per the GP 2025, the average time for on-site response to fire calls is 5 minutes, 30 seconds. Delivering and maintaining such a high level of service in the future as the City grows is a major concern to the City of Riverside Fire Department (RFD). The RFD's goal is to maintain a 5-minute response time for the first arriving units 90 percent of the time for all emergency medical services (EMS) and fire related incidents. The first arriving unit is capable of advancing the first line for fire control, initiating rescue, or providing basic life support for medical incidents. Additionally, the RFD's policy states that units will be located and staffed such that an effective response force of 4 units with 12 personnel minimum shall be available to all areas of the City within a maximum of 10 minutes (total response time). Table 5.15-1 below shows the RFD's fire and rescue stations in the City. The nearest fire stations are Fire Station 9 – Canyon Crest (6674 Alessandro Boulevard) approximately 2 miles northwest on Alessandro Boulevard and Fire Station 13 – Box Spring Station (6490 Sycamore Canyon Boulevard), which is approximately 2.5 miles northeast of the Project site, via Alessandro Boulevard and Sycamore Canyon Boulevard.

Table 5.15-1 – RFD Fire and Rescue Stations

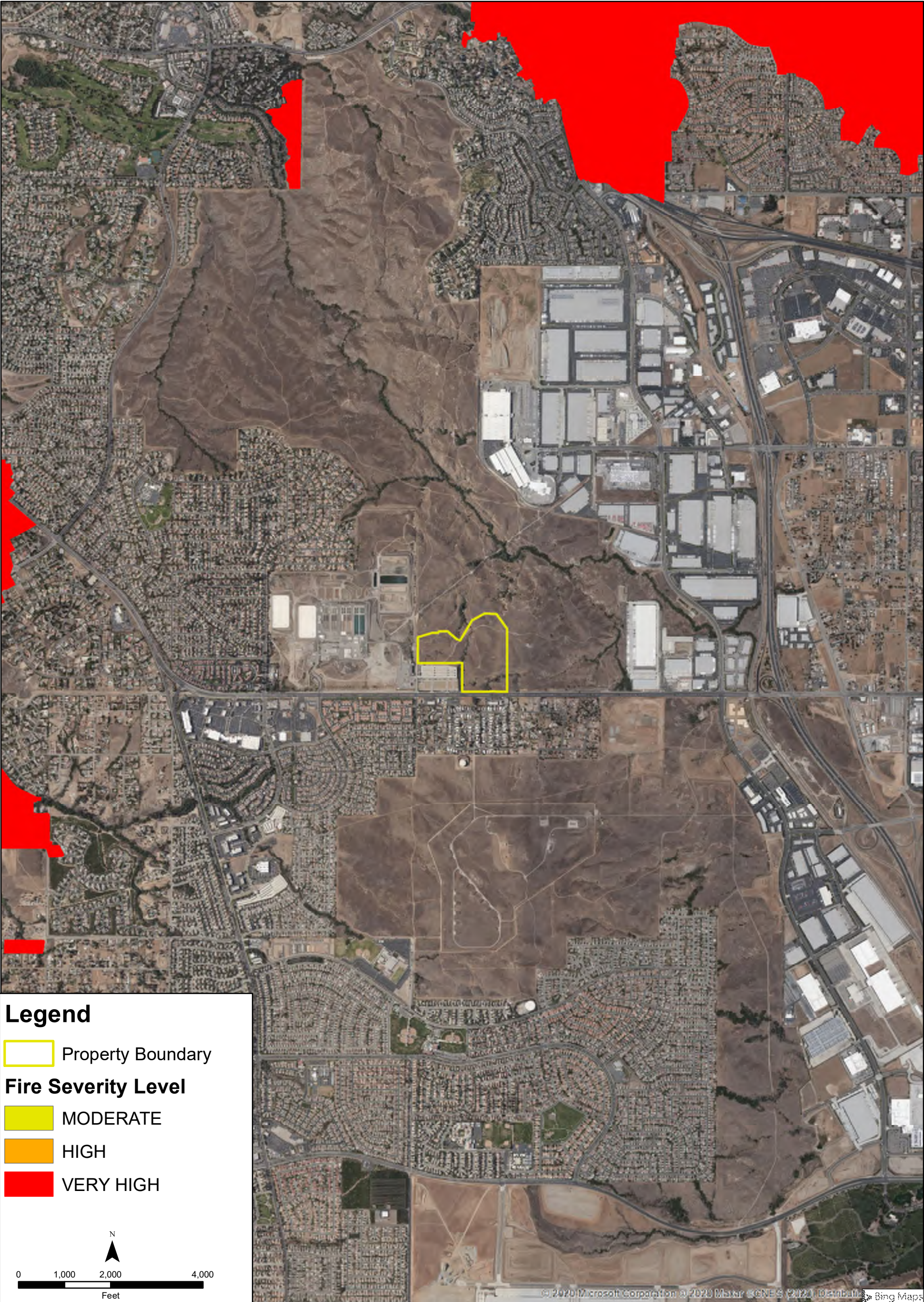
Station No.	Station Name	Location
Fire Station No. 1	Downtown	3401 University Avenue
Fire Station No. 2	Arlington	9449 Andrew Street
Fire Station No. 3	Magnolia Center	6395 Riverside Avenue
Fire Station No. 4	University	3510 Cranford Avenue
Fire Station No. 5	Airport	5883 Arlington Avenue
Fire Station No. 6	Northside	1077 Orange Street
Fire Station No. 7	Arlanza	10191 Cypress Avenue
Fire Station No. 8	La Sierra	11076 Hole Avenue
Fire Station No. 9	Canyon Crest	6674 Alessandro Boulevard
Fire Station No. 10	Arlington Heights	2590 Jefferson Street
Fire Station No. 11	Orange Crest	19595 Orange Terrace Parkway
Fire Station No. 12	La Sierra South	10692 Indiana Avenue
Fire Station No. 13	Box Springs	6490 Sycamore Canyon Boulevard
Fire Station No. 14	Sycamore Canyon	725 Central Avenue

Source: Table 5.13-B City of Riverside General Plan and Supporting Documents EIR, Section 5.13-Public Services


Fire Hazard Severity Zone in the Project Area

The level of hazard to life and property is affected not only by a fire itself but also by road access for evacuation, the number of available firefighters, vegetation clearance around the property, availability of water and water pressure, the effectiveness of building/fire codes, and inspection of developments in areas of higher fire hazard. The City will reduce the destructive potential of fire by providing funding for the RFD so that it continues to provide adequate levels of fire protection and fire hazard education. The current California Fire Code (CFC) is used to reduce structural fire hazards throughout the City. These proactive measures lay out a blueprint to reduce the risks from all types of fires in the City. The Project site is not within a very high fire hazard severity zone (VHFHSZ), as seen on Figure 5.15-1– Fire Hazard Areas. The nearest areas in a VHFHSZ zone


is near Via Vista Drive (2.4 miles northwest) and to the north along the western edge of the Sycamore Canyon Wilderness Park, south of Central Avenue and east of Canyon Crest Drive (GP 2025).





Legend


 Property Boundary

Fire Severity Level

 MODERATE

 HIGH

 VERY HIGH

 N

0 1,000 2,000 4,000

Feet

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

SYCAMORE HILLS DISTRIBUTION CENTER



Fire Hazard Severity Zone Map

Figure 5.15-1

5.15.2 Related Regulations

5.15.2.1 Federal Regulations

There are no Federal plans, policies, regulations, or laws related to fire response and wildfire hazards applicable to the Project under consideration.

5.15.2.2 State Regulations

California Department of Forestry and Fire Protection

The Cal Fire is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal supports the Cal Fire mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The State Fire Marshal provides for fire prevention by enforcing fire-related laws in state-owned or -operated buildings, investigating arson fires in California, licensing those who inspect and service fire protection systems, approving fireworks as safe and sane for use in California, regulating the use of chemical flame retardants, evaluating building materials against fire safety standards, regulating hazardous liquid pipelines, and tracking incident statistics for local and state government emergency response agencies. Classification of a zone as moderate, high, or very high fire hazard is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. Each area of the map gets a score for flame length, embers, and the likelihood of the area burning. Scores are then averaged over the zone areas. Final zone class (moderate, high, and very high) is based on the average scores for the zone (Cal Fire 2018).

The Board of Forestry and Fire Protection (Board) is a government-appointed body within the Cal Fire. It is responsible for developing the general forest policy of the state, determining the guidance policies of the Cal Fire, and representing the State's interest in Federal forestland in California. Together, the Board and the Cal Fire work to carry out the California Legislature's mandate to protect and enhance the state's unique forest and wildland resources.

The Board is charged with protecting all wildland forest resources in California that are not under federal jurisdiction. These resources include major commercial and non-commercial stands of timber, areas reserved for parks and recreation, woodlands, brush-range watersheds, and all private and state lands that contribute to California's forest resource wealth.

Cal Fire 2019 Strategic Plan

The Board has adopted Strategic Fire Plans for California since the 1930s and periodically updates them to reflect current and anticipated needs of California's wildland. The Strategic Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan is adopted to better respond to the changes of the environmental, social, and economic landscape of California's wildlands and to provide the Cal Fire with appropriate guidance for adequate statewide fire protection of state responsibility areas. The latest Strategic Fire Plan is dated January 2019. (Cal Fire 2019)

California Office of Emergency Services

The California Emergency Management Agency was incorporated into the Governor's Office on January 1, 2009, by Assembly Bill (AB) 38, and merged the duties, powers, purposes, and responsibilities of the Governor's Office of Emergency Services (Cal OES) with those of the Governor's Office of Homeland Security. Cal OES is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for ensuring the state's readiness to respond to and recover from all hazards - natural, man-made, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

The Cal OES Fire and Rescue Division coordinates statewide response of fire and rescue mutual aid resources to all types of emergencies, including hazardous materials. Operations Section under the Fire and Rescue Division coordinates the California Fire and Rescue Mutual Aid System and coordinated response through the Mutual Aid System includes responses to major fires, earthquakes, tsunamis, hazardous materials and other disasters.

California Building Code

The California Building Standards Code (CBC), in Part 2 of Title 24 of the California Code of Regulations (CCR), identifies building design standards, including those for fire safety. The CBC is based on the International Building Code but has been amended for California conditions. The CBC is updated every three years, and the current 2019 CBC went into effect January 1, 2020. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of fire sprinklers for new construction (unless otherwise exempt or using alternative fire suppression systems); the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

The CFC, contained in Part 9 of CCR Title 24, incorporates by adoption the International Fire Code of the International Code Council, with California amendments. The CFC is updated every three years, and the current 2019 CFC went into effect January 1, 2020. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. The CFC regulates building standards in the CBC, fire department access, fire protection systems and devices, fire and explosion hazards safety, hazardous materials storage and use, and standards for building inspection.

Very High Fire Hazard Severity Zone

Government Code 51175 to 51189 directs Cal Fire to identify areas of very high fire hazard within local responsibility areas. Mapping of Very High Fire Hazard Severity Zones (VHFHSZ) is based

on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior and expected burn probabilities in order to quantify the likelihood and nature of vegetation fire exposure (including firebrands) to buildings. Local Responsibility Area VHFHSZ maps were initially developed in the mid-1990s and are now being updated based on improved science, mapping techniques, and data.

In late 2005, effective in 2008, the California Building Commission adopted CBC Chapter 7A, requiring new buildings in VHFHSZ to use ignition-resistant construction methods and materials. CBC Chapter 7A is applicable to building materials, systems, and/or assemblies used in the exterior design and construction of new buildings in a Wildland-Urban Interface Fire Area as defined in CBC Section 702A. Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in any fire hazard severity zone within State Responsibility Areas or any wildland-urban interface fire area to resist the intrusion of flames or burning embers projected by a vegetation fire, and therefore contributes to a systematic reduction in conflagration losses.

VHFHSZs are delineated and used to identify property whose owners must comply with natural hazards disclosure requirements at time of property sale as well as a 100-foot defensible space clearance and/or other alternative means and methods to reduce fire hazards.

5.15.2.3 Local Regulations

Riverside Operational Area - Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP)

The Riverside Operational Area - Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP) dated October 5, 2004, is Riverside's commitment to reduce risks from natural and other hazards and serves as a guide for decision makers as they commit resources to reducing the effects of natural and other hazards. It also serves as a basis for Cal OES to provide technical assistance and to prioritize project funding.

Emergency Operations Plan

The Emergency Operations Plan, approved in May 2002, addresses the City's planned response to emergencies associated with natural disasters and technological incidents – including both peacetime and wartime nuclear defense operations.

Hazardous Materials Response Plan

The Fire Department has two levels of a Hazardous Materials Response Plan. The first level is for all responders and the second is specifically for the City's Hazardous Materials Response Team. In addition, the County has a similar plan for multi-agency response.

Riverside General Plan 2025

The following addresses the objective and policies within the GP 2025:

Objective PS-6: Protect property in urbanized and nonurbanized areas from fire hazards.

Policy PS-6.1: Ensure that sufficient fire stations, personnel and equipment are provided to meet the needs of the community as it grows in size and population.

Policy PS-6.2: Endeavor to meet/maintain a response time of five minutes for Riverside's urbanized areas.

Policy PS-6.3: Integrate fire safety considerations in the planning process.

Policy PS-6.4: Evaluate all new development to be located in or adjacent to wildland areas to assess its vulnerability to fire and its potential as a source of fire.

Policy PS-6.5: Mitigate existing fire hazards related to urban development or patterns of urban development as they are identified and as resources permit.

Policy PS-6.6: Continue to implement stringent brush-clearance requirements in areas subject to wildland fire hazards.

Policy PS-6.7: Continue to involve the City Fire Department in the development review process.

Policy PS-6.8: Pursue strategies that maintain and improve the City's Class 2 ISO rating.

Policy PS-6.9: Provide outreach and education to the community regarding fire safety and prevention.

Policy PS-6.10: Identify noncontiguous streets and other barriers to rapid response and pursue measures to eliminate the barriers.

Policy PS-6.11: Promote the prevention, detection, investigation and prosecution of accidental and arson fires through coordinated investigative and training partnerships with fire and law enforcement agencies and prosecuting authorities.

Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan (SCWP SKRMP)

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

Fire is considered from two different viewpoints in the SCWP SKRMP. The first viewpoint, control of wildland fire, recognizes the potentially detrimental effects that an *uncontrolled* wildland fire would have on the resources within the park as well as on the surrounding developed properties. The second viewpoint, the use of fire as a management tool, recognizes *controlled* burns as a means to achieve potentially positive results in the enhancement of Stephens' kangaroo rat (SKR) habitat. As a pilot program within a limited area, the controlled burning of designated habitat areas can enhance grasslands habitat for the SKR.

The SCWP SKRMP analyzed wildland fire severity. The Wildfire Hazard and Risk Assessments were based upon the existing use patterns and vegetative conditions found within the Sycamore

Canyon Wilderness Park and those areas immediately surrounding the park. The assessments included fire hazard and risk evaluations of each Management Unit. The assessments followed a 7-step method. The assessments of each Management Unit is based heavily on steps 1 and 2 stated in Section 3.3.6 subsection A of SCWP SKRMP. Three categories of fire hazard were identified:

- High – Sage scrub Vegetation on 25% plus southwest slopes aligned with the prevailing winds.
- Moderate – Grassland, sage scrub and light brush on gentle slopes, 25% or less aligned with the prevailing winds.
- Low – Grassland and riparian fuels generally not aligned with the prevailing winds.

Based on this fire analysis, as outlined in the SCWP SKRMP, the Project site is located in a hazard category of Low. The rating indicates that there is low occurrence of potential ignition causes.

5.15.3 Project Design Considerations

Although the Project is not within a Moderate, High or Very High Fire Hazard Severity Zone it is partially located within a *Hills and Canyons* area (generally coinciding with the Sycamore Canyon Wilderness Park) as identified in the GP 2025 Public Safety Element, Figure PS-7, Fire Hazard Areas.

The Project will provide adequate fire access to ensure the safety for building occupants as well as RFD. Building A fire access will be on the south side of the Project site located on Driveway 2/Vista Grande Drive and Alessandro Boulevard, and Building B fire access will be on the west side of the Project site located on Driveway 1 and Barton Street. Buildings A and B will both provide fire access and fire access lanes that will leave room for fire trucks to come in and out of the Project and will allow them to reach all areas of the Project site in the event of a fire. Building A and Building B will have a 26-foot-wide fire access lane (refer to Figure 3.0-3 – Site Plan), which would allow room for fire trucks to easily navigate through the planned development. The Project's buildings will be outfitted with sprinkler systems as a means of further protecting the structures from potential wildfire impacts. A fire department access gate will be provided at the terminus of Barton Street and the entrance to Sycamore Canyon Wilderness Park, as shown on the site plan (Figure 3.0-3). There is an existing gate at the current terminus of Barton Street to control vehicle access to the park and it will be removed and replaced with a new access gate at the new terminus of Barton Street further to the north, constructed as part of this Project.

The edge treatment between Building A in Parcel 1 and the Sycamore Canyon Wilderness Park includes an 8-foot high concrete wall and landscaping with fire resistant groundcover, shrubs and columnar trees, consistent with the SCWP SKRMP. The edge treatment between Building B in Parcel 2 includes a 4-foot high wall with 4-foot high tubular steel fence on top along with landscaping that includes fire resistant groundcover, shrubs and columnar trees, also consistent with the SCWP SKRMP. The proposed trailhead parking lot (Parcel C, approximately 1.18 acres)

provides an additional set back with landscaping and buffer from the Sycamore Canyon Wilderness Park boundary. The concrete walls, fire resistant landscaping, and setbacks between the wilderness park boundary and the buildings all reduce the risk of fires spreading to the park from the Project site or from the Project site to the park.

5.15.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds as described in Section 15064.7 of the State CEQA Guidelines. The City of Riverside generally utilizes the CEQA significance thresholds in Appendix G (“Environmental Checklist”) of the State CEQA Guidelines. The Environmental Checklist prepared by the City for the Project (see Appendix A of this document) indicates that impacts related to the Sycamore Hills Distribution Center Project may be considered potentially significant if the Project would:

- (Threshold A): substantially impair an adopted emergency response plan or emergency evacuation plan;
- (Threshold B) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Fire Protection Public Services;
- (Threshold C): 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;
- (Threshold D): require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;
- (Threshold E): 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;
- (Threshold F) expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

5.15.5 Environmental Impacts

Threshold A: *Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The Project will be served by Alessandro Boulevard and Barton Street. No street closures are required during the Project’s construction. Per the GP 2025, Public Safety Element, Figure PS 8.1 Evacuation Routes, Alessandro Boulevard is an arterial evacuation route and the I-215 is designated as a freeway evacuation route. Thus, the Project site is located adjacent to and has immediate access to a designated evacuation route.

In the event of an accident or natural disaster, the increase in traffic in the City may impede the rate of evacuation for the residents. The City's Office of Emergency Management (OEM) is also known as the RFD's Emergency Service Division. The RFD operates and manages the OEM, a comprehensive all-hazards community-based emergency management program. According to the RFD's OEM, and per the GP 2025 FPEIR, in the event of a disaster, the location of a shelter will only be established if needed; otherwise a "shelter-in-place" order will be enacted to provide protection. "Shelter-in-place" is intended to protect public safety by encouraging people to remain indoors. This order would keep unnecessary traffic off the roads to allow emergency vehicles to respond and/or direct an orderly evacuation, if needed. In certain circumstances, local officials may direct people to go to a community shelter for safety purposes.

Emergency response and evacuation procedures would be coordinated through the City in coordination with the police and RFD. The Project would not impair an adopted emergency response plan or evacuation plan and would comply with necessary procedures. The Project's surrounding roadways would continue to provide emergency access through the Project area and to surrounding properties during construction and operation of the Project. Therefore, the Project will have a **less than significant impact** directly, indirectly and cumulatively to an emergency response or evacuation plan.

Threshold B: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Fire Protection Public Services?*

The Project site is located in an area that will be served by the RFD. The nearest fire stations are Fire Station 9 – Canyon Crest (6674 Alessandro Boulevard) approximately 2 miles northwest on Alessandro Boulevard and Fire Station 13 – Box Spring Station (6490 Sycamore Canyon Boulevard), which is approximately 2.5 miles northeast of the Project site, via Alessandro Boulevard and Sycamore Canyon Boulevard.

According to the GP 2025 FPEIR, the average time for on-site response to fire calls is 5 minutes, 30 seconds. Delivering and maintaining such a high level of service in the future as the City grows is a major concern to the RFD. The RFD's goal is to maintain a 5-minute response time for the first arriving units 90 percent of the time for all EMS and fire related incidents. Given the Project site's proximity to the nearest fire station, response time is anticipated to be within the City's 5-minute response time average. The first arriving unit can advance the first line for fire control, initiating rescue, or providing basic life support for medical incidents. Additionally, the RFD policy states that units will be located and staffed such that an effective response force of 4 units with 12 personnel minimum shall be available to all areas of the City within a maximum of 10 minutes (total response time). The Project is not anticipated to necessitate the need for additional staffing.

In the event of a fire, the Project provides a feasible fire access network that allows fire trucks to easily navigate through the planned development to reach all areas of potential wildfire impacts that include structures and open spaces. The standard width of a typical fire truck, especially as

those used by the RPD, is 8 feet wide. The Project fire lanes will be 26 feet wide for Building A and Building B. The fire access would also allow for a typical apparatus turning radius that would allow a typical standard fire truck to navigate through. With the proposed development of Parcel 1 and associated fire lane and gate access along the parcel's eastern side, it would provide improved access for the Fire Department from Alessandro Boulevard to Sycamore Canyon Wilderness Park.

Additionally, the Project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or expanded fire protection equipment to meet potential emergency demand. The proposed Project development would pose a minor incremental impact on fire protection or emergency medical facilities and services as it would require services in the event of a fire or other medical emergency. However, the proposed uses of the Project site are not inherently high risk for causing fires, susceptible to fires, or dangerous, and would not be expected to put a high burden on these services. Any potential impacts to the provision of fire protection or emergency medical facilities and services from the Project will not be significant. Potential impacts will be offset by the payment of development impact fees as required by Chapter 16.52 of the Riverside Municipal Code (RMC) and from revenue generated for the City from property taxes. With the given feasible Project specific fire access network, project design, and two Fire Stations located within 2.5 miles of the Project site, impacts on fire protection public services would be **less than significant**.

Threshold C: *Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The Project site does not contain steep slopes in excess of 30 percent and is not surrounded by steep slopes that would increase the rate of fire spread. A fire will generally spread uphill due to the preheating of the fuel and the up-slope draft unless the general wind is strong enough to overcome these two forces. The flames are closer to the fuel on the uphill side and they receive more radiant heat. This results in more preheating and faster igniting of the fuel. The heated air rises along the slope increasing the draft that further increases the rate of spread. As a result of winds blowing up-slope, more convective heat also reaches the fuel in front of the fire and it is pre-heated more quickly to the ignition temperature. The opposite is true at night. When the slope becomes shaded, the surface generally loses heat rapidly and becomes cool. The air adjacent to the surface also cools and becomes denser thus heavier and it can begin to flow down-slope.

The Project site does not contain steep slopes in excess of 30 percent and the Sycamore Canyon Wilderness Park does not contain steep slopes adjacent to the Project site. Thus, the Project will not be subject to significant wildfire risks in relation to slopes. In addition, as outlined in Section 5.15.3, Project Design Considerations above, the edge treatment between Building A in Parcel 1 and the Sycamore Canyon Wilderness Park includes an 8-foot high concrete wall and landscaping with fire resistant groundcover, shrubs and columnar trees, consistent with the requirements of the SCWP SKRMP. The edge treatment between Building B in Parcel 2 includes a 4-foot high wall with 4-foot high tubular steel fence on top along with landscaping that includes fire resistant groundcover, shrubs and columnar trees, also consistent with the SCWP SKRMP. The proposed

trailhead parking lot (Parcel C, approximately 1.18 acres) provides an additional setback with landscaping and buffer from the Sycamore Canyon Wilderness Park boundary. The concrete walls, fire resistant landscaping, and setbacks between the wilderness park boundary and the buildings all reduce the risk of fires spreading to the park from the Project site or from the Project site to the park.

As noted, the Project site is not within a VHFHSZ, and the closest area within a VHFSZ is 2.4 miles northwest on Alessandro Boulevard between Canyon Crest Drive and Via Vista Drive. However, the major urban/wildland interface areas identified in GP Figure PS-7 closest to the Project site are from areas identified in the legend of the figure as *Hills and Canyons*, partially within the site, and Sycamore Canyon Wilderness Park adjacent to the project, directly to the north. The Project site is bordered by Alessandro Boulevard to the south, Barton Street to the west, Sycamore Canyon Wilderness Park to the north, and undeveloped private land to the east. The risk for the Project site to exacerbate wildfire risks for a wildfire spreading to or from the Project site to these roadways will be relatively unlikely because there is generally little wildfire fuel in the form of vegetation on paved roadways. The addition of 8 foot high concrete walls, fire resistant landscaping, and set-backs between the wilderness park boundary and the buildings all reduce the risk of fires spreading to the park from the Project site or from the Project site to the park. The conservation areas within the Project site will be managed by a 3rd party and would not become overgrown with wildfire fuels.

Additionally, as mentioned previously in this section regarding wind, prevailing daytime winds at the Project site are from west to east and nighttime winds are from east to west. As such, the most likely risk is that a fire from the Project site could be blown to the adjacent undeveloped property to the east from prevailing winds during the day and from the adjacent undeveloped property to the east to the Project site from prevailing winds during the night. The Project would be constructed and operated in compliance with the CFC and CBC.

Further, Project structures would be required to comply with the CFC with regard to emergency fire access and use of building materials that would limit the spread of wildfire to the greatest extent possible, and all proposed construction activities would be subject to compliance with all applicable State and local regulations in place to reduce risk of construction-related fire, such as installation of temporary construction fencing to restrict site access and maintenance of a clean construction site. This would reduce potential spread of a fire from the Project site to areas outside the Project site boundary, which would also reduce the potential of exacerbating wildfire risks. The proposed development will include fire suppression equipment such as alarm systems, fire extinguishers and sprinklers, which could assist in the quick suppression of a fire if it were to occur at the Project site and reduce the potential for spread to the Sycamore Canyon Wilderness Park to the north.

The Project would be constructed and operated in compliance with the CFC and CBC, along with being compliant with the GP 2025 and would not exacerbate wildfire risks or the uncontrolled spread of a wildfire and as a result expose Project occupants to pollutant concentrations from wildfire. Impacts would be **less than significant**.

Threshold D: *Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

Within the Project's proposed Parcel C, the Project will construct trailhead improvements including a parking lot, sidewalk, shade structure, bike rack, drinking fountains, fencing, and a fire department access gate for consistency with the Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan. The Project site is not within a VHFHSZ, although it is partially located within a *Hills and Canyons* area (GP 2025 Figure PS-7, Fire Hazard Areas), and sits on a vacant land in a mostly developed area with roadways, residential units, and open space adjacent to the site and its surrounding area. There are existing utilities near the Project site, and utilities such as water and power will be installed underground via Alessandro Boulevard and Barton Street to access points to Building A and Building B. There would be no utilities crossing overhead over open space and fields where fires are more likely to occur. Implementation of the Project would not require installation of new or increased level of infrastructure maintenance that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, impacts on resources such as installation or maintenance associated with infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would be **less than significant**.

Threshold E: *Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The Project site is bordered by a self-storage facility, Alessandro Boulevard, and commercial and residential uses across Alessandro Boulevard to the south, open space to the north, Barton Street to the west, and vacant land to the east. As mentioned in previous sections and the Geotechnical Evaluation, on-site topography consists of undeveloped land on natural rolling terrain descending gradually from a west to east direction.

As outlined above under Thresholds C and D above, the Project would not exacerbate wildfire risks or the uncontrolled spread of a wildfire. As identified in Section 5.6 Geology and Soils, Threshold A, the project site is not in an area of high susceptibility to landslides. The Project site is also not within a flooding hazard zone per the GP 2025. As outlined in Section 5.9 Hydrology and Water Quality, Threshold C, the Project would be required to comply with the NPDES Statewide General Construction Permit (Order No. 09-09-DWQ). The permit requires preparation of an effective Storm Water Pollution Prevention Plan (SWPPP), which describes erosion and sediment control BMPs to prevent stormwater runoff during construction. Post construction storm water runoff and erosion is minimized with proposed landscaping around the buildings (refer to Section 3.0 Project Description and Figures 3.0-10A and 3.0-10B) as well as Low Impact Development (LID) Best Management Practices (BMPs) to address storm water runoff as outlined in the project specific Water Quality Management Plan (Appendix J).

Thus, the Project would not expose people or structures to significant downstream flooding impacts or landslides as a result of post-fire slope stability, runoff, or drainage changes. With all considered, Project impacts related to exposure of 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 would be **less than significant**.

Threshold F: *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

As discussed, the Project site is also not within a VHFHSZ although it is partially located within a *Hills and Canyons* area. Nonetheless, the Project would be required to comply with applicable CFC, GP 2025, and City Guideline requirements such as fire breaks, sprinklers, walls, emergency access roads, etc. The Project site will be landscaped with fire-resistant landscape, drought-tolerant and climate appropriate trees, shrubs, and ground cover that will meet or exceed the City's requirements. Additionally, the Project site is within approximately 2.5 miles of two fire stations, Fire Station 9 – Canyon Crest (6674 Alessandro Boulevard) and Fire Station 13 – Box Spring Station (6490 Sycamore Canyon Boulevard), which would provide adequate response times to the Project site.

Although the Project is allowing more accessibility to areas with the potential for fire risk/hazard, the Project will include necessary and adequate fire access for RFD to access the site and adjacent Sycamore Canyon Wilderness Park and for occupants (workers/employees) to leave the site in case of a fire. With the proposed development of Parcel 1 and associated fire lane and gate access along the parcel's eastern side, it would provide improved access for the Fire Department from Alessandro Boulevard to Sycamore Canyon Wilderness Park.

Additionally, the Project would comply with all CBC and CFC fire safety codes and regulations to further minimize the potential risk for a wildfire. The SCWP SKRMP also identifies appropriate edge treatments between the wilderness park and the Project site. Fencing and walls around the Project site have been designed to be compliant with requirements in the SCWP SKRMP. With adherence to RFD practices, Project design considerations, and the Project compliance existing codes and policies, impacts involving wildland fires **would be less than significant**.

5.15.6 Proposed Mitigation Measures

Potential impacts are less than significant and mitigation measures are not required.

5.15.7 Cumulative Environmental Effects

The Project site is not within a VHFHSZ, although it is partially located within a *Hills and Canyons* area. The area for cumulative impacts consists of lands within the Cities of Riverside and Moreno Valley and Riverside County that are categorized as VHFHSZ since wildfire can spread rapidly across City and County limits. Urban development projects that are constructed in compliance with applicable CBC and CFC would ensure that appropriate measures, including fire prevention and fuel modification features, are provided so that urban development do not expose project occupants to increased and uncontrolled wildfire hazards. Applicable CBC and CFC standards

are designed to minimize the potential for uncontrolled fires. With compliance with applicable CBC and CFC standards and General Plan policies, implementation of the Project, combined with other development in the City and County, would not result in increased exposure to wildfire risks. Furthermore, cumulative projects would not result in permanent road closures, nor impede an established emergency or evacuation access route, or interfere with emergency response requirements, such as fire protection response time standards established by GP 2025. The Project is surrounded by mostly urban development and served by existing infrastructure. It would not contribute incrementally with other projects in the Cities of Riverside and Moreno Valley and Riverside County to create an environment that could exacerbate wildfire risks. Cumulative wildfire hazard impacts would be **less than significant**.

5.15.8 References

The following references were used in the preparation of this section of the DEIR:

Cal Fire 1999	California Department of Forestry and Fire Prevention (Cal Fire). 1999. Learning to Live with Fire. (Available at https://www.fire.ca.gov/media/8657/live_w_fire.pdf)
Cal Fire 2018	Cal Fire's Fire Hazard Severity Zones Viewer website. (Available at https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414)
Cal Fire 2019	Cal Fire January 2019 Strategic Plan. (Available at https://www.fire.ca.gov/about-us/strategic-plan/)
Cal Fire 2020	Cal Fire 2020 Incident Archive website. (Available at https://www.fire.ca.gov/incidents/2020/)
GP 2025	City of Riverside, General Plan 2025, Public Safety Element. (Available at https://riversideca.gov/cedd/sites/riversideca.gov/cedd/files/pdf/planning/general-plan/18_Public_Safety_Element_with%20maps.pdf , accessed May 2020)
GP 2025 FPEIR	City of Riverside, General Plan 2025 Program Environment Impact Report (SCH# 2004021108), Sections 5.3 Air Quality and 5.13 Public Services. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0 , accessed August 2020)
OEM	City of Riverside, Office of Emergency Management, Riverside Operational Area – Multi-Jurisdictional LHMP, 2019 Part 1/Part 2 and OEM's Strategic Plan. (Available online at: https://riversideca.gov/fire/divisions/office-emergency-management/lhmp , accessed May 2020)
SBFFP and Cal Fire 2018	State Board of Forestry and Fire Protection (SBFFP). January 22, 2019 California Department of Forestry and Fire Protection, <i>Strategic Fire Plan</i>

SCWP SKRMP	Dangermond & Associates, O'Farrell Biological Consulting, Firewise 2000, Inc., Tierra Madre Consultants, Inc., <i>Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan</i> , March 1999. (Available online at: http://www.riversideca.gov/planning/pdf/SpecificPlans/SycCynMnmgtPlan_UpdatedConceptualPlan.pdf , accessed February 2020)
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6.0 Other CEQA Topics

This section includes a summary of the significant and unavoidable impacts found in Section 5.0 Potentially Significant Environmental Effects and also analyzes potential irreversible environmental effects and growth-inducing impacts of the Project. Energy impacts are addressed in Section 5.5, Energy.

6.1 Significant Unavoidable Adverse Impacts

This topic is intended to address any significant impacts that cannot be mitigated to below a level of significance (State CEQA Guidelines Sections 15126.2(c)). As discussed in detail throughout Section 5.0 Potentially Significant Environmental Effects of this DEIR, the proposed Project will not result in any Project-specific or cumulatively significant unavoidable adverse impacts related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Tribal Cultural Resources, Utilities, and Wildfire.

The proposed Project will result in Project-specific or cumulatively significant unavoidable impacts related to Transportation, more specifically Vehicle Miles Traveled (VMT). As outlined in Section 5.12.5, Threshold B, the Project would exceed the threshold of 15% below the current City of Riverside VMT per employee for both the baseline and cumulative Project generated VMT. Even under the most favorable circumstances, projects located within a suburban center context, such as the proposed Project evaluated here, could realize a maximum 15 percent reduction in VMT through implementation of feasible Transportation Demand Management (TDM) strategies. The Project is estimated to exceed the current City of Riverside VMT per employee by 18.66% in base year (2012) and 30.97% in cumulative year (2040). Given that the maximum percent reduction is 15% through feasible TDM measures, the Project cannot reduce the Project-generated VMT to below the threshold of 15% below the current City of Riverside VMT per employee. The Project VMT impact is therefore **considered significant and unavoidable**.

6.2 Consistency with Regional Plans

CEQA, Section 15125(d), requires an EIR to discuss any inconsistencies between the proposed Project and applicable general and regional plans.

City of Riverside General Plan and Sycamore Canyon Business Park Specific Plan

A discussion of the Project's consistency with the City's General Plan 2025 (GP 2025), Municipal Zoning Code, and the Sycamore Canyon Business Park Specific Plan (SCBPSP) is contained in Section 5.10 Land Use and Planning of this DEIR. As discussed, per the GP 2025, the Project site has a current land use designation of B/OP – Business Office Park and is zoned BMP-SP – Business Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. The SCBPSP implements the GP 2025 and is intended to guide development within the Specific Plan area, establishing high-quality development that strengthens the City's economic base. The Project would be consistent with the existing General Plan land use designation, the Municipal Zoning Code, and the SCBPSP.

March Air Reserve Base Land Use Compatibility Plan

Section 5.8 Hazards and Hazardous Materials and Section 5.10 Land Use and Planning provide discussions of the Project's consistency with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). As discussed, the Project is located within Zone C1 of the LUCP, which requires airspace review for structures over 70 feet in height. According to the MARB/IPA LUCP, objects over 70 feet tall within Zone C1 require airspace review in accordance with Federal Aviation Regulation (FAR) Part 77. Both Building A and Building B would have clear heights of 36 feet and parapet heights of 44 feet, with maximum building heights of 45 feet. Thus, the proposed buildings would not exceed the FAR Part 77 height limits of structures over 70 feet in height.

Both Building A and Building B would be subject to the intensity requirements for Zone C1. Utilizing the Airport Land Use Commission's (ALUC) recommendation of determining land use intensity by use of the Building Code Method as provided in Appendix C of the *Riverside County Airport Land Use Compatibility Plan Policy Document*, Table C1-Occupancy Levels, *California Building Code*, adopted December 2004, the Project would not exceed the ALUC Per Person Average Acre Buildings Maximum of 100 persons, nor would the Project exceed the ALUC Per Single Acre Maximum of 250 persons. Thus, the Project would be consistent with the applicable guidelines and requirements of the MARB/IPA LUCP.

Air Quality Management Plan (AQMP)

Section 5.2 Air Quality discusses consistency with the current 2016 Air Quality Management Plan (AQMP). As discussed, the growth forecasting for the AQMP is based in part on the land uses established by local general plans. Thus, if a project is consistent with the land use as designated in the local general plan, it can normally be considered consistent with the AQMP. The Project site is designated as B/OP in the GP 2025 and is zoned BMP-SP Overlay Zones. Permitted land uses include light industrial, distribution and warehousing, and product assembly. The Project would be consistent with the land use and zoning designations and would therefore be consistent with the growth assumptions of the 2016 AQMP.

Another factor used to determine if a project would conflict with implementation of the AQMP is determining if the project would result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards (NAAQS and CAAQS) or interim emissions reductions specified in the AQMP. NAAQS and CAAQS violations could occur if project emissions would exceed regional significance thresholds or localized significance thresholds (LSTs).

As shown in Tables 5.2-6 and 5.2-7 of Section 5.2 Air Quality, construction and operational emissions would be less than the regional significance thresholds. Additionally, as shown in Tables 5.2-8 and 5.2-9 of Section 5.2 Air Quality, construction and operational emissions would be less than the LSTs. Therefore, the Project would not result in an air quality violation and would not conflict with or obstruct the implementation of the AQMP.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

Consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is contained in Section 5.3 Biological Resources. As discussed, the Project site is located within the MSHCP Plan Area, although the site is not located in a Criteria Cell. The Project site is flanked by Public Quasi Public (PQP) Lands within the Sycamore Canyon Wilderness Park, which is located directly north of the site. The MSHCP requires projects comply with its Sections 6.1.2 (Protection of Species within Riparian/Riverine Areas and Vernal Pools), 6.1.3 (Protection of Narrow Endemic Plant Species), 6.1.4 (Urban and Wildlands Interface), 6.3.2 (Additional Survey Needs and Procedures), Appendix C (Standard Best Management Practices), and Section 7.5.3 (Construction Guidelines). Section 5.3.6 of Biological Resources, including Table 5.3-3 – Project Compliance with MSHCP Urban/Wildlands Interface Guidelines, provides discussions on how the Project would be consistent to the applicable MSHCP Sections mentioned here. Overall, through Project design features and recommended mitigation measures, the Project would be in compliance with applicable guidelines associated with the MSHCP Sections listed above.

Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP)

The Project site is not within an SKRHCP Core Reserve. To be compliant with SKRHCP, the Project proponent is required to pay the SKR mitigation fee in effect at the time a grading permit is issued. With payment of this fee the Project would be in compliance with the Plan.

City's Restorative Growthprint-Climate Action Plan (RRG-CAP)

As discussed in Section 5.7 Greenhouse Gases (GHG), the Project was evaluated for consistency with the strategies and actions contained in the City's Restorative Growthprint-Climate Action Plan (RRG-CAP). Table 5.7-8 of Section 5.7 summarizes the Project's consistency with the RRG-CAP measures. As discussed within Table 5.7-8, the Project would be consistent with applicable RRG-CAP measures and would not conflict with applicable policies or regulations adopted for the purpose of reducing GHG emissions.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) is an association of local governments and agencies that serves as a Metropolitan Planning Organization (MPO), a Regional Transportation Planning Agency (RTPA) and a Council of Governments (COG). The SCAG region encompasses six (6) counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. SCAG is responsible for developing long-range regional transportation plans, including the regional Sustainable Communities Strategy (SCS) and associated growth forecasts, regional transportation improvement programs, and regional housing needs allocations.

SCAG's Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions (CTCs), tribal governments, non-profit organizations,

businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Section 5.12 Transportation includes a discussion of whether the Project would conflict with an applicable program, plan, ordinance or policy addressing the circulation system, including the RTP/SCS. With implementation of the improvements identified in the Traffic Operations Analysis to address deficiencies to study area intersections, the Project would not conflict with applicable programs, plans, ordinances, or policies addressing the local circulation system. Therefore, the Project will not conflict with the Connect SoCal – 2020-2045 RTP/SCS.

2015 Urban Water Management Plan

Section 5.14 Utilities and Service Systems discusses Project in relation to the Western Municipal Water District's (Western) 2015 Urban Water Management Plan (UWMP). As discussed, potable water service to Building A and Building B would be provided by Western. The Project would be subject to compliance with the City's Water Conservation Ordinance and the California Green Building Code. Further, based on the water supply and demand projections, projected water supplies would be sufficient to meet the projected water demand for the Project. Thus, the Project would not conflict with the provisions of the UWMP.

6.3 Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines requires EIRs to contain a discussion of significant irreversible environmental changes which would be caused by the proposed project, should it be implemented. This section addresses the use of non-renewable resources during initial and continued phases of the Project, the commitment of future generations to environmental changes or impacts because of the Project, and any irreversible damage from environmental accidents associated with the Project.

6.3.1 Use of Non-Renewable Resources

The Project would involve an irreversible commitment of building materials and energy resources, some of which are non-renewable, to construct 603,000 square feet of planned high cube transload short-term warehouse use within two buildings. The Project additionally proposes a proposed trailhead parking lot, improved with decomposed granite parking, landscaping, shade structure with benches, a bike rack, drinking fountain (including for pets), and ADA compliant parking spaces and sidewalk. Consumption of resources for this development would also occur with any development of the Project site and are not unique to the Project.

Operation of the Project would irreversibly increase local demand for non-renewable energy resources, such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the Project. The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Green Building Standards Code functions to:

- Reduce GHG emissions from buildings
- Promote environmentally responsible, cost-effective, healthy places to live and work
- Reduce energy and water consumption
- Respond to the environmental directives of the administration

The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. With adherence to these standards, the Project would not use unusual amounts of energy or construction materials, and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Consumption of these resources would occur with any development of the Project site and would not be unique to the Project. Section 5.5, Energy, includes a discussion of the potential energy consumption and/or conservation impacts of the Project.

6.3.2 Commitment of Future Generations

Approval of the Project would result in environmental changes or impacts that commit future generations to new environmental circumstances. The Project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in the Initial Study (Appendix A) and in Sections 5.14 Utilities, and 5.15 Wildfire, impacts to these services and systems would not be significant.

6.4 Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The Project's growth inducing potential would therefore be considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

6.4.1 Population Growth

The Project does not include residential development, but rather would consist of the construction of two warehouse buildings 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. While construction of the Project would generate the demand for temporary construction jobs, 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.

Because the Project is consistent with the GP 2025 Typical Growth Scenario and population growth impacts that 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 the Southern California Association of Governments (SCAG) population, housing, and employment forecasts. As discussed in the Project's Initial Study (Appendix A), SCAG prepares population, housing, and employment estimates as part of its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As of September 3, 2020, SCAG has fully adopted the Connect SoCal 2020-2045 RTP/SCS, from which forecasts for employment, population, and households for the City of Riverside were obtained. The Project is a speculative development and, as such, the number of employees, shifts, and days and hours of operation are not known at this time. However, the anticipated number of employees for both buildings was calculated using the County of Riverside generation rate¹ to be approximately 586. This number represents approximately 0.3 percent of the expected opportunities within the City by 2045. Thus, the Project will not induce substantial population growth and impacts will be less than significant.

6.4.2 Economic Growth

The Project is a speculative development and the tenants are unknown at this time, so the number of employees, shifts, days and hours of operation are not known at this time. However, for the purposes of the analysis in the Initial Study and 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 Methodology², 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. The employment opportunities anticipated to be generated by the Project are relatively minor and within SCAG population, housing, and employment forecasts.

Additionally, as described above in Section 6.4.1, the 586 employment opportunities represent approximately 0.3 percent of the expected opportunities within the City by 2045. Therefore, as Project employment opportunities are both within SCAG population, housing, and employment forecasts as well as within expected opportunities within the City, the Project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around Riverside would be addressed as part of the CEQA environmental review for each of those development projects.

¹ 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>

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

6.5 References

The following references were used in the preparation of this section of the DEIR:

GP 2025	City of Riverside, <i>General Plan 2025</i> , certified November 2007 with subsequent amendments to various elements. (Available at https://riversideca.gov/cedd/planning/city-plans/general-plan-0 , accessed January 2020)
RMC, Title 17	City of Riverside, Code of Ordinances, Title 19 Zoning (Available at: https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT17GR , accessed February 2020)
RMC, Title 19	City of Riverside, Code of Ordinances, Title 19 Zoning (https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=PTIICOOR_TIT19ZO , accessed February 2020)
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan (Available at https://www.wrc-rca.org/document-library/ , accessed June 2020)
RRG-CAP	Riverside Restorative Growthprint – Climate Action Plan (Available at: https://riversideca.gov/cedd/planning/city-plans/other-city-plans , accessed May 2020)
SCAG 2020	Southern California Association of Governments. Connect SoCal – the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. (Available at https://www.connectsocal.org/Pages/What-Is-Connect-SoCal.aspx , accessed August 2020)

7.0 Environmental Effects Found Not to be Significant

CEQA provides that a DEIR shall focus on all potentially significant effects created by the project onto the environment, discussing the potential effects with emphasis on proportion to their severity and probability of occurrence. This section summarizes the analysis of issue areas for which no significant adverse impacts were identified and are therefore not discussed in this DEIR. The items listed below are contained in the City's environmental checklist form as well as Appendix G of the CEQA Guidelines. Items not addressed in this section have been addressed in Section 5.0, Environmental Analysis, of this DEIR. Section 5.0 also includes an expanded discussion of the settings under each environmental issue area discussed therein. Issue areas found to have a Project-specific less than significant impact include a short discussion of the potential for cumulative impacts when assessing the Project in addition to the projects listed in Table 4.0-1 – Summary of Cumulative Development Projects in Section 4.0, Environmental Setting.

7.1 Effects Found Not to be Significant During Preparation of the NOP

Section 21100(c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 of the *CEQA Guidelines* adds, "Such a statement may be contained in an attached copy of an Initial Study." Please refer to the Project's Initial Study (Appendix A) for the complete issue area analysis.

7.1.1 Agriculture and Forestry Resources

7.1.1.1 **Threshold A:** *Would the Project 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?*

As discussed in the Project's Initial Study, the Project site includes approximately 33.67 acres of designated Farmland of Local Importance and approximately 14.18 acres of 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, nor are these lands found within the Project site. While 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 Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). Therefore, the Project will have a **less than significant** impact on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As the Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) it will not have a direct or cumulatively considerable impact on Farmland.

7.1.1.2 Threshold B: *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The Project site is not located within a Williamson Act Preserve or under a Williamson Act Contract. The nearest area under the Williamson Act Contracted Land is approximately 4.6 miles from the Project and the nearest Williamson Act Preserve is approximately four (4) 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 not conflict with existing zoning for agricultural use or a Williamson Act contract and thus will have **no impact**. As the Project will not conflict with existing zoning and is not located within a Williamson Act contract, it will not have a direct or cumulatively considerable impact on agricultural use.

7.1.1.3 Threshold C: *Would the Project 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))?*

The Project site is not zoned for or used for agricultural purposes, nor will the Project cause rezoning of or conflict with zoning for forest land or timberland. 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 drainage features on site, and there are an estimated ten trees located in the development footprint (per a review of Google Earth and the Project's Site Plan). However, these individual trees are not great enough in number or size to be considered a forest or forest land. Thus, potential impacts to timberland or forest land as a result of the Project would be **less than significant**. As the Project will not conflict with existing zoning and will not cause rezoning of forest land, timberland, or timberland zoned for Timberland Production, it will not have a direct or cumulatively considerable impact on forest land or timberland.

7.1.1.4 Threshold D: *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*

As outlined above under Threshold C, 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, potential impacts would be **less than significant**. As the Project will not convert forest land, it will not have a direct or cumulatively considerable impact on forest land.

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

The Project site does not support agricultural resources or operations and would not result in the conversion of designated Farmland to non-agricultural uses. Moreover, there are no agricultural

Sycamore Hills Distribution Center Project Environmental Effects Found Not Significant

resources or operations, including farmlands, within proximity to the Project site. Thus, the Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use; **less than significant impacts** will occur. As the Project will not convert Farmland to non-agricultural use or convert forest land to non-forest use, it will not have a direct or cumulatively considerable impact on Farmland or forest land.

7.1.2 Hazards & Hazardous Materials

7.1.2.1 Threshold F: *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

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 **less than significant impact** on an emergency response or evacuation plan. The Project will not impede any emergency response or evacuation plan and therefore will also not have a direct or cumulatively considerable impact on an adopted emergency response plan or emergency evacuation plan.

7.1.3 Hydrology and Water Quality

7.1.3.1 Threshold D: *Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The City in which the Project is located is not within a coastal area, where tsunamis occur. Moreover, the Project site is not within proximity to standing bodies of water that pose seiche or tsunami risks to the Project site, and the Project site is not within a flood hazard area or a dam inundation area. Therefore, **no impacts** related to tsunamis, seiches, or other flood hazard areas will occur. As the Project is not within a flood hazard area and there are no impacts, the Project will not have direct or cumulatively considerable impact related to flood hazards.

7.1.4 Land Use and Planning

7.1.4.1 Threshold A: *Would the Project physically divide an established community?*

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. The northern terminus of Barton Street, along the western boundary of the Project, serves as an access point into and trailhead of the Sycamore Canyon Wilderness Park. The Project will not impede or adversely affect continued access to the park. Rather, it is enhancing access to the park by developing a trailhead shade structure and additional parking and dedicating this area to the City. Therefore, there are **no impacts** related to dividing an established community. As the Project will have no impacts related to dividing an established community, the Project will also not have a cumulatively considerable impact related to dividing an established community.

7.1.5 Mineral Resources

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

The Project site is within designated MRZ-3 Zone and the formational material that underlies the Project site is the rock products formation. This formation does not contain recoverable mineral resources of economic value. 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. Moreover, 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; therefore, the Project will have **no impact** on mineral resources. As the Project will have no impacts related to loss of availability of known mineral resources, the Project will also not have a cumulatively considerable impact related to loss of availability of known mineral resources.

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

The General Plan 2025, Final Program Environmental Impact Report (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. The Project site does not contain a locally important mineral resource recovery site; therefore, the Project will have **no impact** on mineral resources. As the Project will have no impacts related to loss of locally important mineral resources, the Project will also not have a cumulatively considerable impact related to the loss of locally important mineral resources.

7.1.6 Noise

7.1.6.1 **Threshold 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?*

The Project is located within an airport land use plan and partially within the Community Noise Equivalent Level (CNEL) contour designation of 60 CNEL airport noise contour area of the March Air Reserve Base (ARB). The maximum threshold for the proposed industrial warehouse use is 70 dBA. Because the noise contour level for the Project site is found to be a normally acceptable level for the proposed use of 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 **less than significant**. The Project does not include residential development and will not result in exposure of people residing at the Project site to excessive noise. As the Project will not expose people working at the Project site to excessive noise, the Project will also not have a cumulatively considerable impact related to excessive noise exposure.

Sycamore Hills Distribution Center Project Environmental Effects Found Not Significant

7.1.7 Population and Housing**7.1.7.1 Threshold A:** *Would the Project 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)?*

The Project does not include proposed homes. 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.

As the Project is a speculative development, the number of employees, shifts, days and hours of operation are not known at this time. However, for the purposes of the analysis in the Project's Initial Study, as well as the EIR, the anticipated number of employees for both buildings is approximately 586 using County of Riverside¹ generation rate.

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 per the SCAG forecast. 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.

Because the Project is consistent with the General Plan 2025 Typical Growth Scenario and population growth impacts that 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. Thus, the Project will not induce substantial population growth and impacts will be **less than significant**. As the Project will not induce substantial population growth, the Project will also not have a cumulatively considerable impact related substantial population growth.

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

7.1.7.2 Threshold B: *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The Project will not displace existing people or housing, necessitating the construction of replacement housing elsewhere, as the Project site is proposed on vacant land that has no existing housing that will be removed or affected by the Project. Therefore, there will be **no impact** on existing housing. As the Project will have no impacts related to loss of housing or displace existing people, the Project will also not have a cumulatively considerable impact related to the loss of housing and displacement of existing people.

7.1.8 Public Services

7.1.8.1 Threshold A: *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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?

The nearest fire station to the Project site is the Box Spring Station (Fire Station No. 13), located at 6490 Sycamore Canyon Boulevard, approximately 2.5 mile to the northeast of the site. The second nearest station to the Project site is Sycamore Canyon Station (Fire Station No. 14), located at 725 Central Avenue, approximately 4.5 miles to the northwest of the site. The City of Riverside Fire Department's (RFD) goal is to maintain a five-minute response time for the first arriving units 90 percent of the time for all Emergency Medical Services (EMS) and fire related incidents. The average time for on-site responses to fire calls is five minutes and 30 seconds.

The Project site will be served by the Box Springs Station (Fire Station No. 13) and if necessary, emergencies at the Project site may also be served by the Sycamore Canyon Station (Fire Station No. 14). Given the nature of the proposed use and the proximity of existing fire stations, as well as stations throughout the City, the Project will not impact fire response times and will not otherwise create a substantially greater need for fire protection services than already exists. No new or expanded fire protection facilities will be required as a result of the Project. Additionally, the Project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or expanded fire protection equipment to meet potential emergency demand (see Section 5.8 Hazards and Hazardous Materials of this EIR). Any incremental impacts on the provision of fire protection or emergency medical facilities and services will be offset by the payment of development impact fees as required by Chapter 16.52 of the Riverside Municipal Code and from revenue generated for the City from property taxes. Therefore, Project impacts on the demand for additional fire facilities or services will be **less than significant**. As the Project and other development projects are required to offset their incremental impacts with payment of development impact fees, the Project would not have a cumulatively considerable impact related to fire protection or emergency medical facilities.

Sycamore Hills Distribution Center Project Environmental Effects Found Not Significant

b. *Police protection?*

The Field Operations Division of the City of Riverside Police Department (RPD) provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services to the City. Field Operations for the East NPC, which covers the Project site, are based at the Lincoln Station located at 8181 Lincoln Avenue, which is approximately 7.4 miles from the Project site. Moreover, additional police facilities are located throughout the City.

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 continuously or 24-hours a day, which helps keep the site less inviting for crime. Industrial land uses generally do not generate a substantial number of law enforcement calls as compared to residential uses; therefore, the Project would not result in any unique or more extensive crime problems that cannot be adequately handled by the existing level of police resources. As such, no new or expanded police facilities would need to be constructed as a result of the Project. Further, because the staffing needs have already been accounted for in the City's General Plan 2025 and there is no change in land use, the Project is not anticipated to increase the amount of police resources needed. Therefore, Project impacts to police protection services would be **less than significant**. As the Project is not anticipated to increase the amount of police resources needed and is consistent with the City's General Plan 2025 used to determine staffing levels, the Project will also not have a cumulatively considerable impact related to police protection services.

c. *Schools?*

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. The Project site is served by the following schools located within the City of Moreno Valley: Edgemont Elementary School (21790 Eucalyptus Avenue), Badger Springs Middle School (24750 Delphinium Avenue), and Moreno Valley High School (2330 Cottonwood Avenue). 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 regional already, and therefore the Project would not indirectly induce population growth, including school-aged children. Therefore, the Project will have **no impact** on the demand for additional school facilities or services. As the Project will have no impacts related to schools, the Project will also not have a cumulatively considerable impact related to schools.

d. *Parks?*

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 Project is a non-residential use that would not involve the addition of any housing units that would directly increase the population and

Environmental Effects Found Not Significant Sycamore Hills Distribution Center Project

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.

The proposed Project includes a new trailhead parking lot in Parcel C. Trailhead parking lot 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 and operated and managed by the City's Parks, Recreation, & Community Services Department, though it should be noted that Parcel C will not be formally incorporated into the Park. The proposed trailhead parking lot is not required but is being provided by the applicant as an amenity to the City's Sycamore Canyon Wilderness Park,. 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. The addition of parking lot and trailhead amenities would be consistent with the Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan (SCWPMP), which identifies the northerly terminus of Barton Street as a trailhead. While the addition of the parking lot and trailhead amenities could facilitate additional usage of the Sycamore Canyon Wilderness Park, the SCWPMP included a trailhead at this location, and it would not be to a substantial level of physical deterioration of the facility to occur or be accelerated because the parcel would be consistent with the SCWPMP.

The Project would not indirectly induce population growth and associated increase in use of existing park facilities, nor would the trailhead parking lot and improvements result in a substantial level of physical deterioration of existing park facilities. Thus, the Project will have **no impact** on the demand for additional park facilities or services. Although the Project is providing a trailhead, a trailhead at this location is included in the SCWPMP and was already planned for. Therefore, an increase in use of the park from providing the trailhead would not be more than already considered as part of the SCWPMP. The Project will not have cumulatively considerable impacts related to the demand for parks and services or the use of existing recreational facilities.

e. Other public facilities?

The nearest library branch to the Project of the City of Riverside Public Library (RPL) is the Orange Terrace Branch, located at 20010-B Orange Terrace Parkway, approximately 1.5 miles to the south. 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 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 who already reside in the region; therefore, the Project would not indirectly induce population growth, or associated use of library facilities or community centers. Thus, the Project would have **no impacts**, directly or cumulatively, on the demand for additional public facilities or services, including libraries and community centers.

Sycamore Hills Distribution Center Project Environmental Effects Found Not Significant

7.1.9 Recreation**7.1.9.1 Threshold 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?*

The closest parks in proximity to the 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). 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. In addition to members of the public who typically utilize parks in the area, 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.

The 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 (SCWP SKRMP). The Project would provide a new 1.18-acre parking lot and trailhead amenities that will be dedicated to the City and operated and managed by the City's Parks, Recreation, & Community Services Department. While the addition of the parking lot and trailhead amenities could facilitate additional usage of the Sycamore Canyon Wilderness Park, 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 because the parcel would be consistent with the SCWPMP. The Project would result in **less than significant impacts** on recreational facilities.

7.1.10 Transportation**7.1.10.1 Threshold E:** *Would the Project result in inadequate emergency access?*

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 **less than significant impact** directly, indirectly and cumulatively to an emergency response or evacuation plan.

Section 5 of this document summarizes those topics that were found to be less than significant as part of the EIR analysis.

7.2 Effects Found to be Less Than Significant with Mitigation as Part of EIR Analysis

Section 5 of this document summarizes those topics that were found to be less than significant with the need for mitigation as part of the EIR analysis.

8.0 Alternatives to the Proposed Project

The following discussion considers alternatives for implementation of the Project. The discussion examines the potential environmental impacts resulting from each alternative. Through comparisons of these alternatives to the Project, the relative advantage(s) of each can be weighed and analyzed.

The *CEQA Guidelines*, Section 15126.6, identify the parameters within which consideration and discussion of alternatives to the Project should occur. As stated in this section of the guidelines, alternatives must focus on those that would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects on the Project.

8.1 Project Objectives

As stated in Section 3.0 of this DEIR, the Project objectives include:

- Develop the site with two warehouse buildings with a total of 603,100 square feet of building space, a conservation easement, and trailhead improvements area.
- Modify the Restricted Covenant (RC) to allow access to Building A on Parcel 1, which is currently landlocked by the RC.
- Provide trailhead improvements consistent with the *Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan* including:
 - a parking lot,
 - sidewalk,
 - shade structure with benches,
 - bike rack,
 - drinking fountains,
 - fencing, gates, signage, and fire department access gate.
- Develop and operate warehouse buildings that:
 - Take advantage of existing City infrastructure.
 - Are adjacent to similar industrial logistics and distribution centers.
 - Are in close proximity to March Inland Port, State Route 60/Interstate 215, and Interstate 10 to support the distribution of goods throughout the region and that also limit traffic truck disruption to residential areas within the City and neighboring jurisdictions.
 - Will attract quality tenants and will be competitive with other similar facilities in the region.

- Meet industry standards for operational design criteria.
- Implement the *Sycamore Canyon Business Park Specific Plan* through development of a land use allowed by the industrial land use designation and consistent with criteria relevant to the site and proposed use.
- Facilitate the development of underutilized land currently planned for industrial uses that maximizes the use of the site and responds to market demand within the *Sycamore Canyon Business Park Specific Plan* area for warehouse buildings.
- Provide and expand on-site conservation to mitigate for the loss of riparian/riverine resources.
- Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.

8.2 Summary of the Project's Significant Unavoidable Impacts

The analysis in Section 5.0 determined that even with implementation of mitigation measures, significant environmental impacts will result from the operation of the Project related to Vehicles Miles Traveled. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce the following Project-related significant unavoidable impact:

Vehicle Miles Traveled: The Project is estimated to exceed the City of Riverside VMT per employee by 18.66% in base year (2012) and 30.97% in cumulative year (2040). Given that the maximum percent reduction is 15% through feasible TDM measures, the Project cannot reduce the Project-generated VMT to below the threshold of 15% below the City of Riverside VMT per employee. The Project VMT impact is therefore considered significant and unavoidable.

8.3 Rationale for Alternative Selection

State CEQA Guidelines Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. According to this section of the State CEQA Guidelines, "...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."

An EIR is not required to consider alternatives which are infeasible. The City, as lead agency, is responsible for selecting a range of Project alternatives to be discussed other than the "rule of reason" (CEQA Guidelines Section 15126.6(a)). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations,

jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative. (CEQA Guidelines Section 15126.6 (f)(1)). The rationale for selecting the alternatives to be evaluated, and a discussion of the “no project” alternative, are also required (*State CEQA Guidelines*, Section 15126.6(e)).

Alternative 1: As the Project is consistent with designated land use and zoning in and the Sycamore Canyon Business Park Specific Plan, the “no project” alternative is no project development or no change from the existing use (vacant land). This alternative was selected based on CEQA requirements (Section 15126.6(e)).

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

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

8.4 Alternatives Rejected from Further Consideration

Section 15126.6(c) of the *State CEQA Guidelines* specifies that an EIR should identify alternatives that were considered by the lead agency but were rejected during the scoping process and identify the reasons for eliminating the alternatives from further consideration. Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic Project objectives, is infeasible, or does not avoid significant environmental impacts. The Original Project Design, Other March JPA-Owned Property, and Other Vacant Properties within Sycamore Canyon Business Park Specific Plan (SCBPSP), were alternatives considered and rejected by the City and are discussed below.

Original Project Design

The Project applicant originally proposed a two-building logistics center totaling 603,100 square feet (Building A – 400,000 square feet; Building B – 203,100 square feet) similar to the currently proposed project. However, the original configuration of Building B featured a more rectangular and symmetrical building. Based on feedback from City Staff and discussion with consulting Native American tribes, the Original Project Design was revised as follows:

Parcel 2/Building B

- Pulled back northwest building corner to avoid and preserve two bedrock milling sites
- Parking and landscaping along the west side of Building B have been designed to avoid and preserve one bedrock milling site
- The detention basin area at the southeast side of Building B has been designed to avoid and preserve two bedrock milling sites
- Parcel 2 and Parcel C were configured to avoid and preserve 100 linear feet of streambed with riparian/riverine resources (Drainage A as shown in Figure 5.3-5 Drainages) and one bedrock milling site

Trailhead Parking Lot

- Drive aisle curbed and parking designed to avoid and preserve two bedrock milling sites

Based on the benefits of the redesigned Project, the Original Project site plan was withdrawn from further consideration by the Project applicant. The Original Project Conceptual Site Plan is shown in Figure 8.0-1.

Alternative Project Locations

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

Other March Joint Powers Authority-Owned Property

As outlined in Section 3.1.2 Project Site Background, the Project site was formerly owned by the Grove Community Church that planned to build a new church. 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. To mitigate for impacts caused by construction of the church, a portion of the Project Site at Alessandro Boulevard and Barton Street was set aside and preserved in a legally designated "Restricted Property".

MJPA purchased the Project site property from the church with the intent to sell and to convey title of the "Restricted Property" area to the City of Riverside. However, a parcel map was not created, and the title transfer did not take place. MJPA is still the owner of the entire Project site property. The Project applicant has entered into an agreement with MJPA to purchase the property and develop it consistent with the City of Riverside General Plan and Sycamore Canyon Business Park Specific Plan. MJPA does not have other property available and for sale in the SCBPSP area, therefore, no further analysis of MJPA-owned alternative sites is possible.

Other Vacant Properties within Sycamore Canyon Business Park Specific Plan (SCBPSP)

As outlined in Section 3.0 Project Description, the SCBPSP encompasses approximately 1,500 acres, consisting of a 920-acre planned industrial park with industrial and commercial uses, and a 480-acre wilderness park (Sycamore Canyon Wilderness Park) within the City of Riverside. The SCBPSP is the primary industrial area on the east side of the City of Riverside with direct access to the I-215 and SR-60 freeways. Most of the SCBPSP has been built out and there only a few undeveloped areas remaining in the SCBPSP that are designated as *Industrial* or *Industrial Support*, which are identified in Figure 8.0-2 SCBPSP Industrial Undeveloped Land. These sites range in size from approximately 2.37 acres up to 39.58 acres. The largest of these site is located directly east of the Project Site. This is the only site within the SCBPSP comparable in size to the Project Site, and capable for supporting a warehouse development comparable to the proposed Project. As the smaller undeveloped parcels are not large enough to support the proposed Project or a project of comparable size (approximately 600,000 square feet), they are rejected from further consideration.

The property directly east of the Project is privately owned and the current property owner has no intention to sell the property at the time of preparation of this EIR. Therefore, an alternative site is not considered feasible as the proposed Project's applicant does not own or control another site of comparable size within an area planned for industrial development in the SCBPSP, a major business park in the City of Riverside, and an alternative site would likely fail to achieve the underlying purpose and objectives of the Project. In addition, an alternative site would not likely avoid the Project's significant impacts with regard to vehicle miles traveled because these impacts are a function of the Project's use and size and are not location-specific. An alternative site in proximity to the Project would also not likely avoid impacts to Tribal Cultural Resources as there is a high probability that they would occur on nearby properties as well.



SYCAMORE HILLS DISTRIBUTION CENTER

SCBPSP Industrial Undeveloped Land

Figure 8.0-2



8.5 Description of Alternatives Evaluated in the EIR

This section of the EIR presents the analysis of three alternatives in comparison to the potential environmental effects associated with the Project. In accordance with State CEQA Guidelines Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts to each of the environmental topics evaluated in the EIR. A comparison of alternatives matrix is presented in Table 8.0-4 – Comparison of Alternatives Matrix in Section 8.7.

The following Alternatives were identified and considered in this section:

- **Alternative 1:** As the Project is consistent with designated land use and zoning and the Sycamore Canyon Business Park Specific Plan, the “no project” alternative is no project development or no change from the existing use (vacant land). This alternative was selected based on CEQA requirements (Section 15126.6(e)).
- **Alternative 2:** Manufacturing is also a permitted use within the designated land use, zoning, and specific plan. As such, Alternative 2 is manufacturing use with the same site plan as the proposed Project. This alternative was selected as it is an allowable use under the existing land use, zoning, specific plan, and was anticipated to reduce potential impacts associated with trucks, including trip generation and VMT, and also associated air quality and greenhouse gas emissions. Other types of uses such as institutional (educational or religious), retail/commercial, or residential would not meet the density/intensity standards of the compatibility Zone C1 of the MARB/IPA LUCP, resulting in an increase in potential impacts related to hazards, safety, and land use compatibility, as compared to the proposed Project.
- **Alternative 3:** The third alternative is a reduced development; it was selected based on the potential to reduce or avoid impacts to vehicle miles traveled.

8.5.1 Alternative 1 – No Project/No Development

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative for a development project on identifiable property is the circumstance under which the Project does not proceed, and the discussion of the No Project Alternative must compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the Project is approved. Accordingly, under the No Build Alternative, the site would remain in its existing condition (vacant land) and no development would occur. Thus, assessor parcels, 263-060-022-7, 263-060-024-9, and 263-060-026-1 would remain vacant and undeveloped.

8.5.1.1 Impact Analysis of Alternative 1 – No Project/No Development

Aesthetics

Alternative 1, No Project/Development, would retain the Project site’s existing conditions (vacant land). There would be no development that would modify the existing visual character of the Project site. With no structures being developed, there would be no views obstructed from roadways and adjacent neighborhoods, and impacts concerning light or glare would not occur. Therefore, there would be no aesthetic impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Air Quality

As analyzed in Section 5.2, Air Quality, the Project would generate emissions through construction and operations. Alternative 1, No Project/Development would result in no construction or operation needed since the site would remain undeveloped, thus resulting in generated emissions being less impactful compared to the other Alternatives and the Project. Carbon monoxide (CO) is emitted directly from internal combustion engines – motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. With no construction or operation proposed with Alternative 1, the number of emission-generating vehicles on the Project Site would not increase, and air quality impacts would be avoided compared to the Project. Therefore, there would be no air quality impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Biological Resources

Under Alternative 1, No Project/Development, there would be no need for site preparation or construction, and thus Alternative 1 would not result in a change to the existing biology of the Project site. As assessed in Section 5.3 Biological Resources, disturbed non-native grassland dominates the site with a few ephemeral drainages, some with riparian vegetation, transecting the site. Under this Alternative, the Project would not involve construction or the development of the site, and, no impacts would occur to any special-status plant or wildlife species, riparian/riverine areas, or waters of the US and State. Therefore, there would be no biological impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Cultural Resources

As discussed in Section 5.4, Cultural Resources, all of the prehistoric archaeological resources documented within a one-mile radius of the Project's Area of Potential Effects (APE) are bedrock milling sites (some with ground stone, such as manos, and other lithics), including the four previously recorded sites and the three additional sites within the Project's APE. A review of the EIC archaeological literature and records, NRHP, OHP Archaeological Determinations of Eligibility File, OHP Directory of Properties in the Historic Property Data File, and the City's Historic Landmark List indicated that no historic properties or landmarks are recorded or listed within, or immediately adjacent to, the Project's APE. Under Alternative 1, No Project/Development, construction or ground-disturbing activities would not occur, which would avoid all bedrock milling sites and eliminate potential impacts to previously unidentified archaeological resources and human remains. Therefore, there would be no cultural resources impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Energy

Under Alternative 1, No Project/Alternative, the site would remain vacant and there would be no use of electricity, natural gas, or petroleum in the construction or operation of the Project. As discussed under Section 5.5, Energy, the Project would utilize electricity, natural gas, and

petroleum in the construction and operation of the development. Thus, Alternative 1 would not utilize any energy resources or generate energy consumption and impacts related to energy conservation. Therefore, there would be no energy impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Geology and Soils

Under Alternative 1, No Project/Development, the Project site would not be altered and there would be no ground disturbance on the site. Thus, with no development, there would be no construction, operation, and maintenance in a seismically active area. However, the potential for loss of topsoil and soil erosion would continue and would not be countered by the incorporation of best management practices (BMPs) or landscaped areas and groundcovers intended to reduce soil erosion as would be implemented under the Project. Therefore, there would be impacts associated with Alternative 1 which would be greater than those of the Project.

Greenhouse Gas Emissions (GHG)

With no construction and operation needed in Alternative 1, No Project/Development, the generation of greenhouse gas emissions (GHG) would not occur. Therefore, there would be no GHG impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Hazards and Hazardous Materials

Under Alternative 1, No Project/Development, there would be no potential to create a significant hazard to the public due to improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development of the Project site. Therefore, there would be no hazards impacts associated with Alternative 1 and the level of impact under Alternative 1 would be less than that of the Project.

Hydrology and Water Quality

Under Alternative 1, No Project/Development, the existing hydrologic conditions would continue, and the existing storm drain facilities and storm flow patterns and capacity would remain as discussed in the existing setting in Section 5.6, Hydrology and Water Quality. Water supplies throughout the City of Riverside are predominately sustained by groundwater basins. Groundwater conditions in these basins are influenced by natural hydrologic conditions such as precipitation, groundwater seepage and surface water from the Santa Ana River and the six arroyos that traverse the City. The existing drainage features would remain in their current state. Therefore, Alternative 1 would have no hydrology or water quality impacts, and the level of impact under Alternative 1 would be less than that of the Project.

Land Use and Planning

With Alternative 1, there would be no possibility of an existing community being separated as the Project site would remain undeveloped. There would also be no potential conflict with applicable land use plans, policies, or habitat conservation plans. However, under this Alternative, certain

General Plan and *SCBPSP* goals and objectives for industrial and warehouse activity in the City would not be met. Thus, impacts under this Alternative would be greater than those of the Project.

Noise

Under the Alternative 1, No Project/Development, the Project site would remain vacant and undeveloped with no noise generated from construction, operation, or any other form of development on the site. Therefore, Alternative 1 would have no noise impacts and the level of impact under Alternative 1 would be less than that of the Project.

Transportation

Under Alternative 1, No Project/Development, traffic would remain at current conditions. Temporary traffic associated with construction activities, the increase in average daily trips from the operation of the Project, and the impacts to surrounding intersections would be eliminated. Additionally, since the Project site would remain undeveloped and vacant, vehicle miles traveled would be less than those of the Project as the Project site would be not be used and would not generate any trips. Therefore, Alternative 1 would have no transportation impacts and the level of impact under Alternative 1 would be less than that of the Project.

Tribal Cultural Resources

Under Alternative 1, No Project/Development, there would be no construction that would involve ground-disturbing activities with the potential to adversely impact any of the bedrock milling sites identified and discussed in Sections 5.4 Cultural Resources and 5.13 Tribal Cultural Resources, or potentially unearth or adversely impact previously unidentified tribal cultural resources. A Traditional Cultural Landscape (TCL) Study (confidential) was prepared by Applied Earthworks (AE) as requested by the Soboba Band of Luiseño Indians and a Traditional Cultural Property/ Tribal Cultural Resource (TCP/TCR) Study (confidential) prepared by AE as requested by the Pechanga Band of Luiseño Indians. Results of the TCP/TCR Study found that the TCP/TCR is potentially eligible for listing in the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP), 3/C, and 4/D and retains sufficient integrity for listing. Similarly, the TCL Study found that the TCL is potentially eligible for listing under the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP) and 4/D and retains sufficient integrity for listing. The studies determined that the project site is within the general boundary of the respective TCP/TCR and TCL and the bedrock milling features on the site are considered contributing features. All bedrock milling sites documented on site as well as the TCL/TCP/TCR would be avoided and left in place under Alternative 1, No Project/Development. Therefore, Alternative 1 would have no impacts on tribal cultural resources and the level of impact under Alternative 1 would be less than that of the Project.

Utilities

Under Alternative 1, No Project/Development, there would be no development on the site, no impact to utilities or service systems. Therefore, Alternative 1 would have no impacts on utilities and the level of impact under Alternative 1 would be less than that of the Project.

Wildfire

The Project site is not in a Very High Fire Hazard Severity Zone (VHFHZ). The site will be served by the Riverside Fire Department (RFD). However, areas of dense, dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. The Project includes landscaping and an extension wall which constitutes a fuel break. Since Alternative 1 will not be developing an extension wall nor a landscape buffer, higher risks of wildfire may occur, and impacts on wildfire will be more significant. Additionally, since there will be no construction of structures for this Alternative, there will not be any fire suppression equipment such as alarm systems, fire extinguishers, and sprinklers provided. However, under Alternative 1, No Project/Development, the risk of exposing people to wildfire will be less since there will be no tenants on the Project site. Conversely, Alternative 1 will provide a higher risk of starting a wildfire since it does not provide fuel breaks and fire equipment such as sprinklers and retaining walls. Overall, wildfire impacts under Alternative 1 would be greater than those of the Project.

Alternative 1 – Relationship to Project Objectives

Under Alternative 1, no development would occur. The proposed buildings, conservation easement, and trailhead parking lot and associated improvements would not be realized. Table 8.0-1 – Ability to Achieve Project Objectives, Alternative 1 – No Project/No Development identifies the Project objectives and whether or not Alternative 1 meets each objective.

Table 8.0-1 – Alternative 1 (No Project/No Development Alternative) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Develop the site to create two warehouse buildings with a total of 603,100 square feet of building space, a conservation easement, and trailhead improvements area.	No. Alternative 1 would not develop the site, construct the two warehouse buildings, create a conservation easement, or create a trailhead parking lot and associated improvements.
Modify the Restrictive Covenant (RC) to allow access to Building A on Parcel 1, which is currently landlocked by the RC.	No. Alternative 1 would not involve any development and thus would not modify any portions of the Restricted Property (RP) or the RC.
Provide trailhead improvements including a parking lot, sidewalk, shade structure with benches, bike rack, drinking fountains, fencing, gates, signage, and a fire department access gate, consistent with the Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan.	No. Alternative 1 would not develop the Project site; thus, trailhead improvements such as a parking lot, sidewalk, shade structure, bike rack, drinking fountains, fencing, and a Fire Department access gate would not be developed.
Develop and operate warehouse buildings that: <ul style="list-style-type: none"> Take advantage of existing City infrastructure Are adjacent to similar industrial logistics and distribution centers Are in close proximity to March Inland Port, State Route 60/Interstate 215, and Interstate 10 to support the distribution of goods throughout the region, while limiting traffic 	No. Alternative 1 would not develop the site or construct and operate the warehouse buildings. Therefore, none of the listed Project objectives associated with the development of the warehouse buildings would be realized.

Sycamore Hills Distribution Center Project

Alternatives to the Proposed Project

Project Objective	Alternative Meets Objective?
truck disruption to residential areas within the City and neighboring jurisdictions <ul style="list-style-type: none"> Will attract tenants and will be competitive with other similar facilities in the region Meet industry standards for operational design criteria 	
Implement the Sycamore Canyon Business Park Specific Plan through development of a land use allowed by the industrial land use designation and consistent with the criteria relevant to the site and proposed use.	No. Alternative 1 would not implement the <i>Sycamore Canyon Business Park Specific Plan</i> .
Facilitate the development of underutilized land currently planned for industrial uses that maximizes the use of the site and responds to market demand within the Sycamore Canyon Business Park Specific Plan area for warehouse buildings.	No. Alternative 1 would not facilitate the development of underutilized industrial land; therefore, Alternative 1 would not respond to the market demand in the <i>Sycamore Canyon Business Park Specific Plan</i> area.
Provide and expand on-site conservation to mitigate for the loss of riparian/riverine resources.	No. Alternative 1 would not provide or expand on-site conservation or provide on-site mitigation.
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.	No. Alternative 1 would not contribute to the economy of the City.

Alternative 1 Conclusion

While the majority of the environmental impacts from Alternative 1 would be less than the Project, with the exception of those related to Geology and Soils, Land Use and Planning, and Wildfire, Alternative 1 would greatly underutilize the Project site and would not meet any of the Project objectives listed above. Section 15126.6(f)(1) of the *State CEQA Guidelines* states that among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability and economic viability; Alternative 1 is neither suitable for the site nor economically viable. Although in the short-term this alternative may be feasible, over the long-term it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. Thus, as it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not economically viable and thus not feasible.

8.5.2 Alternative 2 – Other Permitted Use/ Manufacturing

The City of Riverside's General Plan (GP 2025) designates the Project site as B/OP (Business/Office Park). The Project site is zoned BMP-SP – Business and Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zones. The SCBPSP designates the Project site as Industrial. The land use designation, zoning, and Specific Plan permit the warehouse/distribution center use proposed by the Project, as well as manufacturing and other

uses. This alternative was selected as manufacturing is also a permitted use within the BMP-SP – Business Manufacturing Park and Specific Plan (Sycamore Canyon Business Park) Overlay Zone and was anticipated to reduce potential impacts associated with trucks, including trip generation and VMT, and associated air quality and greenhouse gas emissions, while utilizing the same site plan. Other types of uses such as institutional (educational or religious), retail/commercial, or residential would not meet the density/intensity standards of the compatibility Zone C1 of the MARB/IPA LUCP, resulting in an increase in potential impacts related to hazards, safety, and land use compatibility, as compared to the proposed Project. Under Alternative 2, the Project site would be developed with approximately 603,100 square feet of manufacturing uses. This alternative is assumed to be developed with the same site plan as the proposed Project for Buildings A and B, with the only changes being additional parking, as required parking for manufacturing use is greater than warehouse/distribution use. Alternative 2 would also include the on-site conservation areas and a trailhead parking lot.

8.5.2.1 Impact Analysis of Alternative 2 – Other Permitted Use/Manufacturing

Aesthetics

Alternative 2, Other Permitted Use/Manufacturing, would result in the construction of approximately 603,100 square feet of industrial buildings for manufacturing use, utilizing the same plans as the Project, with additional parking spaces provided. As with the Project, Alternative 2 would modify the visual character of the Project site through grading, vegetation removal, construction of industrial buildings, associated parking, walls, fencing, landscaping, trailhead parking, a trailhead parking lot, fire access road, and parking and security lighting. The grading concept would remain the same as the Project so that the structures' comparable height to existing large scale light industrial buildings in the Sycamore Canyon Business Park would preserve views of the Box Springs Mountains. Lighting under Alternative 2 would be shielded and directed downward and away from the adjacent residences to the south, Sycamore Canyon Wilderness Park to the north, and the Conservation Areas within the Project site. Therefore, impacts resulting from implementation of Alternative 2 would be similar to those of the Project.

Air Quality

Development of Alternative 2, Other Permitted Use/Manufacturing, would result in grading the same portion of the Project site as the Project, the same amount of paving, and construction of a building of similar size as the Project. Because construction under Alternative 2 would use similar equipment and incorporate the same project design features and mitigation measures as the Project, short-term construction impacts would be the same as the Project and will not exceed SCAQMD thresholds. However, odor and pollutants due to operation will have a higher impact to air quality. The Project under Alternative 2 may facilitate manufacturing uses, such as chemical manufacturing, fiberglass manufacturing, and Painting/Coating operations that may result in air quality impacts such as odor and pollutants. Thus, Alternative 2 would have greater air quality impacts as compared to the Project.

Biological Resources

As detailed in Section 3.0, Biological Resources, certain sensitive species, non-native grassland, and vegetation would be impacted under the Project. Because development of Alternative 2, Other Permitted Use/Manufacturing, would encompass a similar footprint as the Project, impacts to biological resources would be the same and would also be required to provide the same mitigation measures as the Project. Thus, impacts under Alternative 2 would be similar to those of the Project.

Cultural Resources

Alternative 2, Other Permitted Use/Manufacturing, includes the same building footprint as the Project. Thus, Alternative 2 would impact the same number of bedrock milling sites and have the potential to unearth or adversely impact unidentified tribal cultural resources. As discussed in Section 5.4, Cultural Resources, impacts on cultural and historical resources can potentially occur during grading and construction and any other ground disturbance activities under the Project. The Project under Alternative 2 would also implement mitigation measures **CUL-1** through **CUL-9** to mitigate any potential impacts that could occur. Cultural Resource Impacts under Alternative 2 would be similar to impacts under the Project.

Energy

Alternative 2, Other Permitted Use/Manufacturing, would include the same building footprints as the Project and would similarly require site preparation, grading, building construction, paving, and architectural coating. As with the Project, all construction under Alternative 2 would be typical for the region and building types, as would the types of construction equipment. However, construction and operational energy demands such as those related to fuel, natural gas, and electricity consumption may increase under Alternative 2 due to activities related to manufacturing uses (i.e., the transport of raw materials for production, the manufacturing/production of products). While construction and operational activities under Alternative 2 would still be subject to compliance with applicable Federal, State, and regional energy efficiency regulations, energy impacts under Alternative 2 would potentially increase in comparison to impacts under the Project.

Geology and Soils

Alternative 2, Other Permitted Use/Manufacturing, would include the same building footprints as the Project and require similar grading, including grading exceptions. Grading design considerations, such as avoidance of tribal cultural features and potential seismic impacts, would be similar to the Project. Under Alternative 2, impacts would be similar to the Project and the existing geologic hazards on the site would remain the same as the Project.

Greenhouse Gas Emissions (GHG)

In its analysis of GHG emissions impacts, the Project considers construction, mobile, energy use, area source, water and wastewater, and solid waste emissions. While Alternative 2, Other Permitted Use/Manufacturing, would similarly be subject to compliance with applicable guidelines and policies geared toward regulating and/or reducing GHG emissions, GHG emissions would potentially increase as a result of manufacturing-related activities. Manufacturing uses would

likely require increased vehicle trips to transport raw materials and finished products, resulting in increased mobile/vehicle emissions from the combustion of fossil fuels in vehicle engines. Further, as manufacturing uses would create an increased energy demand on electricity and natural gas consumed for the manufacturing of products, GHG emissions from energy use would increase as well. Thus, GHG emissions under Alternative 2 would increase in comparison to the Project.

Hazards and Hazardous Materials

Under Alternative 2, Other Permitted Use/Manufacturing, the buildings for manufacturing uses would be built with the same project footprint on the same site as the Project. The Phase I Environmental Site Assessment (ESA) for the Project revealed no evidence of recognized environmental conditions (RECs) or that hazardous substances or petroleum products above *de minimus* quantities existed on the site. Further, manufacturing and other chemical processing involving hazardous materials (i.e., petroleum products, pesticides, fertilizer) would not be permitted under the provisions of the Specific Plan. Similar to the Project, the overall quantity of hazardous materials and waste generated in the area may generally increase as a result of implementation of Alternative 2. Any development that would handle or use hazardous materials would be required to comply with the regulations, standards, and guidelines established by U.S. Environmental Protection Agency (EPA), the State, County and the City, related to storage, use, and disposal of hazardous materials.

Further, Alternative 2 would similarly be located within Zone C1 of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP) and subject to its compatibility requirements. Zone C1 discourages above ground storage of more than 6,000 gallons of hazardous or flammable materials and requires airspace review for structures over 70 feet. As Alternative 2 would be subject to the same regulations and compatibility requirements of the Project, impacts related to hazards and hazardous materials under Alternative 2 would be similar to those of the Project.

Hydrology and Water Quality

Under Alternative 2, Other Permitted Use/Manufacturing, the Project would be required to comply with the NPDES Statewide General Construction Permit (Order No. 09-09-DWQ). The permit requires preparation of a SWPPP as previously discussed above under Geology and Soils. Additionally, implementation of a SWPPP would prevent runoff from the construction site and would prevent water degradation of water quality. Similar to the Project, Alternative 2 is not expected to violate any water quality standards or waste discharge requirements during construction.

Generation of pollutants is expected during the operation of the Project under Alternative 2; therefore, Alternative 2 would follow site control, source control, and treatment control BMPs as outlined in the Project-Specific Water Quality Management Plan (PWQMP). An increase of runoff is similarly anticipated under Alternative 2 and would be addressed by self-treated landscape and by four (4) standard bioretention basins and four (4) volume-based treatment basins.

As with the Project, given that the site is not used for and is not suited for groundwater recharge, development of the Project will not impact a local groundwater recharge condition. Therefore, the

Project will not cause a net deficit in aquifer volume or a lowering of the local groundwater table. In conclusion, hydrology and water quality impacts associated with Alternative 2 would be the similar as to those of the Project.

Land Use and Planning

Alternative 2, Other Permitted Use/Manufacturing, would be consistent with the existing General Plan, Zoning Code, and Specific Plan; no amendments would be required. Manufacturing uses are permitted by the underlying land use designation, zoning, and Specific Plan designation (Business/Office Park (B/OP), BMP-SP – Business and Manufacturing Park and Specific Plan, Industrial, respectively), similar to the Project. Moreover, except for the same variances and grading exceptions required for the proposed Project, Alternative 2 would also comply with building standards and City Code standards and regulations required for industrial development. Alternative 2 would also not physically divide an established community, as it also proposes the development of vacant land. Alternative 2 would also be subject to the requirements of the C1 Zone of the March Air Force Base Land Use Compatibility Plan (MARB/IPA LUCP), as reflected in Table 5.8-1 in Section 5.8 Hazards and Hazardous Materials. Thus, Alternative 2 would have the same impacts as the Project related to land use and planning.

Noise

Similar to the Project, Alternative 2, Other Permitted Use/Manufacturing, would be subject to construction noise standards within the allowable times as described by Title 7 of the Riverside Municipal Code (Section 7.35.010). As the project footprint of Alternative 2 would be the same as the Project and the same types of construction equipment would be utilized, construction noise levels and impacts would likely not increase or vary significantly from the Project, particularly if the same types of mitigation measures were implemented to lessen noise impacts to surrounding areas. However, there may be increases in off-site traffic noise and on-site generated noise levels as a result of increased vehicle traffic associated with manufacturing uses in Alternative 2. Thus, noise levels under Alternative 2 would increase in comparison to the Project.

Transportation

Under Alternative 2, Other Permitted Use/Manufacturing, it is anticipated that impacts to transportation would increase in comparison to the Project. Alternative 2 would include manufacturing uses which have a higher overall trip generation rate than the Project. Manufacturing uses typically reduce the number of truck trips, while increasing the number of car trips, as compared to the Project. However, the vehicle miles traveled (VMT) per employee would be similar. Therefore, Alternative 2 would also result in a significant and unavoidable transportation impact, as with the Project.

Tribal Cultural Resources

Under Alternative 2, Other Permitted Use/Manufacturing, the buildings for manufacturing uses would be built with the same project footprint on the site as the Project. Alternative 2 would also include the on-site Conservation Areas and trailhead parking lot as with the Project. A Tribal Cultural Landscape (TCL) Study (confidential) and Traditional Cultural Property (TCP) Study

(confidential) were prepared by Applied Earthworks (AE) as requested by the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians, respectively. Results of the TCP Study found that the TCP/TCR is potentially eligible for listing in the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP), 3/C, and 4/D and retains sufficient integrity for listing. Similarly, the TCL Study found that the TCL is potentially eligible for listing under the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP) and 4/D and retains sufficient integrity for listing. The studies determined that the project site is within the general boundary of the respective TCP/TCR and TCL and the bedrock milling features on the site are considered contributing features. Alternative 2 would still develop the site the same as the Project and would still impact the identified TCP/TCR and TCL. The alternative's impacts to the identified TCP/TCR and TCL are considered **less than significant** with the design considerations in which a majority of the resources will be avoided and preserved. Nonetheless, mitigation measures MM CUL-1 through MM CUL-9 are required to further reduce potential impacts to tribal cultural resources, including to potentially undiscovered/unknown tribal cultural resources. Impacts to onsite tribal cultural resources will be **less than significant** with design considerations. Overall impacts under Alternative 2 would be similar to those of the Project.

Utilities

As with the Project, Alternative 2, Other Permitted Use/Manufacturing, would be subject to requirements of the City's Water Efficient Landscaping and Irrigation Ordinance. Based on the water demand projections in the City for the Project, projected water supplies are similarly anticipated to be enough and would not exceed the projected water demand of the Project under Alternative 2.

Additionally, as with the Project, under Alternative 2, dry utility extensions would be constructed underground to serve the Project and would connect to existing utility lines in Alessandro Boulevard for one of the proposed manufacturing use buildings and Barton Street for the other building, respectively. Electricity would similarly be provided by Riverside Public Utilities (RPU) and natural gas would be provided by Southern California Gas Company. Additionally, water to the manufacturing buildings would be similarly provided by Western Municipal Water District via existing lines.

As described under Energy above, energy use may increase due to manufacturing uses under Alternative 2; thus, there is the potential the Project under Alternative 2 may require or result in expansion of the utilities facilities described above, such as those for electricity and/or natural gas. Therefore, impacts related to the relocation, construction, or expansion of utilities facilities would potentially be greater under Alternative 2 than those under the Project.

Similarly, as it is anticipated the number of employees would increase under Alternative 2 due to the alternative's manufacturing uses, there is potential the amount of operational solid waste would increase accordingly under Alternative 2. However, the Project under Alternative 2 would still be required to comply with all Federal, State, and local solid waste-related statutes and regulations.

Overall, under Alternative 2, impacts would likely be greater than those of the Project.

Wildfire

Alternative 2, Other Permitted Use/Manufacturing, like the Project, would develop structures and a traffic network that would support the Project. The traffic network would include curbs, landscape buffers, parking lots, and improved streets that would serve as a fuel break from wildfire. Structures for industrial and manufacturing uses would likely have fire suppression equipment as well as sprinklers and alarms, as seen in the Project. As Alternative 2 will not be within a VHFSZ, impacts on wildfire will be similar to the Project.

Alternative 2 – Relationship to Project Objectives

Under Alternative 2 - Other Permitted Use/Manufacturing, the Project site would be developed with two manufacturing buildings and supporting infrastructure and would be constructed according to the land use and zoning for the Project site identified in the City's GP 2025 and *Sycamore Canyon Business Park Specific Plan*. Table 8.0-2 – Alternative 2 (Other Permitted Use/Manufacturing Alternative) Ability to Meet Project Objectives identifies the Project objectives and whether or not Alternative 2 meets each objective.

Table 8.0-2 – Alternative 2 (Other Permitted Use/Manufacturing Alternative) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Develop the site to create two warehouse buildings with a total of 603,100 square feet of building space, a conservation easement, and trailhead improvements area.	No. Alternative 2 would develop the site with the same building footprints, conservation easement, and trailhead improvements area, but the alternative manufacturing use would differ from the objective of creating warehouse buildings.
Modify the Restrictive Covenant (RC) to allow access to Building A on Parcel 1, which is currently landlocked by the RC.	Yes. As Alternative 2 would be developed and constructed with the same footprint and site plan as the Project, the RC would similarly need to be modified to allow access to the proposed manufacturing building located on Parcel 1.
Provide trailhead improvements including a parking lot, sidewalk, shade structure with benches, bike rack, drinking fountains, fencing, gates, signage, and a fire department access gate for consistency with the Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan.	Yes. Alternative 2 would provide the same trailhead improvements as those provided under the Project.
Develop and operate warehouse buildings that: <ul style="list-style-type: none"> Take advantage of existing City infrastructure Are adjacent to similar industrial logistics and distribution centers Are in close proximity to March Inland Port, State Route 60/Interstate 215, and Interstate 10 to support the distribution of goods throughout the region, while limiting traffic truck disruption to residential areas within the City and neighboring jurisdictions 	No. Although Alternative 2 would take advantage of existing City infrastructure, would be adjacent to industrial logistics and distribution centers, would be developed on the same Project site, and would similarly be in close proximity to March Inland Port, State Route 60/215, and Interstate 10 to support the distribution of goods throughout the region, it would not result in the development and operation of warehouse buildings.

Alternatives to the Proposed Project

Sycamore Hills Distribution Center Project

Project Objective	Alternative Meets Objective?
<ul style="list-style-type: none"> Will attract tenants and will be competitive with other similar facilities in the region Meet industry standards for operational design criteria 	
Implement the Sycamore Canyon Business Park Specific Plan through development of a land use allowed by the industrial land use designation and consistent with the criteria relevant to the site and proposed use.	Yes. Alternative 2 would implement the <i>Sycamore Canyon Business Park Specific Plan</i> .
Facilitate the development of underutilized land currently planned for industrial uses that maximizes the use of the site and responds to market demand within the Sycamore Canyon Business Park Specific Plan area for warehouse buildings.	No. Alternative 2 would facilitate the development of underutilized industrial land in the <i>Sycamore Canyon Business Park Specific Plan</i> area. However, it would not respond to the market demand as the market demand for warehouse use exceeds the demand for manufacturing (at the time of preparation of this DEIR).
Provide and expand on-site conservation to mitigate for the loss of riparian/riverine resources.	Yes. Alternative 2 would similarly provide or expand on-site conservation to mitigate for the loss of riparian/riverine resources.
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.	Yes. Alternative 2 would contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.

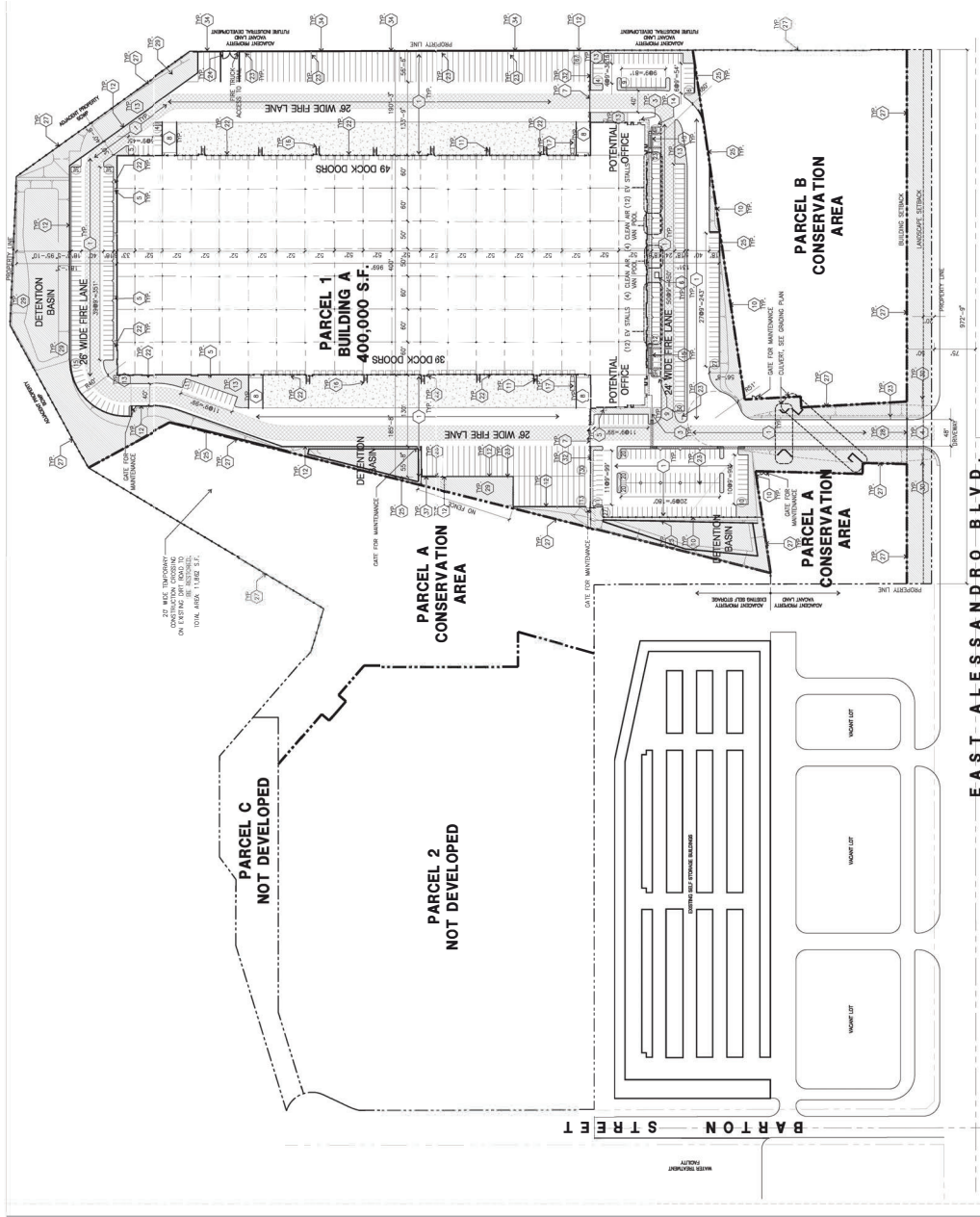
Alternative 2 Conclusion

While Alternative 2 – Other Permitted Use/Manufacturing would meet some of the Project's objectives, it does not meet all of the objectives, and a number of this alternative's environmental impacts have the potential to be greater in comparison to those of the Project. As outlined above, this alternative was selected as it is an allowable use under the existing land use, zoning, specific plan, and was initially anticipated to reduce potential impacts associated with trucks, including trip generation and VMT, and also associated air quality and greenhouse gas emissions. Although this alternative was chosen, in good faith effort to reduce potential impacts, as a result of the analysis above, it actually would have greater impacts than the proposed Project in the following areas: air quality, energy, GHG emissions, noise, transportation, and utilities. As this alternative fails to meet the project objectives and reduce impacts, Alternative 2 is considered infeasible and rejected accordingly.

8.5.3 Alternative 3 – Reduced Development

Alternative 3, Reduced Development, would not develop Parcel 2/ Building B or Parcel C, refer to Figure 8.0-3, Reduced Development Site Plan. The development footprint for Parcel 1/ Building A would remain the same as the Project as well as the proposed Parcels A & B for the conservation areas. This alternative would result in the construction of approximately 400,000 square feet of warehouse/distribution center use. The walls, fencing, landscaping, parking,

security lighting, and other design features for Building A would be with the same as the Project. The proposed revision to the existing Restrictive Property and the Conservation Easement would be required for Alternative 3, as is required for the Project.



8.5.3.1 Impact Analysis of Alternative 3 – Reduced Development

Aesthetics

As with the Project, Alternative 3, Reduced Development, would modify the visual character of the Project site through grading, vegetation removal, construction of an industrial building, associated parking, walls, fencing, landscaping, and parking and security lighting. The grading concept would remain the same as the Project for Building A, so that the structures' comparable height to existing large scale light industrial buildings in the Sycamore Canyon Business Park would preserve views of the Box Springs Mountains. Lighting under Alternative 3 would be shielded and directed downward and away from the adjacent residences to the south, Sycamore Canyon Wilderness Park to the north, and the Conservation Areas within the Project site. However, the amount of development would be reduced. Therefore, impacts resulting from implementation of Alternative 3 would be less than that of the Project.

Air Quality

Development of Alternative 3, Reduced Development, would result in a reduction in grading, the amount of paving, and building size. Because construction under Alternative 3 would use similar types of but less equipment overall, short-term construction impacts would be less than the Project, and will not exceed SCAQMD thresholds. The reduction in square footage of warehouse development would also have reduced operational emissions. Thus, Alternative 3 would decrease air quality impacts as compared to the Project.

Biological Resources

As mentioned, and detailed in Section 3.0, Biological Resources, certain sensitive species, non-native grassland, and vegetation would be impacted under the Project. Because development of Alternative 3 would encompass a smaller footprint than the Project, impacts to biological resources would be the less than the Project.

Cultural Resources

Alternative 3 includes a smaller building footprint than the Project. The majority of the documented cultural resources are located in Parcel 2/ Building B footprint, with one in Parcel C, the trailhead parking lot, and one in Parcel A, Conservation Area. Alternative 3 would encompass a smaller footprint as the Project and avoid impacts to all known/documented cultural resources, although impacts on cultural and historical resources could potentially occur during grading and construction and any other ground disturbance activities and would require the same mitigation measures as the Project. Overall, impacts to cultural resources under Alternative 3 would be less than the Project.

Energy

Development of Alternative 3, Reduced Development, would result in a reduction in square footage of warehouse development and would also have reduced operational energy demands. Thus, Alternative 3 would have less energy demand and associated impacts as compared to the Project.

Geology and Soils

Alternative 3, Reduced Development, includes a smaller building footprint than the Project. Therefore, impacts to geology and soils would be less than the Project, but would still require mitigation measures.

Greenhouse Gas Emissions (GHG)

Development of Alternative 3, Reduced Development, would result in a reduction in grading, the amount of paving, and building size. Because construction under Alternative 3 would use similar types of but less overall equipment, short-term construction impacts would be less than the Project and will not exceed thresholds. The reduction in square footage of warehouse development would also result in reduced operational emissions. Thus, Alternative 3 would decrease greenhouse gas emissions as compared to the Project.

Hazards and Hazardous Materials

Development of Alternative 3, Reduced Development, would result in a reduction in square footage of warehouse development and would also reduce operational use of chemicals and number of employees within the MARB/IPA LUCP C1 Zone. Thus, Alternative 3 would have less hazards impacts than the Project.

Hydrology and Water Quality

Under Alternative 3, Reduced Development, the Project would be required to comply with the NPDES Statewide General Construction Permit (Order No. 09-09-DWQ). The permit requires preparation of a SWPPP. Additionally, implementation of a SWPPP would prevent runoff from the construction site and would prevent water degradation of water quality. Similar to the Project, Alternative 3 is not expected to violate any water quality standards or waste discharge requirements during construction.

Generation of pollutants is expected during the operation of the Project under Alternative 3, although it would be less than the Project as there is less development and reduced operations. Alternative 3 would still follow site control, source control, and treatment control BMPs as outlined in the Project-Specific Water Quality Management Plan (PWQMP) for Building A/Parcel 1. An increase of runoff is similarly anticipated under Alternative 3, although it would be less than the Project as there is less development and impervious surfaces. The increase in runoff for Alternative 3 and would also be addressed by self-treated landscape and by standard bioretention basins and volume-based treatment basins.

As with the Project, given that the site is not used for and is not suited for groundwater recharge, development of Alternative 3 will not impact a local groundwater recharge condition. Therefore, the Project will not cause a net deficit in aquifer volume or a lowering of the local groundwater table. In conclusion, hydrology and water quality impacts associated with Alternative 3 would be the similar to those of the Project.

Land Use and Planning

Under Alternative 3, Reduced Development, the 400,000 square foot Building A would be permitted under the General Plan, Zoning Code, and Specific Plan. However, the reduced development would not implement the City's objectives in the General Plan or Sycamore Canyon Business Park, such as establishing high-quality industrial development for the City that would strengthen the City's economic base, to the same degree, and would leave Parcel 2 vacant and underutilized. Overall, Alternative 3 would have similar impacts as the Project in regard to land use plans.

Noise

Because development of Alternative 3, Reduced Development, would encompass a smaller footprint than the Project, noise impacts from construction would be less. Development of Alternative 3 would result in a reduction in square footage of warehouse development and would also reduce operational vehicle and truck trips and associated noise, although mitigation measures would still be required. Thus, Alternative 3 would have less operational noise impacts as compared to the Project.

Transportation

Development of Alternative 3, Reduced Development, would result in a reduction in square footage of industrial development and associated transportation impacts in comparison to the Project. Alternative 3 would include approximately 400,000 square feet of warehouse use and would have less vehicle and truck trips, resulting in less VMT than the Project. The reduction in VMT under Alternative 3 could possibly reduce the Project's impact to VMT but due to the size of the building it would still be significant and unavoidable. As outlined in the City's *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment*, July 2020, projects generating less than 110 daily vehicle trips are screened out from the need to complete a VMT analysis as they do not generate VMT impacts. For warehouse use consistent with the proposed Project¹, it would need to be 79,000 square feet in size, or approximately 87% smaller, in order to have no VMT impact. Therefore, impacts to transportation under Alternative 3 would be less than those of the Project, but are not expected to be reduced to less than significant impacts.

Tribal Cultural Resources

Under Alternative 3, Reduced Development, the Parcel 2/ Building B and Parcel C would not be developed, and thus all impacts to individual Tribal Cultural Resources would be avoided, and the impact to the larger TCL and TCP/TCR would be reduced.

A Tribal Cultural Landscape (TCL) Study (confidential) and Traditional Cultural Property (TCP) Study (confidential) were prepared by Applied Earthworks (AE) as requested by the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians, respectively. Results of the TCP Study found that the TCP/TCR is potentially eligible for listing in the CRHR and NRHP under

¹ The Proposed Project warehouse type is more specifically high cube transload and short-term storage

Criterion 1 (CRHR)/A (NRHP), 3/C, and 4/D and retains sufficient integrity for listing. Similarly, the TCL Study found that the TCL is potentially eligible for listing under the CRHR and NRHP under Criterion 1 (CRHR)/A (NRHP) and 4/D and retains sufficient integrity for listing. The studies determined that the project site is within the general boundary of the respective TCP/TCR and TCL and the bedrock milling features on the site are considered contributing features. A total of seven bedrock milling sites, that include fourteen bedrock outcrops and 36 milling slicks, documented on site, contributing features to the TCL and TCP/TCR would be avoided and left in place under Alternative 3, Reduced Development.

The Reduced Development Alternative will impact the TCL and TCP/TCR by developing one warehouse building and associated improvements within the overall TCL and TCP/TCR and converting vacant/undeveloped natural land to developed land. However, this alternative's development footprint of 24.31 acres is a relatively small area within the larger TCP/TCR/TCL and is located on the periphery of the TCP/TCR/TCL. Additionally, Parcels A and B within the Project encompass 12.23 acres and include onsite preserved bedrock milling sites as well as a drainage course and associated habitat that will be preserved under a conservation easement and managed in perpetuity. Therefore, this 12.23 conservation area would retain and preserve undeveloped natural land within the TCP/TCR/TCL. Impacts to Tribal Cultural Resources under Alternative 3 would be less than the Project.

Utilities

Development of Alternative 3, Reduced Development, would result in a reduction in square footage of industrial development and would also have reduced operational demand for utilities. Thus, Alternative 3 would have less water, electric, and gas demand and less generation of wastewater and solid waste as compared to the Project.

Wildfire

Alternative 3, Reduced Development, like the Project, would develop structures and a traffic network that would support the Project. The traffic network would include curbs, landscape buffers, parking lots, and improved streets that would serve as a fuel break from wildfire. Structures with industrial and manufacturing uses would likely have fire suppression equipment as well, such as sprinklers and alarms as seen in the Project. As Alternative 3 will not be within a VHFSZ, impacts on wildfire will be similar to the Project.

Alternative 3 Relationship to Project Objectives

Alternative 3 – Reduced Development would not develop Parcel 2/ Building B and Parcel C but the development footprint for Parcel 1/ Building A and the conservation area parcels A & B would remain the same as the Project. Table 8.0-3 – Summary of Alternative 3 (Reduced Development) Ability to Meet Project Objectives identifies the Project objectives and whether or not Alternative 3 meets each objective.

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Table 8.0-3 – Alternative 3 (Reduced Development) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Develop the site to create two warehouse buildings with a total of 603,100 square feet of building space, a conservation easement, and trailhead improvements area.	No. Alternative 3 would only develop one warehouse building instead of two, and trailhead improvements would not be developed on Parcel C.
Modify the Restrictive Covenant (RC) to allow access to Building A on Parcel 1, which is currently landlocked by the RC.	Yes. As Alternative 3 would develop Building A on Parcel 1, the RC would similarly need to be modified to allow access to the proposed warehouse building located on Parcel 1.
Provide trailhead improvements including a parking lot, sidewalk, shade structure with benches, bike rack, drinking fountains, fencing, gates, signage, and a fire department access gate for consistency with the Sycamore Canyon Wilderness Park Stephen's Kangaroo Rat Management Plan and Updated Conceptual Development Plan.	No. As only Parcel 1 would be developed, Alternative 3 would not provide the trailhead improvements area on Parcel C.
Develop and operate warehouse buildings that: <ul style="list-style-type: none"> • Take advantage of existing City infrastructure • Are adjacent to similar industrial logistics and distribution centers • Are in close proximity to March Inland Port, State Route 60/Interstate 215, and Interstate 10 to support the distribution of goods throughout the region, while limiting traffic truck disruption to residential areas within the City and neighboring jurisdictions • Will attract tenants and will be competitive with other similar facilities in the region • Meet industry standards for operational design criteria 	Yes. While Alternative 3 would only include the development of Building A on Parcel 1, the alternative would still develop and operate a warehouse building as described in this objective.
Implement the Sycamore Canyon Business Park Specific Plan through development of a land use allowed by the industrial land use designation and consistent with the criteria relevant to the site and proposed use.	No. Alternative 3 would only partially implement the <i>Sycamore Canyon Business Park Specific Plan</i> and would leave Parcel 2 vacant and underutilized.
Facilitate the development of underutilized land currently planned for industrial uses that maximizes the use of the site and responds to market demand within the Sycamore Canyon Business Park Specific Plan area for warehouse buildings.	No. Alternative 3 would only partially facilitate the development of underutilized industrial land and would not respond as fully to the market demand in the <i>Sycamore Canyon Business Park Specific Plan</i> area for warehouse buildings.
Provide and expand on-site conservation to mitigate for the loss of riparian/riverine resources.	Yes. Alternative 3 would similarly provide or expand on-site conservation to mitigate for the loss of riparian/riverine resources.
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.	No. Alternative 3 would only partially contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.

Alternative 3 Conclusion

While Alternative 3 meets some of the Project objectives, it does not meet all of the objectives. Alternative 3 would partially develop underutilized land currently planned for industrial uses, but the reduced development under this alternative would not maximize use of available land on the site. This in turn results in a decreased response to market demand within the *Sycamore Canyon Business Park Specific Plan* for warehouse buildings as only one warehouse building would be developed in lieu of the two proposed under the Project. Further, while the development of Building A on Parcel 1 under Alternative 3 would still contribute to the economy of the City, these objectives are similarly only partially met. As this alternative fails to meet the project objectives and reduce significant and unavoidable impacts Alternative 3 is considered infeasible and rejected accordingly.

8.6 Environmentally Superior Alternative

CEQA requires the identification of the environmentally superior alternative among the options studied. The environmentally superior alternative must be an alternative to the Project that reduces some of the environmental impacts of the Project, regardless of the financial costs associated with that alternative. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as environmentally superior may not be the one that best meets the goals or needs of the Project.

Table 8.0-4: Comparison of Alternatives Matrix, indicates whether each alternative's environmental impact is reduced, increased, or similar compared to that of the Project for each of the issue areas studied. Based on the alternative's analysis provided above, Alternative 1: No Project/Development Alternative, would be the environmentally superior alternative. The No Project/Development Alternative would either avoid or lessen the severity of all significant impacts of the Project. However, the No Project Alternative would not fulfill the objectives of the Project.

When the Alternative No Project/Development alternative is determined to be environmentally superior, State CEQA Guidelines also requires identification of the environmentally superior alternative among the development options. Of the other alternatives evaluated in this EIR, Alternative 3: Reduced Development Alternative, is also determined to be an environmentally superior alternative to the Project. However, the Reduced Development Alternative would also not fulfill the objectives of the Project.

8.7 Comparison of Alternatives

Table 8.0-4: Comparison of Alternatives Matrix, below, compares the potential environmental impacts of each alternative and ranks each alternative as *less*, *same*, or *greater* in comparison to the significance determinations that the Project would have with respect to each issue area.

Table 8.0-4 – Comparison of Alternatives Matrix

Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Manufacturing	Alternative 3 Reduced Development
<i>Aesthetics</i>	LTS	Reduced	Similar	Reduced
<i>Air Quality</i>	LTS	Reduced	Increased	Reduced
<i>Biological Resources</i>	LTSM	Reduced	Similar	Reduced
<i>Cultural Resources</i>	LTSM	Reduced	Similar	Reduced
<i>Energy</i>	LTS	Reduced	Increased	Reduced
<i>Geology and Soils</i>	LTSM	Increased	Similar	Reduced
<i>Greenhouse Gas Emissions (GHG)</i>	LTS	Reduced	Increased	Reduced
<i>Hazards and Hazardous Materials</i>	LTSM	Reduced	Similar	Reduced
<i>Hydrology and Water Quality</i>	LTS	Reduced	Similar	Similar
<i>Land Use and Planning</i>	LTS	Increased	Similar	Similar

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Environmental Issue	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Manufacturing	Alternative 3 Reduced Development
<i>Noise</i>	LTSM	Reduced	Increased	Reduced
<i>Transportation</i>	SU	Reduced	Increased	Reduced
<i>Tribal Cultural Resources</i>	LTSM	Reduced	Similar	Reduced
<i>Utilities</i>	LTS	Reduced	Increased	Reduced
<i>Wildfire</i>	LTS	Increased	Similar	Similar
<i>Meets Project Objectives?</i>		Alternative 1 does not meet any of the Project objectives.	Alternative 2 does not meet all the Project objectives.	Alternative 3 does not meet all the Project objectives.

LTS = Less than Significant Impact

LTSM = Less than Significant Impact with Mitigation

SU = Significant and Unavoidable

9.0 References

9.1 DEIR References

The following documents were referred to as general information sources during preparation of this Draft EIR. They are available for public review at the locations identified after each listing. They are referenced in the DEIR shown at the end of each section.

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