

## Section 6 – Other CEQA Topics

The State *CEQA Guidelines* set forth several general content requirements for a Draft Environmental Impact Report (DEIR). Those applicable to the proposed Project include: cumulative impacts (Section 15130); unavoidable adverse impacts (Section 15126(b)); irreversible changes (Section 15126.2(c)), and growth inducing impacts (Section 15126(d)). Section 15125(d) of the State *CEQA Guidelines* also requires an EIR to discuss any inconsistencies between the proposed Project and applicable general and regional plans. This section addresses each of these general requirements.

### 6.1 Cumulative Impact Analysis

#### 6.1.1 Introduction

The California Environmental Quality Act (CEQA) requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to a project alone (State *CEQA Guidelines* Section 15130(b)).

As stated in Section 15130(a) of the State *CEQA Guidelines*, an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “Cumulatively considerable” means that “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130” (State *CEQA Guidelines*, Section 15065(c)). Section 15355 of the State *CEQA Guidelines* states that “cumulative impacts” occur from “...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

The EIR must examine “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (State *CEQA Guidelines* Sections 15130(a)(3) and 15130(b)(5)). A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through mitigation fee payment programs.

#### 6.1.2 Assessment of Cumulative Impacts

State *CEQA Guidelines* Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (“the list method”); or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or

certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (“summary of projections method”).

This EIR utilizes the “list method” approach in the cumulative analysis, and therefore focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the Project area that have the potential to contribute to cumulatively considerable impacts. Based on discussions with City staff, the projects identified in **Table 6-A – Cumulative Development Projects** are located in the Project area and may have the potential to contribute to cumulative effects. The location of the cumulative development projects in relation to the Project site is shown in **Figure 6-1 – Cumulative Development Location Map**. In determining the appropriate proximity to the Project for the cumulative development projects, the City included all related development projects in the City and the City of Moreno Valley.

**Table 6-A – Cumulative Development Projects**

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
<b>Projects within the City of Riverside</b>				
1	Auto Parts Store in Mission Plaza P07-1181/P07-0593 381 Alessandro Blvd	Auto parts store	1,500 SF	Approved (5/6/2008) Not constructed
2	Proposed bank in Canyon Crossings Shopping Center P08-274/P08-0275 2570 Canyon Springs Pkwy	Commercial bank with drive-thru lane	2,746 SF	Approved (9/9/08) Not constructed
3	ARCO and <i>ampm</i> Market P10-0090/P10-0091 6287 Day Street	Gasoline station with convenience market	2,700 SF	Approved (6/8/2010) Open
4	Chase Bank (P12-0419/P12-0557/ P12-0558/P12-0559) 360 Alessandro Boulevard	Bank with two-lane drive-thru	3,100 SF	Approved (5/7/2013) Not constructed
5	Health and Fitness Center (P14-0457) 6465 Sycamore Canyon Boulevard	Interior remodel for a health and fitness center within existing 92,410 SF two-story office building	4,000 SF	Approved (6/30/2014) Constructed

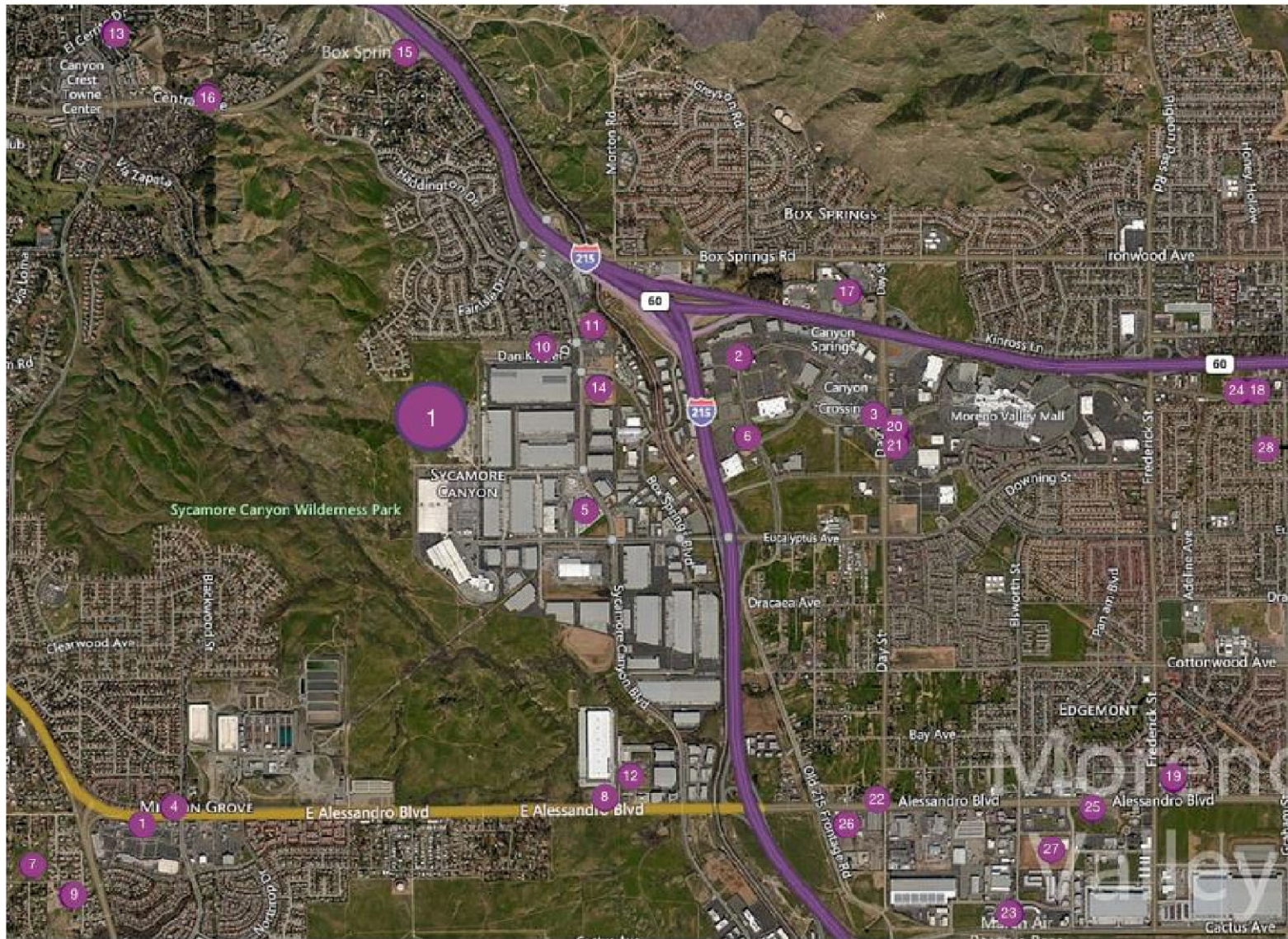
No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
6	Steak and Shake (P14-0536/P14-0537) Northwesterly corner of Valley Springs Parkway and Corporate Center Drive	Fast food restaurant with drive-thru restaurant	3,750 SF	Application submitted
7	Tract Map 32180 (P07-1073) North of the intersection of Moss Road and Pear Street	Nine lot subdivision for single family residences	9 DU	Approved (6/5/2008) Construction has not started
8	Alessandro Business Center (P07-1028/P06-0416/P06-0418/P06-0419/P06-0421/P07-0102) Northwest corner of Alessandro Boulevard and San Gorgonio Drive	Four industrial/manufacturing buildings.	662,018 SF	Approved (3/9/2010) Construction complete
9	Tract Map 36641 (P13-0665) Southwest corner of Wood Road and Moss Street	Eight lot subdivision for single family residences	8 DU	Approved (4/17/2014) Construction has not started
10	CT Sycamore Center (P14-1053/P14-1054) Northwest corner of Dan Kipper Drive and Sycamore Canyon Boulevard	Five buildings with warehouse and office space in each building.	230,420 SF total (205,4720 SF warehouse and 25,000 SF office)	Approved (4/30/2015) Construction complete
11	Sycamore Canyon Apartments (P13-0553/P13-0554/P13-0583/P14-0065) 5940 – 5980 Sycamore Canyon Boulevard (Between Raceway Ford and Raceway Nissan)	Multi-family residential	275 DU	Approved (10/9/2014) Construction has not started
12	Mt. Baldy Drive/San Gorgonio Drive Industrial Project (P14-0600/P14-0601/P14-0602/P15-0044) Southeast corner of Mt. Baldy Drive and San Gorgonio Drive	Multiple-tenant industrial building	121,390 SF	Approved (6/9/2015) Under construction

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
13	Street Vacation for an Apartment Project (P12-0309) Monte Vista Drive and Pollard Street	Apartment building	88 DU	Construction of apartment project has not started
14	Sycamore Canyon Industrial Warehouse Development (P13-0607/P13-0608/P13-0609/P13-0854) 6150 Sycamore Canyon Boulevard	Industrial building	171,616 SF	Approved (5/13/2014) Construction complete
15	Annexation 118 (P14-0246/P14-1059/P14-0901) Northwest corner of Sycamore Canyon Boulevard and Central Ave.	Annexation, GPA, and Pre-Zoning for a retail commercial shopping center	102,000 SF	Approved (7/28/2015) Construction has not started
16	Quail Run Apartments (P14-0683/P14-0684/P14-0685/P15-1080/P15-1081/P15-1082) Northwest corner of Quail Run Road and Central Avenue)	Multi-family residential	216 DU	Approved (07/26/16)
<b>Projects within the City of Moreno Valley</b>				
17	Status Nightclub and Lounge Canyon Springs Plaza	Nightclub	11,000 SF	Open for business
18	O'Reilly Automotive 23334 Sunnymead Boulevard	Auto parts store	7,500 SF	Open for business
19	Available Restaurant Space Plaza Del Sol Shopping Center 23060 Alessandro Boulevard	Restaurant	9,000 SF	Available
20	Rivals Sports Bar & Grill TownGate Promenade	Sports bar & grill	6,452 SF	In plan check
21	Aldi Market 12630 Day Street (TownGate Promenade)	Grocery market	20,300 SF	Open for business

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Size	Status
22	Yum Yum Donut Shop Northwest corner of Day Street and Alessandro Boulevard	Donut shop and convenience store	4,351 SF	In planning
23	Hawthorn Inn & Suites Cactus Commerce Center Cactus Avenue	Four-story Hotel	79 guest rooms	Approved Not constructed
24	Sleep Inn Suites Olivewood Plaza Sunnymead Boulevard	Three-story Hotel	66 guest rooms	Approved Not constructed
25	Moreno Valley Professional Center Alessandro Boulevard east of Ellsworth Street	Four Office buildings	84,000 SF	Approved
26	Gateway Business Park South of Alessandro Boulevard west of Day Street	34 Industrial condominiums between 5,000 and 10,000 SF	184,000 SF	Approved
27	Veterans Way Logistics Center	Distribution facility	366,698 SF	Under construction
28	World Logistics Center	Corporate park specific plan	41 million SF total	Approved (8/26/2015) Construction has not started

The cumulative development projects located nearest the proposed Project site are No. 5 – Health and Fitness Center, No. 10 – CT Sycamore Center, No. 11 – Sycamore Canyon Apartments, and No. 14 – the Sycamore Canyon Industrial Warehouse Development.

The geographic scope (or cumulative impact area) used for each environmental issue is different depending upon the potential area of effect. For example, the geographic scope for air quality would be the South Coast Air Basin (Basin), while the geographic scope for cumulative aesthetics impacts would be the viewshed, and the geographic scope for traffic/circulation would be the intersections in the Project vicinity that could be affected by the cumulative projects. The appropriate scope is explained below in connection with each impact area.



**Figure 6-1 - Cumulative Development Location Map**

Sycamore Canyon Business Park Buildings 1 and 2 DEIR



NOT TO SCALE

### 6.1.3 Aesthetics

The geographic scope for impacts related to aesthetics consists of the *Sycamore Canyon Business Park Specific Plan (SCBPSP)* area, the *Sycamore Highlands Specific Plan* area and, the Sycamore Canyon Wilderness Park. Development of the Project in conjunction with the cumulative development projects will result in a mix of urban infill including multi-family residential, logistics, warehouse, office, industrial, and hospitality uses. For cumulative development to result in a cumulative impact on aesthetics, the cumulative development projects typically must be contiguous to the Project site and/or be located within the same viewshed, i.e., viewable from the same points as the Project.

As shown on **Figure 6-1** and described in **Table 6-A**, the cumulative development projects nearest to the Project site are No. 10 – CT Sycamore Center, No. 11 – Sycamore Canyon Apartments, No. 14 – Sycamore Canyon Industrial Warehouse Development, and No. 5 – Health and Fitness Center (at Platt College). Of these projects, only No. 10 is visible from portions of the Sycamore Canyon Wilderness Park and by certain residences north and west of the Project site. Cumulative development project No. 11 – Sycamore Canyon Apartments, will be visible from some of the multi-family units northeast of the Project site once it is constructed; however, it will not be visible from the Park once the Project is constructed. Views of project No. 14 from the Park and residents adjacent to the Project site are blocked by existing buildings and project. Project No. 5 – Health and Fitness Center is located within the existing Platt College building and these interior improvements will not result in an aesthetic change.

Development project No. 10, consists of five recently constructed buildings adjacent to the Project site (to the east) and north of Dan Kipper Drive are within the same relative viewshed as the proposed Project, from the perspective of the residents within the Sycamore Highlands apartment complex and single-family residential community. Most of the residences directly north of the Project site that front on Sutherland Drive and Stockport Drive have limited views of the site due to topography. (See **Figure 5.1-1 – Surrounding Area**.) None of these homes front either the Project site or the site of project No. 10, so any views would be from the back yards. Many of these homes do not have a direct view of the Project site due to manufactured steep slopes and property line fencing atop the slopes within their respective backyards. Residences to the west and northwest of the Project site (particularly the homes fronting Cannich Road and Bannock Drive) are located at a higher elevation than the Project site and have a direct view of the Project site and project No. 10 from their backyards,. Implementation of the Project combined with project No. 10 will change the existing foreground views from these adjacent residences as the site is converted from vacant land to a developed condition. However, the Project will not block any direct views of the Sycamore Canyon Wilderness Park from the adjacent residences. Although the foreground view of the site from the residences and the Sycamore Canyon Wilderness Park will change from undeveloped land, the developed condition will be consistent with views of existing large-scale logistics and light industrial development east and south of the Project site within the Sycamore Canyon Business Park. Because the Project's proposed structures are consistent and complementary with the existing

similar uses within the business park, including those immediately adjacent to the site, the Project does not represent a significant change to the viewshed. Moreover, the Project will not block views of the Box Springs Mountains, a notable viewpoint, from these abutting residences, or impact the aesthetic value of the Sycamore Canyon Wilderness Park's natural terrain.

The proposed Project and cumulative development projects will include new lighting as necessary for safety and business operations. The Zoning Code requires that on-site lighting be arranged so as to reflect away from adjoining property or any public streets, and that lighting not be directed skyward or in a manner than interferes with aircraft operation. In addition, these projects are served by existing roadways with existing lighting and nighttime traffic glare. Because high-glare and reflective materials are not proposed to be used, Project implementation is not anticipated to create a new source of substantial glare that would adversely affect daytime views in the area. Likewise, the five buildings constructed by project No. 10 – CT Sycamore Center, were built using non-reflective materials and with shielded lighting to minimize impacts on the adjacent residences.

As shown on **Figure 6-1 – Cumulative Development Location Map**, the only cumulative projects that share the same viewshed as the Project site are Project No. 8 (Alessandro Business Center, Project No. 10 (CT Sycamore Canyon), and Project No. 12 (Mt Baldy Drive/San Gorgonio Drive Industrial Project). All of these cumulative development projects are within the *Sycamore Canyon Business Park Specific Plan*. Cumulative Project No. 10 (CT Sycamore Canyon) is adjacent to the Project site and within the foreground view of the residences adjacent to the Project site. Cumulative Projects Nos. 8 and 12 are in the background view of the residences adjacent to the Project site. The Sycamore Canyon Business Park has been planned for urban development, and the *SCBPSP* and City Municipal Code includes development standards that require landscaping, setbacks, pedestrian access, building elevations and street frontage improvements. The Project will not introduce a new type of use or construction material into the viewshed. The nearby cumulative development projects are concrete tilt-up structures, as such, the proposed Project's buildings will be consistent with other large-scale logistics and industrial uses adjacent to the east and south of the Project site, as well as industrial uses visible in the distance, For these reasons, the proposed Project's contribution to aesthetic resources with implementation of mitigation measures identified in Section 5.1 – Aesthetics, is not cumulatively considerable when added to the cumulative development proposed within the viewshed. Therefore, with regards to aesthetics cumulative impacts are **not significant**.

#### 6.1.4 Agriculture and Forest Resources

Cumulative impacts to agricultural resources would occur if the proposed Project and the cumulative development projects would result in the conversion of Farmland<sup>1</sup> or property used

---

<sup>1</sup> For CEQA purposes Farmland refers to Prime Farmland, Farmland of Statewide Importance and Unique Farmland and does not include Farmland of Local Importance or Grazing Land.



for agricultural purposes to other uses. With regard to the conversion of Farmland, none of the cumulative development Projects are located on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (GP2025 FPEIR, Figure 5.2-1; MVGP FPEIR, Figure 5.8-1). The Project site and cumulative development projects are located on Farmland of Local Importance or Urban and Built-Up Land. With regard to the conversion of property in agricultural uses, the Project site and cumulative development projects are located within developed areas and none of these sites are currently used for agricultural purposes, nor are they designated for agricultural uses in the GP 2025 Land Use and Urban Design Element (GP 2025 Figure LU-10) or the Moreno Valley General Plan Community Development Element (MVGP, Figure 2-2). Therefore, **no potentially significant cumulative effects** related to Farmland or agricultural resources will result from the proposed Project.

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

### 6.1.5 Air Quality

Due to the defining geographic and meteorological characteristics of the Basin, the cumulative area for air quality impacts is the Basin itself. As discussed in Section 5.3.9 (Air Quality, Related Regulations, Criteria Air Pollutants), the portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-2.5, and PM-10 under State standards; and for ozone and PM-2.5 under both Federal standards.

Project emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts within the Basin. Cumulative localized impacts for pollutants are also considered and reflect Project air pollutant emissions in the context of ambient conditions in the Project vicinity.

As discussed in Section 5.3.14 (Air Quality, Environmental Impacts before Mitigation), Section 5.3.16 (Summary of Environmental Effects after Mitigation Measures are Implemented), and the *Sycamore Canyon Business Park Warehouse CalEEMod Emissions Estimates, LST Analysis, and Screening HRA* (herein after "the AQ Report," and included as Appendix B.1 to this DEIR), the Project's short-term emissions will not exceed the SCAQMD regional daily thresholds. However, the Project's long-term operational emissions will exceed the SCAQMD regional threshold for NO<sub>x</sub>.

As stated in Section 5.3 – Air Quality, SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. Therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable.

Based on SCAQMD's regulatory jurisdiction over regional air quality, it is reasonable to rely on its thresholds to determine whether there is a cumulative air quality impact. None of the SCAQMD mass daily significance thresholds are exceeded during Project construction; however, the mass daily significance threshold for NO<sub>x</sub> would be exceeded during Project operation. Thus, the Project would have a cumulatively considerable increase in emissions due to operational NO<sub>x</sub>. In terms of localized air quality impacts, construction of the Project would not have a cumulatively considerable impact due to criteria pollutant emissions. However, because the Project's emissions exceed applicable SCAQMD thresholds during operation, the Project will result in **significant and unavoidable cumulative impacts** to air quality.

### 6.1.6 Biological Resources

The Project site and cumulative development projects are located within the Western Riverside County Multiple Species Habitat Conservation Plan<sup>2</sup> (MSHCP); thus the geographic scope for cumulative impacts to biological resources is the MSHCP plan area. As stated in Section 5.4.3 (Biological Resources, Related Regulations), the overall biological goal of the MSHCP is to conserve covered species and their habitats, as well as to maintain biological diversity and ecological processes while allowing for future economic growth within a rapidly urbanizing region. Because the City and all cities within western Riverside County are signatories to the MSHCP, all projects within the City are required to comply with the MSHCP and conduct biological habitat assessments/focused surveys as necessary and to pay the local development mitigation fee (LDMF). Compliance with the MSHCP provides mitigation for direct, indirect, and cumulative impacts to covered species. As required by the MSHCP, a Habitat Assessment and MSHCP Compliance Report, jurisdictional delineation, presence/absence surveys for the least Bell's vireo, and focused fairy shrimp surveys have been conducted to assess potential impacts associated with the proposed Project. Additionally, because the Project will impact riparian habitat a determination of biologically equivalent of superior preservation (DBESP) was prepared and the Project incorporates a Conservation Area to mitigate for the loss of riparian habitat.

The proposed Project is required to adhere to mitigation measures **MM BIO 1** through **MM BIO 8** to reduce impacts to less than significant, pay the LDMF in support of the MSHCP, and the pay the Stephens' Kangaroo Rat Preservation Fee. Cumulative development projects within the MSHCP plan area will also be required to pay the LDMF to offset impacts to the MSHCP, and additional mitigation measures will be identified on a project-specific level as they are proposed and approved. Because compliance with the MSHCP is intended to address all projects within the Western Riverside County region, it addresses and provides mitigation for cumulative impacts to biological resources for the area of coverage. (GP2025 FPEIR, p. 7-10) Therefore, because the proposed Project and cumulative development projects will comply with the MSHCP and the MSHCP provides mitigation for direct, indirect, and cumulative impacts to covered species, cumulative impacts are **not significant**.

---

<sup>2</sup> The MSHCP is discussed in Section 5.4.2 (Biological Resources, Related Regulations).

### 6.1.7 Cultural Resources

The geographic scope for cumulative impacts to cultural resources is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. Western Riverside County was part of the territory of the Cahuilla and perhaps Luiseño people. Cumulative projects 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 cultural resources; however, to reduce impacts to significant historical, archeological, and paleontological resources, the City's General Plan and General Plan EIR incorporate policies and programs to protect and/or document these resources as part of the City's development review process and mitigation measures that require preparation of technical studies, coordination with native American tribes, and the presence of monitors if necessary (GP EIR, pp. 5.5-28 – 5.5-33). Therefore, the General Plan EIR concluded that with adherence to and implementation of General Plan policies, mitigation measures, and standard federal, state, and City regulations, cumulative impacts to historical resources, archaeological resources, and paleontological resources will be less than significant with mitigation.

As discussed previously, with implementation of with mitigation measures described in Section 5.5 – Cultural Resources, the proposed Project will have a less than significant impact on cultural resources. Likewise, as discussed in the City's General Plan EIR, cumulative development projects within the City will have a less than significant impact on cultural resources. Therefore, cumulative impacts will be **less than significant with mitigation incorporated**.

### 6.1.8 Geology and Soils

Geologic hazards such as liquefaction or rock slides are localized by nature, as they are related to the soils and geologic character of a particular site and thus are not cumulative. Cumulative impacts could occur related to an earthquake, if the magnitude of the quake and location of the fault(s) traversed the region. Impacts due to seismic activity would be cumulative if State and local building and development codes and regulations were not being implemented throughout the region, resulting in structural collapse. Thus, the geographic scope for geology and soils is the State.

Pursuant to City requirements and the current edition of the California Green Building Standards Code requirements, the proposed Project, the cumulative development projects, and all new development in the City will be required to incorporate appropriate design and construction measures to guard against ground-shaking hazards. Further, all projects and structures will be constructed in compliance with existing seismic safety regulations of the California Uniform Building Code, which requires the use of site-specific engineering and construction standards identified for each class of seismic hazard. In addition, the City requires

geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process. Proposals for development or redevelopment projects which do not provide for mitigation of seismic or geologic hazards to the satisfaction of responsible agencies will not be approved. Since all local jurisdictions in the region are subject to local, State, and federal laws, including CEQA, cumulative impacts related to seismic safety are less than significant.

The construction and operation of the proposed Project and all cumulative projects would involve exposure of ground surfaces during construction and the collection and discharge of stormwater. Cumulative impacts to geology and soils could occur if the proposed Project and cumulative projects are constructed within the same time period and erosion occurs during construction that creates sedimentation or bank stabilization issues within the local watershed. Additionally, during long-term operation of the projects, cumulative impacts could occur if stormwater is discharged to Sycamore Canyon Creek at increased velocities resulting in erosion or bank stability issues.

All new construction that involves disturbance of more than 1 acre of land is required to prepare a SWPPP and implement BMPs during construction in compliance with the NPDES General Permit for Construction Activities. The implementation and effectiveness of the BMPs chosen are monitored by site inspections conducted by Santa Ana RWQCB Stormwater Division staff. The regulations regarding preparation and implementation of SWPPPs for projects that ultimately drain to the Santa Ana River are promulgated by the Santa Ana Regional Water Quality Control Board (RWQCB) and implemented by local jurisdictions. Because any cumulative development project that may be constructed at the same time as the proposed Project will be required to prepare and implement a SWPPP, cumulative impacts from erosion during construction are **not significant**.

Additionally, in accordance with the County of Riverside MS4 NPDES Permit, all new construction is required to implement permanent BMPs, such as water quality basins, vegetated swales, and other stabilization measures to minimize the potential for erosion and related impacts to water quality. For projects that are not served by an existing city storm drain system and must discharge stormwater to natural water features, the cities and RWQCB require that each project retain stormflows such that the amount of stormwater discharged from the basin does not exceed pre-existing conditions to downstream erosion. The proposed Project and much of the *Sycamore Canyon Business Park Specific Plan* area will drain to an existing 120-inch storm drain in Eastridge Avenue prior to discharge into a series of regional marshes, which will reduce off-site erosion.

For the reasons set forth in the preceding paragraphs, the Project's contribution to impacts with regard to geology and soils is not cumulatively considerable. Therefore with regard to geology and soils, cumulative impacts are **not significant**.

### 6.1.9 Greenhouse Gas Emissions

Greenhouse gases (GHG) are those gases that will contribute to global climate change; therefore, the cumulative impact area for GHG emissions is the earth's atmosphere. Implementation of the proposed Project along with the cumulative development projects will contribute GHG emissions to the atmosphere.

Despite the global nature of GHG impacts, it is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions, including for example transportation policy, fuel consumption, and energy generation, which the state has determined are necessary to meet all of AB 32's greenhouse gas reduction goals. Further, some of the GHG emissions associated with the Project can be reduced only by measures to be implemented by other governmental agencies which are outside the City's jurisdiction. GHG emissions are clearly significant on a global basis, and when GHG emissions are outside of the lead agency's jurisdiction and control, consistent with CEQA Section 21081(a)(2), a project has cumulatively considerable significant and unavoidable GHG impacts if other agencies do not take necessary action.

However, the City has adopted a Climate Action Plan (CAP) to ensure that projects within the City will comply with all necessary policies to achieve a 15 percent reduction in GHG emissions by 2020 compared to a business as usual scenario. As described in Section 5.7, Greenhouse Gas Emissions, greenhouse gas emission modeling was used to predict the amount of greenhouse gasses the Project would generate upon opening and in 2020. These models revealed that Project design features will reduce the predicted greenhouse gas emissions in 2020 by 18.5 percent compared to a business as usual scenario. This percent reduction is greater than the 15 percent reduction target outlined in the City's CAP, pursuant to AB 32 reduction targets. Therefore, the Project does not generate greenhouse gas emissions that would cause a significant impact on the environment and the impacts are less than significant without mitigation. Additional cumulative development projects will also be subject to consistency analysis with the City's CAP as well as state and subregional policies that restrict greenhouse gas production. As these buildings, roads, or other cumulative developments are updated or replaced over time, they will be subject to the then-existing requirements for greenhouse gas emissions reductions, including those set forth to ensure compliance with Executive Orders S-3-05 and B-30-15, as described in Section 5.7, as well as then-existing technologies employed to achieve deep reductions in greenhouse gas emissions. Therefore, cumulative impacts to greenhouse gas emissions will be **less than significant without mitigation** from the proposed Project and other cumulative development projects within the City of Riverside..

### 6.1.10 Hazards and Hazardous Materials

The geographic context for cumulative impacts relative to the use of hazardous materials is the City and the portion of Moreno Valley in which cumulative development projects are located. The proposed Project, along with several of the cumulative development projects, may

routinely transport, use, store, or dispose of hazardous materials and universal wastes. However, even though at this time no specific or known end user has been identified for the proposed Project and some of the cumulative projects, Riverside Municipal Code, Chapter 9.48 and Moreno Valley Municipal Code, Chapter 9.08.090 requires businesses to disclose storage and handling of hazardous materials and hazardous waste, to establish and implement emergency response plans, and to cooperate in periodic reporting and inspections. Although the overall quantity of hazardous materials and waste generated in the City and the portion of Moreno Valley in which cumulative projects are located may increase as a result of implementation of the proposed Project in combination with the cumulative development projects, all new development that will handle or use hazardous materials and all existing development that handles or uses hazardous materials are required to comply with the regulations, standards, and guidelines established by USEPA, the State of California, County of Riverside, City of Riverside, and City of Moreno Valley, related to storage, use, and disposal of hazardous materials.

Implementation of the proposed Project with incorporation of the Project design considerations discussed previously in Section 5.8.4 (Hazards and Hazardous Materials, Project Design Considerations) will not result in any significant impacts that will require mitigation. With respect to the cumulative development projects, each of these projects will be required to evaluate its own project-specific potential impacts, and will also be required to comply with all applicable federal, state and local regulations governing the use, handling, storage and transport of hazardous materials and other hazards. Since hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with development proposals on these properties. In light of the existing regulatory framework governing the storage and use of hazardous materials and waste, the Project's cumulative impact related to hazard and hazardous materials is less than significant, and the Project's contribution is not considered cumulatively considerable. Therefore, cumulative impacts with regard to hazardous materials are **not significant**.

The proposed Project and several of the cumulative projects are located within Compatibility Zones of the March Air Reserve Base/Inland Port Airport (MARB/IPA). The MARB/IPA Land Use Compatibility Plan (LUCP) sets forth the types and intensity of uses that are suitable within each of these zones. As required by the State Aeronautics Act, the LUCP contains compatibility criteria by which safety hazards related to future land use and aircraft activity would be managed. These compatibility criteria are intended to reduce the risk of exposure to the hazards of an off-airport aircraft accident by limiting residential densities and non-residential intensities (i.e., concentration of people) in specified areas surrounding March ARB/IP. The risk of aircraft accidents and exposure of people to such hazards would be reduced by the proposed ALUCP's regulation of the height of new structures, trees, and other objects that might penetrate the navigable airspace, as defined by Title 14 of the Code of Federal Regulations, Part 77 and the United States Standard for Terminal Instrument Procedures (TERPS). (MARB/IPA LUCP DEIR, Appendix A, p. 30). Thus, compliance with the

compatibility criteria of the MARB/IPA LUCP is the mechanism by which the safety of people working and living within proximity to the MARC/IPA is managed.

Proposed development (such as the Project and the cumulative development projects within the Compatibility Zones) that does not meet all criteria set forth in the LUCP is subject to review by the Riverside County Airport Land Use Commission (ALUC). ALUC may, as part of its review, impose height, use, and lighting restrictions on development to reduce the potential impacts associated with aviation use of the MARB/IPA to less than significant levels. On December 10, 2015 ALUC determined that the Project is consistent with the MARB/IPA LUCP with incorporation of the Project Design Features identified in Section 5.8.4 of this DEIR and implementation of mitigation measures **MM HAZ 2**, **MM HAZ 3**, and **MM HAZ 4**. Additional cumulative projects proposed within the MARB/IPA LUCP would be independently subject to ALUC review and required to incorporate project design features or mitigation to ensure compliance with MARB/IPA LUCP policies. Because the Project is consistent with the MARB/IPA LUCP and will implement mitigation measures **MM HAZ 2**, **MM HAZ 3**, and **MM HAZ 4**, implementation of the proposed Project would not contribute to cumulatively considerable impacts associated with operations at MARB, and would not result in a safety hazard to people meeting or working in the Project area. For these reasons, the Project's contribution is not considered cumulatively considerable and , cumulative impacts with regard to a safety hazard associated with an airport are **not significant**.

The City also maintains an Emergency Operations Plan (EOP), as discussed in Section 5.8 – Hazards and Hazards Materials and outlined in the City's General Plan (GP 2025 FPEIR, p. 5.7-35). Moreno Valley has an adopted Local Hazard Mitigation Plan. The proposed Project along with the cumulative development projects will not interfere with any emergency response or evacuation plans, and with implementation of mitigation measure **MM HAZ 4**, will provide a planned emergency vehicle access to the Sycamore Canyon Wilderness Park. Therefore, the Project's contribution is not considered cumulatively considerable. Because the cumulative development projects would also be required to comply with the City's EOP and Moreno Valley's Local Hazard Mitigation Plan, cumulative impacts with regard to conflicts with emergency response plans are **not significant**.

The proposed Project and cumulative development project No. 8 – Alessandro Business Center are contiguous to the Sycamore Canyon Wilderness Park. All other cumulative development projects are some distance from the Park. The GP 2025 indicates that areas of dense, dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. Urban/wildland interface fires occur when a fire burning in wildland vegetation gets close enough to threaten urban structures. The General Plan 2025 specifically identifies Sycamore Canyon as among the major urban/rural interface areas of high-fire risk. The proposed Project, when combined with cumulative project No. 8, has the potential to increase threats from wildland fires. The proposed Project will incorporate sprinklers, landscaping along the Project/Park boundary, and includes the Fire Access/Parks Maintenance Road to provide emergency vehicle access to the Sycamore Canyon Wilderness Park, thus the Project's

contribution is not considered cumulatively considerable. Therefore cumulative impacts with regard to the exposure of people to wildland fires are **not significant**.

### 6.1.11 Hydrology and Water Quality

The cumulative impact area for hydrology and water quality impacts is the Santa Ana River watershed hydrologic unit. The City is located within the Santa Ana Region (Region 8) of the Regional Water Quality Control Board, and Reach 3 of the Santa Ana River is the ultimate receiving water body for runoff from the Project site.

Cumulative impacts to water quality could be significant with the addition of substantial increases in development and temporary construction activities in the Santa Ana River watershed. These cumulative effects include increasing the amount of flow, sedimentation, and urban pollutants that are transmitted via storm flows to the Santa Ana River and its tributaries. The proposed Project, along with all of the cumulative development projects, are required to comply with current storm water requirements for construction-related activities and operation of the site. Erosion and sediment control best management practices (BMPs) will be implemented during construction of the Project in compliance with the National Pollutant Discharge Elimination Systems (NPDES) General Permit for Construction Activities. After construction, the proposed Project would implement the permanent treatment systems identified in *Project-Specific Water Quality Management Plan*. Therefore, Project construction and operation would not considerably contribute to a significant cumulative impact.

As noted in Section 5.9.4 (Hydrology and Water Quality, Project Design Features), the WQMP identifies site design, source control, and treatment control BMPs to be implemented as part of the proposed Project. These include minimization of impervious area at the Project site as well as depressed landscape for infiltration, when appropriate, at the Project site. Permanent Structural Source Control BMPs include, but are not limited to: onsite storm drain inlet markings, interior floor drains, and regular maintenance of refuse areas. An existing downstream subregional water quality BMP exists and is available for use by the Project (TE(b), p. 15) in addition to cumulative development projects No. 10 – CT Sycamore Center, No. 11 – Sycamore Canyon Apartments, No. 14 – Sycamore Canyon Industrial Warehouse Development, and No. 5 – Health and Fitness Center (at Platt College).

The increase in the amount of impermeable surfaces within the watershed resulting from the proposed Project and cumulative projects has the potential to affect groundwater recharge. However, because the Project and cumulative projects are not located within a groundwater recharge area, there would be no cumulative impacts in this regard. Because the proposed Project incorporates several water use reduction strategies, as described in Section 5.9 – Hydrology and Water Quality, and will comply with the State's current drought regulations, the Project's contribution is not considered cumulatively considerable. Further, the cumulative development projects are also required to reduce water use. For these reasons cumulative impacts with regard to groundwater are **not significant**.



The proposed Project will alter the existing drainage pattern of the Project site due to the relocation of two ephemeral drainages located on the Project site (see **Figure 5.4-2 USACE/RWQCB Jurisdictional Delineation Map** and **Figure 5.4-3 CDFW Jurisdictional Delineation Map**). When combined with cumulative projects, the proposed Project would contribute to significant cumulative impacts to the drainage pattern in the area if not mitigated properly. The proposed Project will capture a portion of the runoff currently received in the ephemeral drainages in a low-flow swale that is part of the on-site Conservation Area on the western portion of the Project site before entering into an on-site storm drain (**Figure 5.9-4 – Proposed Condition Hydrology**). The remainder of the runoff currently received in the ephemeral drainages will be collected in on-site storm drains and conveyed via an off-site storm drain to be constructed by the Project to an existing 120-inch diameter storm drain in Eastridge Avenue prior to discharge into a water quality marsh constructed to serve the SCBP in the mid-1990s prior to discharge into Sycamore Canyon Creek. No substantial erosion or siltation is expected either during project operation or construction considering the proposed facilities and erosion control methods that will be in place during construction. Through compliance with the terms of the NPDES general construction permit and the City's MS4 permit, the Project's impact to altering existing drainage patterns is not cumulatively considerable. Therefore, cumulative impacts with regard to alteration of existing drainage patterns are **not significant**.

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

### 6.1.12 Land Use and Planning

Land use and planning decisions for the cumulative development projects fall within the jurisdiction of the City of Riverside and the City of Moreno Valley; thus the geographic scope for land use and planning is the City and the portion of Moreno Valley in which cumulative development projects Nos. 17 through 28 are located. As with the proposed Project, all of the cumulative development projects are required to comply with applicable land use plans and policies of the applicable jurisdiction. Accordingly, a project cannot be approved that is not consistent with the GP 2025 or the Moreno Valley General Plan or the zoning ordinance of either City unless amendments, variances, or exceptions are proposed and adopted as part of the project. The proposed Project is located within the *Sycamore Canyon Business Park Specific Plan (SCBPSP)*. As described in Section 3 – Project Description, the Project proposes an amendment to the GP 2025 Circulation Element, an amendment to the Circulation Plan of the *SCBPSP*, a grading exception, and a parking variance. Implementation of the proposed general plan amendment, specific plan amendment, grading exception, and parking variance were determined to have a less than significant impact on the environment. Additionally, the proposed Project was found to be consistent with the applicable policies and guidelines of the

GP 2025, the SCBPSP, the *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan*. Therefore, the Project's contribution with regard to conflicts with applicable land use plans, policies, or regulations is not considerable and cumulative impacts in this regard are **not significant**.

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

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

### 6.1.13 Mineral Resources

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

### 6.1.14 Noise

The geographic scope for noise impacts associated with on-site construction and operations is the immediate vicinity of the Project site because noise by definition is a localized phenomenon, and drastically reduces in magnitude as the distance from the noise sources increases. Consequently, only those cumulative development projects within the immediate vicinity of the proposed Project will be likely to contribute to cumulative noise impacts resulting from Project construction or operation. Only three of the cumulative development projects are within 0.50 miles of the Project site; No. 10 – CT Realty Sycamore Center, No. 11 – Sycamore

Canyon Apartments, and No. 14 – Sycamore Canyon Industrial Warehouse Development  
**(Figure 6-1 – Cumulative Development Location Map).**

Potential impacts from Project-related construction will be significant, even with implementation of feasible mitigation measures. Additional potential cumulative impacts from construction noise could result if construction of the proposed Project and one or more of the three cumulative development projects within 0.5 miles of the Project site occurred simultaneously. Because project Nos. 10 and 14 have already been constructed (**Table 6-A – Cumulative Development Projects**), project No. 11 – Sycamore Canyon Apartments is the only project with the potential to be constructed at the same time as the proposed Project. As shown on **Figure 6-1**, project No. 11 is located east of Sycamore Canyon Boulevard and there are intervening structures between this site and the Project site, which would block some of the noise from this site. Further, the Draft Mitigated Negative Declaration for the Sycamore Canyon Apartments Project concluded that construction noise impacts from this project would be less than significant with regard to direct, indirect and cumulative impacts (SCA Draft MND, pp. 32, 40–41). Nonetheless, because the Project’s construction noise impacts are significant even with incorporation of feasible mitigation measures, the Project’s contribution to short-term noise is considerable and **cumulative impacts from construction noise are considered significant and unavoidable.**

The geographic scope for noise impacts associated with Project-generated vehicular noise is the roadways that will be used by Project-generated traffic in combination with traffic from the cumulative development projects. As shown in **Table 5.12-M – Change in Future Noise Levels at 50 Feet from Centerline (Existing Plus Ambient Plus Project Condition)**, the Project’s contribution to future noise levels on area roadways is less than 1 dBA for all roadway segments except for Sierra Ridge Drive west of Sycamore Canyon Road. Project-related noise is expected to result in a 2.6 dBA increase along Sierra Ridge Drive west of Sycamore Canyon Boulevard. Because noise increases of 3 dBA or less are barely perceptible, the Project’s contribution to cumulative traffic noise is not considerable. Therefore, cumulative impacts with regard to traffic noise are **not significant.**

The geographic scope for noise impacts associated with Project operations are the sensitive receptors adjacent to the Project site because noise a localized phenomenon, and drastically reduces in magnitude as the distance from the noise sources increases. Unmitigated operational noise will not exceed the daytime noise standards of 55 dBA  $L_{eq}$ . However, the exterior nighttime standard of 45 dBA  $L_{eq}$  will be exceeded at two single-family detached residential dwelling units adjacent to the northwest corner of the site. In order to mitigate nighttime project operational noise levels to the nighttime standard of 45 dBA  $L_{eq}$  at affected sensitive receptors (i.e., receptor nos. 3 and 4) a ten-foot noise barrier is required along the perimeter of the outdoor use areas (KA. p. 19) per mitigation measure **MM NOI 16**. In addition to the noise barrier, the use of the western portion of the dock doors and trailer parking area for Building 2 as shown on **Figure 5.12-6 – Operational Noise Levels ( $L_{eq}$ ) with Mitigation** will be limited as indicated in mitigation measure **MM NOI 14**. The ten-foot tall barriers are required at the eastern edge of the residential lots (i.e., private property) and not at the property

line at the bottom of the slope (i.e. the Project site.) Because neither the Project proponent nor the City controls the private property, the installation of this barrier is not certain. Because mitigation measures **MM NOI 14** is considered infeasible Project-specific impacts are significant; however, because noise is such a localized phenomenon cumulative impacts with regard to operational noise are **not significant**.

### 6.1.15 Population and Housing

The cumulative impact area for population and housing is the City. Implementation of the proposed Project and cumulative development projects could contribute to significant cumulative impacts to population and housing if they would induce substantial population growth or displace substantial numbers of existing housing units requiring the construction of replacement housing. Because implementation of the proposed Project will not entail the development of new housing or the displacement of any existing housing it will not directly contribute to a cumulative impact with regard to population and housing. The residential cumulative development projects identified in **Table 6-A – Cumulative Development Projects** represent a total of 596 future residences; 17 future single family residences (SFRs) and 579 new multi-family residences (MFRs).<sup>3</sup> According to the Demographics and Growth Forecast prepared by the Southern California Association of Governments (SCAG) for the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), there were 92,400 households in the City in 2012 with 118,600 households projected in 2040 (2016 RTP SCS DGF, p. 27). Based on a household size of 3.3 persons per residence (SCAG Riverside Profile, p. 3) the cumulative development projects represent a potential population increase of approximately 1,977 persons.<sup>4</sup> According to the Demographics and Growth Forecast prepared by SCAG for the 2016 RTP/SCS, the population in the City was 310,700 in 2012 and is projected to be 386,600 in 2040. The cumulative development projects represent an increase of approximately 0.6 percent over the 2012 population and households and approximately 0.5 percent of the population and households forecast for 2040. Because the Project will not directly contribute to new housing or the displacement of existing housing and the residential cumulative development projects are responsible for a less than one percent increase in population and households, direct cumulative impacts with regard to population and housing are **not significant**.

Implementation of the proposed Project will generate demand for temporary construction jobs, Because there is not an identified user for the buildings that will be constructed by the proposed Project, specific employment figures are not available; however based on the proposed size of the two buildings combined, the Project is expected to generate between approximately 860<sup>5</sup> and 1,335<sup>6</sup> employment opportunities at build-out. According to the

---

<sup>3</sup> The residential cumulative development projects are No. 7– Tract Map No. 32180 (9 SFRs), No. 9 – Tract Map No. 36641 (8 SFRs), No. 11 – Sycamore Canyon Apartments (275 MFRs), No. 13 – Street Vacation for an Apartment Project (88 MFRs), and No. 16 – Quail Run Apartment (216 MFRs)

<sup>4</sup> 3.3 persons per residence multiplied by 596 residences = 1977 persons.

<sup>5</sup> Based on an average of 1,598 SF or logistics space per employee per *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010 prepared by the NAIOP

Demographics and Growth Forecast prepared by SCAG for the 2016 RTP/SCS, there were 120,000 jobs in the City in 2012 and 200,500 jobs projected in 2040 (2016 RTP/SCS DGF, p. 27). Jobs generated by the proposed Project represent an increase ranging from 0.7 percent to 1.1 percent over the number of jobs in 2012 and from 0.4 percent to 0.7 percent of the jobs forecast for 2040. As of May 2016, the unemployment rates in Riverside and San Bernardino Counties were 5.4 percent and 5.2 percent, respectively (EDD). Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce.

The cumulative development projects will also create temporary employment opportunities during construction, and permanent employment opportunities once constructed. Moreover, as a 24 percent increase in population is expected from 2012 to 2040 within the City and a 30 percent increase in population is expected within Moreno Valley during the same period (2016 RTP/SCS DGF, p. 24), it is reasonably anticipated that the cumulative project's employment opportunities will be filled by residents that will reside in the region. Given the nature of the job opportunities and availability of labor, it is reasonable to assume that any new jobs created by the proposed Project and cumulative development projects would not result in indirect population growth. Because the proposed Project will not indirectly induce population or housing growth, its contribution is not cumulatively considerable in this regard. Because the non-residential cumulative development projects will not result indirect population growth, cumulative impacts with regards to population and housing are **not significant**.

### 6.1.16 Public Services

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

#### Fire Protection

The proposed Project, in conjunction with the cumulative development projects within the City, will contribute toward an increased demand for fire protection services. An increased demand has the potential to result in new or expanded fire station facilities that may cause significant environmental impacts. The proposed Project and the cumulative development projects will be required to pay the "Fire Station Development Fee" per Riverside Municipal Code Chapter 16.52 prior to the issuance of a building permit for new construction for the purpose of providing RFD resources to purchase land and construct or expand fire stations as well as to acquire additional equipment and fire station furnishings. The 16 cumulative development

---

Research Foundation. (2010 NAIOP, Figure 3, p. 12). Number of employees calculated as follows: 1,375,174 total SF ÷ 1,598 SF/employee = 860 employees.

<sup>6</sup> Based on the County of Riverside employee generation rate for light industrial uses of 1,030 SF per employee; number of employees calculated as follows: 1,375,174 total SF ÷ 1,030 SF/employee = 1,335 employees.

projects within the City are not likely to directly result in the need for new construction or expansion of existing fire station facilities; however, if in the future, RFD determines new construction or expansion of existing fire station facilities is necessary to serve the City's continued growth, payment of said fee will provide RFD the resources for such activity. A CEQA analysis to determine the level of environmental impact resulting from the construction or expansion of fire station facilities is proper when actual plans for such facilities are proposed. Moreover, the cumulative increased demand is absorbed in the GP 2025 policies that strive for a sufficient number of fire stations and that RFD should maintain/meet a 5-minute response time in urbanized areas (GP 2025, p. PS-29). Given the nature of the proposed Project, the proposed fire access across the southern portion of the Project site, and the proximity of the Box Springs Station (Fire Station No. 13), as well as stations throughout the City, the Project will not impact fire response times and will not otherwise create a substantially greater need for fire protection services than already exists; thus Project impacts are not cumulatively considerable. Cumulative impacts with regard to fire protection are **not significant**.

### **Police Protection**

The proposed Project, in conjunction with the cumulative development projects in the City, will contribute toward an increased demand for police protection services. An increased demand has the potential to result in the need for additional police officers; however, it is not anticipated that new or expanded police facilities will be required. While the proposed Project could lead to an incremental increase in the number of potential calls placed with the police department, the Project will not cause substantial adverse physical impacts requiring new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The Project's potential incremental increase and the cumulative development projects' increase demand for police protection services are absorbed in the GP 2025 policies wherein RPD endeavors to provide proactive community policing, specifically to provide a minimum response time of 7 minutes on all Priority 1 calls, and 12 minutes on all Priority 2 calls (GP 2025, pp. PS-30–PS-32). Of the multifamily-residential and commercial projects that qualify, the City also requires Crime Prevention Through Environmental Design (CPTED) for projects requiring a Site Plan Review Permit and any large development projects, which involves review by RPD and the City Planning Division against CPTED principles (GP 2025 FPEIR, p. 5.13-38). Adherence of qualifying projects to CPTED will reduce cumulative impacts on police protection services. Moreover, staffing for RPD is based on the business and residential growth and evaluated by RPD on a project-by-project basis (GP 2025 FPEIR, p. 5.13-29). RPD also anticipates that its decentralized policing center plan, which involves an emphasis on providing "satellite" policing centers distributed throughout the City, will allow the GP 2025 response times to be achieved (GP 2025 FPEIR, pp. 5.13-29–5.13-30). Any incremental impacts on level of service will also be offset from revenue generated for the City from property taxes. Therefore, cumulative impacts to police protection are **less than significant**.

### Schools

Non-residential projects, including the proposed Project, do not increase school-age children or impact schools. The five residential cumulative development projects will result in a total of 596 future residences, which will probably include school-age children. In accordance with California Government Code, a standard school facility impact fee will be paid to offset any incremental impacts of the Project and the cumulative development projects. In addition, cumulative residential development projects will pay school mitigation fees to affected school districts as required by Proposition 1A and Senate Bill 50, codified in California Government Code Sections 65995.5–65995.7 and 66000 *et seq.* For CEQA purposes, pursuant to State law, payment of these associated fees reduces school facilities impacts to a less than significant level. Moreover, impacts on school services are absorbed in the GP 2025 policies, which encourage accommodating growth needs, growing smarter, and housing strategies to best utilize existing infrastructure and services such as schools (GP 2025, pp. LU-26; E-12–E-13; AQ-26–AQ-27). Thus, cumulative impacts to schools are **less than significant**.

### Parks, Libraries and Other Public Services

As discussed in Section 6.1.15 – Population and Housing, the proposed Project and the non-residential cumulative development projects are not likely to result in a substantial direct or indirect increase in population or housing, and as such would not increase the demand for community services wherein new or expanded park or library facilities would be necessary or required. The five residential cumulative development projects will result in a total of 596 future residences and generate a population of approximately 1,977 persons, which will increase the demand for library, park, and other public services.

The proposed Project and all cumulative development projects within the City will be required to pay the “Regional Parks and Reserve Parks Development Fee” per Riverside Municipal Code Chapter 16.44 and the “Local Park Development Fee” per Riverside Municipal Code Chapter 16.60, which will offset potential impacts to park facilities. In addition, the Project will be required to pay the City’s library tax in the amount of \$19 per parcel, continuous until 2022. Payment of said fees will provide the resources for such activity if, in the future, new or expanded library or park facilities are necessary to serve the City’s continued growth. A CEQA analysis to determine the level of environmental impact resulting from the construction or expansion of park facilities is proper when actual plans for such facilities are proposed. Therefore, **no potentially significant cumulative effects** related to public services will result from the proposed Project.

### 6.1.17 Recreation

Park and recreation services are provided by the City Parks, Recreation, and Community Services Department; therefore, the geographic scope for cumulative impacts to recreation is the City. As discussed in Section 6.1.15 (Population and Housing), the proposed Project and the non-residential cumulative development projects are not likely to result in a substantial direct or indirect increase in population or housing, and as such, would not increase the demand for park and recreation services. The residential cumulative development projects

identified in **Table 6-A – Cumulative Development Projects** represent a total of 17 future single family residences (SFRs) and 579 new multi-family residences (MFRs)<sup>7</sup> will increase the demand for park and recreation services. Nevertheless, the proposed Project and cumulative development projects will be required to pay the “Regional Parks and Reserve Parks Development Fee” per Riverside Municipal Code Chapter 16.44 and the “Local Park Development Fee” per Riverside Municipal Code Chapter 16.60, which will offset potential impacts to park and recreation facilities. Because local and regional park development fees must be paid by each of the cumulative development projects prior to construction, the Project’s contribution is not considered cumulative considerable; Therefore cumulative impacts with regard to increases in use of existing neighborhood parks, regional parks, or other recreation facilities or the need for the construction or expansion of recreational facilities are **not significant**.

### 6.1.18 Transportation/Traffic

The cumulative impact area for transportation/traffic impacts consists of the study area (hereinafter referred to as the Study Area) identified in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* prepared by Albert A. Webb Associates, revised May 2016, and the nine intersections (see **Figure 5.16-1 – Study Area Intersections**) and six freeway segments identified below.

#### Study Area Intersections

1. I-215 Northbound Ramps (NS) / Fair Isle Drive-Box Springs Road (EW)
2. Sycamore Canyon Boulevard (NS) / Fair Isle Drive (EW)
3. Sycamore Canyon Boulevard (NS) / I-215 Southbound Ramps (EW)
4. Sycamore Canyon Boulevard (NS) / Dan Kipper Drive (EW)
5. Sycamore Canyon Boulevard (NS) / Box Springs Boulevard (EW)
6. Sycamore Canyon Boulevard (NS) / Sierra Ridge Drive (EW)
7. Sycamore Canyon Boulevard (NS) / Eastridge Avenue (EW)
8. Box Springs Boulevard (NS) / Eastridge Avenue (EW)
9. I-215 Ramps (NS) / Eastridge Avenue-Eucalyptus Avenue (EW)

#### Study Area Freeway Segments

##### I-215 Northbound

1. Eastridge Ave-Eucalyptus Ave Off-Ramp
2. Eastridge Ave-Eucalyptus Ave On-Ramp
3. Fair Isle Dr-Box Springs Rd On-Ramp

##### I-215 Southbound

4. Sycamore Canyon Boulevard Off-Ramp

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



5. Truck Bypass-Eastridge Ave-Eucalyptus Ave Off-Ramp Weaving Section
6. Eastridge Ave-Eucalyptus Ave On-Ramp

Cumulative impacts to transportation/traffic would be significant if the addition of Project-related traffic, combined with ambient growth and the cumulative development projects (the E+A+C+P scenario) and/or Project-related traffic combined with the traffic expected at buildout per the GP 2025, results in any study area intersection operating at LOS E or LOS F. Except at some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis (GP 2025, p. CCM-11).

As shown in **Table 5.16-N – Intersection LOS, Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C) (2018)**, 8 of the 9 the study area intersections will operate at LOS B, C, or D, during the peak hours with existing geometrics for the existing plus ambient growth plus cumulative development project traffic condition (E+A+C), that is without the proposed Project. Under the E+A+C scenario, Intersection 9 (Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW)) will operate at LOS F during the AM peak hour. With the addition of Project related (E+A+P+C), there is no change in the LOS for 8 of the 9 intersections and Intersection 9 (Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW)) will continue to operate at LOS F. In evaluating a project's impact to an intersection operating at LOS F, Exhibit F of the City's Traffic Impact Analysis Guidelines indicates that a peak hour delay of 1.0 seconds is considered unacceptable. Because the delay attributable to Project traffic is only 0.9 seconds, cumulative impacts to study area intersections the Project's contribution is not considered significant; thus, mitigation is not required (WEBB, p. 5-10). The Project proponents will pay the City's local development impact fee (DIF) related to transportation improvements as set forth in Chapter 16.64 of the Riverside Municipal Code. The Project will also participate in the TUMF program through the payment of mitigation fees. For these reasons, **cumulative impacts with regard to local traffic are not significant.**

As shown in **Table 5.16-O – Freeway Segment Level of Service E+A+C+P (2018)** (on the following page), LOS for AM peak hour traffic with the Project (E+A+C+P) and without the Project (E+A+C) ranges from LOS B to E and the addition of Project traffic will not change the LOS on any of the 6 study area segments. LOS for PM peak hour traffic with the Project (E+A+P) and without the Project (E+A) ranges from LOS C to F; the addition of Project traffic will not change the LOS on any of the study intersections.

The PM peak hour LOS for the I-215 Northbound off-ramp at Eastridge-Eucalyptus changed from LOS D in the E+A (year 2018) condition (**Table 5.16-K**) to LOS E with the addition of traffic from the cumulative development projects without the Project (E+A+C). When Project traffic is added to the E+A+C condition (E+A+C+P), the LOS at the I-215 Northbound off-ramp at Eastridge-Eucalyptus remains at LOS E (**Table 5.16-O**). AM peak hour LOS for the I-215 Northbound on-ramp at Fair Isle-Box Springs changed from LOS C in the E+A condition (**Table 5.16-K**) to LOS E in the E+A+C condition (**Table 5.16-O**). Under the E+A+C+P condition, LOS

at the I-215 Northbound off-ramp at Fair Isle-Box Springs remains at LOS E. The PM peak hour LOS for the I-215 Northbound on-ramp at Fair Isle-Box Springs changed from LOS C in the E+A condition (**Table 5.16-K**) to LOS F in the E+A+C condition (**Table 5.16-O**). Under the E+A+C+P condition, LOS at the I-215 Northbound off-ramp at Fair Isle-Box Springs remains at LOS F. Thus, the addition of Project-related traffic to an already failing freeway ramp is significant. With the addition of the following improvements, a satisfactory LOS will be achieved at the Eastridge-Eucalyptus I-215 Northbound off-ramp and the Fair Isle-Box Springs I-215 Northbound on-ramp:

- One HOV lane for northbound I-215 at the Eastridge-Eucalyptus off-ramp (this improvement is part of the I-215 North Project)
- One mainline mixed flow lane for northbound I-215 at Fair Isle Drive-Box Springs Drive on-ramp.

The improvements identified above are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Further, Riverside County Transportation Commission's I-215 North Project is conceptual in nature; therefore, design of the project has not taken place. As a result, since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither, the City, as the lead agency, nor the Project proponent can contribute fair share fees or implement the required improvements needed, which must be designed and constructed by Caltrans. Fair share payment may be paid when there is an identified fund and where it is reasonably foreseeable that the mitigation will be installed. Because Caltrans has no fund established to receive payment and the timing of these improvements are unknown, **cumulative impacts with regard to freeway LOS are significant.**

With regard to the GP 2025 buildout scenario. cumulative impacts to transportation/traffic could be significant if the addition of Project-related traffic combined with the traffic expected at buildout per the GP 2025 results in any study area intersection operating at LOS E or F, except at some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis (GP 2025, p. CCM-11). Sycamore Canyon Boulevard between Central Avenue and Box Springs/Fair Isle is one of the streets identified to operate at LOS E or F at buildout of the GP 2025 as a result of regional cut-through traffic. With regard to these streets, the GP 2025 FPEIR states that a decision made, following discussion of the Circulation Element components in the Citizens Advisory Committee, Planning Commission and City Council, not to build roadways larger just to accommodate regional cut-through traffic and it was determined that LOS E or F would be acceptable for these roadways. (GP 2025 FPEIR, p. 5.15-33) Therefore, **impacts with regard to buildout per GP 2025 are not significant.**

### 6.1.19 Utilities and Service Systems

Utilities and service systems include water, wastewater, storm drains, landfills, and solid waste disposal services. Drainage is discussed in Section 6.1.11 (Hydrology and Water Quality), above.

#### 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 fixtures and appliances to conserve water, thus reducing the amount of water required and the amount of wastewater generated. New landscaping at the Project site will be water efficient. However, the proposed Project, when combined with the cumulative development projects within Western's Riverside Retail Area will increase the demand for water. As discussed in Section 5.1.7, pursuant to SB 610 a *Water Supply Assessment* was prepared for the Project by Western. (Appendix K of this DEIR) Because Western concluded that its total projected water supplies during normal, single-dry, and multiple-dry years throughout the next 20 year horizon are sufficient to meet the projected water demands of the proposed Project in addition to Western's existing and planned future uses, no new water supplies or entitlements are needed to serve the proposed Project.

According to the Western's *2015 Urban Water Management Plan* (2015 UWMP), Western will be able to provide a sufficient amount of water to its service area based on current and projected future water use (UWMP 2015, p. 3-7). Thus, Western has the ability to serve the proposed Project, as well as the cumulative development projects for the next 25 years. Because cumulative water supplies exceed water demand, **cumulative impacts to water supply are less than significant** and the proposed Project will not contribute to a cumulatively considerable impact on water supply.

#### 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). The RWQCP has a capacity of 46 million gallons per day (MGD) and can provide sufficient capacity to treat the wastewater generated by the proposed Project, cumulative development projects, and buildout in the City per the GP 2025. For these reasons, **cumulative impacts to wastewater collection and treatment are less than significant** and the proposed Project will not contribute to a cumulatively considerable impact in this regard.

## 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 non-hazardous municipal solid waste.

As discussed in Section 5.17 – Utilities and Service Systems, the GP 2025 predicted a total maximum daily load of 17,000 tons per day at buildout, which represents approximately 8% of the solid waste the landfills are allowed to accept daily under the expected typical build-out. Therefore, assuming all other cumulative development Projects are consistent with the General Plan, **no potential significant cumulative impacts** with regard to solid waste will result from the proposed Project.

### 6.1.20 Energy Conservation

Electricity and natural gas services are provided to the proposed Project and the cumulative development projects by Riverside Public Utilities (RPU) and the Southern California Gas Company (SCG), respectively. Therefore the geographic context for cumulative impacts to electricity is the City and the geographical context for cumulative impacts to natural gas is the service area of SCG. SCG's service area encompasses most of central and southern California.

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted building standards consistent with Title 24.

The proposed Project will comply with, and in some cases exceed, Title 24 standards for insulation, glazing, lighting, shading, and water and space-heating systems in all new construction. Through the use of modern energy-efficient construction materials and practices, incorporation of the Sustainability Features described in Section 3 (Project Description), in addition to compliance with Title 24 standards, the proposed Project will be consistent with the State's energy conservation standards and, therefore would not conflict with an adopted energy conservation plan.

The cumulative development projects must also abide by the City's building standards and the provisions of Title 24, and in some instances may exceed the Title 24 guidelines for new

construction. It is also reasonable to assume that one or more of the cumulative development projects will use energy-efficient construction materials and practices.

Both RPU and SCG have adequate energy supplies to serve the proposed Project, the cumulative development projects, and to meet existing demand in future years. RPU and SCG are both developing additional energy supplies to serve anticipated development in future years.

Therefore, **no potentially significant cumulative effects** related to energy conservation will result from the proposed Project.

## 6.2 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* Section 15126.2). As discussed in detail throughout Section 5.0 Environmental Impact Analysis of this DEIR, the proposed Project will not result in any Project-specific or cumulatively significant unavoidable adverse impacts related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, hydrology and water quality, transportation/traffic, utilities and service systems, or energy conservation.

The proposed Project will result in Project-specific or cumulatively significant unavoidable impacts to:

- Air quality – cumulative and Project-specific impacts during construction and operations;
- Noise – Project-specific impacts during construction and operation); and
- Traffic – Project-specific and cumulative impacts to freeway LOS.

## 6.3 Growth Inducing Impacts

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

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

As discussed in Section 3.0 Project Description of this DEIR, the Project will involve construction and operation of two logistics center buildings. Other than a storm drain that will serve only the Project, the Project will not require the expansion of infrastructure or utilities and will not remove obstacles to population growth. Further, the Project itself does not involve the

creation of households and will not directly impact population growth. The jobs that are created during Project construction and operation are anticipated to be occupied by individuals already residing in the Project vicinity and so the proposed Project will not have an indirect impact on population growth either.

#### **6.4 Significant Irreversible Environmental Changes which would be Involved in the Proposed Project Should it be Implemented**

The intent of this section of this DEIR is to discuss primary and secondary impacts of the proposed Project that result in significant irreversible changes in the environment. State *CEQA Guidelines* Section 15126.2(c) identifies, as examples, such things as use of nonrenewable natural resources, irreversible changes in land use, and irreversible damage to the environment resulting from environmental accidents associated with a project.

As discussed in Section 3.0 – Project Description, the proposed Project will involve construction and operation of two buildings to serve as a logistics center. The proposed Project site is currently undeveloped, except for a concrete v-ditch, and so implementation of the Project would result in irreversible environmental changes at the Project site. Nevertheless, the proposed Project site is within the *SCBPSP* and is designated for industrial use. Likewise, in the City’s Zoning Map the Project site is zoned as Business and Manufacturing Park Zone. The proposed logistics center at the Project site is consistent with these land use and zoning designations and so these irreversible changes are not considered significant.

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

#### **6.5 Consistency with Regional Plans**

Section 15125(d) of the State *CEQA Guidelines* also requires an EIR to “to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” The regional plans applicable to the proposed Project are: the GP 2025, *SCBPSP*, the *Sycamore Canyon Wilderness Park Stephens’ Kangaroo Rat Management Plan and Updated Conceptual Development Plan*, *MARB/IPA LUCP*, the *MSHCP*, the *TUMF*, the *Air Quality Management Plan (AQMP)*, the *Green Action Plan*, and the *Riverside Restorative Growthprint*. The following table identifies the location in which each of these plans is discussed in the DEIR.

**Table 6-B – Location in the DEIR in which  
Consistency with Regional Plans is Discussed**

<b>Plan</b>	<b>Location of Discussion</b>
GP 2025	Appendix M
AQMP	Section 5.2.4.13.9 (Air Quality, Related Regulations, Criteria Air Pollutants)
Congestion Management Plan	Section 5.16.2 (Transportation/Traffic, Related Regulations)
<i>Green Action Plan</i>	Section 5.7.2 (Greenhouse Gas Emissions, Related Regulations. Local) Section 5.9.2 (Hydrology and Water Quality, Related Regulations) Section 7.2.3 (Energy Conservation, Local Regulations)
MARB/IPA LUCP	Section 5.8..3 (Hazards and Hazardous Materials, Related Regulations)
MSHCP	Section 5.3.4.44.2 (Biological Resources, Related Regulations, MSHCP and Ordinance No. 6709 – MSHCP Fee Program Ordinance)
Park and Recreation Master Plan	Section 5.15.2 (Recreation, Related Regulations)
<i>Riverside Restorative Growthprint</i>	Section 5.7.2 (Greenhouse Gas Emissions, Related Regulations. Local)
SCBPSP	Section 3.1.2 (Project Description, Specific Plans in the Project Area) Appendix M
Stephen's Kangaroo Rat Habitat Conservation Plan	Section 5.4.2 (Biological Resources, Related Regulations)
<i>Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat Management Plan and Updated Conceptual Development Plan</i>	Section 3.1.2 (Project Description, Specific Plans in the Project Area) Section 5.4.2 (Biological Resources, Related Regulations) Section 5.8.2 (Hazards and Hazardous Materials, Related Regulations) Section 5.15.2 (Recreation, Related Regulations)
TUMF	Section 5.8.4.216.2 (Transportation/Traffic, Related Regulations, Western Riverside County Transportation Uniform Mitigation Fee)

The Project does not entail the construction of new housing or the need for replacement housing; thus no discussion of any housing plan is required.

### 6.5.1 Southern California Association of Governments' Regional Transportation Plan and Compass Growth Visioning

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization for Ventura, Los Angeles, Orange, Riverside, San Bernardino, and Imperial counties and is charged by the federal government to research and prepare plans for transportation, growth management, hazardous waste management, and air quality. SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375.

As recommended in SCAG's comment letter in response to the NOP (Appendix A), **Table 6-B – Proposed Project Consistency with the 2016 RTP/SCS Goals**, presents a side by side comparison of the 2016 RTP/SCS Goals and a discussion regarding the Project's consistency, non-consistency, or non-applicability with each goal.

**Table 6-C – Proposed Project Consistency with the 2016 RTP/SCS Goals<sup>a</sup>**

Goal <sup>b</sup>	Analysis
<p>2016 RTP/SCS Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.</p>	<p><b>Consistent:</b> The Project proposes approximately 1.4 million SF of logistics use in two buildings. The Project site is within the <i>Sycamore Canyon Business Park Specific Plan (SCBPSP)</i>, which is a planned industrial park consisting of approximately 920 acres of industrial and commercial uses and a 480 acre wilderness park (Sycamore Canyon Wilderness Park) within an area encompassing approximately 1,500 acres.</p> <p>The series of circumstances that led to and informed preparation of the <i>SCBPSP</i> included: (i) the <i>SCBPSP</i> area was the only large, undeveloped area of land not previously subject to planning analysis; (ii) this area had been identified as a potentially significant development opportunity for economic revitalization; (iii) the adoption of the Arlington Heights Plan in 1979; (iv) the Southeast Study Area report adopted in 1980; and (v) the Air Installation Compatible Use Zones (AICUZ) (amended in 1979) for March Air Force Base.</p> <p>Specific Project objectives that support 2016 RTP/SCS Goal 1 are:</p> <ul style="list-style-type: none"> <li>• Develop and operate a large format logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.</li> </ul>



Goal <sup>b</sup>	Analysis
	<ul style="list-style-type: none"> <li>• Develop and operate a large format logistics center that is in close proximity to March Inland Port, State Route 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic disruption to residential areas within the City and neighboring jurisdictions.</li> <li>• Develop and operate a large format logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.</li> <li>• Maximize efficient goods movement throughout the region by locating a large format logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.</li> <li>• Develop and operate a large format logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.</li> <li>• Implement the <i>Sycamore Canyon Business Park Specific Plan</i> through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.</li> <li>• 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 <i>Sycamore Canyon Business Park Specific Plan</i> area for a large format logistics center.</li> <li>• 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.</li> </ul>
<p>2016 RTP/SCS Goal 2: Maximize mobility and accessibility for all people and goods in the region.</p>	<p><b>Consistent:</b> The Project proposes a logistics center within the <i>SCBPSP</i> on a site that has been designated for industrial uses since 1984. The <i>SCBPSP</i> is strategically located in close proximity to State Route 60 and Interstate 215, which provide good access to the Ports of Long Beach and Los Angeles.</p>
<p>2016 RTP/SCS Goal 5: Maximize the productivity of our transportation</p>	

Goal <sup>b</sup>	Analysis
system.	
.2016 RTP/SCS Goal 3: Ensure travel safety and reliability for all people and goods in the region.	<b>Not-Applicable.</b> Monitoring regional transportations systems is beyond the scope of the proposed Project, which is a logistics center and outside the authority of the Project proponents. However, the Project does not include any component that would impede the attainment of this goal.
2016 RTP/SCS Goal 4: Preserve and ensure a sustainable regional transportation system.	<b>Not-Applicable.</b> Preserving and ensuring a sustainable regional transportation system is beyond the scope of the proposed Project and outside the authority of the Project proponents. However, the Project does not include any component that would impede the attainment of this goal.
2016 RTP SCS Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). .	<p><b>Consistent:</b> The impact on the environment as a result of Project implementation has been analyzed in this Draft EIR pursuant to CEQA. Mitigation measures, as appropriate, have been identified to reduce air quality impacts to the maximum extent practicable.</p> <p>To encourage active transportation the Project will:</p> <ul style="list-style-type: none"> <li>• Provide short-term and long-term bicycle parking per the Cal Green Code Sections 5.710.6.2.1 and 5.710.6.2.2, respectively.</li> <li>• Designate 10 or more vehicular parking spaces per CalGreen Code Section 5.710.6.3 for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles as shown in Table 5.106.2.2 of CalGreen Building Code Division 5.1.</li> </ul> <p>Additionally, the Building Operator will support and encourage ridesharing and transit for the construction crew.</p> <p>The Project proposes parking and a trail across the southern portion of the Project site to the Sycamore Canyon Wilderness Park, which is a popular location for mountain biking and hiking.</p>
2016 RTP SCS Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	<p><b>Consistent:</b> The Project is located in the City of Riverside and will receive electricity from Riverside Public Utilities (RPU). RPU has the following incentive programs in place that may be used by the Project.</p> <ul style="list-style-type: none"> <li>• Air Conditioning Incentives – rebates for replacement of energy efficient AC units.</li> <li>• Energy Star Appliances – rebates for purchase of Energy Star rated refrigerators, dishwashers, commercial clothes washers, solid door refrigerator/freezers, ceiling fans and</li> </ul>

Goal <sup>b</sup>	Analysis
	<p>televisions.</p> <ul style="list-style-type: none"> <li>• Lighting Incentive – rebates for kWh savings on installation of more energy efficient lighting and controls.</li> <li>• Tree Power – rebates for purchase and planting of up to 5 qualifying shade trees per year.</li> <li>• Weatherization – rebates for installation of insulation, window film and cool roofs.</li> <li>• Performance Based Incentive – rebates for customers who can demonstrate a kWh savings based on custom energy-efficiency measures.</li> <li>• Commercial Food Service Program – This program is specifically targeted to commercial food service customers such as restaurants, hospitality providers, institutional, medical/hospital customers, schools and government customers. The program is offered in conjunction with Southern California Gas Company and provides customers with a comprehensive facility audit offering recommendations on specific energy efficiency measures, estimated return on investment and applicable utility incentives.</li> <li>• Key Account Energy Efficiency Program (KEEP) – This program is targeted to RPU’s largest Time of Use Customers. This customer segment includes the top 300 RPU customers in terms of consumption. KEEP is intended to provide these Key Account customers with a comprehensive energy efficiency plan including a priority list of recommended energy efficiency measures along with an estimated return on investment and applicable utility incentives. RPU is also working with Southern California Gas Company on this program. Customers are also offered additional technical and contracting assistance to bring large energy efficiency projects from concept to completion.</li> <li>• Custom Energy Technology Grants – Grants are awarded for research, development, and demonstration of energy efficiency and renewable energy projects that are unique to the business or manufacturing process and can demonstrate energy savings, demand reduction or renewable power generation.</li> <li>• Energy Innovation Grants – Grants are available to public or private universities within RPU’s service territory for the purpose of research, development and demonstration of energy efficiency, renewable energy, energy storage,</li> </ul>

Goal <sup>b</sup>	Analysis
	<p>strategic energy research and electric transportation.</p> <ul style="list-style-type: none"> <li>• Upstream HVAC Rebate Program – This program offers a rebate incentive for commercial high efficiency HVAC equipment purchases that exceed Title 24 requirements. The incentive is provided upstream at the wholesale distribution channel level, thereby encouraging distributors to stock and sell more efficient HVAC equipment.</li> <li>• Energy Management Systems – rebates for the purchase and installation of energy management systems for monitoring and controlling facility energy load.</li> <li>• New Construction and LEED construction Incentives – rebates for energy savings exceeding Title 24 standards for new construction projects pre-approved by Riverside Public Utilities.</li> <li>• Premium Motor Incentives – rebates for the purchase of premium high efficiency electric motors.</li> <li>• Solar Rebate Program (SB 1) – RPU continues to promote residential and commercial participation in its solar rebate program to reduce peak load and offset customer electricity bills. In support of Senate Bill 1 (SB1) RPU has allocated rebates funds for solar annually through December 31, 2016 for customer installed systems.</li> </ul> <p>The Project will meet or exceed all applicable standards under California’s Green Building Code (CalGreen) and Title 24. This will be accomplished by incorporating, at a minimum, the following sustainability features or other features that are equally efficient:</p> <p><u>Energy Efficiency</u></p> <ul style="list-style-type: none"> <li>• Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.</li> <li>• Design buildings to provide CalGreen Standards with Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, HVAC, lighting, and power systems. Additionally, the architectural expression such as roofs and windows in the buildings will relate to conserving energy.</li> <li>• Install efficient lighting and lighting control systems. Solar or light-emitting diodes (LEDs) will be installed for</li> </ul>

Goal <sup>b</sup>	Analysis
	<p>outdoor lighting. The site and buildings will be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems in buildings. Lighting will incorporate motion sensors that turn them off when not in use.</p> <ul style="list-style-type: none"> <li>• Use trees and landscaping on west and south exterior building walls to reduce energy use.</li> <li>• Install light colored “cool” roofs over office area spaces and cool pavements.</li> <li>• For future office improvement, install energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated.</li> <li>• For future office improvement, refrigerants and HVAC equipment will be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. Ventilation and HVAC systems will be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHREA) standards and/or per California Title 24 requirements.</li> <li>• For future office improvement, implement design features to increase the efficiency of the building envelope (i.e., the barrier between conditioned and unconditioned spaces). This includes installation of insulation to minimize heat transfer and thermal bridging and to limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption.</li> <li>• Provide vegetative or human-made exterior wall shading devices or window treatments for east, south, and west-facing walls with windows.</li> <li>• Incorporate Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.</li> </ul> <p><u>Renewable Energy</u></p> <ul style="list-style-type: none"> <li>• Design buildings to have “solar ready” roofs that will structurally accommodate later installation of rooftop solar panels. Building operators providing rooftop solar panels will submit plans for solar panels prior to occupancy.</li> </ul>

Goal <sup>b</sup>	Analysis
	<p><u>Water Conservation and Efficiency</u></p> <ul style="list-style-type: none"> <li>• Create water-efficient landscapes in compliance with the City’s Water Efficient Landscape and Irrigation Ordinance 19.570.</li> <li>• Surface parking lots will be landscaped in accordance with City standards to reduce heat island effect.</li> <li>• Install water-efficient irrigation systems and devices, such as soil moisture based irrigation controls and sensors for landscaping according to the City’s Water Efficient Landscape and Irrigation Ordinance 19.570, which complies with the California Department of Water Resources Model Efficient Landscape Ordinance.</li> <li>• Design buildings to be water-efficient. Install water-efficient fixtures and appliances (e.g., EPA WaterSense labeled products).</li> <li>• Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.</li> <li>• Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.</li> </ul> <p><u>Solid Waste Measures</u></p> <ul style="list-style-type: none"> <li>• Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).</li> <li>• Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.</li> <li>• The property operator will provide readily available information provided by the City for employee education about reducing waste and available recycling services.</li> </ul> <p><u>Transportation and Motor Vehicles</u></p> <ul style="list-style-type: none"> <li>• Limit idling time for commercial vehicles to no more than five minutes.</li> <li>• Provide up to three electric vehicle charging facilities to encourage the use of low or zero-emission vehicles.</li> <li>• Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience.</li> <li>• Provide facilities that encourage bicycle commuting</li> </ul>

Goal <sup>b</sup>	Analysis
	<p>(e.g., locked bicycle storage or covered or indoor bicycle parking) consistent with City code requirements.</p> <ul style="list-style-type: none"> <li>The Building Operator will support and encourage ridesharing and transit for the construction crew.</li> </ul> <p><u>On-Site Equipment and Loading Docks</u></p> <ul style="list-style-type: none"> <li>The Project will require building operators (by contract specifications) to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities will post signs requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes.</li> </ul> <p><u>Construction</u></p> <ul style="list-style-type: none"> <li>Require Construction Equipment to Turn Off When Not in Use.</li> <li>Use locally produced and/or manufactured building materials for at least 10% of the construction materials used for the project.</li> <li>Use “green” building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. .</li> </ul>
<p>2016 RTP/SCS Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>Not-Applicable:</b> Encouraging land use and growth patterns beyond the scope of the proposed Project and the authority of the Project proponents The Project site is within the SCBPSP and has been planned for industrial uses since 1984. The SCBPSP is strategically located in proximity to State Route 60 and Interstate 215.</p>
<p>2016 RTP/SCS Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p><b>Not-Applicable.</b> Maximizing the security of the regional transportation system is beyond the scope of the proposed Project and the authority of the Project proponents. However, the Project does not include any component that would impede the attainment of this goal.</p>

<sup>a</sup> SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Sycamore Canyon Business Park Buildings 1 and 2 (SCAG No. IGR8578), prepared by Ping Chang, Program Manager II, Land Use and Environmental Planning, September 16. (Appendix A) requested an analysis of the applicable 2012 RTP Goals and Strategies, However, since the 2016 RTP/SCS was adopted subsequent to the SCAG letter, the 2016 RTP/SCS Goals are evaluated in this table.

<sup>b</sup> Goals from page 64 of the 2016 RTP/SCS.

## 6.6 References

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- 2010 NAIOP NAIOP Research Foundation, *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010. (Available at <http://www.naiop.org/en/Research/Our-Research/Reports/Logistics-Trends-and-Specific-Industries.aspx>, accessed July 5, 2016.)
- 2015 UWMP Western Municipal Water District, *2015 Urban Water Management Plan*, June 2016. (Available at <http://www.wmwd.com/215/Urban-Water-Management-Plan>, accessed June 29, 2016)
- 2016 RTP/SCS Southern California Association of Governments, *The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*, April 2016. (Available at <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>, accessed July 5, 2016.)
- 2016 RTP/SCS DPEIR Southern California Association of Governments, *Draft Program Environmental Impact Report, State Clearinghouse # 2015031035, for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, December 2015. (Available at [http://scagrtpscs.net/Documents/2016/peir/draft/2016dPEIR\\_Complete.pdf](http://scagrtpscs.net/Documents/2016/peir/draft/2016dPEIR_Complete.pdf), accessed July 5, 2016.)
- AQ Report Yorke Engineering, *Sycamore Canyon Business Park Warehouse CalEEMod Emissions Estimates, LST Analysis, and Screening HRA*, revised June 2016. (Included as Appendix B.1)
- CGC 51104 State of California, *California Government Code*. (Available at <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=51001-52000&file=51100-51104>, accessed November 5, 2015)
- DOC FMMP California Department of Conservation, *Important Farmland Categories*. (Available at [http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map\\_categories.aspx](http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx) accessed May 11, 2016.)
- EDD State of California Employment Development Department Labor Market Information Division, *Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA) (Riverside and San Bernardino Counties)*. June 17, 2016. (Available at [http://www.calmis.ca.gov/file/lfmonth/rive\\$pd.pdf](http://www.calmis.ca.gov/file/lfmonth/rive$pd.pdf), accessed July 5, 2016.)



- GP 2025 City of Riverside, *General Plan 2025*, certified November 2007 with subsequent amendments to various elements. (Available at <http://www.riversideca.gov/planning/gp2025program/general-plan.asp>, accessed June 29, 2016.)
- GP 2025 FPEIR City of Riverside, *General Plan 2025 Program Environmental Impact Report* (SCH# 2004021108), certified November 2007. (Available at <http://www.riversideca.gov/planning/gp2025program/>, accessed June 29, 2016)
- GP 2025 FPEIR, Appendix I City of Riverside, *General Plan 2025 Program Environmental Impact Report* (SCH# 2004021108), *Appendix I Designated Farmland Table and Maps*, certified November 2007. (Available at [http://www.riversideca.gov/planning/2008-0909/FPEIR/Volume\\_3/Appendix\\_I.pdf/](http://www.riversideca.gov/planning/2008-0909/FPEIR/Volume_3/Appendix_I.pdf/), accessed June 15, 2016.)
- MARB/IPA LUCP DEIR Riverside County Airport Land Use Commission, *March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan Draft Environmental Impact Report*, SCH #2013071042, August 2014. (Available at <http://www.rcaluc.org/Portals/0/PDFGeneral/plan/2014/Draft%20EIR%20for%20March%20ALUCP.pdf>, accessed July 26, 2016.)
- MARB/IPA LUCP Riverside County Airport Land Use Commission, *March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan*, adopted November 13, 2014. (Available at <http://www.rcaluc.org/filemanager/plan/new//17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf>, accessed June 30, 2016.)
- MSHCP Riverside County Transportation & Land Management Agency, *Western Riverside County Multiple Species Habitat Conservation Plan*. Volume One. (Available at [http://wrc-rca.org/Permit\\_Docs/mshcp\\_vol1.html](http://wrc-rca.org/Permit_Docs/mshcp_vol1.html), accessed July 1, 2016.)
- MV LHMP City of Moreno Valley, *Local Hazard Mitigation Plan*, October 4, 2011. (Available at [http://www.moreno-valley.ca.us/city\\_hall/departments/fire/pdfs/hazmit-plan-1011.pdf](http://www.moreno-valley.ca.us/city_hall/departments/fire/pdfs/hazmit-plan-1011.pdf), accessed July 3, 2016.)
- MVGP City of Moreno Valley, *City of Moreno Valley General Plan*, July 11, 2006. (Available at [http://www.moreno-valley.ca.us/city\\_hall/general-plan/06gpfinal/gp/gp-tot.pdf](http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf), accessed July 2, 2016.)

- MVGP FPEIR City of Moreno Valley, *Final Program Environmental Impact Report, City of Moreno Valley General Plan* (SCH# 20091075), Volume I, July 2006. (Available at [http://www.moreno-valley.ca.us/city\\_hall/general-plan/06gpfinal/ieir/eir-tot.pdf](http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/ieir/eir-tot.pdf), accessed July 2, 2016.)
- MVMC City of Moreno Valley *Municipal Code*, May 2016. (Available at <http://qcode.us/codes/morenovalley/>, accessed July 2, 2016.)
- PRC 12220 State of California, *Public Resources Code Section 1220*. (Available at <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=12001-13000&file=12220>, accessed November 5, 2015.)
- PRC 4526 State of California, *Public Resources Code Section 4526*. (Available at <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=04001-05000&file=4521-4529.5>, accessed November 5, 2015.)
- SCA Draft MND City of Riverside Community Development Department Planning Division, *Draft Mitigated Negative Declaration, P13-0553, P13-0554, P13-0583, and P14-0065*. July 3, 2014. (Available at [http://www.riversideca.gov/ceqa/planning/P13-0553\\_0554\\_0583-P14-0065%20Initial%20Study.pdf](http://www.riversideca.gov/ceqa/planning/P13-0553_0554_0583-P14-0065%20Initial%20Study.pdf), accessed July 5, 2016.)
- WEBB Albert A. Webb Associates *Revised Traffic Impact Analysis, Sycamore Canyon Industrial Buildings 1 & 2 (P14-1072)*, May 2016. (Appendix J)