Comment Letter 1 – Rincon Band of Luiseño Indians

RINCON BAND OF LUISEÑO INDIANS
Cultural Resources Department
1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2635 Fax:(760) 749-2639

1

August 10, 2016

Patricia Brenes
City of Riverside
Community & economic Development Department
3900 Main Street
Riverside, C 92522

Re: SCBP Buildings 1 & 2 Project

Dear Ms. Brenes:

1-A

This letter is written on behalf of Rincon Band of Luiseño Indians. We have received your notification regarding the SCBP Buildings 1 & 2 Project we thank you for the consultation notification. The location you have identified is within the Territory of the Luiseño people.

Embedded in the Luiseño Territory are Rincon's history, culture and identity. The project is within the Luiseño Aboriginal Territory of the Luiseño people however, it is not within Rincon's Historic Boundaries. We do not have any additional information regarding this project but, we defer this project to the Pechanga Band of Luiseño Indians or Soboba Band of Luiseño Indians who are located closer to your project area.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Bo Mazzetti, Tribal Chairman · Stephanie Spencer, Vice Chairwoman · Steve Stallings, Council Member · Laurie E. Gonzalez, Council Member · Alfonso Kolb, Council Member

Response to Comment Letter 1 – Rincon Band of Luiseño Indians

Response to Comment 1-A:

The City appreciates the Rincon Band of Luiseño Indians' review of the Draft Environmental Impact Report (DEIR). The City received Rincon Band of Luiseño Indian's letters dated December 14, 2015 and January 25, 2016 indicating deferral to the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians, and these tribes were notified of the deferral. The City engaged in consultation with the Pechanga Band of Luiseño Indians, the Soboba Band of Luiseño Indians, and the Morongo Band of Mission Indians pursuant to Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18). (DEIR, pp. 5.5-18–5.5-20.) The consultation process included meetings, conference calls, on-site visits (by representatives of the Pechanga Band of Luiseño Indians and Morongo Band of Mission Indians), review of the *Cultural Resources Assessment of the Sycamore Canyon Business Park Buildings 1 & 2, Riverside County, California* (included as Appendix D.1 of the DEIR) and the confidential results of the records search. As a result of the consultation process, the following mitigation measures will be implemented to reduce impacts to tribal cultural resources to less than significant: (DEIR, pp. 5.5-31–5.5-33.)

> **MM CR 1:** Prior to grading permit issuance: If there are any changes to project site design and/or proposed grades, the Applicant shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant and interested tribes to discuss the proposed changes and to review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project. The Applicant will make all attempts to avoid and/or preserve in place as many as possible of the cultural resources located on the project site if the site design and/or proposed grades should be revised in consult with the City. In specific circumstances where existing and/or new resources are determined to be unavoidable and/or unable to be preserved in place despite all feasible alternatives, the developer shall make every effort to relocate the resource to a nearby open space or designated location on the property that is not subject to any future development, erosion or flooding.
>
> **MM CR 2:** Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.
>
> 1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include:

a. Project grading and development scheduling;

b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists;

c. Plan for the controlled grading within 50 feet of the boundaries of CA-RIV-8750, CA-RIV-8751 and CA-RIV-8752. Grading within 50-feet of these sites shall be conducted using controlled grading techniques. Large indiscriminate grading equipment shall not be used, and the controlled grading technique shall be reviewed by the Project Archaeologist, in consultation with interested tribes, the Developer and the City. The Project Archaeologist and Native Tribal Monitors shall ensure that the grading efforts in these areas are conducted in a manner that allows for the identification of subsurface cultural resources. Any resources observed shall be addressed in accordance with Mitigation Measure CR 3;

d. The determination by the project archaeologist, Developer, City and Native American Tribal Monitors as to which features of sites CA-RIV-8750, CA-RIV-8751 and CA-RIV-8752 can be successfully relocated to locations onsite that will be mutually agreed upon. The relocated features will be placed in an area that will be preserved in perpetuity, so that no future disturbances will occur;

e. The protocols and stipulations that the Developer, City, Tribes and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;

f. The 3D modeling on all the sites located within the Project site, specifically in Areas 1 (CA-RIV-8750), 2 (CA-RIV-8751), and 3 (CA-RIV-8752), as delineated on the Site Plan attached to the Archaeological Monitoring Plan shall take into account the potential impacts to undiscovered buried archaeological and cultural resources and procedures to protect in place and/or mitigate such impacts;

g. The location of the Cottonwood Tree requested by the Morongo Band of Mission Indians for their tribal requirements shall be noted on the Archaeological Monitoring Plan. The Monitoring Plan shall

address the timing of the removal of the tree by the Morongo Band of Mission Indians and transfer of the tree to them; and

h. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure CR 4.

MM CR 3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the Project Archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and
2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
    a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
    b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
    c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default;
    d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted

to the City documenting monitoring activities conducted by the Project Archaeologist and Native American Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes;

e. Information on the location of up to 13 protein residue tests on the site and one or more control sites will be provided in the final report.

MM CR 4: Cultural Sensitivity Training: The County certified Archaeologist and Native American Monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report. (DEIR, pp. 5-33–5-36.)**.**

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 2 – SoCalGas

2

SoCalGas
A Sempra Energy utility

Estefania Sanchez
Program Assistant 3

9400 Oakdale Blvd
Chatsworth, CA 91311

ESanchez5@semprautilities.com

August 15, 2016

City of Riverside
Community & Economic
Development Department

Email: Patricia Brenes - pbrenes@riversideca.gov

Subject: Notice of Availability of a Draft Environmental Impact Report
Sycamore Canyon Business Park Buildings 1 and 2 State Clearinghouse No. 2015081042

DCF: 1299-16NC953

2-A

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

To assure no conflict with the **Southeast** Distribution's pipeline system, please contact them at (714) 634-5067.

Sincerely,

Estefania Sanchez
Program Assistant 3
ESanchez5@semprautilities.com

Response to Comment Letter 2 – SoCalGas

Response to Comment 2-A:

The City appreciates SoCal Gas' review of the Draft Environmental Impact Report (DEIR) and notes that there are no facilities within the Project Site.

The Applicant has contacted the Southeast Distribution Division of SoCalGas and received confirmation from SoCalGas[1] that the Project will not conflict with SoCalGas' existing pipeline facilities in the area and, as such, no changes are needed to the proposed Project.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

[1] Confirmation was provided via email from Randolph Darnell on November 9, 2016.

Comment Letter 3 – Jeffrey and Lauri Pitcher

3-1

Jeffrey and Lauri Pitcher
1512 Stockport Drive
Riverside, CA 92408
909-936-2973

Patricia Brenes, Principal Planner
Community & Economic Development Department
Planning Division
3900 Main Street, Third Floor
Riverside, CA 92522

Good Morning Ms. Brenes,

I'm writing in response to the Draft Environmental Impact Report (DEIR) which was prepared regarding the proposed Sycamore Canyon Business Park project.

3-A

I am not an engineer and certainly no expert in reading these reports. However it does seem that there are multiple areas in which the EIR points out significant adverse environmental impacts that cannot be mitigated.

Our home backs up right against the northern property line of the proposed Building 2. Our address is 1512 Stockport Drive. Considering how unbelievably close to homes the project adjacent to us was approved and built, I am very concerned about the possibility of this second, and much larger project being approved.

3-B

Honestly, we need to decide soon whether we need to sell our house. I really don't want to move. I love our home, our backyard and this neighborhood. However, if this 1.4 million square foot project is allowed to be built 60 feet from our property line as proposed, we would have no choice, in order to maintain our outdoor quality of life. After purchasing this home new in 1998, we have finally completed improvements to our backyard where friends and family gather often, only to find out the quality of life of this entire street and surrounding neighborhoods could be compromised by factors such as noise, lighting and pollution. I can't believe or understand why it has to be built so close to the residential property lines.

I am aware of the City of Riverside Good Neighbor Guidelines adopted October 14, 2008. I would hope that this was adopted in a true attempt to maintain balance and compromise, and maintain quality of life for the City's residences. At the time I would've also assumed that this means the City of Riverside really cares about its residents. I've lived in this city since I was 18 months old and love it here, and don't want to think that residents' concerns are discarded that easily. It seems that this document was adopted specifically for projects such as these to suggest that these projects should be designed so as to minimize the negative effects on residential neighborhoods. I don't see how allowing a building such as this 60 feet from our back fence is adhering to these guidelines. How seriously will these guidelines be considered in this approval process?

3-C

3-2

Needless to say I am concerned not just about the quality of life for the neighborhood but also the potential loss in property values. If this is allowed to happen, I can see this turning into a neighborhood full of nothing but low-end rentals, since no one else will want to live here, with a daunting, loud warehouse facility literally looming right on top of them. There are many high-end homes in the neighborhoods immediately surrounding this Fair Isle/Lochmoor area that could also potentially be affected by a downgrade in this neighborhood. This area has become a great place for new and growing families in Riverside. It would be a shame so see it go downhill. 3-D

On another note, the truck traffic is already prohibitive at certain times of the day on Sycamore Canyon Blvd and this would only make it worse. 3-E

I'm a CPA in the area and am all for economic development. However, I think everyone in the city would agree that the project down the street was NOT approved with a reasonable set-back and is honestly disrespectful to the residents who live right there. It is almost a disgrace that the city allowed this to happen. In your approval process, PLEASE, if approved at all which would be a mistake in itself, at least consider approving the project with a reasonable set-back from all the surrounding neighborhoods and possibly reducing the size of the project. 3-F

I would urge that you, Mayor Bailey, and Mr.Melendrez take 30 minutes out of your day and drive to Stockport Dr and you'll see what I am concerned about. I think if you lived here, you would feel the same. 3-G

Please note that I am very generally easy going, go with the flow, positive thinker hoping for the best, etc. and definitely not one to make waves or complain, but this I cannot let go without speaking up.

Thank you for your consideration and response.

Sincerely,

Jeffrey and Lauri K. Pitcher

Response to Comment Letter 3 – Jeffrey and Lauri Pitcher

Response to Comment 3-A:

As discussed in detail throughout Section 5.0 – Environmental Impact Analysis of the Draft Environmental Impact Report, the proposed Project will result in Project-specific or cumulatively significant unavoidable impacts to air quality (operations), noise (construction and operation), as well as transportation and traffic. (DEIR, pp. 1-21–1-28, 1-44–1-49, 1-51, 1-56–1-57, 5.3-30-5.3-31, 5.3-35, 5.3-40, 5.12-24, 5.12-28, 5.12-34, 5.12-44, 5.12-48, 5.16-35, 5.16-48, 5.16-52, 5.16-53, 5.16-57, 6-10, 6-19.) Thus, a Statement of Overriding Considerations, as allowed by State California Environmental Quality Act (CEQA) Guidelines Section 15093, will be required should the City choose to approve the Project. (DEIR, pp. 1-21–1-28, 1-44–1-49, 5.3-30–5.3-31, 5.3-40.)

Specifically, the Draft Environmental Impact Report (DEIR) discloses that the Project will have significant unavoidable impacts with regard to:

Air Quality: NO_x (oxides of nitrogen) emissions of 325.95 lbs/day (summer) and 339.39 lbs/day (winter) during Project operation will exceed the South Coast Air Quality Management District (SCAQMD) threshold of 55 lbs/day. (DEIR, p. 5.3-26.)

Noise: Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. Operational noise of up 52 dBA L_{eq} (without mitigation) will exceed the City's nighttime exterior standard for residential property of 45 dBA L_{eq} for certain sensitive receptors west of the Project site. (DEIR, pp. 5.12-28, 5.12-34.) See Response to Comment 3-B for a discussion regarding noise impacts at 1512 Stockport Drive. On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code. Pursuant to this new Ordinance, the construction noise from the Project would not have resulted in a significant impact.

Transportation/Traffic: Project traffic will contribute to an exceedance of level of service (LOS) at the following freeway segments that are within Caltrans jurisdiction:

- I-215 Northbound off-ramp at Eastridge-Eucalyptus during the PM peak hour for the Existing plus Ambient Growth plus Project condition. (DEIR, pp. 5.16-45– 5.16-47.)
- I-215 Northbound on-ramp at Fair Isle-Box Springs during the AM and PM Peak hours for the Existing plus Ambient Growth plus Cumulative Development plus Project condition (Cumulative).

It is worth noting that the Level of Service ("LOS") will be exceeded at these ramps as a result of ambient growth and cumulative development, i.e., without the Project. (DEIR, pp. 5.16-45–5.16-47.)

Since the DEIR discloses the Project's significant and unavoidable impacts, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-B:

The Project as originally submitted and presented at the August 26, 2015, scoping meeting for the DEIR, proposed two buildings totaling 1.43 million square feet (SF) with the northern building (Building 2) setback 60 feet from the northerly property line. (DEIR, Figure 8-1 – Original Project.) As discussed on page 8-3 of the DEIR, during preparation of the DEIR, the Project Applicant received feedback from the City encouraging additional setback and landscaping along the northern portion of the Project site and a reduction in the size of Building 2. As a result, the proposed Project was revised by the Project Applicant so that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site, including the residence located at 1512 Stockport Drive referenced in this comment. The proposed Project's 100 foot setback between the northern property line and Building 2 includes 64 feet of landscaping (abutting the residential properties), a 30-foot wide drive aisle (vehicles only, no trucks) and an additional 6-foot wide landscape area (abutting Building 2). (DEIR, p. 3-35, **DEIR Figure 3-10 – Proposed Site Plan, DEIR Figure 3-11 – Conceptual Landscape Plan**.)

If the reference to the "project adjacent to us was approved and built" is referring to the CT Sycamore Center Project on Dan Kipper Drive, those buildings were constructed 50 feet south of the residential property line. Building 2 of the proposed Project would be twice as far away (100 feet) and includes 64 feet of landscaping between the property line and the drive aisle. The CT Sycamore Center Project is separate and independent from the proposed Project and was previously approved by the City following the requisite public hearing and environmental review. The existence of this warehouse is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections of the DEIR.

With regard to noise impacts, as discussed in DEIR Section 5.12 – Noise, a detailed noise impact analysis was prepared for the proposed Project. (See Appendix I to the DEIR.) Because of the topographical differences between the Project site and certain sensitive receptors, the noise impact analysis utilized the SoundPLAN Noise Model. The SoundPlan model considers differences in topography between a noise source and a receptor and allows for noise impacts to be evaluated at individual locations. The residence at 1512 Stockport Drive is Receptor No. 18 as shown on **DEIR Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation, DEIR Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**, **DEIR Figure 5.12-7 Back Up Beeper Operational Noise Levels (Lmax) with No Mitigation, DEIR Figure 5.12-8 – Dock Areas Operation Noise Levels (Leq) with No Mitigation**. As shown in each of these

figures, Project-related operational noise will not exceed the City standards at Receptor No. 18 or any of the residences north of the Project site. With regard to construction noise, as shown in **DEIR Figure 5.12-3 – Worst Case Construction Noise Scenario (Leq) with No Temporary Barrier and DEIR Figure 5.12-4 – Worst Case Construction Noise Scenario (Leq) with 12-Foot High Temporary Barrier**, construction noise in the vicinity of 1512 Stockport Drive will range between 60-65 dBA. (DEIR, pp. 5.12-21–5.12-34.) Additionally, the Project will comply with Section 7.35.010 of the Riverside Municipal Code, which prohibits construction, drilling, repair, alteration, grading, or demolition work that would result in sound creating a noise disturbance across a residential or commercial property line between the hours of 7:00 p.m. and 7:00 a.m. on week days, between 5:00 p.m. and 8:00 a.m. on Saturdays, and at any time on Sunday or a federal holiday. Compliance with this mandatory requirement would further minimize potential impacts due to construction-related vibration. (DEIR, pp. 5.12-37-5.12-38.)

The Project will introduce new sources of light in the form of security lighting, internal roadway and parking lot lighting within the Project site for public safety and operation of the proposed structures. The proposed lighting at the Project site has been designed in accordance with all applicable City codes to minimize spillover. Impacts with regard to new sources of light and glare were determined to be less than significant through compliance with the City's Zoning Code, mitigation measures **MM AES 10** and **MM HAZ 4**, any other applicable lighting requirements and regulations, and compliance with the Staff Recommended Conditions of Approval listed below: (DEIR, pp. 5.1-29–5.1-31.)

> **MM AES 10**: To reduce light spill and glow into the residential backyards to the north, lighting mounted on the north wall of Building 2 shall be placed on this wall as low as feasible to provide the required security lighting. (DEIR, p. 5.1-36.)
>
> **MM HAZ 4:** The following additional MARB-required risk-reduction Project design features shall be incorporated into Project design:
>
> - The Project will not include:
>   - Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light, visual approach slope indicator, or FAA-approved obstruction lighting;
>   - Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport;
>   - Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area;

- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation; or
- Although such uses are not anticipated, in Building 1: Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, places of assembly, noise sensitive outdoor nonresidential uses and hazards to flight are prohibited.

o Any outdoor lighting that is installed will be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. All outdoor lighting will be downward facing;

o March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result;

o No skylights will be included;

o Exterior walls will consist of 8-inch-thick solid grouted, 4-hour rated concrete masonry;

o Building roof will consist of structural steel columns and steel roof structure framing elements, including structural steel decking;

o Use of windows will be limited to only the structures' main entrances;

o The structure will incorporate an enhanced fire sprinkler system to exceed California Fire Code requirements; and

o The structure will include emergency exits that exceed the exit requirements set forth by the Riverside County Fire Code by approximately 15 to 20 percent.

o The applicant will not propose any uses prohibited or discouraged in Compatibility Zones C1 or D. (DEIR, p. 5.1-36.)

With regard to lighting and the height of any light poles adjacent to the residences to the north, Staff Recommended Condition of Approval 20 requires:

> An exterior lighting plan shall be submitted to Design Review staff for review and approval. A photometric study and manufacturer's cut sheets of all exterior lighting on the building, in the landscaped areas and in the parking lot shall be submitted with the exterior lighting plan. All on-site lighting shall provide a minimum intensity of one foot-candle and a maximum of ten foot-candles at ground level throughout the areas serving the public and used for parking, with a ratio of average light to minimum light of four to one (4:1). The light sources shall be hooded and shielded to minimize off-site glare, shall not direct light skyward and shall be directed away from adjacent properties, and public rights-of-ways. No light spill shall be permitted on the MSHCP Conservation Area (Sycamore Canyon Wilderness Park). If lights are proposed to be mounted on buildings, down-lights shall be utilized. Light poles shall not exceed fourteen (14)

feet in height ~~twenty feet (20)~~ in height, including the height of any concrete or other base material within the 100-foot setback between Building 2 and the residential properties ~~adjacent~~ to the north ~~property line~~ and shall not exceed 20 feet in height, including the height of any concrete or other base material, elsewhere on the property.

For the reasons set forth above, impacts with regard to Project lighting will be less than significant with mitigation. (DEIR, p. 5.1-31.)

With regard to pollution, as discussed in Response to Comment 3-A, Oxides of Nitrogen (NO_x) emissions during Project operation will exceed the South Coast Air Quality Management District (SCAQMD) threshold of 55 lbs/day. (DEIR, p. 5.3-26.) The predominant source of air emissions expected to be generated by the proposed Project is vehicle emissions. Motor vehicles primarily emit Carbon Monoxide (CO), NO_X, and Volatile Organic Compounds (VOC) Reactive Organic Gases (ROG) and Hydrocarbons (HC). (DEIR, p. 5.3-4.) Mobile air pollution sources, including motor vehicles, are regulated by the California Air Resources Board (CARB). CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. (DEIR, p. 5.3-11.) Because the Project is expected to exceed the SCAQMD threshold for NO_x, the Project will be required to implement mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19**, as well as additional mitigation measures **MM AQ 22** through **MM AQ 25**) below: (DEIR, p. 5.3-30.)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored “cool” roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building

permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to five minutes or less pursuant to Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the CARB diesel idling regulations, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

b) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment. (DEIR, pp. 5.3-35–5.3-39.)

Although there will be significant and unavoidable impacts related to air pollution and noise, even with feasible mitigation incorporated, the City has discretion to approve a Statement of Overriding Considerations and move forward with the Project. Section 15093(a) of the State CEQA Guidelines requires the City to balance, as applicable, the economic, legal, social, technological, or other benefits, of the proposed Project against its unavoidable environmental risks in determining whether to approve the Project. If these benefits outweigh the unavoidable adverse environmental effects, the City may consider the adverse environmental effects to be acceptable.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-C:

The City adopted the *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72.) Because each individual Project and property has different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, the *Good Neighbor Guidelines* recommend that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. The HRA should indicate how the project can be designed to limit health risks. A HRA was prepared in June 2016 (included in Appendix B of the DEIR) and a Refined HRA was prepared in November 2016 (included in the Final EIR) to evaluate cancer and non-cancer risks associated with the proposed Project. None of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the proposed Project vicinity (DEIR, pp. 5.3-33 - 5.3-34). According to the Refined HRA, none of the cancer or non-cancer thresholds will be exceeded as a result of Project operation for workers or residents within the Project vicinity. In fact, the estimated maximum cancer risk reduced from 5.3 in one million as reported in the June HRA (DEIR, **Table 5.3-J**) to 1.64 in one million at the nearest residential receptor.,

Therefore, the Project will not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation. The site has also been designed in order to minimize impacts on the adjacent residential area including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

See Response to Comment 3-B, above, regarding the proximity of Building 2 to the residences. Building 2 will be located approximately 100 feet from the residences and separated from the residential area by landscaping and a drive aisle. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-D:

The commenter's concern regarding loss of property values is noted. It is also noted that the commenter does not provide any evidence to support the speculation that the quality of the neighborhood will be degraded and property values reduced if the proposed Project is approved. A comment which draws conclusions without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the

lead agency is obligated to respond to timely comments with "good faith, reasoned analysis" (CEQA Guidelines § 15088(c)). These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, § 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient]).

The DEIR fully addresses and compares the impacts associated with the proposed Project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, health risk assessment, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR. The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment" (CEQA Guidelines, § 15064(f)(6)). The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. Economic and social impacts of proposed projects, therefore, are outside CEQA's purview" (*Anderson First Coalition v. City of Anderson* [2005] 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)]).

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-E:

Traffic-related impacts will be considered "substantial" if the Project contributes to a LOS D exceedance on a City-maintained intersection within the Project's study area, unless the City determines that LOS E is acceptable per General Plan 2025 Circulation and Mobility Element

Policy CCM-2.3 or if peak-hour delays resulting from Project traffic conditions exceed the standards set forth in the *City of Riverside Public Works Department Traffic Impact Analysis Preparation Guide.* (DEIR, p. 5.16-27)

The study area of the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA), which is DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in their existing conditions.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA. T

The following scenarios are evaluated in the TIA and discussed in DEIR Section 5.16 – Transportation/Traffic:

- ***Existing plus Project:*** All study area intersections along Sycamore Canyon Boulevard are projected to operate at acceptable levels of service during the peak hours with existing geometrics. Although the LOS at the intersection of Sycamore Canyon Boulevard/Eastridge Avenue will change from LOS C to LOS D, this change is not significant because LOS D is acceptable. (DEIR, pp. 5.16-29 – 5.16-30) Likewise, the Sycamore Canyon Boulevard I-215 SB exit will continue to operate at an acceptable LOS. (DEIR, p. 5.16-31)

- ***Existing plus traffic from 2% ambient growth plus Project:*** None of the study area intersections along Sycamore Canyon Boulevard will experience a change in LOS due to Project traffic under this condition. (DEIR, p. 5.16-33) The Sycamore Canyon Boulevard I-215 SB exit will continue to operate at an acceptable LOS under this condition. (DEIR, Table 5.16-K)
- ***Existing plus ambient plus Project plus traffic from cumulative development projects:*** With the addition of Project related traffic in this condition, only the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive will continue to operate at LOS F. However, in evaluating a project's impact to an intersection operating at LOS F, the City's TIA Guidelines indicate that a peak hour delay of 1.0 seconds is considered unacceptable. The delay attributable to Project traffic is only 0.9 seconds; therefore, cumulative impacts to study area intersections are not significant and no mitigation is required. (DEIR, pp. 5.16-43 – 5.16-44) The Sycamore Canyon Boulevard I-215 SB exit will continue to operate at an acceptable LOS under this condition. (DEIR, Table 5.16-O)

As indicated by the analysis in the DEIR, although the Project will introduce new passenger and truck trips to Sycamore Canyon Boulevard, Project-related traffic will not result in a significant degradation of LOS for this roadway. Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-F:

The commenter's opinion regarding the CT Sycamore Center Project is noted. However, the approval of that project is not the subject of the DEIR. The CT Sycamore Center Project is separate and independent from the proposed Project and was previously approved by the City following the requisite public hearing and environmental review. As discussed in Response to Comment 3-B, the Project has been revised, in part due to the CT Sycamore Center Project, to provide a setback from the adjacent residences to the north that is twice as large.

> The proposed Project has been revised by the Project applicant so that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site, including the residence located at 1512 Stockport Drive referenced in this comment. There is 64 feet of landscaping between the northern property line of Parcel 2 and a 30-foot wide drive isle north of Building 2, and an additional 6-foot wide landscape area between the drive aisle and the building. (DEIR, p. 3-35)

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 3-G:

The comment is noted and the City appreciates the commenter's review of the Project. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Attachment 3.1: Roadway Segment Average Daily Traffic from Appendix C of the TIA

Roadway Segment Average Daily Traffic (not PCE)

Street	From	To						Project Only					Cumulative (2018) Only									
								Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)					
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps						111	4	5	14	134	1515	11	5	14	1545					
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps						336	4	5	14	358	1358	25	13	34	1430					
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive						372	8	10	28	418	1522	30	16	42	1610					
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard						223	4	5	14	246	1505	52	47	120	1724					
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive						223	4	5	14	246	1443	65	54	137	1699					
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue						1120	148	198	526	1992	1419	64	54	136	1673					
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard						820	124	166	444	1554	1187	52	46	116	1401					
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps						820	124	166	444	1554	2228	159	97	243	2727					

Street	From	To	Existing					Existing Plus Project														
			Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)										
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps	12075	410	30	175	12690	12186	414	35	189	12824										
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps	14530	400	25	200	15155	14865	404	30	214	15513										
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	13390	13157	208	110	333	13808										
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	12925	12563	204	95	309	13171										
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	9940	9648	154	40	344	10186										
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	11220	11835	288	258	831	13212										
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard	12300	130	80	600	13080	13120	254	216	1044	14634										
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps	14175	130	35	690	15030	14995	254	201	1134	16584										

Street	From	To	Existing Plus Ambient Growth (2018)					Existing Plus Ambient Growth (2018) Plus Project					Existing Plus Ambient Growth (2018) Plus Cumulative Projects					Existing Plus Ambient (2018) Plus Cumulative Plus Proj				
			Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps	12800	435	32	186	13453	12911	439	37	200	13587	14315	445	37	200	14998	14426	450	42	214	15132
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps	15402	424	27	212	16065	15737	428	32	226	16423	16760	449	40	246	17495	17095	453	45	260	17853
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive	13552	212	105	323	14193	13924	220	116	351	14611	15074	242	122	365	15803	15446	250	132	393	16221
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard	13080	212	95	313	13700	13303	216	100	327	13946	14585	264	142	433	15424	14808	268	147	447	15670
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive	9991	159	37	350	10537	10214	163	42	364	10783	11434	224	91	487	12236	11657	228	96	501	12482
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue	11358	148	64	323	11893	12478	296	262	849	13885	12777	212	118	459	13566	13897	360	316	985	15558
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard	13038	138	53	636	13865	13858	262	219	1080	15419	14225	190	99	752	15266	15045	314	265	1196	16820
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps	15026	138	37	731	15932	15846	262	203	1175	17486	17254	297	134	974	18659	18074	421	300	1418	20213

Comment Letter 4 – Moreno Valley Unified School District

4

Board of Education
Gary E. Baugh
Denise Fleming, Ed.D.
Jesse M. Holanda
Cleveland Johnson
Patrick R. Kelleher
Superintendent of Schools
Judy D. White, Ed.D.

Moreno Valley Unified School District
25634 Alessandro Boulevard
Moreno Valley, California 92553
(951) 571-7500
www.mvusd.net

Our mission is to prepare all students academically and socially to become productive members of society.

August 23, 2016

Ms. Patricia Brenes, Principal Planner
Community & Economic Development
Department, Planning Division
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

SUBJECT: NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT, SYCAMORE CANYON BUSINESS PARK BUILDINGS 1 AND 2 STATE CLEARINGHOUSE NO. 2015081042

Dear Ms.Brenes:

The proposed project, Sycamore Canyon Business Park, is within a two mile radius of two nearby schools, Seneca Elementary and Edgemont Elementary within the Moreno Valley Unified School District. 4-A

Currently, the commercial developer fees are $ .56/Sq.Ft. Please verify with the district prior to obtaining a building permit as these fees are subject to change. If you should have any questions please contact me at (951) 571-7690.

Respectfully,

Alice Grundman
Interim Facilities Director
Facilities Planning & Development Department

rm

Response to Comment Letter 4 – Moreno Valley Unified School District

Response to Comment 4-A:

Comment noted. The northern portion of the Project site, including all of Parcel 2 and a portion of Parcel 1 as shown on Tentative Parcel Map No. 36879, is within the Riverside Unified School District (RUSD) and the southern portion of the Project site, including the balance of Parcel 1, is within the Moreno Valley Unified School District (MVUSD). (Draft Environmental Impact Report (DEIR), p. 5.14-2.) Although the Project is not anticipated to directly or indirectly increase the number of school-aged students within either RUSD or MVUSD, the school facility impact fees in effect at the time of building permit issuance will be paid by the Project developer to both RUSD and MVUSD in accordance with the California Government Code. (DEIR, p. 5.14-8.)

As requested, and as required by California Government Code, the Project developer will verify the current commercial developer fees with MVUSD prior to obtaining a building permit. Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 5 – Roberto Rubini

5

From: Roberto Rubini [mailto:roberto_rubini@yahoo.com]
Sent: Sunday, September 04, 2016 9:37 AM
To: Brenes, Patricia <PBrenes@riversideca.gov>
Subject: [External] Notice of availability of a draft environmental impact report

Sycamore canyon business Park buildings 1 & 2 state clearinghouse # 2015081042

To whom it may correspond.
Of course we don't want anything more built around the Sycamore Canyon area. 5-A
It is depressing to see how the little nature left over is been transformed into a big gray boxes.
Please let me know what I can do to oppose more buildings in the area.

Thank you

Roberto Rubini
1562 Stoneykirk dr
Riverside can 92507

951 452 4319

Sent from Yahoo Mail on Android

Click here to report this email as spam.

Response to Comment Letter 5 – Roberto Rubini

Response to Comment 5-A:

The Project site and surrounding area has been the subject of City planning efforts since the early 1980s, beginning with an economic revitalization study which identified the site as a potentially significant development opportunity in economic revitalization. Accordingly, in 1984 the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) was approved by the City to ensure efficient, orderly, and attractive development of a planned industrial park consisting of approximately 920 acres of industrial and commercial uses and a 480-acre wilderness park. (DEIR, p. 3-6.) The Project site is designated as Industrial in the SCBPSP; therefore, the proposed logistics center Project at this site is consistent with the SCBPSP. (DEIR, p. 5.10-8.) The construction and operation of the proposed Project will not result in a loss of existing or planned natural habitat within the Sycamore Canyon Wilderness Park, as designated by the SCBPSP and *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat and Updated Conceptual Development Plan*. In addition, the Project has been reviewed for compliance with Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). See Section 5.4 – Biological Resources of the Draft Environmental Impact Report (DEIR).

The Project includes Design Review (P14-1081) to ensure that the Project is consistent with the *Citywide Design and Sign Guidelines*, Title 19, Title 17, Chapter 19.710 – Design Review Process and the SCBPSP as well as all applicable City plans and municipal codes. (DEIR, p. 5.1-29.) The Project's grading plan and site plan have been designed to minimize the visibility and aesthetic impacts of Buildings 1 and 2 and to ensure that the buildings are consistent with the visual character of the site's surroundings. (DEIR, pp. 5.1-8 – 5.1-10.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 6 – Maureen Clemens

6

RECEIVED
SEP 16 2015
Community & Economic Development Department

Patricia Brenes, Principal City Planner
Riverside City Hall
3900 Main Street
Riverside, CA 92522

Re: Sycamore Canyon Business Park Buildings 1 and 2
1,012,955 square feet and 362,174 square feet of WAREHOUSES

Dear Ms Brenes:

One needs to know what the obstruction and the new air pollution and noise that will be evident if these buildings go forward as proposed. The traffic is already evident and obtrusive. The noise from the existing warehouses is already a nuisance. 6-A

The developers are lovely people and I am sure the owners of this property are also. I have no quarrel with them, but with you, the City. 6-B

We all know that growth is important, but why can't we strike a balance? Why must these warehouses be so close to residents, who will be looking out on giant walls. Yes they promise greenery that will make it bearable, but that alone will not contain the noise of Semi-Trucks idling and backing up in close proximity to homeowners (property tax payers) back yards. 6-C

Please, think twice before you allow this project to continue. 6-D

Sincerely,
Maureen Clemens
Maureen Clemens
6012 Abernathy Dr.
Riverside, CA 92507

RECEIVED
SEP 1 2015
Community & Economic Development Department

Response to Comment Letter 6 – Maureen Clemens

Response to Comment 6-A:

The Draft Environmental Impact Report (DEIR) analyzed and fully disclosed Project-related impacts to air quality, noise, and traffic, as discussed below. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15, MM AQ 18** and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (DEIR, p. 5.3-27). (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40.) Mitigation Measures AQ-13 and AQ-22 were modified and new text is shown as double underlined and the text to be deleted is shown as ~~strikethrough~~. These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation.

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to threefive minutes or less pursuant to Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

In addition to the Project design features, the following mitigation measures shall be implemented during Project operations to minimize air quality impacts.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement thatCARB diesel idling times cannot exceed three minutesregulations, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

Noise: Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

MM NOI 1: To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or

site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from

the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) The Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below, (DEIR, p. 5.12-46.) to reduce noise from nighttime operations.

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including

providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

Traffic: The *Revised Traffic Impact Analysis, Sycamore Canyon Industrial Buildings 1 & 2,* or TIA, (DEIR Appendix J) was prepared to evaluate the effect of Project-generated traffic on nine local intersections and six freeway on- and off-ramps under the following scenarios.

- Existing (baseline) plus Project (E+P) (2015);
- Existing plus traffic from 2% ambient growth (ambient) plus Project (E+A+P) (2018) with and without improvements; and
- Existing plus ambient plus Project plus traffic from cumulative development projects (E+A+P+C).

All local intersections will operate at an acceptable LOS with Project-generated traffic under each of the above scenarios. (DEIR, pp. 5.16-29–5.16-30, 5.16-33-5.16-34, 5.16-38–5.16-45. 5.16-56–5.16-57.)

With regard to the freeway on- and off-ramps, because the LOS will be exceeded as a result of ambient growth and cumulative development, i.e., without the Project, the Project's contribution is considered significant for the following ramps: (DEIR, pp. 5.16-31–5.16-32, 5.16-34–5.16-48, 5.16-56–5.16-57.)

- I-215 Northbound off-ramp at Eastridge-Eucalyptus during the PM peak hour for the Existing plus Ambient Growth plus Project condition.
- I-215 Northbound on-ramp at Fair Isle-Box Springs during the AM and PM Peak hours for the Existing plus Ambient Growth plus Cumulative Development plus Project condition (Cumulative).

To restore satisfactory operations to the freeway ramps, the Riverside County Transportation Commission (RCTC) I-215 North Project and one mainline mixed flow lane for northbound I-215 at Fair Isle Drive-Box Springs Drive on-ramp are required to be completed. However, because the freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is currently available, Project impacts are considered significant and unavoidable until improvements are funded or constructed with

feasible mitigation and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, pp. 5.16-56–5.16-57.)

Response to Comment 6-B:

This comment, which does not address any environmental issues, is noted.

Response to Comment 6-C:

With regard to Project noise, please refer to Response to Comment 6-A.

With regard to balancing growth, the Project site and surrounding area has been the subject of City planning efforts since the early 1980s, beginning with an economic revitalization study which identified the site as a potentially significant development opportunity in economic revitalization. Accordingly, in 1984, the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) was approved by the City to ensure efficient, orderly, and attractive development of a planned industrial park consisting of approximately 920 acres of industrial and commercial uses and a 480-acre wilderness park. (DEIR, p. 3-6.) The Project site is designated as Industrial in the SCBPSP; therefore, the proposed logistics center Project at this site is consistent with the SCBPSP. (DEIR, p. 5.10-8.) Thus, construction and operation of the proposed Project will not result in a loss of existing or planned natural habitat within the Sycamore Canyon Wilderness Park, as designated by the SCBPSP and *Sycamore Canyon Wilderness Park Stephens' Kangaroo Rat and Updated Conceptual Development Plan*. The proposed distribution center at the Project site is consistent with the vision for the site outlined in the City's General Plan and the *Sycamore Canyon Business Park Specific Plan* (SCBPSP).

With regard to the proximity of the buildings to the adjacent residences, subsequent to the original application submittal, the site plan was revised to reduce the size of Building 2 from 420,604 square feet (SF) to 362,174 SF and increase the setback from the northern property line. (DEIR, pp. 8.3–8-5.) Building 2 is proposed to be located 100 feet south of the northerly property line. Within this 100-foot wide setback there is 64 feet of landscaping, a 30-foot wide drive aisle for use by passenger vehicles only, and an additional 6 feet of landscaping. (DEIR, p. 3-35.) Building 2 does not propose any dock doors (i.e., no cross docks), truck or vehicle parking, or truck movement on the north site of the building, so as to locate these activities away from the Sycamore Highlands Neighborhood and reduce noise from these types of operations. (DEIR **Figure 3-10 – Site Plan**.) The Project's grading plan is designed to minimize visibility of Building 1 and Building 2 from the adjacent neighborhood through the use of site grading and building height differences. (DEIR, p. 5.1-7.) Along the westerly boundary of the Project site, the proposed landscaping and Mitigation Area, range in a combined width from 90 to 120 feet. (DEIR **Figure 5.11 – Conceptual Landscape Plan**)

The Project will also implement mitigation measure **MM AES 1,** which states: (DEIR, pp. 5.12-19, 5.12-31–5.12-33.)

> **MM AES 1:** To provide separation between the Project site and the adjacent residential uses and to be consistent with the wall constructed on the project located east of the Project site and north of Dan Kipper Drive, the developer

shall install an 8-foot tall wall constructed of two-sided decorative masonry material along the Project site's northern property line and that portion of the Project's westerly property line adjacent to existing residential uses. As part of the Design Review process and prior to the issuance of a grading permit, the Project developer shall submit a revised site plan showing the 8-foot tall wall and the proposed materials and decorative treatment for such wall to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

Furthermore, truck idling at the Project site will be limited to three minutes, pursuant to revised Mitigation Measures AQ-13 and AQ-22.

The Project includes City Design Review and will implement mitigation measure **MM AES 9** to ensure that the buildings are attractively designed. (DEIR, p. 5.1-35)

MM AES 9: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.

a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.

b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 6-D:

This comment letter along with the responses will be provided to decision-makers and become part of the Project's record. This comment, which does not identify any environmental issues or impacts, is noted.

Comment Letter 7 – Rick Wade

7

RECEIVED
SEP 13 2016
Community & Economic Development Department

September 10, 2016

City of Riverside
Community & Economic Development
Department of Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Attn: Ms. Patricia Brenes , Principal Planner

Re: Draft EIR: Sycamore Canyon Business Park Buildings 1 and 2

References: Building 1: 1,012,995 S.F. Building 2: 420,604 S.F.

Submitted are my comments regarding proposed project noted above: My residence is located directly to the west of Building 2 to the southwest corner. My comments reflect Building 2; 7-A

1. The elevation of the tilt-up is much higher than the elevation of Building 1: I request that the elevation of Building 2 MATCH the elevation of Building 2;
2. The elevation should also match the elevations of Big 5 [1,000,000 S.F.] warehouse directly East of my property as well as the new tilt-ups recently constructed to the north of Big 5. 7-B

Rick Wade
6058 Cannich Road
Riverside, CA 92507

Response to Comment Letter 7 – Rick Wade

Response to Comment 7-A:

The location of the commenter's residence in relationship to the Project site is noted.

Response to Comment 7-B:

Note: It is assumed that the commenter intended item 1 in this comment to read as follows: "…I request that the elevation of Building 2 MATCH the elevation of Building 1." It is also assumed that the "new tilt-ups recently constructed to the north of Big 5" is referring to the CT Sycamore Center Project north of Dan Kipper Drive and east of the Project site.

Matching the elevations of Building 1 and Building 2 with each other as well as the elevation of the existing Big 5 warehouse is infeasible mainly due to the slope of the existing terrain of the Project site.

Building 1 is proposed to be 41-feet high from a pad elevation that ranges from 1,561-feet at the south end of the building to 1,568-feet at the north end of the building (above Mean Sea Level (MSL). Building 2 is proposed to be 37-feet high from a pad elevation that ranges from 1,594-feet at the northwest corner to an elevation of 1,590-feet at the northeast corner (above MSL). With regard to the commenter's request to match the elevations of Building 1 and Building 2, there is a consistent elevation change of roughly 50 feet from the north end (the higher end) of the Project site to the south end (the lower end). To match the elevations of Building 1 and Building 2, a large amount of soil would have to be exported to level the site. Due to the existing granite material that lays a few feet beneath the existing terrain, a major blasting operation would be needed to remove the granite material to place the buildings at roughly the same elevation. This would necessitate a greater number of truck trips during construction to haul the exported soil off site in addition to creating noise and vibration impacts associated with the needed blasting operation. It should be noted that blasting is also prohibited by mitigation measure **MM NOI 12.** (DEIR, p. 5.12-46.)

> **MM NOI 12:** No blasting shall take place on the Project site.

With regards to the commenter's suggestion to match the Big 5 building height of 41.5-feet above the finished pad, while Big 5's graded pad is roughly the same elevation above MSL as proposed Building 1's pad, the existing street elevations in Lance Drive as well as the existing terrain of the Project site make this infeasible. Lance Drive is approximately 25–30 feet higher than the existing yard elevations within the Big 5 building site. Matching the Big 5 building heights would render a large portion of the Project site unusable, due to the needed grade transition buffers to achieve the elevations needed. This large amount of grading, and the underlying granite, would entail a greater number of truck trips during construction to haul the exported soil off site in addition to creating noise and vibration impacts associated with the needed blasting operation. Pursuant to the DEIR, blasting is prohibited by mitigation measure **MM NOI 12.** (DEIR, p. 5.12-46.)

With regard to the CT Sycamore Center Project (the "new tilt-ups recently constructed" north of Big 5), the pads are at elevations ranging from 1,545 (easterly pad for Building 1) to 1,568-feet (westerly pad for Building 5) (above MSL) and the Building 1 (easterly building) is approximately 37-feet tall with the other four buildings at 41-feet tall. Although the proposed Project will be at an elevation 22 to 26-feet higher than Building 5 of the CT Sycamore Center Project, proposed Building 2 is setback an additional 50-feet (100-feet total) from the residential property line and it has been designed to reduce the feeling and appearance of massing and/or bulkiness. The Project will implement mitigation measures **MM AES 9** and **MM AES 11** which state: (DEIR, p. 5.1-35.)

> **MM AES 9**: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.
>
> b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow.
>
> **MM AES 11**: In order to avoid the appearance of a flat wall, as part of the Design Review process prior to the issuance of a grading permit, revised plans showing the incorporation of design features such as articulation and the use of color on the 14-foot-tall wall proposed along the east side of the truck parking and loading docks east of Building 1 shall be submitted for review and approval by Design Review staff.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report.

Comment Letter 8 – California Department of Transportation

8

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr. Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING (MS 722)
464 WEST 4th STREET, 6th Floor
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
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TTY (909) 383-6300
www.dot.ca.gov/dist8

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Community & Economic Development Department

Serious drought
Help save water!

September 12, 2016

City of Riverside
Community & Economic
Development Department
Kyle Smith, Senior Planner
3900 Main Street, 3rd Floor
Riverside, CA 92522

Sycamore Canyon Business Park Buildings 1 and 2 (RIV 215 PM 37.56)

Mr. Smith,

We have completed our initial review for the above mentioned proposal to construct and operate approximately 1.4 million square feet of light industrial office and warehousing contained within two buildings on site. Building 1 will consist of 10,000 square feet of office space with 1,002,995 square feet of warehouse with 72 dock doors. Building 2 will consist of 410,604 square feet of warehouse with 48 dock doors. 8-A

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. Under the California Environmental Quality Act (CEQA), we are required to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Riverside due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS. 8-B

We recommend the following:

Traffic Study

- Please use Standard Traffic Signal Sequencing. 8-C
- Table 5-3: Intersection Levels of Service – Existing Plus Ambient Growth Plus Project Conditions (2018) – Why are the delays at the intersection of I-215 Northbound Ramps (NS)/Fair Isle Drive-Box Springs Road (EW) less than or equal to the Existing Plus Project Conditions (2015) at PM Conditions (Table 5-1) of 19.4 sec compared with 19.7 sec, and 19.6 sec compared with 19.6 sec? 8-D

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

- Table 5-4: Freeway Segment Levels of Service – Existing Plus Ambient Growth Plus Project Conditions (2018) – Why are the densities at the segment of I-215 Northbound/Fair Isle Drive-Box Springs On, less than for the Existing Plus Project Conditions (2015) on Table 5-2 of 23.7 pc/mi/ln compared with 32.7 pc/mi/ln, and 23.9 pc/mi/ln compared with 32.8 pc/mi/ln? 8-E

- Table 5-6: Intersection Levels of Service – Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (2018) – Why are these delays at the intersection of I-215 Northbound Ramps (NS)/Fair Isle Drive-Box Springs Road (EW) less than the Existing Plus Ambient Growth Plus Project Conditions (2018) on Table 5-3 of 19.1 sec compared with 19.4 sec, and 19.0 sec compared with 19.6 sec? 8-F

- Table 5-6: Intersection Levels of Service – Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (2018) – Why are the delays at the intersection of I-215 Northbound Ramps (NS)/Eastridge Avenue-Eucalyptus Avenue (EW) less than the Existing Plus Ambient Growth Plus Project Conditions (2018) on Table 5-3 of 22.7 sec compared with 23.8 sec, and 22.3 sec compared with 23.5 sec? 8-G

- Page 7 under High-Cube Warehouse/Distribution Center Land Use. Project Trip Generation, the truck rate for high-cube warehouse, which is based on the weighted average rates, provided in the Trip Generation. Although the County's 'Traffic Impact Analysis Prepartion Guide (2008) Section 10.10 Special Uses – Truck Intensive Uses' clearly states that the County does not use rates for truck intensive uses other than ITE; traffic studies for similar projects (within the Inland Empire) have incorporated the results from the Fontana Truck Trip Generation Study; and more recently, from the NAIOP Study. 8-H

- Page 8 under Princple Findings, according to the City of Riverside Traffic Impact Analysis Guidelines, Exhibit F: Please provide Exhibit F under this title. 8-I

- Page (14) as stated under "Site Access" no vehicle type restrictions are proposed on Lance Drive and with limited access to and from Dan Kipper Drive. Please explain how would this project limits the access to or from Dan Kipper Drive. 8-J

- Page (17) under title "Study Freeway Segments" refers to Appendix A for correspondence from Caltrans but Appendix A- page 7 "Study Freeway Segments" is blank. I-215 Southbound, Eastridge Ave-Eucalyptus Ave Off-Ramp is missing. I-215 Northbound, Fair Isle Dr-Box spring Rd Off-Ramp is missing. 8-K

- Page (17) under title "Existing Traffic Volume" states that existing traffic counts increased since counts were taken during the summer hours, while schools were not in session. Please explain how the methodology was used to increase the existing counts. Even though Appendix C shows higher counts under PCE worksheets but there is no way to know how these numbers were increased. 8-L

- Page (18) Figure 3-A depicts Existing Roadway System. The SB Off-Ramp to WB Eastridge Ave controlled by Stop Sign not by traffic signal. 8-M

- Page (24) explain why few different Peak Hour factors in Appendix E was used to calculate LOS in PTV Vistro software. 8-N

- Page (25) the freeway segment LOS shown on Table 3-6 are based upon freeway volumes. Please provide sources and plots with (readable traffic volumes) showing AADT and AM/PM Peak Hours for all modeled years Existing, Plus Ambient Growth, Plus Project, Plus Cumulative and Passenger Car Equivalent (PCE). 8-O

- Page (30) under "Project Trip Distribution" Figure 4-A depicts directional distribution traffic (PCE - Outbound) from the project. The figure shows that 100% cars /trucks will use Sierra Ridge Drive. Please explain how and what method of traffic control this project will use to stop cars/trucks from using Dan Kipper Drive for outbound traffic. Figure 4-B shows 20% of inbound traffic using Dan Kipper to the project. 8-P

- Page (46) under LOS-Existing plus Ambient Growth plus Project Conditions (2018) indicates that freeway segments operate at LOS of D or better. Please show any graphs or congestion monitoring plots that shows the LOS D or better for the NB I-215 from Eucalyptus Ave to Box Spring road during the peak hours. Please check the level of service calculation worksheet in Appendix E page 312 indicates that the number of lanes on the freeway is 3 and the length of first accel/decel lane is 530 8-Q

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance. 8-R

Sincerely,

Mark Roberts

MARK ROBERTS
Office Chief
Intergovernmental Review, Community and Regional Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Comment Letter 8 – California Department of Transportation

Response to Comment 8-A:

The City appreciates the California Department of Transportation's (Caltrans') review of the Draft Environmental Impact Report (DEIR). Subsequent to preparation of the traffic impact analysis, the size of Building 2 was reduced to 362,174 square feet (SF) consisting of 10,000 SF of office space with 362,174 SF of logistics/warehouse with 49 dock doors. However, this reduction in building size did not change the conclusions of the Traffic Impact Analysis (TIA) or DEIR with regard to significance or mitigation. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-B:

Caltrans' responsibility with regard to California Environmental Quality Act (CEQA) review is noted. The analysis in Section 5.16 – Transportation/Traffic of the DEIR and the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) with regard to freeway impacts was based on Caltrans methodology. Caltrans was consulted during preparation of the TIA (DEIR Appendix J, p. 1-2 and attached e-mails in Attachment 8.1 on the pages following these responses to comments.) and at Caltrans' request, the TIA included merge/diverge analysis for the following freeway segments:

I-215 Northbound

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

I-215 Southbound

4. Sycamore Canyon Boulevard Off-Ramp
5. Truck Bypass-Eastridge Avenue-Eucalyptus Ave Off-Ramp Weaving Section
6. Eastridge Ave-Eucalyptus Avenue On-Ramp (DEIR, p. 5.16-6)

Copies of the email communication between the TIA preparer and Caltrans is included in DEIR Appendix J. A copy of this correspondence is included as Attachment 8.1 on the pages following these responses to comments. Additionally, the significance determination with regard to levels of service (LOS) for State Highways is based on Caltrans' measures of effectiveness (MOEs). (DEIR, pp. 5.16-20.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-C:

As indicated on page 3-6 of the TIA (DEIR Appendix J) and in several places in DEIR Section 5.16 – Transportation/Traffic, the software used to conduct the traffic analysis is PTV Vistro. PTV Vistro analyzes level of service based on the methodology in the Highway Capacity Manual (HCM) 2010 and uses standard traffic signal sequencing with rings and barriers,

protective, permitted and split phasing, etc. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-D:

The slight decrease or constant delay is reasonable because level of service (LOS) is calculated as an average delay for all of the vehicles in the intersection. Ambient growth increases the number of vehicles making all turns, including those vehicles going through or those vehicles that have relatively less delay, which can cause the delay to remain approximately the same or slightly reduced. These delays do not result in a change in the LOS stated in the DEIR. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-E:

The LOS analysis has been reviewed and it was determined there was a computational error in the modeling software. As a result DEIR **Table 5.16-K – Freeway Segment Level of Service E+A+P (2018)** will be revised in the Final EIR (FEIR) to change the AM Peak Hour Density for I-215 Northbound Fair Isle-Box Springs Drive for: (i) the Existing + Ambient Growth (E+A) condition from 23.7 pc/mi/ln to 34.5 pc/mi/ln and (ii) the Existing + Ambient + Project (E+A+P) condition from 23.9 pc/mi/ln to 34.6 pc/mi/ln as shown on the following page. The new text is shown as double underlined and the text to be deleted is shown as ~~strikethrough~~.

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Table 5.16-K – Freeway Segment Level of Service[a] E+A+P (2018)

Freeway Direction of Travel From/To or Junction	Segment Type	Lanes		Without Project (E+A)				With Project (E+A+P)							
				AM Peak Hour		PM Peak Hour		AM Peak Hour				PM Peak Hour			
		Main	Ramp	Density[b] (pc/mi/ln)	LOS	Density[b] (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density[b] (pc/mi/ln)	LOS	Mainline Volume	Ramp Volume	Density[b] (pc/mi/ln)	LOS
I-215 Northbound															
1. Eastridge-Eucalyptus Off	Diverge	3	1	32.1	D	**35.5**	**E**	4860	698	32.2	D	5641	709	35.6	**E**
2. Eastridge-Eucalyptus On	Merge	3	1	25.9	C	31.3	D	4163	368	26.0	C	4932	581	31.6	D
3. Fair Isle-Box Springs On[c]	Merge	4	1	34.5 ~~23.7~~	D	27.6	C	6167	1417	~~34.6~~ ~~23.9~~	D	7308	720	28.0+	D
I-215 Southbound															
4. Sycamore Canyon Boulevard Off	Basic	5	NA	13.8	B	21.8	C	4810	NA	14.0	B	7176	NA	21.9	C
5. Truck Bypass /Eastridge Off	Weave	4	1	27.1	C	31.6	D	4867	1114	27.3	C	5714	1136	31.7	D
		4	2					5554	427			5901	949		
6. Eastridge-Eucalyptus On	Merge	3	1	25.9	C	31.3	D	4447	402	25.9	C	4768	884	31.4	D

Notes:
a Source: TIA, Table 5-4– Freeway Segment Levels of Service – Existing Plus Ambient Growth Plus Project Phase Conditions (2018), Appendix J
b Density and LOS were calculated in the TIA using HCS 2010 (version 6.0, 2014). Per the 2010 Highway Capacity Manual, freeway segment density and LOS are shown for merge and diverge segments, weaving segments, and basic segments.
c HOV lanes and HOV volumes not included in the mainline volume
+ Density is above LOS threshold, Number has been rounded down to the nearest tenth.

These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-F:

See Response to Comment 8-D. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-G:

The LOS analysis has been reviewed and it was determined there was a computational error in the modeling software. As a result, **DEIR Table 5.16-J – Intersection LOS, Existing Plus Ambient Growth Plus Project Conditions (E+A+P) (2018)** will be revised in the FEIR to change the Delay at the intersection of the I-215 Ramps (NS)/Eastridge Avenue-Eucalyptus Avenue (EW) for: (i) the E+A condition from 23.8 sec to 20.0 sec and the (ii) E+A+P condition from 23.5 sec to 21.7 sec as shown below. These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation.

Table 5.16-J – Intersection LOS,
Existing Plus Ambient Growth Plus Project Conditions[a] (E+A+P) (2018)

Intersection	Peak Hour	Without Project (E+A)			With Project (E+A+P)		
		Traffic Control[b]	Delay (sec)	LOS	Traffic Control[b]	Delay (sec)	LOS
1. I-215 Northbound Ramps (NS) / Fair Isle Drive – Box Springs Road (EW)	AM	TS	39.6	D	TS	39.9	D
	PM		19.4	B		19.6	B
2. Sycamore Canyon Boulevard (NS) / Fair Isle Drive (EW)	AM	TS	28.2	C	TS	28.2	C
	PM		27.2	C		27.6	C
3. Sycamore Canyon Boulevard (NS) / I-215 Southbound Ramps (EW)	AM	TS	18.8	B	TS	19.2	B
	PM		12.3	B		12.3	B
4. Sycamore Canyon Boulevard (NS) / Dan Kipper Drive (EW)	AM	OWSC	12.5	B	OWSC	12.7	B
	PM		12.3	B		12.4	B
5. Sycamore Canyon Boulevard (NS) / Box Springs Boulevard (EW)	AM	TS	15.8	B	TS	15.9	B
	PM		12.4	B		12.4	B
6. Sycamore Canyon Boulevard (NS) / Sierra Ridge Drive (EW)	AM	TS	10.7	B	TS	13.1	B
	PM		11.3	B		14.1	B

Intersection	Peak Hour	Without Project (E+A)			With Project (E+A+P)		
		Traffic Control[b]	Delay (sec)	LOS	Traffic Control[b]	Delay (sec)	LOS
7. Sycamore Canyon Boulevard (NS) / Eastridge Avenue (EW)	AM	TS	35.5	D	TS	44.6	D
	PM		24.5	C		25.4	C
8. Box Springs Boulevard (NS) / Eastridge Avenue (EW)	AM	TS	31.8	C	TS	31.8	C
	PM		28.8	C		29.4	C
9. I-215 Ramps (NS) / Eastridge Avenue-Eucalyptus Avenue (EW)	AM	TS	<u>20.0</u> ~~23.8~~	C	TS	<u>21.7</u> ~~23.5~~	C
	PM		22.5	C		22.7	C

Notes:

a Source: TIA, Table 5-3 – Intersection Levels of Service – Existing Plus Ambient Growth Plus Project Conditions (2018), Appendix J

b TS = Traffic Signal; OWSC = One way stop controlled

Delay and LOS were calculated in the TIA using Vistro (version 3.00, 2014) for signalized and unsignalized intersections. Per the 2010 Highway Capacity Manual, overall average intersection delay and LOS are shown for intersections with a traffic signal or all-way stop control. For intersections with cross-street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.

DEIR **Table 5.16-N – Intersection LOS, Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+C+P) (2018)** will also be revised in the FEIR to change the Delay at the intersection of the I-215 Ramps (NS)/Eastridge Avenue-Eucalyptus Avenue (EW) for: (i) the Existing + Ambient Growth + Cumulative (E+A+C) condition from 22.7 sec to 20.8 sec and the (ii) Existing + Ambient Growth + Cumulative + Project (E+A+C+P) condition from 22.3 sec to 21.7 sec. Table 5.16-N will also be revised to change the Delay Due to Project at this intersection from -0.4 sec to 0.9 sec as shown below.

Table 5.16-N – Intersection LOS, Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions[a] (E+A+C+P) (2018)

Intersection	Peak Hour	Without Project (E+A+C)			With Project (E+A+C+P)			Delay Due to Project (sec)
		Traffic Control[b]	Delay[c] (sec)	LOS	Traffic Control[b]	Delay[c] (sec)	LOS	
1. I-215 Northbound Ramps (NS) / Fair Isle Drive – Box Springs Road (EW)	AM	TS	40.5	D	TS	40.8	D	0.3
	PM		19.1	B		19.0	B	-0.1

Intersection	Peak Hour	Without Project (E+A+C)			With Project (E+A+C+P)			Delay Due to Project (sec)
		Traffic Control[b]	Delay[c] (sec)	LOS	Traffic Control[b]	Delay[c] (sec)	LOS	
2. Sycamore Canyon Boulevard (NS) / Fair Isle Drive (EW)	AM	TS	29.5	C	TS	29.6	C	0.1
	PM		29.5	C		30.0	C	0.5
3. Sycamore Canyon Boulevard (NS) / I-215 Southbound Ramps (EW)	AM	TS	20.0	B	TS	20.4	C	0.4
	PM		12.4	B		12.5	B	0.4
4. Sycamore Canyon Boulevard (NS) / Dan Kipper Drive (EW)	AM	OWSC	52.9	**F**	OWSC	53.8	**F**	0.9
	PM		27.5	D		28.4	D	
5. Sycamore Canyon Boulevard (NS) / Box Springs Boulevard (EW)	AM	TS	18.0	B	TS	18.1	B	0.1
	PM		13.6	B		13.7	B	0.1
6. Sycamore Canyon Boulevard (NS) / Sierra Ridge Drive (EW)	AM	TS	11.1	B	TS	13.7	B	2.6
	PM		11.2	B		14.1	B	2.9
7. Sycamore Canyon Boulevard (NS) / Eastridge Avenue (EW)	AM	TS	41.8	D	TS	53.0	D	11.2
	PM		24.6	C		26.1	C	1.5
8. Box Springs Boulevard (NS) / Eastridge Avenue (EW)	AM	TS	32.2	C	TS	32.1	C	-0.1
	PM		36.2	D		36.9	D	0.7
9. I-215 Ramps (NS) / Eastridge Avenue-Eucalyptus Avenue (EW)	AM	TS	20.8 ~~22.7~~	C	TS	21.7 ~~22.3~~	C	0.9 ~~-0.4~~
	PM		22.5	C		22.7	C	0.2

Notes:

a Source: TIA, Table 5-~~3~~ 6~~–~~ ~~Intersection~~ Levels of Service – Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (2018), Appendix J

b TS = Traffic Signal; OWSC = One way stop controlled

c Per the 2010 Highway Capacity Manual, overall average intersection delay and LOS are shown for intersections with a traffic signal or all-way stop control. For intersections with cross-street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-H:

The City of Riverside is the lead agency for the proposed Project, not the County; thus, the TIA was prepared using the City of Riverside Traffic Impact Analysis Preparation Guide, December

2014. (DEIR, pp. 5.16-4, 5.16-25, 5.16-27; DEIR Appendix J, pp. 1-2, 3-1, 3-8.) The Project truck trip generation used in the TIA is based on the ITE 9th Edition Trip Generation Manual's truck trip generation for high-cube warehouse. The Fontana Truck Trip Generation Study, specifically cited as a source for truck axle splits in the ITE Manual, was then used to split the projected number of trucks into different kinds of trucks to estimate the equivalent PCE. This use of the Fontana truck study is noted as a footnote under TIA Table 4-1 – Trip Generation Rates in addition to DEIR **Table 5.16-E – Trip Generation Rates**. (DEIR, pp. 5.16-18; DEIR Appendix J, p. 4-1.) The City has accepted the use of the Fontana Study for splitting the types of trucks. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-I:

It is assumed this comment's reference to page 8 is to TIA page 1-2 (which is page 8 of the PDF file of the TIA).

The City of Riverside Traffic Impact Analysis Guidelines, Appendix F states:

> *City of Riverside allows Level of Service (LOS) D to be used as the maximum acceptable threshold for the study intersections and roadways of Collector or higher classification. LOS C is to be maintained on all street intersections. For projects in conformance with the General Plan, a significant impact occurs at a study intersection when the peak hour LOS falls below C, or D per CCM-2.3 as noted below. For projects that propose uses or intensities above that contained in the General Plan, a significant impact at a study intersection is when the addition of project related trips causes either peak hour LOS to degrade from acceptable (LOS A thru D) to unacceptable levels (E or F) or the peak hour delay to increase as follows:*
>
> *LOS A/B = By 10.0 seconds*
> *LOS C = By 8.0 seconds*
> *LOS D = By 5.0 seconds*
> *LOS E = By 2.0 seconds*
> *LOS F = By 1.0 seconds*
>
> *City of Riverside General Plan 2025 Policy CCM-2.3:*
> *Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.*

This text is also included on pages 3-8 – 3-9 of the TIA (DEIR Appendix J, pp. 3-8 – 3-9) and on page 5.16-25 of the DEIR. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-J:

Building 1 will have two driveways along Lance Drive and Building 2 will have one driveway along Lance Drive. Building 1 and Building 2 will have full ingress and right-out only egress at each of their individual project driveways. (DEIR, pp. 5.16-26.)

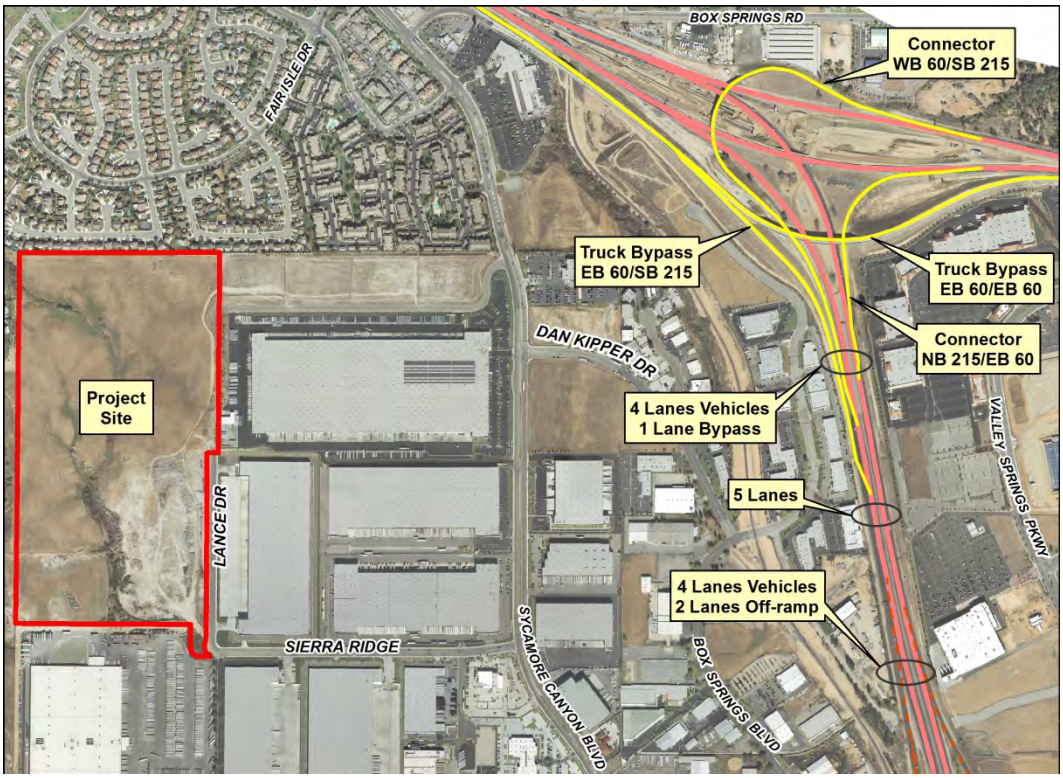
The Project will not allow passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-K:

The correspondence regarding the freeway segments to be studied is found on pages 13 and 14 of Appendix A of the TIA (which is Appendix J of the DEIR). The correspondence consists of e-mails between Caltrans (Mark Roberts) and the TIA preparer, Albert A. Webb Associates (Grace Cheng). A copy of this correspondence is included as Attachment 8.1 on the pages following these responses to comments.

With regard to the I-215 SB Eastridge-Eucalyptus Ave Off-Ramp, due to the nature of the geometry, the off-ramp is considered as a weaving segment[1] with the existing truck ramp at the State Route (SR) 60/I-215 Interchange. The weaving segment is created when the southbound truck bypass lane at the SR 60/I-215 interchange joins the four lane SB I-215 mainline resulting in the addition of a fifth lane (4 lanes mainline plus 1 lane bypass). The I-215 SB Eastridge-Eucalyptus Ave Off-Ramp is a two-lane off-ramp and a four-lane mainline continuing south as shown below.

[1] A weaving segment is a merge segment (on-ramp) that is closely followed by a diverge segment (off-ramp) and the two are connected by a continuous auxiliary lane. (DEIR, p. 5.16-6.)



With regard to the I-215 Northbound Fair Isle Dr-Box Spring Rd Off-Ramp, the ramp is not included in the TIA because the City and the TIA preparer determined no inbound or outbound Project traffic would use this off-ramp based on the geographical location of the site, the type of land uses in the study area, access and proximity to the regional freeway system, existing roadway system, existing traffic patterns, and existing and future land uses. Given the proximity of Sycamore Canyon Boulevard and Sierra Ridge Drive to the Eastridge-Eucalyptus Avenue/I-215 Interchange it is a reasonable assumption that vehicles, trucks in particular, would utilize this freeway ramp rather than the Fair Isle Drive-Box Springs/I-215 interchange. (See **DEIR Figure 5.16-4 – Project Trip Distribution (Passenger Cars - Inbound)** and DEIR **Figure 5.16-6 – Project Trip Distribution (Trucks - Inbound).)**

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the TIA, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle Drive/Box Springs Road interchange.

Thus, it is reasonable to expect that outbound cars and trucks will use the Eastridge Avenue-Eucalyptus Avenue interchange.

Response to Comment 8-L:

Existing AM and PM peak period intersection turning movement counts were conducted in July 2015 and are included in Appendix C to the TIA. The counts were increased per agreement with the City of Riverside since counts were taken during the off-school period of July 2015. (DEIR, p. 5.16-17; DEIR Appendix J, p. 3-2.) The following are the edits to the counts listed by intersection number. The counts used in the TIA were increased (based on older counts taken when school was in session) to simulate vehicles travelling through the intersections from residential neighborhoods to nearby schools.

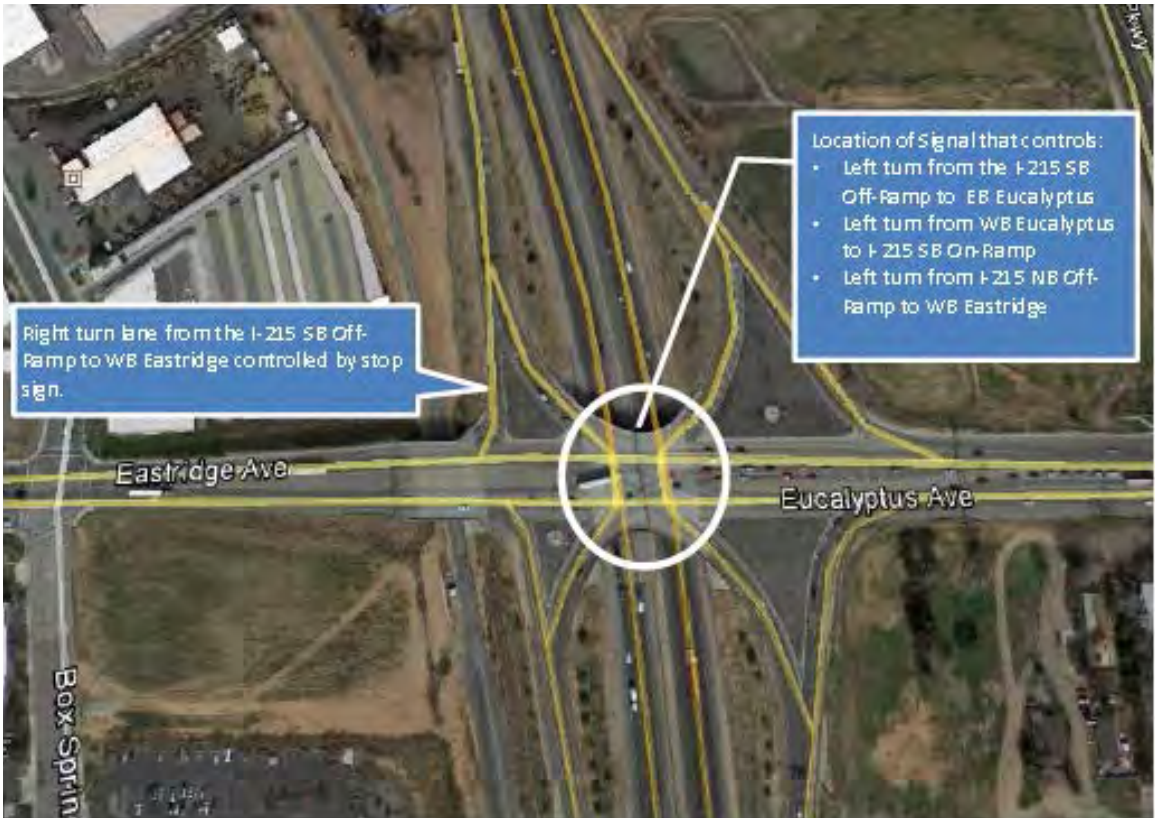
Intersection	Increase in Counts
1. I-215 Northbound Ramps (NS) / Fair Isle Drive-Box Springs Road (EW)	+200 WBR in AM
2. Sycamore Canyon Boulevard (NS) / Fair Isle Drive (EW)	+200 NBT in AM
3. Sycamore Canyon Boulevard (NS) / I-215 Southbound Ramps (EW)	+200 NBT in AM
4. Sycamore Canyon Boulevard (NS) / Dan Kipper Drive (EW)	+200 NBT in AM
5. Sycamore Canyon Boulevard (NS) / Box Springs Boulevard (EW)	+200 NBT in AM
6. Sycamore Canyon Boulevard (NS) / Sierra Ridge Drive (EW)	+200 NBT in AM
7. Sycamore Canyon Boulevard (NS) / Eastridge Avenue (EW)	+200 NBT in AM +300 WBL in PM
8. Box Springs Boulevard (NS) / Eastridge Avenue (EW	+300 WBT in PM
9. I-215 Ramps (NS) / Eastridge Avenue-Eucalyptus Avenue (EW)	+300 SBR in PM

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-M:

As shown in the aerial photograph below, although the intersection as a whole is controlled by a traffic signal (or signals), the right turn lane from the I-215 SB Off-Ramp is controlled by a stop sign. The TIA evaluated LOS for the study intersections using PTV Vistro 3.00 traffic modeling software, which is based upon the Transportation Research Board (TRB) Highway Capacity Manual 2010 (HCM2010) methodologies. (DEIR Appendix J, p. 3-6.) Although PTV

Vistro does not display how the right turn is controlled but rather how the intersection as a whole is controlled; this does not change the results of the analysis because right turn movements rarely contribute to intersection delay, which is what LOS measures. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.



Source of Aerial Imagery: GoogleEarth

Response to Comment 8-N:

As discussed in Response to Comment 8-L, existing counts were taken at the study intersections and an existing peak hour factor obtained. This is the peak hour factor used in the analysis. However, in some cases, when the volume from ambient growth, or Project traffic, or cumulative development projects or some combination thereof, is significantly increased from the existing peak hour volume, the intersection may not operate in the same manner as in the existing condition. Therefore, the default peak hour factor (0.92) was used as prescribed in the HCM 2010 Volume 1, Chapter 6, Appendix A's reference to the NCHRP Report 599. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-O:

Caltrans publishes existing hourly volumes on freeways in California on the Caltrans PeMS Web site (pems.dot.ca.gov). Freeway volumes used in the TIA were from the PeMS Website

except for the truck ramp between the Fair Isle-Box Springs Road exit and the Eastridge-Eucalyptus exit. Counts were taken at this truck ramp with approval from Caltrans. These counts were included in Appendix C of the TIA. The AM and PM Peak used in the TIA are underlined in red on the tables on the following page.

Since Caltrans does not publish counts in future scenarios, volumes in future scenarios were estimated based on the build-up model, using the same trip generation, trip distribution, modal split, and trip assignment assumptions as used for the proposed Project and cumulative projects in the LOS analysis for the intersections. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

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Northbound

Counts by Hour

					Midnight	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	NOON	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	TOTAL FOR DAY
R36.5	818606	ALLESSANDRO BLVD	Mainline	0.0	1,023	763	667	764	1,541	3,228	3,863	4,406	4,569	4,209	4,070	4,122	4,335	4,549	4,959	5,291	5,313	5,197	4,617	3,764	3,287	2,905	2,254	1,619	81,315
R37.2	818223	EUCALYPTUS AVE S/O	Mainline	0.0	1,023	763	667	764	1,541	3,228	3,863	4,406	4,569	4,209	4,070	4,122	4,335	4,549	4,959	5,291	5,313	5,197	4,617	3,764	3,287	2,905	2,254	1,619	81,315
R37.6	819086	EUCALYPTUS AVE N/O	Mainline	0.0	1,519	1,510	1,622	2,012	2,989	4,004	3,680	3,298	3,420	3,697	3,636	3,582	3,620	3,757	3,707	3,820	3,869	3,774	3,055	2,649	2,384	2,315	1,997	1,754	71,670
R38.4	818224	60/215 SEPARATION	Mainline	66.7	989	891	1,040	1,783	3,616	4,754	4,272	3,705	3,886	4,249	4,427	4,268	4,393	4,563	4,606	4,656	4,690	4,570	3,694	2,982	2,379	2,198	1,735	1,352	79,698
R38.627	801577	BOX SPRINGS	Mainline	100.0	1,066	769	883	1,634	3,811	5,035	5,529	5,903	5,157	5,445	5,657	5,787	6,184	6,483	6,696	6,546	6,947	6,696	6,014	5,053	4,213	3,613	2,570	1,648	109,339
R38.627	801579	BOX SPRINGS	On Ramp	N/A	102	68	80	107	287	441	977	1,176	966	752	506	530	561	672	642	646	681	676	491	331	267	216	170	101	11,446
R38.627	811866	BOX SPRINGS	Off Ramp	N/A	15	4	2	6	26	29	65	50	84	57	55	59	61	75	70	81	69	107	78	56	62	41	33	26	1,211
R38.627	816134	BOX SPRINGS	HOV	100.0	92	61	56	226	983	1,407	1,616	1,629	1,476	1,241	934	831	987	1,237	1,143	1,144	977	1,059	879	675	474	442	258	133	19,960
39.426	819964	CENTRAL AVE SB ON	Mainline	100.0	780	669	789	1,791	4,496	5,734	5,779	5,662	5,211	5,364	5,012	4,848	5,136	5,523	5,570	5,427	5,310	5,173	4,222	3,455	2,669	2,473	1,755	1,164	94,012

Note: The volumes underlined in red were used in the TIA.

Southbound

Counts by Hour

					Midnight	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	NOON	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	TOTAL FOR DAY
R36.5	818607	ALLESSANDRO BLVD	Mainline	0.0	1,023	763	667	764	1,541	3,228	3,863	4,406	4,569	4,209	4,070	4,122	4,335	4,549	4,959	5,291	5,313	5,197	4,617	3,764	3,287	2,905	2,254	1,619	81,315
R37.2	818222	EUCALYPTUS AVE S/O	Mainline	0.0	1,023	763	667	764	1,541	3,228	3,863	4,406	4,569	4,209	4,070	4,122	4,335	4,549	4,959	5,291	5,313	5,197	4,617	3,764	3,287	2,905	2,254	1,619	81,315
R37.991	816155	S/O 60/215 IC	Mainline	0.0	1,365	1,022	885	1,018	2,053	4,299	5,147	5,878	6,094	5,608	5,426	5,495	5,779	6,060	6,614	7,056	7,087	6,934	6,155	5,013	4,382	3,874	3,008	2,159	108,411
R38.4	818225	60/215 SEPARATION	Mainline	0.0	1,460	1,220	1,133	1,282	1,762	2,426	3,118	3,508	3,162	3,260	3,218	3,536	3,694	3,867	4,024	4,085	4,469	4,431	4,258	3,679	3,444	3,061	2,430	1,814	72,341
R38.627	819956	BOX SPRINGS	HOV	100.0	335	315	351	613	1,289	1,538	1,278	1,099	1,013	1,321	1,513	1,502	1,587	1,554	1,558	1,596	1,542	1,473	1,298	1,145	937	855	650	459	26,821
R38.627	819957	BOX SPRINGS	Mainline	100.0	1,254	964	807	1,069	1,878	3,018	4,239	4,692	4,025	4,155	3,903	4,244	4,706	4,890	5,166	5,412	5,971	5,895	5,368	4,461	4,054	3,506	2,559	1,821	88,057
R38.774	816150	BOX SPRINGS SB ON	Mainline	100.0	1,300	895	711	826	1,484	2,707	4,056	4,392	4,496	4,185	4,074	4,636	5,029	5,235	5,725	5,864	6,749	6,630	5,976	5,166	4,676	3,921	2,819	1,896	93,448
R38.774	819905	BOX SPRINGS SB ON	HOV	99.7	106	47	35	36	77	147	284	315	366	451	545	636	709	724	874	928	1,081	1,033	1,013	856	723	598	351	194	12,129
R38.774	820164	BOX SPRINGS SB ON	Mainline	100.0	83	92	60	84	166	269	310	371	310	275	252	278	297	323	356	338	304	349	291	292	274	248	170	122	5,914
39.426	816106	CENTRAL AVE SB ON	Mainline	100.0	1,681	1,267	1,097	1,297	2,089	3,558	4,939	5,327	4,886	5,180	5,140	5,648	5,945	6,124	6,483	6,407	7,038	6,796	6,605	5,779	5,450	4,577	3,450	2,490	109,253

Note: The volumes underlined in red were used in the TIA.

Response to Comment 8-P:

As part of the TIA scoping process, a preliminary analysis was done in regard to the proposed Project using Dan Kipper Drive as a point of egress for passenger cars and/or trucks. Based on future nearby development of the area, the existing and future geometry of the intersection and nearby intersections, the City determined that traffic leaving the Project site would have a right-out-only egress onto Lance Drive. (DEIR, pp. 5.16-10, 5-16-26.)

Building 1 will have two driveways along Lance Drive and Building 2 will have one driveway along Lance Drive. Building 1 and Building 2 will have full ingress and partial right-out only egress at each of their individual project driveways. (DEIR, pp. 5.16-26.)

The Project will limit passenger car and truck egress onto Dan Kipper Drive by installing small barriers ("pork chops") at the all three driveways which will limit left-out turns onto Lance Drive. This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.)

The commenter is correct that TIA Figure 4-B (DEIR **Figure 5.16-6 – Project Trip Distribution (Passenger Cars - Inbound)**) show that 20% of the inbound passenger cars will use Dan Kipper Drive. Access to the site from Dan Kipper Drive is not being restricted because this will not adversely affect the LOS at Dan Kipper Drive/Sycamore Canyon Boulevard.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-Q:

Based on correspondence with Caltrans, the scope of the traffic study only included freeway ramps and not the mainline between the freeway ramps. For the NB I-215 segment from Eucalyptus Ave to Box Springs Road, only the off-ramp at Eucalyptus Ave was analyzed, using that off-ramp provides the most direct access to the Project site. A vehicle using the NB I-215 Eastridge-Eucalyptus Off-Ramp would exit the freeway, travel west on Eastridge Avenue and proceed north on Sycamore Canyon Boulevard to Sierra Ridge Drive before turning west onto Lance Drive. This route includes only one signalized intersection at Sycamore Canyon Boulevard/Eastridge Avenue. A vehicle using the NB I-215 Alessandro Boulevard Off-Ramp would exit I-215, travel west on Alessandro Boulevard, proceed north on Sycamore Canyon Boulevard to Sierra Ridge Drive before turning west onto Lance Drive. This route includes three signalized intersections: Alessandro Boulevard/Sycamore Canyon Boulevard-Meridian Parkway, Sycamore Canyon Boulevard/Cottonwood Avenue, Sycamore Canyon Boulevard/Eastridge Avenue. Because outbound traffic is precluded from making left turns onto Lance Drive, outbound traffic will take Lance Drive south to Sierra Ridge Drive to Sycamore Canyon Boulevard. Because of the proximity of the Sierra Ridge Drive/Sycamore

Canyon Boulevard intersection to the I-215 Eastrige-Eucalpytus interchange, it is that likely vehicles will use that interchange instead of the I-215 Alessandro interchange. (See DEIR **Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound**), **DEIR Figure 5.16-4 – Project Trip Distribution (Passenger Cars – Inbound)**, **DEIR Figure 5.16-5 – Project Trip Distribution (Trucks – Outbound)**, and DEIR **Figure 5.16-6 – Project Trip Distribution (Trucks – Inbound)**.) The analysis for the Eucalyptus Avenue off-ramp has been included in the traffic study with existing geometrics of 3 lanes and an approximately 530 foot accel/decel lane.

The mainline freeway was not analyzed and the Box Springs Road off-ramp was not analyzed because, as discussed in Response to Comment 8-K there will be no Project traffic using the off-ramp and, this off-ramp cannot be reached via NB I-215.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 8-R:

The City appreciates Caltrans' review and comments they have provided on the DEIR. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Attachment 8.1: Email correspondence between WEBB Associates and Caltrans

Caltra

From: Grace Cheng
Sent: Friday, July 10, 2015 11:25 AM
To: 'Roberts, Mark B@DOT'
Subject: RE: Acceptable Levels of Service at I-215 Freeway Ramps - City of Riverside

Hi Mark,
Thanks for the quick reply. We will include the merge/diverge analysis for Box Springs & Eucalyptus. The project won't be sending any trips to Alessandro so that ramp wouldn't need to be included in the analysis. For the ambient growth rate, we'll take a look at the RivTAM model which is based on the SCAG model, since that is what the Riverside County uses for their modelling. I'll get back to you on what that turns out to be. Thanks.

Grace Lin Cheng, MS | MCP | PE - Associate Engineer
Albert A. Webb Associates
3788 McCray Street, Riverside, CA 92506
t: 951.320.6038
e: grace.cheng@webbassociates.com w: www.webbassociates.com
LinkedIn | Twitter | Facebook | YouTube

From: Roberts, Mark B@DOT [mailto:mark.roberts@dot.ca.gov]
Sent: Thursday, July 09, 2015 9:28 AM
To: Grace Cheng
Subject: RE: Acceptable Levels of Service at I-215 Freeway Ramps - City of Riverside

Hello

I concur with the intersections to be studied.

Our Traffic Operations Division will also likely ask for a merge/diverge analysis for the affected Freeway ramps (Box Springs, Eucalyptus and Allesandro).

Related to the use of 2% growth rate assumption I'd prefer you use the 2012 SCAG RTP Model or other model based on the SCAG Model (if 2% is what you derive from the SCAG Model) then I concur as well.

****

Caltrans
District 8 (San Bernardino and Riverside Counties)
Mark Roberts
Office of Intergovernmental Review, Community and Regional Planning
Senior Transportation Planner, AICP
464 West 4th Street, 6th Floor, MS 725
San Bernardino, CA 92401-1400

1

(909) 383-4557

From: Grace Cheng [mailto:grace.cheng@webbassociates.com]
Sent: Wednesday, July 08, 2015 11:54 AM
To: Roberts, Mark B@DOT
Subject: Acceptable Levels of Service at I-215 Freeway Ramps - City of Riverside

Hi Mark,
Attached is a preliminary scoping agreement for a proposed project in the City of Riverside, located in the Sycamore Canyon Business Park area. As a part of the traffic study, we will be studying the I-215 freeway ramps at Fair Isle/Box Springs and Eucalyptus. Please review the scoping agreement and provide any comments you may have. Would these intersections be evaluated under a required level of service of D?
Thanks.

ALBERT A. WEBB ASSOCIATES

Grace Lin Cheng, MS | MCP | PE - Associate Engineer
Albert A. Webb Associates
3788 McCray Street, Riverside, CA 92506
t: 951.320.6038
e: grace.cheng@webbassociates.com w: www.webbassociates.com
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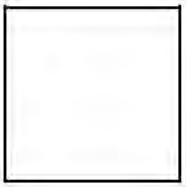

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Comment Letter 9 – Johnson & Sedlack

9

Johnson & Sedlack
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RECEIVED
SEP 15
Community & Economic Development Department

VIA E-MAIL and U.S. MAIL

September 14, 2016

City of Riverside
Community & Econom c Development Dept., Planning Division
Attn: Patricia Brenes, Principal Planner
3900 Main Street, 3rd Floor
Riverside, California 92522
pbrenes@ riversideca.gov

To the City of Riverside:

Re: ***Request for Extension of Public Comment Period – Sycamore Canyon Business Park Buildings 1 and 2 Draft EIR*** **(SCH # 2015081042)**

9-A

On behalf of the Sycamore Highlands Community Action Group, I am writing to request an extension of the public comment period for the Sycamore Canyon Business Park Buildings 1 and 2 Draft Environmental Impact Report (SCH # 2015081042). Notwithstanding the availability of the Draft EIR on or about August 10, 2016, the Draft EIR's Technical Appendices were not initially made available to the public through the City's website. Residents only received a copy of the Appendices on **August 25, 2016**.

Therefore, in order to have adequate time to review the substantial technical information supporting the Draft EIR, we request a brief, 15-day extension of the public comment period which currently closes on September 23, 2016.

Thank you for your consideration of this request.

Sincerely,

Abigail Smith

Abigail Smith
JOHNSON & SEDLACK

Response to Comment Letter 9 – Johnson & Sedlack

Response to Comment 9-A:

The commenter's assertion that the Draft Environmental Impact Report's (DEIR) technical appendices were not initially made available to the public through the City's website is incorrect. The technical appendices were available on the City's website, at the City of Riverside Community & Development Department, and at the Main and Orange Terrace libraries on August 10, 2016. Nonetheless, the public comment period on the DEIR was extended to October 7, 2016.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 10 – Maureen Clemens

10

Patricia Brenes, Principal Planner 9/14/16
3900 Main Street
Riverside, CA 92522

RECEIVED
SEP 15 2016
Community & Economic Development Department

Re: Sycamore Canyon Business Park Building 1 and 2

Dear Ms. Brenes

I am enclosing a Location Map for you to study and I mean STUDY so you can see how many homes are impacted by the number of existing warehouses. You can wake up at 4:30 AM and if your windows are open you will hear the hum and beep, beep of Semi Tractor Trailer Trucks. You don't have to be directly in back of these warehouses you can be as far away as Lochmoor close to Central Avenue sound really cares up here. 10-A

This map does not show the warehouse that is closely and I mean closely behind the homes on Stockport. If you have a two story home on Stockport you will be looking at giant wall from your second story, which is usually your master bedroom. 10-B

If you go out in the early morning or mid-day or evening on Sycamore Canyon Blvd. you will encounter at least eight trucks in a one block area. These trucks were meant to enter and exit at Eastridge. They do not, they constantly enter and exit the Fair Isle Box Spring exit and entrance and have been known to go as far as Central to enter the 60 freeway. 10-C

I advise you to have a look, a good look at the Good Neighbor Guidelines adopted by the city on October 14th, 2008. Also you might want to review the City's Mission Statement: The City of Riverside is committed to providing high quality municipal services to ensure a safe, inclusive and livable community. 10-D

Sincerely,

Maureen Clemens
6012 Abernathy Dr.
Riverside, CA 92507

Figure 2 - Location Map
Sycamore Canyon Business Park Buildings 1 and 2

Response to Comment Letter 10 – Maureen Clemens

Response to Comment 10-A:

The existing warehouses depicted on the provided map went through separate California Environmental Quality Act review processes at the time they were proposed. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

To thoroughly evaluate the proposed Project's construction and operational noise impacts on the surrounding residences as part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (the NIA), over 30 receptor locations were modeled (see DEIR **Figures 5.12-5** through **5.12-8**). Without mitigation, Project operational noise levels are expected to range between 30 dBA L_{eq} and 52 dBA L_{eq} at nearby sensitive receptors and up to 55 dBA L_{eq} along the westerly property line. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Noise Levels (Leq) No Mitigation**.) Therefore, unmitigated operational noise will not exceed the City's daytime exterior noise standards of 55 dBA L_{eq}. However, the Project's operational noise levels will exceed the nighttime exterior noise standard of 45 dBA L_{eq} along the western project boundary and certain single-family detached residential dwelling units adjacent to the northwest corner of the Project site as shown on DEIR **Figure 5.12-5 – Noise Levels (Leq) No Mitigation**. (DEIR, p. 5.12-27.)

In order to mitigate Project operational noise levels to the City's nighttime residential standard of 45 dBA L_{eq} at the affected sensitive receptors, a ten-foot noise barrier is required along the perimeter of the outdoor use areas per mitigation measure **MM NOI 16** below. This barrier is required at the top of the slope because the residences are at a higher elevation than the Project site. (DEIR, p. 5.12-28, 5.12-31, 5.12-34.)

> **MM NOI 16**: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the Project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

> Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate. (DEIR, p. 5.12-47.)

In addition to the noise barrier described in **MM NOI 16**, the use of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line (see DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**) will be limited as indicated in mitigation measure **MM NOI 15** below: (DEIR, p. 5.12-28, 4.12-34.)**.**

> **MM NOI 15**: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**. (DEIR, p. 5.12-46.)

With construction of the proposed ten-foot barrier in **MM NOI 16** and the nighttime restrictions in **MM NOI 15**, interior and exterior nighttime noise levels at the residences adjacent to the Project site are not expected to exceed the City's exterior or interior nighttime noise standard. (DEIR, pp. 5.12-28, 5.12-34.)

Thus, although it is acknowledged that truck-related noise will be audible in the residences adjacent to and in the vicinity of the Project site, implementation of DEIR mitigation measures **MM NOI 13, MM NOI 14**, and **MM AQ 14** (below) in addition to **MM NOI 15** and **MM NOI 16** would reduce the Project's operational noise levels to be compliant with City code.

> **MM NOI 13**: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient-sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An

alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system. (DEIR, p. 5.12-46.)

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling. (DEIR, p. 5.12-46.)

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language. (DEIR, p. 5.12-47.)

Nonetheless, because the residences west of the Project site are at a higher elevation than the Project site, the ten-foot tall barrier described in **MM NOI 16** is required on private property at the eastern edge of the residential lots, not at the property line at the bottom of the slope. Therefore, if the property owners do not allow for installation of this noise barrier, operational noise at two residences (Receptor Numbers 3 and 4, as shown on DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation** and DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation** will exceed the City's nighttime exterior noise standard of 45 dBA L_{eq} and operational noise impacts may be significant as disclosed in the DEIR. (DEIR, p. 5.12-28.) Although this impact is significant and unavoidable, with feasible mitigation incorporated, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 10-B:

The existing warehouse located behind the homes on Stockport Drive was recently constructed and received separate approvals from the City Planning Commission on April 23, 2015. The proposed Project does not introduce building walls in close proximity to houses along Stockport Drive. The northern wall of Building 2 is located 100 feet south of the residential lots situated to the north of the Project site. There is 64 feet of landscaping between the northern property line of Parcel 2, a 30-foot-wide drive aisle north of Building 2, and an additional 6-foot-wide landscape area between the drive aisle and the building (DEIR, **Figure 3-10 – Proposed Site Plan**).

With regard to the view from residences adjacent to the Project site, line of sight exhibits were prepared to evaluate the post-Project view (once all landscaping is mature) of the Project site from the residences to the north and northwest of the Project site and from the Sycamore Canyon Wilderness Park (DEIR, **Figures 3-14a through 3-14c – Line of Sight Exhibit**). Although the top of Building 2 will be visible from the second story of the residences to the north of the Project site, even once landscaping is mature, mitigation measure **MM AES 9** (below) will be implemented. This mitigation measure requires the north elevation of Building 2 and the west elevation of Building 1, the portions of the buildings that will be visible to the residences and users of Sycamore Canyon Wilderness Park, to include design elements, such as articulation to create pockets of light and shadow, designed to break up the long expanse of wall surface. This design shall be reviewed and approved by Design Review staff prior to Grading Permit Issuance. (DEIR, pp. 5.1-28 – 5.1-29.)

> **MM AES 9**: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.
>
> b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow. (DEIR, p. 5.1-35.)

Additionally, mitigation measure **MM AES 1** (below) requires the developer to install an 8-foot tall decorative (on both sides) block wall between the Project site and the residential properties to the north and northwest to provide a better visual appearance. The design and materials of this wall shall be subject to the approval of the Community and Economic Development Department Planning Division and the Parks, Recreation, and Community Services Department. (DEIR, p. 5.1-27)

> **MM AES 1**: To provide separation between the Project site and the adjacent residential uses and to be consistent with the wall constructed on the project located east of the Project site and north of Dan Kipper Drive, the developer shall install an 8-foot tall wall constructed of two-sided decorative masonry material along the Project site's northern property line and that portion of the

> Project's westerly property line adjacent to existing residential uses. As part of the Design Review process and prior to the issuance of a grading permit, the Project developer shall submit a revised site plan showing the 8-foot tall wall and the proposed materials and decorative treatment for such wall to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 10-C:

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is, DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB

Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA. This table is included as Attachment 10.1 to this response.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 10-D:

The City adopted its *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between

distribution center buildings and adjacent residential uses. Rather, it recommends that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. A HRA was prepared for the project and concluded that the project will not result in a significant impact to the residents. A health risk assessment (HRA) was prepared in June 2016 (included in Appendix B of the DEIR) and a revised HRA was prepared in November 2016 (found on the City's website at http://www.riversideca.gov/planning/pdf/eir/sycamorecanyon/Refined-HRA-Report-11-9-16.pdf) to evaluate cancer and non-cancer risks associated with the proposed Project. None of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the proposed Project vicinity (DEIR, pp. 5.3-33 - 5.3-34). Therefore, the Project will not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation. The site has been designed in order to minimize impacts on the adjacent residential areas, including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

The commenter notes the City's Mission Statement: The City of Riverside is committed to providing high quality municipal services to ensure a safe, inclusive and livable community. The proposed Project has incorporated various Project design features that are consistent with, and in furtherance of, the City's Mission Statement, such as no loading docks or cross dock facilities on the north of Building 2 adjacent to residences, the parking lot to accommodate users of the Sycamore Canyon Wilderness Park, the man-made earthen trail across the middle of the subject site in an east to west direction that leads into the adjacent Sycamore Canyon Wilderness Park to the west of the Project site, extensive tree planting, and the relocation of wetland area to blend with the Sycamore Canyon Wilderness Park.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Attachment 10.1: Roadway Segment Average Daily Traffic from Appendix C of the TIA

Roadway Segment Average Daily Traffic (not PCE)

Street	From	To	Project Only;					Cumulative (2018) Only;										
			Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)						
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps	111	4	5	14	134	1515	11	5	14	1545						
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps	335	4	5	14	358	1358	25	13	34	1430						
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive	372	8	10	28	418	1522	30	16	42	1610						
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard	223	4	5	14	246	1505	52	47	120	1724						
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive	223	4	5	14	246	1443	65	54	137	1699						
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue	1120	148	198	526	1992	1419	64	54	136	1673						
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard	820	124	166	444	1554	1187	52	46	116	1401						
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps	820	124	166	444	1554	2228	159	97	243	2727						

Street	From	To	Existing					Existing Plus Project										
			Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)						
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps	12075	410	30	175	12690	12186	414	35	189	12824						
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps	14530	400	25	200	15155	14885	404	30	214	15513						
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	13390	13157	208	110	333	13808						
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	12925	12953	204	95	309	13171						
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	9940	9648	154	40	344	10186						
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	11220	11835	288	258	831	13212						
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard	12300	130	50	600	13080	13120	254	216	1044	14634						
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps	14175	130	35	690	15030	14995	254	201	1134	16584						

Street	From	To	Existing Plus Ambient Growth (2018)					Existing Plus Ambient Growth (2018) Plus Project					Existing Plus Ambient Growth (2018) Plus Cumulative Projects					Existing Plus Ambient (2018) Plus Cumulative Plus Proj				
			Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)	Pass. Cars	2 Axle Trucks (not PCE)	3 Axle Trucks (not PCE)	4+ Axle Trucks (not PCE)	Total (not PCE)
Fairisle Drive-Box Springs Road	Sycamore Canyon Boulevard	I-215 Northbound Ramps	12800	435	32	186	13453	12911	439	37	200	13587	14315	446	37	200	14998	14426	450	42	214	15132
Sycamore Canyon Boulevard	Fairisle Drive	I-215 Southbound Ramps	15402	424	27	212	16065	15737	428	32	226	16423	16760	449	40	245	17495	17095	453	45	260	17853
Sycamore Canyon Boulevard	I-215 Southbound Ramps	Dan Kipper Drive	13552	212	105	323	14193	13924	220	116	351	14611	15074	242	122	365	15803	15446	250	132	393	16221
Sycamore Canyon Boulevard	Dan Kipper Drive	Box Springs Boulevard	13080	212	95	313	13700	13303	216	100	327	13946	14585	264	142	433	15424	14808	268	147	447	15670
Sycamore Canyon Boulevard	Box Springs Boulevard	Sierra Ridge Drive	9991	159	37	350	10537	10214	163	42	364	10783	11434	224	91	487	12236	11657	228	96	501	12482
Sycamore Canyon Boulevard	Sierra Ridge Drive	Eastridge Avenue	11358	148	64	323	11893	12478	296	262	849	13885	12777	212	118	459	13566	13897	360	316	985	15558
Eastridge Avenue	Sycamore Canyon Boulevard	Box Springs Boulevard	13038	138	53	636	13865	13858	262	219	1080	15419	14225	190	99	752	15266	15045	314	265	1196	16820
Eastridge Avenue	Box Springs Boulevard	I-215 Ramps	15026	138	37	731	15932	15846	262	203	1175	17486	17254	297	134	974	18659	18074	421	300	1418	20213

Comment Letter 11 – Maureen Clemens

11

9/15/16

Community & Economic Development Department
THE PLANNING COMMISSION
3900 Main Street
Riverside, CA 92522

RECEIVED
Sep 16 2016
Community & Economic Development Department

Re: Sycamore Canyon Business Park Building 1 and 2

THE ENTIRE PLANNING COMMISSION: (who ever you may be)

I am enclosing a Location Map for you to study and I mean STUDY so you can see how many homes are impacted by the number of existing warehouses. You can wake up at 4:30 AM and if your windows are open you will hear the hum and beep, beep of Semi Tractor Trailer Trucks. You don't have to be directly in back of these warehouses you can be as far away as Lochmoor close to Central Avenue, sound really cares up here. 11-A

This map does not show the warehouse that is closely and I mean closely behind the homes on Stockport. If you have a two story home on Stockport you will be looking at a giant wall from your second story, which is usually your master bedroom. 11-B

If you go out in the early morning or mid-day or evening on Sycamore Canyon Blvd. you will encounter at least eight trucks in a one block area. These trucks were meant to enter and exit at Eastridge. They do not, they constantly enter and exit the Fair Isle, Box Spring exit and entrance and have been known to go as far as Central to enter the 60 freeway. 11-C

I advise you to have a look, a good look at the Good Neighbor Guidelines adopted by the city on October 14th, 2008. Also you might want to review the City's Mission Statement: The City of Riverside is committed to providing high quality municipal services to ensure a safe, inclusive and livable community. 11-D

Sincerely,
Maureen Clemens
Maureen Clemens
6012 Abernathy Dr.
Riverside, CA 92507
enclosure

RECEIVED
SEP 16 2016
Community & Economic Development Department

Figure 2 - Location Map
Sycamore Canyon Business Park Buildings 1 and 2

Response to Comment Letter 11 – Maureen Clemens

Note: Comment Letter 11 is identical to Comment Letter 10, except it is addressed to the Planning Commission.

Response to Comments 11-A through 11-D:

Comment noted, please see Response to Comments 10-A to 10-D. This comment letter does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report.

Comment Letter 12 – Marla Diaz

12

City of
iverside
September 21, 2016
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Ms. Brenes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). 12-A

I can't believe that Riverside the city that strives to be about community is even thinking about putting another warehouse behind Sycamore Community.

I have a warehouse behind my home. Our home consists of me, my husband and 2 children. We already hear the 24 hour business of Big5 and have the light of the new warehouse shine through my children's window. The noise is very loud at night and my children are having a problem sleeping. If these two buildings are approved I can only imagine the noise my kids will have to deal with. 12-B

I work in distribution and know firsthand that fork lifts are noisy and there will be pollution. Also I see trailers parked on street waiting over the weekend for facilities to open. Who knows what these out of state truckers will bring to our COMMUNITY. 12-C

Please keep in mind the metro now is open and this will make it easy for truck drivers to pick up and drop off street walkers and make it easy for drug transactions. I see this in Ontario all the time. 12-D

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate mitigation strategies (including NO development) should be considered. 12-E

Sincerely,

Marla Diaz
1572 Stockport Dr.
92507

Response to Comment Letter 12 – Marla Diaz

Response to Comment 12-A:

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP) and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14)

The Project currently proposed at the site is consistent with the GP 2025 and SCBPSP. Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report (DEIR).

Response to Comment 12-B:

The comment regarding existing noise from the Big 5 warehouse is noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential light and noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections of the DEIR.

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. These measurements are taken to quantify the existing noise in the area so that the anticipated noise from the construction and operation of the proposed Project can be evaluated. The results of this monitoring is reported in **DEIR Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from existing adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) The NIA also quantified potential noise impacts associated with construction and operation of the proposed Buildings 1 and 2. (DEIR Appendix I.)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

MM NOI 1: To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) The Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below (DEIR, p. 5.12-46.) to reduce noise from nighttime operations.

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

As a result of implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written

notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit the noise barrier per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

The Project will introduce new sources of light in the form of security lighting, internal roadway and parking lot lighting within the Project site for public safety and operation of the proposed structures. The proposed lighting at the Project site has been designed in accordance with all applicable City codes to minimize spillover. Impacts with regard to new sources of light and glare were determined to be less than significant through compliance with the City's Zoning Code, mitigation measures **MM AES 10** and **MM HAZ 4**, any other applicable lighting requirements and regulations, and compliance with Staff Recommended Conditions of Approval modified below: (DEIR, pp. 5.1-29–5.1-31.)

MM AES 10: To eliminate~~reduce~~ light spill and glow into the residential backyards to the north, lighting mounted on the north wall of Building 2 shall be placed on this wall as low as feasible to provide the required security lighting.

MM HAZ 4: The following additional MARB-required risk-reduction Project design features shall be incorporated into Project design:

- The Project will not include:
  - Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light, visual approach slope indicator, or FAA-approved obstruction lighting;
  - Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport;

- Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area;
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation; or
- Although such uses are not anticipated, in Building 1: Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, places of assembly, noise sensitive outdoor nonresidential uses and hazards to flight are prohibited.

o Any outdoor lighting that is installed will be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. All outdoor lighting will be downward facing;

o March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result;

o No skylights will be included;

o Exterior walls will consist of 8-inch-thick solid grouted, 4-hour rated concrete masonry;

o Building roof will consist of structural steel columns and steel roof structure framing elements, including structural steel decking;

o Use of windows will be limited to only the structures' main entrances;

o The structure will incorporate an enhanced fire sprinkler system to exceed California Fire Code requirements; and

o The structure will include emergency exits that exceed the exit requirements set forth by the Riverside County Fire Code by approximately 15 to 20 percent.

o The applicant will not propose any uses prohibited or discouraged in Compatibility Zones C1 or D. (DEIR, p. 5.1-36.)

With regard to lighting and the height of any light poles adjacent to the residences to the north, Staff recommended the following Condition of Approval, which has been modified as follows in the Errata to the DEIR:

> An exterior lighting plan shall be submitted to Design Review staff for review and approval. A photometric study and manufacturer's cut sheets of all exterior lighting on the building, in the landscaped areas and in the parking lot shall be submitted with the exterior lighting plan. All on-site lighting shall provide a minimum intensity of one foot-candle and a maximum of ten foot-candles at ground level throughout the areas serving the public and used for parking, with a ratio of average light to minimum light of four to one (4:1). The light sources shall be <u>hooded and</u> shielded to minimize off-site glare, shall not direct light

> skyward and shall be directed away from adjacent properties, and public rights-of-ways. No light spill shall be permitted on the MSHCP Conservation Area (Sycamore Canyon Wilderness Park). If lights are proposed to be mounted on buildings, down-lights shall be utilized. Light poles shall not exceed fourteen (14) feet in height ~~twenty feet (20)~~ in height, including the height of any concrete or other base material within the 100-foot setback between Building 2 and the residential properties ~~adjacent~~ to the north ~~property line~~ and shall not exceed 20 feet in height, including the height of any concrete or other base material, elsewhere on the property.

For the reasons set forth above, impacts with regard to Project lighting will be less than significant with mitigation. (DEIR, p. 5.1-31.)

Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 12-C:

Comment noted. Pursuant to mitigation measure **MM AQ 15** in the DEIR, forklifts and other service equipment used at the site shall be electric or compressed natural gas-powered. This will reduce the amount of pollution produced by use of this equipment at the site and will result in quieter operation.

> **MM AQ 15:** Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 12-D:

Comment noted. It is uncertain what the commenter is referring to by "the metro is now open." Additionally, there is no evidence provided that truck drivers using the Project site will engage in illegal activities. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis" (CEQA Guidelines, § 15088(c)). These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, § 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].)

The DEIR fully addresses and compares the impacts associated with the proposed Project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air

quality, greenhouse gas emissions, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR. The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment" (CEQA Guidelines, § 15064(f)(6)). The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. Economic and social impacts of proposed projects, therefore, are outside CEQA's purview." (*Anderson First Coalition v. City of Anderson* [2005] 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)].)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 12-E:

The DEIR was prepared in accordance with the requirements of the State CEQA Guidelines and the City's local guidelines for implementing CEQA. The DEIR contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise and light and as addressed in Response to Comments 12-A through 12-C above.

CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a)). According to this section of the State CEQA Guidelines, "…an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet; however, during preparation of the

DEIR the Project Applicant received feedback from the City, encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the Sycamore Canyon Business Park Specific Plan: All of the vacant parcels along Alessandro Boulevard and within the SCBPSP are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the SCBPSP designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 13 – Ric Wade

13

Brenes, Patricia

From: ric wade <waderic1028@att.net>
Sent: Wednesday, September 21, 2016 9:07 PM
To: Brenes, Patricia
Subject: [External] Comments Re: Sycamore Canyon Business Park Buildings 1 and 2

September 21, 2016

13-A

My property, 6058 Cannich Road, Riverside, is directly impacted by noises that will come from the 1.3 million square foot
warehouses proposed to be constructed. Contrary to the noise studies noted in the DEIR, no comments were stated regarding sound and ground vibration that occurs from semi-trailers being dropped to the surface from the trailer forklifts. When winds come from the south or east, this noise increases substantially to our property.

13-B

Another observation during my morning walks in the Sycamore trails, I am seeing semi trucks now coming down Lochmoor street as a means of avoiding the congestion of cars and trucks on Sycamore Canyon road and Eastridge as well as the gridlock each morning on the 215S and 60E connectors.

Rick Wade
6058 Cannich Road

Response to Comment Letter 13 – Ric Wade

Response to Comment 13-A:

The commenter's concerns are noted. With regard to exposure to persons from groundborne vibration (annoyance) Table 1 in the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (DEIR Appendix I) (the "NIA") presents "Vibration Source Levels for Construction Equipment" (Federal Transit Administration 2006). DEIR **Table 5.12-I – Vibration Source Levels for Construction Equipment** includes the same information**.** NIA Table 2 and DEIR **Table 5.12-H – Typical Human Reaction and Effect on Buildings Due to Groundborne Vibration** includes "Typical Human Reaction and Effect on Buildings due to Groundborne Vibration (Caltrans 2002). The NIA acknowledges that vibratory construction equipment may annoy persons within 100 feet of on-site Project construction.

Use of a vibratory roller, which may occur within 25 feet of an adjacent receptor could generate up to 0.21 PPV (94 VdB) at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV (87 VdB) at a distance of 25 feet (two of the most vibratory pieces of construction equipment) for a few days. Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 75 VdB. The use of vibratory construction equipment will be short term and temporary and the DEIR includes mitigation measures **MM NOI 6** and **MM NOI 9** to minimize vibration impacts.

> **MM NOI 6:** All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west. (DEIR, p. 5.12-45.)
>
> **MM NOI 9:** It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible. (DEIR, p. 5.12-46.)

Further, any annoyance would only occur during site grading and preparation activities as trailer trucks are prohibited from use of the driveway located between the sensitive receptors located north of the Project site and the proposed building and sensitive receptors upslope and to the west of the Project site are too far away to be affected.

With regard to sound associated with trailer hitching and unhitching, the Project's operational noise levels shown on DEIR **Figure 5.12-5 – Project Operational Noise Levels (Leq) No Mitigation** and **Figure 5.12-6 – Project Operational Noise Levels (Leq) with Mitigation** includes all noise associated with Project operations including: vehicles arriving, trucks and trailers moving around the Project site, back-up beepers, hitching and unhitching of trailers, and the movement of trailers into the loading docks averaged over a one hour period. The NIA

and DEIR also evaluated and disclosed maximum noise levels (L_{max}) resulting from trailers hitching and unhitching. As stated on page 5.12-34 of the DEIR, the maximum noise event from the dock areas without mitigation could reach up to 63 dBA L_{max} at the nearest sensitive receptor, which does not exceed the City's daytime or nighttime noise standards. Additionally, the Project will implement mitigation measure **MM NOI 15**, which limits the use of the loading area and trailer parking located south of Building 2 and within 360 feet of the western property line. With implementation of mitigation measure **MM NOI 15** (listed below), noise impacts will be reduced to less than significant for all sensitive receptors except for the following two receptors: receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich).

> **MM NOI 15:** A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**. (DEIR, p. 5.12-46.)

Therefore, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 13-B:

The commenter's observation regarding trucks on Lochmoor Drive is noted; however, these trucks are not related to the proposed Project.

With regard to the existing condition of trucks using Fair Isle Drive for any reason other than to turn onto Sycamore Canyon Boulevard, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From

the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 14 – Alec Gerry

14

Brenes, Patricia

From: Alec Gerry <alecg@ucr.edu>
Sent: Wednesday, September 21, 2016 11:26 PM
To: Brenes, Patricia; sycamorehighlands@yahoo.com
Subject: [External] Mega warehouses proposed for Sycamore Canyon Business Park

City of Riverside

Community Development Department Planning Division

Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Ms. Brenes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). 14-A

My family already suffers from warehouse noise, particularly in the nighttime and very early morning hours (2am-6am is the worst!). Yet the nearest warehouse to me (Big 5) is approximately 2,000 feet away from my home. Much of the early morning noise comes from the Ralphs facility which is over 2,700 feet from my home. Sound travels very far in the canyon and into the residential homes due to the geography of the area. The acoustics of this area were not well modeled in the EIR - in fact the noise monitoring in the EIR was frankly a joke with sound not measured at locations where and during environmental conditions when noise would be expected to be most severe. I can tell you that warehouse noises are much greater on cloudy nights, high humidity nights, and nights when the wind blows toward the north. These were not the conditions when noise was monitored. If my children, my wife, and I are already awakened many nights by warehouse noise (backup alarms and truck horns) when warehouses are over 2,000 feet away, it can only be anticipated that noise will be much worse if the new MEGA warehouses are built just 700 or so feet away from my home. And I cannot even imagine the torture of being one of the closest homes to the Business Park!!

I want to also state that the traffic patterns mentioned in the draft EIR are inaccurate. Many trucks travel north on Sycamore Canyon Blvd from the warehouses (not just the 5% modeled). Also, many of the warehouses in the area currently vacant so their truck traffic is not included in any traffic analysis, but when these warehouses are filled, teh number of truck visits per day will be well more than what is modeled in the EIR. We already have very heavy traffic on Sycamore Canyon Blvd and the Box Springs entrance and exit from the 60 freeway. This will only be worse if the two proposed warehouses are constructed. In fact, trucks already are coming into our community looking for short cuts around the traffic jams on Sycamore Canyon Blvd. 14-B

1

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns above. I believe that the draft EIR should be reconsidered and alternate mitigation strategies (including NO development) should be considered. 14-C

Sincerely,

Dr. Alec C. Gerry
Professor of Veterinary Entomology
UC Extension Specialist in Veterinary Entomology
(951) 827-7054
www.veterinaryentomology.ucr.edu

2

Response to Comment Letter 14 – Alec Gerry

Response to Comment 14-A:

The comment regarding existing noise from the Big 5 warehouse is noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections of the DEIR.

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. The results of this monitoring is reported in Draft Environmental Impact Report (DEIR) **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) Ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that change in the noise levels resulting from Project implementation would be overstated. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, Table 5.12-B.) These measurements consist of three 10-minute, short-term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note that, in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Again, the purpose of the ambient noise measurements is to provide a basis for the comparison of noise with and without the Project; thus, longer term measurements are not necessary. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards.

Regarding meteorological conditions, precipitation, rain, snow, or fog, has an insignificant effect on sound levels although the presence of precipitation will affect humidity and may also affect wind and temperature gradients. (Sound Propagation.[1]) As sound travels through the atmosphere, it is affected by temperature, humidity, and wind currents, which can change the speed and direction of sound. Just as light bends when traveling through a prism, sound bends as a result of the varying atmospheric properties. Sound waves tend to bend toward

[1] Sound Propagation website. (Available at https://www.sfu.ca/sonic-studio/handbook/Sound_Propagation.html, accessed November 27, 2016.)

cooler temperatures and away from warmer temperatures. For example, on a typical summer afternoon, because air temperatures generally decrease with altitude, sound generated at ground level would bend upward towards the cooler air. For a person at the same level as the sound, the sound waves are bending up and over the person listening, creating what is known as a shadow zone. When this occurs, a noise source may be visible at a distance but be perceived as quieter than expected. When the air temperature is cooler close to the ground than it is at higher altitudes, such as late at night or over calm lakes or icy surfaces, the sound waves bend closer to the ground and if the ground is reflective, the sound bounces off the ground and may propagate (travel) further than expected. (Cowan,[2] pp. 11, 19-21.) Because the effects of temperature gradients are more important over long distances (Caltrans TeNS[3]), these gradients would not substantially change the results of the NIA.

Generally speaking, wind currents allow sound to travel further than expected when the sound is being emitted in the same direction as the wind (downwind) and sound will travel a shorter distance than expected when the sound is being emitted in the direction against the wind (upwind). (Cowan, p. 21.)

The NIA used SoundPLAN to model the Project's construction and operational noise. SoundPLAN allows the user to input humidity and temperature into the model. For purposes of the NIA, modeled temperature was 66 degrees Fahrenheit (66° F) and 49 percent humidity. According to Weather Underground, the average temperature for the City of Riverside is 69° F and average humidity is 49.7 percent. Between November 2015 and November 2016, the highest temperature in Riverside was 114° F and the lowest temperature was 33° F. To evaluate the effects of changes in temperature and humidity referenced in the commenter's comment, four new modeling runs were prepared assuming: (i) temperature at 33° F and 0% humidity, (ii) temperature at 33° F and 100% humidity, (iii) temperature at 114° F and 0% humidity, and (iv) temperature at 114° F and 100% humidity. The results of this analysis, which does not change or materially impact the conclusions set forth in the NIA and DEIR, is summarized in the table below and shown on the attached figures.

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
1 first floor	43	42	43	41	41
1 second floor	45	44	45	43	44
2 first floor	30	30	30	30	30
2 second floor	32	32	32	32	32
3 first floor	45	45	45	44	44

[2] Cowan refers to the *Handbook of Environmental Acoustics*, published by John Riley & Sons, Inc., 1994.

[3] Caltrans TeNS refers to the Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. (Available at http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed November 27, 2016.)

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
3 second floor	49	48	49	48	48
4 first floor	48	47	48	47	47
4 second floor	52	51	52	51	51
5 first floor	49	49	49	49	49
5 second floor	50	49	50	49	49
6 first floor	43	43	43	43	43
6 second floor	44	43	44	43	43
7 first floor	38	38	38	38	38
7 second floor	39	39	39	39	39
8 first floor	33	33	33	33	33
8 second floor	35	35	35	35	35
9 first floor	35	35	35	34	35
9 second floor	37	37	37	36	36
10 first floor	39	38	39	37	38
10 second floor	41	40	41	39	40
11 first floor	33	33	33	33	33
11 second floor	35	35	35	35	35
12 first floor	31	31	32	31	32
12 second floor	34	34	34	34	34
13 first floor	30	30	30	30	30
13 second floor	32	32	32	32	32
14 first floor	31	31	31	31	31
14 second floor	33	33	33	33	33
15 first floor	32	31	32	32	32
15 second floor	34	34	34	34	34
16 first floor	31	31	31	31	31
16 second floor	34	33	34	34	34
17	30	30	30	30	30
18 first floor	44	43	44	43	43
18 second floor	45	44	45	44	44
19 first floor	43	43	43	42	42
19 second floor	43	43	43	43	43
20 first floor	31	31	31	31	31
20 second floor	37	37	37	37	37
21 first floor	34	34	34	34	34
21 second floor	39	39	39	38	38
22	36	36	36	36	36
23 first floor	36	36	36	35	36
23 second floor	37	37	38	37	37
24 first floor	33	32	33	32	32

Receptor No. per DEIR Figure 5.12-5	Noise Level per DEIR Figure 5.12-5	Noise Level at 33° F and 0% humidity (Figure A)	Noise Level at 33° F and 100% humidity (Figure B)	Noise Level at 114° F and 0% humidity (Figure C)	Noise Level at 114° F and 100% humidity (Figure D)
24 second floor	35	34	35	34	34
25 first floor	31	30	31	30	31
25 second floor	34	34	34	34	34
26 first floor	29	29	29	29	29
26 second floor	32	32	32	32	32
27 first floor	32	32	32	32	32
27 second floor	34	33	33	33	33
28 first floor	31	31	31	31	31
28 second floor	34	34	34	34	34
29 first floor	30	30	30	30	30
29 second floor	33	33	33	33	33
30 first floor	31	31	31	31	32
30 second floor	35	35	35	34	35
31	48	48	48	48	48
32	47	47	47	47	47
33	38	38	38	37	37
34	55	54	54	54	54

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays from the standards of the Noise Code. Pursuant to this new Ordinance, the construction noise from the Project, would not have resulted in a significant impact.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials

providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 14-B:

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

With respect to the existing condition of trucks using Fair Isle Drive for any reason other than to turn onto Sycamore Canyon Boulevard, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to

report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is, DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at the Fair Aisle Drive off ramps than the Eastridge Avenue off-ramps; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative

impacts and in compliance with State CEQA Guidelines Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff (**DEIR, Figure 5.16-9**). This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

Thus, this comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 14-C:

The DEIR was prepared in accordance with the requirements of the State CEQA Guidelines and the City's local guidelines for implementing CEQA. The DEIR contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise and light and as addressed in Response to Comments 12-A through 12-C above.

CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a). According to this section of the State CEQA Guidelines, "…an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 15 – Alec Gerry

15

Brenes, Patricia

From: Alec Gerry <alecgerry@sbcglobal.net>
Sent: Thursday, September 22, 2016 6:57 AM
To: Brenes, Patricia
Subject: [External] Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042).

City of Riverside
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Ms. Brenes,
I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). 15-A

My family already suffers from warehouse noise, particularly in the nighttime and very early morning hours (2am-6am is the worst!). Yet the nearest warehouse to me (Big 5) is approximately 2,000 feet away from my home. Much of the early morning noise comes from the Ralphs facility which is over 2,700 feet from my home. Sound travels very far in the canyon and into the residential homes due to the geography of the area. The acoustics of this area were not well modeled in the EIR - in fact the noise monitoring in the EIR was frankly a joke with sound not measured at locations where and during environmental conditions when noise would be expected to be most severe. I can tell you that warehouse noises are much greater on cloudy nights, high humidity nights, and nights when the wind blows toward the north. These were not the conditions when noise was monitored. If my children, my wife, and I are already awakened many nights by warehouse noise (backup alarms and truck horns) when warehouses are over 2,000 feet away, it can only be anticipated that noise will be much worse if the new MEGA warehouses are built just 700 or so feet away from my home. And I cannot even imagine the torture of being one of the closest homes to the Business Park!!

I want to also state that the traffic patterns mentioned in the draft EIR are inaccurate. Many trucks travel north on Sycamore Canyon Blvd from the warehouses (not just the 5% modeled). Also, many of the warehouses in the area currently vacant so their truck traffic is not included in any traffic analysis, but when these warehouses are filled, teh number of truck visits per day will be well more than what is modeled in the EIR. We already have very heavy traffic on Sycamore Canyon Blvd and the Box Springs entrance and exit from the 60 freeway. This will only be worse if the two proposed warehouses are constructed. In fact, trucks already are coming into our community looking for short cuts around the traffic jams on Sycamore Canyon Blvd. 15-B

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns above. I believe that the draft EIR should be reconsidered and alternate mitigation strategies (including NO development) should be considered. 15-C

Sincerely,

Alec Gerry
6017 Cannich Road
Riverside, CA 92507

Response to Comment Letter 15 – Alec Gerry

Note: Comment Letter 15 is identical to Comment Letter 14, except it was sent from a different email address.

Response to Comments 15-A through 15-C:

Comment noted, see Responses to Comment 14-A through 14-C. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report.

Comment Letter 16 – Jesus Galvan

16

RECEIVED
SEP 27 2016
Community & Economic Development Department

September 22, 2016

City of Riverside
Community and Economic Development
Department, Planning Division
Attn: Patricia Barnes

Subject: Comments to Draft Environmental Impact Report (DEIR); Clearinghouse no. 2015081042

Patricia:

Here are my comments to the DEIR:

1 Table 1-B-DEIR Impact Summary Matrix. Aesthetics "Substantially degrade the existing visual character or quality of the site and its surroundings"- More than just including trees to block out the view of building 2 needs to be done to address this issue. Building 2 can be graded in such a way to avoid it towering 30 feet in view of the homes. By grading, the building profile could be reduced to below a standard home fence. 16-A

2 Choosing "Alternative 3, Reduced Density" would substantially reduce the impacts to adjacent homes by eliminating building 2 and still provide plenty of building space. 16-B

3 Table 5.1-A- Line of Sight Analysis: Section D-D is wrong. Due to the existing topography the view of the building will be significant. The top of building 2 will be approximately 40 to 50 feet in the Air! And just because the views of existing industrial buildings east and south of the project site exist, as stated in section D-D, does not justify the construction of additional industrial buildings! The reasoning for this project based on past injustices is wrong. 16-C

4 Page 5.1-27: 1st paragraph. As stated before, because this proposed project is consistent with "other large-scale logistics and industrial uses adjacent to the east and south" does not justify new construction that will substantially impact further residences. The City allowed the views and value of several homes in this area to be destroyed once and shouldn't allow this to happen again. 16-D

5 Page 5.1-27: 1st paragraph. Classifying the prior use of the project area as "the Rocks" is wrong. Just look and the included pictures in the DEIR. 16-E

6 Page 5.1-27: 1st paragraph. Justifying the project by stating that illegal dumping will be eliminated is a weak excuse. 16-F

If you have any question for me, please give me a call at 909-214-6022. 16-G

Sincerely,

Jesus Galvan

Response to Comment Letter 16 – Jesus Galvan

Response to Comment 16-A:

The Project will require three grading exceptions to implement the Project's proposed grading plan because the Riverside Municipal Code permits a maximum of 20-foot high slopes and benches are not normally permitted. (DEIR, p. 3-22.) The Project's grading plan has been designed to minimize views of Building 1 and Building 2 from the neighboring residences; however, it is not feasible to safely grade the site to have the building profile reduced to below a standard home fence. In addition, due to the existing granite material that lays a few feet beneath the existing terrain, a major blasting operation would be needed to remove the granite material to place the buildings below the height of the standard rear yard fence. This would necessitate a greater number of truck trips during construction to haul the exported soil off site in addition to creating noise and vibration impacts associated with the blasting operation. Blasting is prohibited by mitigation measure **MM NOI 12.** (DEIR, p. 5.12-46.)

> **MM NOI 12:** No blasting shall take place on the Project site.

In addition to the proposed landscaping, Building 2 will be articulated along its northern edge, the edge of the building visible to the residences, to offset the appearance of the building. The Project proponents will also be required to install an 8-foot tall decorative (on both sides) block wall between the Project site and the residential properties. (DEIR, p. 5.1-9.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report (DEIR).

Response to Comment 16-B:

Alternative 3 – Reduced Density Alternative would reduce development by 30 percent compared to the proposed Project, reducing site coverage (or the percentage of the site that is covered in buildings) from 45 percent to 31 percent. Due to scarcity of sites of this size, the attendant land cost of sites this size, and the low Inland Empire market lease rates for product of this type, unless site coverage reaches at least 45 percent, the rate of return from the lease would be too low to justify the cost and risk of investment. The feasibility of this alternative is further impacted by economies of scale in the construction of smaller buildings, which would drive the return on investment to below zero. Further, a survey of industrial buildings in the Inland Empire submarket indicates that there is a very low availability of buildings in the 1,000,000-square foot size range and a high availability of buildings in the 700,000 and 300,000 square foot size ranges. Therefore, a reasonable developer would not take the risk to develop the reduced density alternative and this Alternative 3 was rejected as infeasible. (DEIR, p. 8-33.) Additionally, Alternative 3 would not meet all the Project objectives.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 16-C:

The residences at Section D-D of the Line of Sight Exhibit are located downslope from the proposed Buildings 1 and 2. Additionally, the northern wall of Building 2 is located 100 feet south of the residential lots located to the north of the Project site. Within the 100-foot building setback, there is 64 feet of landscaping adjacent to and between the northern property line of Parcel 2, and the 30-foot-wide drive aisle north of Building 2. There is then an additional 6-foot-wide landscape area between the drive aisle and the northern edge of Building 2. (DEIR, **Figure 3-10 – Proposed Site Plan.**) As shown on **Figure 3-13A – Line of Sight Exhibit,** the line of sight for Section D-D shows that the trees (once matured) within the 64-foot landscape buffer would screen the views of the proposed Building 2 from the ground level as well as from second stories.

Appendix G of the State CEQA Guidelines state that a significant impact will occur if a project would "substantially degrade the *existing* visual character or quality of the site and its surroundings" (emphasis added). Therefore, because analysis in this section considers the significance of the *change* of the views it is necessary to consider the existing warehouses as part of the existing visual character of the site and its surroundings. The proposed Buildings 1 and 2 would be contiguous with views of existing industrial buildings east and south of the Project site and would not substantially impact the character or quality of the site and its surroundings as seen by viewers. (DEIR, p. 5.1-27.) Additionally, the proposed Buildings 1 and 2 will be designed to be architecturally consistent with modern light industrial logistics centers and other structures within the Sycamore Canyon Business Park.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 16-D:

Comment noted. In 1984, the *Sycamore Canyon Business Park Specific Plan* (SCBPSP) was approved by the City to ensure efficient, orderly, and attractive development of a planned industrial park consisting of approximately 920 acres of industrial and commercial uses and a 480-acre wilderness park. (DEIR, p. 3-6.) The Project site is designated as Industrial in the SCBPSP; therefore, the proposed Project at this site is consistent with the SCBPSP. (DEIR, p. 5.10-8.) Regarding justification of the Project based on existing warehouses in the vicinity, see Response to Comment 16-C above. Further, the Project has been designed to minimize visual impacts to the residences, including installation of a two-sided decorative wall, a 64-foot wide landscaped area, and a 100-foot setback of Building 2 from the property line abutting the residential areas and the Project site. The site's grading plan and site plan have been designed so as to minimize visual impacts to the residences from Building 1.

Economic issues, such as home values, are not an environmental issue and not within the scope of analysis for an Environmental Impact Report. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does

not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis" (CEQA Guidelines, § 15088(c)). These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, § 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].)

The DEIR fully addresses and compares the impacts associated with the Project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR. The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment." (CEQA Guidelines, § 15064(f)(6).) The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. Economic and social impacts of proposed projects, therefore, are outside CEQA's purview." (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)].) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 16-E:

The Project site was previously used for a surface mining operation to excavate primarily decomposed granite for exporting and using the overburdened soils for on-site fill. There are several large rocks leftover in this portion of the Project site as a result of these mining operations. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 16-F:

Comment noted. The mention of illegal dumping was related to documenting the existing visual conditions of the site. The City views illegal dumping as bringing decay and blight into the City's neighborhoods thus creating public health hazards. Once constructed, the Project will eliminate the illegal dumping that has occurred in the past and thereby prevent the further incursion of decay and blight into the City. (DEIR, p. 5.1-27.) This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 16-G:

Comment noted. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 17 – Mark Newhall

17

Brenes, Patricia

From: Mark Newhall <Lnewhall30@charter.net>
Sent: Thursday, September 22, 2016 10:43 AM
To: Brenes, Patricia
Subject: [External] Concerns Regarding Warehoused in Sycamore Canyon Business Park

City of Riverside September 22, 2016
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Ms. Brenes,
I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). 17-A

This development is literally going to be in my back yard. Because of its proximity, I have concerns listed below:

The noise from the 24/7 trucks coming in and out was not adequately addressed. Currently we hear back up beeping and horns honking throughout the night from the warehouses that are already in existence (Big Five) and farther away. I'm not sure how the noise level may already be acceptable and the addition of 2 more warehouses will continue to be acceptable. I can't have my windows open at night with all of the beeping and honking going on. And because we are up higher than the warehouses, the amphitheater effect of sound rising is even more amplified!

The traffic on Sycamore Canyon and Fair Isle is already horrible. Trucks that are supposed to only use Eastridge as an exit do not, and the big rigs on our streets add to the mess of traffic and pollution by their having to idle while waiting for traffic to move or when they run into the convenience store or fast food restaurant. In addition, because the roads are narrow, you can't see around these big rigs in order to safely get around. The amount of trucks and the pollution they bring are not what should be in a residential neighborhood. 17-B

Also, these buildings are not what I want to be looking at when I am in my back yard. These warehouses will block part of my view of the city lights, and having to look at the roof tops is not appealing as there is not much they can do to make them aesthetically pleasing. 17-C

All of these factors regarding the warehouses bring down the value of my home and impact the health and safety of my family and neighbors. 17-D

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate mitigation strategies (especially including NO development) should be considered. 17-E

Sincerely,

Lisa Newhall
6040 Cannich Road, Riverside 92507

Response to Comment Letter 17 – Mark Newhall

Response to Comment 17-A:

The comment regarding existing noise from the Big 5 warehouse is noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections of the Draft Environmental Impact Report (DEIR).

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. These measurements are taken to quantify the existing noise in the area so that the anticipated noise from the construction and operation of the proposed Project can be evaluated. The results of this monitoring is reported in DEIR **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, ambient noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) Ambient noise measurements were taken to determine the existing noise setting for purposes of comparing Project-generated noise to quantify the extent, if any, that construction and operation of the proposed Project would result in a noise increase. If, as asserted by the commenter, the ambient noise levels reported in the NIA and DEIR are too low, the result would be that change in the noise levels resulting from Project implementation would be overstated. Existing noise levels in the Project vicinity were measured on five separate days in December 2015. (DEIR, **Table 5.12-B**.) These measurements consist of three 10-minute, short-term, noise measurements and two 24-hour, long-term, noise measurements. Noise measurement locations were chosen to reflect different existing noise environments from the residents to the northwest of the Project site as well as residents to the north of the Project site. It is important to note that, in selecting the locations for ambient monitoring, locations that would be quieter were intentionally selected to avoid the perception that ambient noise was measured at the noisiest spots in order to understate the Project's impacts with regard to an increase in noise associated with the Project. Again, the purpose of the ambient noise measurements is to provide a basis for the comparison of noise with and without the Project; thus, longer term measurements are not necessary. Ambient noise measurements were not taken for purposes of determining whether existing operations in the Project area are in violation of the City's Noise Ordinance or applicable standards.

The NIA also quantified potential noise impacts associated with construction and operation of the proposed Buildings 1 and 2. (DEIR Appendix I)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent

feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below: (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

MM NOI 1: To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division. **MM NOI 2:** To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these two residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square

foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit per mitigation measure **MM NOI 16**, operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 17-B:

Traffic: With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is

approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

With respect to the existing condition of trucks using Fair Isle Drive for any reason other than to turn onto Sycamore Canyon Boulevard, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**

Segment of Sycamore Canyon Boulevard		Existing Condition (ADTs) by Vehicle Type					Project Trips Only (ADTs) by Vehicle Type				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State CEQA Guidelines Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff (DEIR, Figure 5.16-9). This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (DEIR, p. 5.3-27). (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40.)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the FEIR as shown below.[1]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to three ~~five~~ minutes or less which is shorter than required under ~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

[1] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (example text).

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that ~~CARB diesel~~ idling times cannot exceed three minutes ~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 17-C:

With regard to the view from residences adjacent to the Project site, line of sight exhibits were prepared to evaluate the post-Project view (once all landscaping is mature) of the Project site from the residences to the north and northwest of the Project site and from the Sycamore Canyon Wilderness Park (DEIR, **Figures 3-14a through 3-14c – Line of Sight Exhibit**). Although the top of Building 2 will be visible from the second story of the residences to the north of the Project site, even once landscaping is mature, mitigation measure **MM AES 9** (below) will be implemented. This mitigation measure requires the north elevation of Building 2 and the west elevation of Building 1, the portions of the buildings that will be visible to the residences and users of Sycamore Canyon Wilderness Park, to include design elements, such as articulation to create pockets of light and shadow, designed to break up the long expanse of wall surface. This design shall be reviewed and approved by Design Review staff prior to Grading Permit Issuance. (DEIR, pp. 5.1-28 – 5.1-29.)

> **MM AES 9**: To offset the long expanses of wall surfaces on Building 1 and Building 2, prior to the issuance of a grading permit as part of the Design Review process, revised architectural plans and elevations shall be submitted for review and approval by the City of Riverside Design Review staff.
>
> a. The revised architectural plans and building elevation for the west elevation of Building 1 shall include some of the same elements used on the front elevation to offset the long (1,394 feet) expanse of wall surface, including providing design techniques like those at the office areas on every corner of Building 1. The new design shall implement articulation to create pockets of light and shadow.
>
> b. The revised architectural plans and building elevation for the north elevation of Building 2 shall be articulated in the same manner as the front elevation and shall include the same elements used on the east

> elevation to offset the long (978 feet) expanse of wall surface. The exterior features provided at the office areas shall be provided on every corner of Building 2. The new design shall implement articulation to create pockets of light and shadow. (DEIR, p. 5.1-35.)

Additionally, mitigation measure **MM AES 1** (below) requires the Applicant to install an 8-foot tall decorative (on both sides) block wall between the Project site and the residential properties to the north and northwest to provide a better visual appearance. The design and materials of this wall shall be subject to the approval of the Community and Economic Development Department Planning Division and the Parks, Recreation, and Community Services Department. (DEIR, p. 5.1-27)

> **MM AES 1**: To provide separation between the Project site and the adjacent residential uses and to be consistent with the wall constructed on the project located east of the Project site and north of Dan Kipper Drive, the developer shall install an 8-foot tall wall constructed of two-sided decorative masonry material along the Project site's northern property line and that portion of the Project's westerly property line adjacent to existing residential uses. As part of the Design Review process and prior to the issuance of a grading permit, the Project developer shall submit a revised site plan showing the 8-foot tall wall and the proposed materials and decorative treatment for such wall to the City of Riverside Community and Economic Development Department, Planning Division and the Parks, Recreation, and Community Services Department for review and approval.

Additionally, there is a 100 foot setback between Building 2 and the residences to the north. The 100 foot setback includes 64 feet of landscaping adjacent to the northern property line of Parcel 2, a 30-foot-wide drive aisle north of Building 2, and an additional 6-foot-wide landscape area between the drive aisle and the building (DEIR, **Figure 3-10 – Proposed Site Plan**). The 100 foot setback and landscaping will screen the Project from the residences.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 17-D:

Comment noted. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis" (CEQA Guidelines 15088(c)). These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required. (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [where a general comment is made, a general response is sufficient].)

The DEIR fully addresses and compares the impacts associated with the Project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR. The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project's social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

Indeed, "evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment." (CEQA Guidelines, § 15064(f)(6).) The California Supreme Court has explained that "[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. Economic and social impacts of proposed projects, therefore, are outside CEQA's purview." (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)].)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 17-E:

The DEIR was prepared in accordance with the requirements of the State CEQA Guidelines and the City's local guidelines for implementing CEQA. The DEIR and contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise, traffic, and aesthetics as addressed in Response to Comments 17-A through 17-C above.

CEQA requires the lead agency to consider a range of alternatives to the Project (CEQA Guidelines Section§ 15126.6(a)). According to this section of the State CEQA Guidelines, "…an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. Four alternatives were identified but rejected from detailed consideration because they either:

failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term,

over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 18 – Maureen Clemens

18

Brenes, Patricia

From: Maureen Clemens <maureenclemens@att.net>
Sent: Thursday, September 22, 2016 6:10 PM
To: Brenes, Patricia
Subject: [External] Sycamore Canyon Business Park Bldgs 1&2 SCHNO. 2015081042

Ms. Brenes: Once again , you need to know that the propsed development mentioned is totally unacceptable and the simple reasons being, addtional noise issues, ungodly traffic not to mention more pollution that can currrently be tolerated. I have lived here since 1999 and I am currently 80 years old and I will not allow this development to ruin this pleasant and neighborly environment with more hideous builings encroching on this lovely community. 18-A

Response to Comment Letter 18 – Maureen Clemens

Note: This is the fourth comment letter from Ms. Clemens. She is also the author of Comment Letters 6, 10, and 11. This comment letter raises the issues of air quality, noise, and traffic as did the previous letters.

Response to Comment 18-A:

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP) and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land Use Designation Map**, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's Sycamore Canyon Business Park Specific Plan (SCBPSP), which was adopted in 1984 by the City in order to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14.)

The proposed Project is consistent with the planned use at the site in both the GP 2025 and SCBPSP. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Noise: To thoroughly evaluate the proposed Project's construction and operational noise impacts on the surrounding residences, the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (the NIA), modeled over 30 receptor locations (see DEIR **Figures 5.12-5** through **5.12-8**). Without mitigation, Project operational noise levels are expected to range between 30 dBA L_{eq} and 52 dBA L_{eq} at nearby sensitive receptors and up to 55 dBA L_{eq} along the westerly property line. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Noise Levels (Leq) No Mitigation**.) Therefore, unmitigated operational noise will not exceed the City's daytime exterior noise standards of 55 dBA L_{eq}. However, the Project's operational noise levels will exceed the nighttime exterior noise standard of 45 dBA L_{eq} along the western project boundary and at certain single-family detached residential dwelling units adjacent to the northwest corner of the Project site as shown on DEIR **Figure 5.12-5 – Noise Levels (Leq) No Mitigation**. (DEIR, p. 5.12-27.)

In order to mitigate Project operational noise levels to the City's nighttime residential standard of 45 dBA L_{eq} at the two affected sensitive receptors, a ten-foot noise barrier is required along the perimeter of the outdoor use areas per mitigation measure **MM NOI 16** below. This barrier is required at the top of the slope because the residences are at a higher elevation than the Project site. (DEIR, p. 5.12-28, 5.12-31, 5.12-34.)

> **MM NOI 16**: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project

site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the Project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicants good faith estimate. (DEIR, p. 5.12-47.)

In addition to the noise barrier described in **MM NOI 16**, the use of the loading area and trailer parking located just south of Building 2 within 360 feet of the western property line (see DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**) will be limited as indicated in mitigation measure **MM NOI 15** below: (DEIR, p. 5.12-28, 4.12-34.)**.**

MM NOI 15: A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation**. (DEIR, p. 5.12-46.)

With construction of the proposed ten-foot barrier in **MM NOI 16** and the nighttime restrictions in **MM NOI 15**, interior and exterior nighttime noise levels at the residences adjacent to the Project site are not expected to exceed the City's exterior or interior nighttime noise standard. (DEIR, pp. 5.12-28, 5.12-34.)

Although it is acknowledged that truck-related noise will be audible in the residences adjacent to and in the vicinity of the Project site, implementation of DEIR mitigation measures **MM NOI 13, MM NOI 14**, and **MM AQ 14** (below) in addition to **MM NOI 15** and **MM NOI 16** would reduce the Project's operational noise levels to be compliant with City code.

MM NOI 13: To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup

alarm. Ambient-sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.

If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system. (DEIR, p. 5.12-46.)

MM NOI 14: To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling. (DEIR, p. 5.12-46.)

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language. (DEIR, p. 5.12-47.)

Nonetheless, because the residences west of the Project site are at a higher elevation than the Project site, the ten-foot tall wall described in **MM NOI 16** is required on private property at the eastern edge of the residential lots, not at the property line at the bottom of the slope. Therefore, if the property owners do not allow for installation of this noise barrier, operational noise at two residences (Receptor Numbers 3 and 4, as shown on DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation** and DEIR **Figure 5.12-6 – Operational Noise Levels (Leq) with Mitigation)** will exceed the City's nighttime exterior noise standard of 45 dBA L_{eq} and operational noise impacts may be significant as disclosed in the DEIR. (DEIR, p. 5.12-28.) Although this impact is significant and unavoidable, with feasible mitigation incorporated, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Traffic: With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange. Thus, the majority of traffic generated at the Project site is expected to use Sierra Ridge Drive to Sycamore Canyon Boulevard to Eastridge Avenue which will provide on/off ramp access to Interstate 215. (DEIR, p. 5.16-26)

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA, which is DEIR Appendix J, included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		Existing Condition (ADTs) by Vehicle Type					Project Trips Only (ADTs) by Vehicle Type				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State CEQA Guidelines Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff (DEIR, **Figure 5.16-9**). This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (DEIR, p. 5.3-27). (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to

building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the FEIR as shown below.[1]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to three ~~five~~ minutes or less which is shorter than required under ~~pursuant to~~ Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

[1] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (example text).

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that ~~CARB diesel~~ idling times cannot exceed three minutes ~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs

that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 19 – Linda Scott

19

Brenes, Patricia

From: Linda G Scott <linda.scott1@ucr.edu>
Sent: Thursday, September 22, 2016 10:45 AM
To: Brenes, Patricia
Subject: [External] More Warehouse in Sycamore Canyon

City of Riverside
Community Development Department Planning Division
Attn: Patricia Brenes, Principal Planner

September 21, 2016

Ms. Brenes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described below. I believe that the draft EIR should be rewritten and alternate mitigation strategies (including NO development) should be considered. 19-A

Let me begin by stating that I have just learned of this and can't believe that my area is going to have even more truck traffic than it does now. Every time I get onto the freeway at the Fair Isle entry to the 60/215 freeway entrance there are at least two large trucks getting on the freeway at the same time. I am always afraid that I will be crushed or run over by these trucks or will not be able to get into the correct lane because the trucks are slow and the traffic on the freeway is already driving at 70 mph. This is without the current mega warehouse! I shutter to think what it will be like when those warehouses are built. Is there no way that these trucks can't be forced to use the Eastridge entry and exit points? What is also disturbing about the trucks is just the sheer volume that this will create on the 60/215 freeway coming up the hill from the University towards San Diego/Indio. It is already a nightmare. None of my family members will drive on the freeway to get to my house anymore. They take surface streets because they are afraid of all of the trucks creeping up the hill. I drive it every day and still find it difficult to maneuver. 19-B

Often I think of moving simply because of the amount of truck traffic in this area. I hope that there is something you can do about this increasing problem. I love my house and Riverside but I can only take so much. 19-C

Sincerely,

Linda G. Scott
5563 Applecross Drive
Riverside, CA 92507

Response to Comment Letter 19 – Linda Scott

Response to Comment 19-A:

The Draft Environmental Impact Report (DEIR) was prepared in accordance with the requirements of the *State CEQA Guidelines* and the City's local guidelines for implementing CEQA. The DIER contains a thorough analysis of the Project's potential environmental impacts, including impacts related to traffic as addressed in Response to Comments 19-B and 19-C below.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 19-B:

Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, freeway facilities are under the jurisdiction of Caltrans and there is no mechanism for the City or Project Applicant to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts to Caltrans facilities are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, p. 5.16-52.) Although this impact is significant and unavoidable, with feasible mitigation incorporated, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as "pork chops") at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars – Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound))**. From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.)

From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Sycamore Canyon Boulevard is the major north-south street within the Sycamore Canyon Business Park. Designated as a 106-foot wide thru-way in the Sycamore Canyon Business Park Specific Plan, the road has been designed to accommodate truck traffic. The study area of the TIA (see, DEIR Appendix J), included six intersections along Sycamore Canyon Boulevard as well as the Sycamore Canyon Boulevard Interstate 215 Southbound (SB) Off-Ramp. (**DEIR Figure 5.16-1 – Study Area**; DEIR, p. 5.16-4.) All intersections and the I-215 SB Sycamore Canyon Boulevard off-ramp currently operate at an acceptable LOS in the existing condition.

The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
I-215 Southbound Ramps	Dan Kipper Drive	12785	200	100	305	**605**	372	8	10	28	**46**
Dan Kipper Drive	Box Springs Boulevard	12340	200	90	295	**585**	223	4	5	14	**23**
Box Springs Boulevard	Sierra Ridge Drive	9425	150	35	330	**515**	223	4	5	14	**23**
Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State *CEQA Guidelines* Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff (DEIR, Figure 5.16-9). This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

With regard to the existing condition of trucks using residential streets in the Project area, Chapter 10.56 of the Riverside Municipal Code prohibits the use of Fair Isle Drive, Lochmoor Drive, and Sycamore Canyon Boulevard between El Cerrito Drive and University Drive, by commercial vehicles exceeding ten thousand pounds (5 tons) gross weight. Residents observing commercial vehicles exceeding ten thousand pounds (5 tons) gross weight in locations where these restrictions are in place may call 311 to report the incident. The 311 call will be routed to the Traffic Department and Police Department so that the appropriate response can be coordinated.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 19-C:

Comment noted. Refer to Response to Comment 19-B above. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 20 – Teresa Denham

20

Brenes, Patricia

From: Teresa Denham <taddenham@aol.com>
Sent: Thursday, September 22, 2016 11:43 AM
To: Brenes, Patricia
Subject: [External] Draft EIR

City of Riverside
Community Development Department Planning Division

Ms. Benes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042) 20-A

Since 1999 when we purchased our home in the Sycamore Highlands Community we have heard noises rom the Kroger and Pepsi warehouses that keep us awake at night and this has only increased since adding additional warehouses. The distance is 1 mile from my home to those f. The acoustics in the canyon is allowing us to hear this noise.

Traffic has also increased on Sycamore Canyon and Fair Isle with trucks from these warehouse using the on ramp at Box Springs/Fair Isle to avoid traffic on the 215. Just recently I counted 10 trucks coming down Sycamore Canyon to Fair Isle. It is just too much traffic, too much pollution! 20-B

The Developer drawings appear to represent the view form one of the westernmost homes on Sutherland which would be least impacted by warehouse height rather than representing homes on the eastern side of Sutherland which will be most impacted aesthetically by the height difference between the home and warehouse. 20-C

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate strategies (including NO development) should be considered. 20-D

Sincerely,

John & Teresa Denham
1347 Sutherland Drive
Riverside, CA 92507

Sent from Mail for Windows 10

Response to Comment Letter 20 – Teresa Denham

Response to Comment 20-A:

Comment noted. The comment regarding existing noise from the Kroger (Ralph's) and Pepsi warehouses are noted. The existing warehouses referenced in the comment are separate and independent from the proposed Project and were approved by the City after undergoing their own environmental review and public hearing processes that included analysis of potential noise impacts. The existence of these warehouses is addressed in the proposed Project's environmental analysis, specifically, in the aesthetics, air quality, greenhouse gas emissions, noise, traffic, and cumulative impacts sections.

As part of the *Sycamore Canyon Business Park Warehouse Noise Impact Analysis* (hereinafter the NIA), ambient noise at two locations on the Project site was monitored for a period of 24 hours. These measurements are taken to quantify the existing noise in the area so that the anticipated noise from the construction and operation of the proposed Project can be evaluated. The results of this monitoring are reported in Draft Environmental Impact Report (DEIR) **Table 5.12-C – Existing 24-Hour Noise Levels in Project Vicinity**. As stated in the DEIR, noise sources included noise from adjacent industrial uses, residential noise, dogs barking, traffic, aircraft noise, and bird song. (DEIR, p. 5.12-9.) The NIA also quantified potential noise impacts associated with construction and operation of the proposed distribution center Buildings 1 and 2. (DEIR Appendix I.)

Construction noise of up to 80 dBA L_{eq} at the westerly property line will exceed the City's daytime exterior standard for residential property of 55 dBA L_{eq} and the standard for public recreational facilities of 65 dBA L_{eq}. (DEIR, p. 5.12-22.) These standards were in effect at the time of the Notice of Preparation for this DEIR. To reduce construction noise to the extent feasible, the Project will implement mitigation measures **MM NOI 1** through **MM NOI 12**, below. (DEIR, pp. 5.12-45–5.12-46.) On August 18, 2016 (taking effect 30-days later), Ordinance 7341 was adopted by the City of Riverside City Council, amending the City's Noise Code to exempt construction noise between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. of Saturdays from the standards of the Noise Code.

> **MM NOI 1:** To reduce noise impacts to the surrounding residences and Sycamore Canyon Wilderness Park, prior to any Project-related construction or site preparation, a 12-foot tall temporary noise barrier shall be installed along the Project site's northern and western property line. The barrier shall be continuous without openings, holes or cracks and shall reach the ground. The barrier may be constructed with1-inch plywood and provide a transmission loss of at least 23 dBA to ensure construction noise levels do not exceed 75 dBA at single-family residential units located near the proposed project. Other materials providing the same transmission loss shall also be permitted with the approval of the City Planning Division.

MM NOI 2: To attenuate initial impact noise generated when an excavator drops rock and debris into a truck bed, heavy grade rubber mats/pads shall be placed within the bed of the trucks. These mats shall be maintained and/or replaced as necessary.

MM NOI 3: During all Project-related excavation and grading, construction contractors shall equip all construction equipment, fixed and mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.

MM NOI 4: All stationary construction equipment shall be located so that emitted noise is directed away from the residences to the north and west and from the Sycamore Canyon Wilderness Park to the west.

MM NOI 5: All construction equipment shall be shut off and not left to idle when not in use.

MM NOI 6: All equipment staging during all phases of construction shall be located in areas that will create the greatest distance between construction-related noise/vibration sources and the residences to the north and west and the Sycamore Canyon Wilderness Park to the west.

MM NOI 7: The use of amplified music or sound is prohibited on the Project site during construction.

MM NOI 8: Haul truck deliveries shall be limited to the same hours specified for construction equipment.

MM NOI 9: It is acknowledged that some soil compression may be necessary along the Project boundaries; however, the use of heavy equipment or vibratory rollers and soil compressors along the Project site's north and western boundaries shall be limited to the greatest degree feasible.

MM NOI 10: Jackhammers, pneumatic equipment, and all other portable stationary noise sources shall be shielded and noise shall be directed away from the residences to the north and west and Sycamore Canyon Wilderness Park to the west.

MM NOI 11: For the duration of construction activities, the construction manager shall serve as the contact person should noise levels become disruptive to local residents. A sign shall be posted at the Project site with the contact phone number.

MM NOI 12: No blasting shall take place on the Project site.

Even with implementation of feasible mitigation measures **MM NOI 1** through **MM NOI 12,** which will reduce construction noise by approximately 10 dBA, Project-related construction activities will result in temporary and periodic exposure of persons to and generation of noise levels in excess of standards established in the Riverside Municipal Code at the time of the Notice of Preparation, which is considered a significant and unavoidable impact. (DEIR, p. 5.12-34.)

Noise levels from Project operation will not exceed the City's daytime residential exterior noise standard of 55 dBA L_{eq} at any of the residences adjacent to the Project site. (DEIR, p. 5.12-26, DEIR **Figure 5.12-5 – Operational Noise Levels (Leq) No Mitigation**.) To reduce noise from nighttime operations, the Project will implement mitigation measures **MM NOI 13** through **MM NOI 15** and **MM AQ 14**, below: (DEIR, p. 5.12-46.)

> **MM NOI 13:** To reduce noise associated with the use of back-up alarms, either ambient-sensitive self-adjusting backup alarms or manually adjustable alarms shall be used on all equipment in use on the Project site that requires a backup alarm. Ambient- sensitive self-adjusting backup alarms increase or decrease their volume based on background noise levels. The alarm self-adjusts to produce a tone that is readily noticeable over ambient noise levels (a minimum increment of 5 decibels is typically considered readily noticeable), but not so loud as to be a constant annoyance to neighbors. Close attention shall be given to the alarm's mounting location on the machine in order to minimize engine noise interference, which can be sensed by the alarm as the ambient noise level. These alarms shall be mounted as far to the rear of the machine as possible. An alarm mounted directly behind a machine radiator will sense the cooling fan's noise and adjust accordingly.
>
> If manually-adjustable alarms are used, each alarm shall be set at the beginning of each day and night shift. The manual setting feature eliminates the machine mounting location problem of the ambient-sensitive self-adjustable backup alarms. Alternatively, back-up movements can be supervised with a guide and flagging system.
>
> **MM NOI 14:** To reduce operational noise at the residences located west of the Project site, no trucks shall use the northern access road or regular sized vehicle sized parking areas at Building 2 for site access, parking, queuing, or idling.
>
> **MM NOI 15:** A restriction of nighttime use between the hours of 10:00 PM to 7:00 AM shall be implemented for the portion of the loading area and trailer parking located just south of Building 2 and within 360 feet of the western property line as shown on **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.
>
> **MM AQ 14:** Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in

when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement language.

With implementation of mitigation measures **MM NOI 13** through **MM NOI 15**, and **MM AQ 14**, noise from nighttime operations at the Project site will be reduced to acceptable levels for all receptors except two residences located northwest of the Project site. Because these residences are at a higher elevation than the Project site, a noise barrier as described in **MM NOI 16**, below, is required to reduce nighttime noise to below the City's nighttime noise standard of 45 dBA L_{eq}. (DEIR, pp. 5.12-26–5.12-28, 5.12-47, DEIR **Figure 5.12-6 – Operational Noise Levels (L_{eq}) with Mitigation**.)

MM NOI 16: Prior to finalization of building permit, the temporary 12-foot noise barrier shall be removed and the Project applicant shall work with City Design Review staff and the property owners of receptor location 3 (6063 Bannock) and receptor location 4 (6066 Cannich) to determine the design and materials for a noise barrier that is mutually acceptable to the Project Applicant, City Design Review staff, and the property owners. The noise barrier shall be ten-foot high installed at the top of the slope of the residential properties west of the Project site. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts or line-of-site openings between the shielded areas and the project site. Noise control barrier may be constructed using one, or any combination of the following materials: masonry block; stucco veneer over wood framing (or foam core), or 1-inch thick tongue and groove wood of sufficient weight per square foot; glass (1/4 inch thick), or other transparent material with sufficient weight per square foot; or earthen berm.

Prior to the issuance of a Certificate of Occupancy for the Project, the Project applicant shall construct said noise barrier provided all of the property owners upon whose property the barrier is proposed to be constructed provide written authorization for such construction. The Project applicant shall provide written notice to the property owners of its intent to commence wall construction at least 90-days prior to the anticipated construction date. If all of the property owners do not authorize the construction of the wall in writing, including providing the applicant with all requisite legal access to the affected properties, within 60 days of applicant's written notice, the applicant shall instead pay to the property owners the equivalent cost to construct the wall, based on applicant's good faith estimate.

With the installation of a ten-foot tall noise barrier at the locations where the property owners will permit pursuant to mitigation measure **MM NOI 16**, the Project's operational noise will not exceed the City's nighttime noise standard of 45 dBA. However, because the noise barrier

outlined in **MM NOI 16** would be on private property, the installation of this mitigation measure is dependent on the individual property owner authorizing, not the Project Applicant. For this reason, impacts are significant and unavoidable with feasible mitigation, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.12-48.)

It is noted that the acoustics in the canyon are affecting noise impacts. The Noise Model used for this project, SoundPLAN, is a three-dimensional noise model that takes into consideration the acoustic effects of existing and proposed topography as well as existing and proposed buildings. So, any sound reflection associated with the proposed Buildings 1 and 2 was taken into consideration.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 20-B:

Traffic: Implementation of the Project will introduce additional traffic to the study area. All study area intersections and freeway segments will continue to operate at an acceptable level of service (LOS) when Project-related traffic is added to the existing traffic, traffic from ambient growth, and traffic from cumulative development projects except for the Eastridge-Eucalyptus I-215 Northbound off-ramp, the intersection of Sycamore Canyon Boulevard/Dan Kipper Drive, and the Fair Isle/Box Springs I-215 northbound ramp. In order for the freeway segments to operate at an acceptable LOS, improvements to the freeway would be required. However, freeway facilities are under the jurisdiction of Caltrans and there is no mechanism for the City or Project Applicant to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until improvements are funded or constructed by Caltrans. (DEIR, p. 5.16-52.) Although this impact is significant and unavoidable, with feasible mitigation incorporated, the City has the discretion to adopt a Statement of Overriding Considerations and move forward with the Project if there is evidence to support such action.

With regard to the trip distribution (i.e. the trip directional orientation of Project-generated traffic) used in the *Revised Traffic Impact Analysis for the Sycamore Canyon Industrial Buildings 1 & 2* (the TIA) and the DEIR, the TIA was prepared by a registered professional traffic engineer with local experience and expertise in traffic modeling. The trip distribution used in the TIA is based on professional engineering judgement and was approved by the City as part of the scoping agreement. (See Appendix A of the TIA.) Factors taken into consideration in developing the trip distribution model include: the existing roadway system, existing traffic patterns, and existing and future land uses. The Project will prevent passenger car and truck egress onto Dan Kipper Drive by installing small barriers (referred to as “pork chops”) at all three Project driveways that will limit left-out turns onto Lance Drive. (DEIR pp. 5.16-26.) This will force both outbound (i.e. leaving the Project site) passenger cars and trucks to turn south onto Lance Drive to Sierra Ridge Drive and then east on Sierra Ridge Drive to Sycamore Canyon Boulevard (see **DEIR Figure 5.16-3 – Project Trip Distribution (Passenger Cars –**

Outbound), and DEIR Figure 5.16-5 Project Trip Distribution (Trucks – Outbound)). From the intersection of Sierra Ridge Drive and Sycamore Canyon Boulevard, outbound vehicles will either turn north or south to travel to I-215 or other surrounding roadways. (DEIR, pp. 5.16-26.) From the intersection of Sierra Ridge Drive/Sycamore Canyon Road, it is approximately 0.7 miles to the Eastridge-Eucalyptus interchange and approximately 0.9 miles to the Fair-Isle/Box Springs interchange. Additionally, the Eastridge-Eucalyptus interchange is geometrically easier for trucks to turn at than the Fair Isle-Box Springs interchange. The Eastridge-Eucalyptus interchange is a single point interchange (SPI) which has large sweeping radii for all turning movements. The Fair Isle-Box Springs interchange is a partial diamond/partial hook ramp design with relatively small radii for many turning movements. For these reasons, it is reasonable to expect that more trucks will use the Eastridge-Eucalyptus interchange.

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The following table presents the existing average daily traffic (ADT) and the Project-generated ADT by vehicle type for Sycamore Canyon Boulevard from the I-215 Southbound Ramps to Eastridge Avenue.

Segment of Sycamore Canyon Boulevard		**Existing Condition (ADTs) by Vehicle Type**					**Project Trips Only (ADTs) by Vehicle Type**				
From	To	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**	Passenger Cars	2 Axle Trucks	3 Axle Trucks	4 Axle Trucks	**Total All Trucks**
Fair Isle Drive	I-215 Southbound Ramps	14530	400	25	200	**625**	335	4	5	14	**23**
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Sierra Ridge Drive	Eastridge Avenue	10715	140	60	305	**505**	1120	148	198	526	**872**

Source: Roadway Segment Average Daily Traffic (not PCE) from Appendix C of the TIA.

Based on the table above, there are more truck trips in the existing conditions without the Project at Fair Aisle Drive off ramps than the Eastridge Avenue; however, there are more 2-axle (light duty) trucks utilizing Fair Isle Drive than Eastridge Avenue. The heavier duty trucks (3-axle and 4-axle) are utilizing Eastridge Avenue. Therefore, per the table above, the proposed Project is expected to attract the heavier duty trucks which are anticipated to utilize Eastridge Avenue rather than Fair Isle Drive.

The TIA studied several development scenarios, including the Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions (E+A+P+C). In order to quantify potential cumulative impacts and in compliance with State *CEQA Guidelines* Section 15130(b)(1)(A), a list of past, present, and probable future projects that may potentially have a cumulative impact on traffic was developed based on consultation with City of Riverside and City of Moreno Valley staff (DEIR, Figure 5.16-9). This list of projects includes several warehouses, and associated traffic, that have been recently constructed or are planned in the vicinity of the Project site.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25** (DEIR, p. 5.3-27). (DEIR, pp. 5.3-26, 5.3-30, 5.3-35–5.3-40)

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and

west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the

City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 13** will be revised in the FEIR as shown below.[1]

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to threeﬁve minutes or less which is shorter than required underpursuant to Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

To reduce vehicle idling time to three minutes, mitigation measure **MM AQ 22** will be revised in the FEIR as shown below.**MM AQ 22**: The Project shall implement the

[1] . Deletions are shown with strikethrough text (~~example text~~) and additions are shown with double underline text (example text).

following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 20-C:

Commenter notes that the residences on the eastern side of Sutherland Drive will be most impacted by implementation of the proposed Project. Cross sectional line of sight exhibits were prepared for four locations to represent the view from four representative residential locations adjacent to the Project site. (DEIR, **Figures 3-10 – Proposed Site Plan and 3-13a – Line of Sight Exhibit,** Sections A-A (in the vicinity of 6050 Cannich Road), B-B (in the vicinity of 1443 Sutherland Drive), C-C (in the vicinity of 1465 Sutherland Drive), and D-D (in the vicinity of 6071 Kendrick Drive).) As discussed in the DEIR and shown on DEIR **Figure 3-13a**, Section A-A (6050 Cannich Road) is the line of sight of the northwestern portion of the Project site from the vicinity of 6050 Cannich Road, which is west of the Project site. All the residences along Cannich Road are at a higher elevation than the Project site. (DEIR, pp. 5.1-14–5.1-15.)

Sections B-B (1443 Sutherland Drive), C-C (1465 Sutherland Drive), and D-D (6071 Kendrick Drive), as shown on DEIR **Figure 3-13a – Line of Sight Exhibit**, are from residences to the north. As discussed in the DEIR and shown on **Figure 3-13a**, the rear yards of these residences are either below or at grade with the Project site in the post-Project condition (i.e., after grading).

Section B-B (1443 Sutherland Drive) as shown on DEIR **Figure 3-13a**, is from the vicinity of 1443 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section B-B depicts the line of sight from a residences and rear yards that are at approximately the same finished grade as the Project site. (DEIR, pp. 5.1-15–5.1-16.) Section C-C (1465 Sutherland Drive) as shown on DEIR **Figure 3-13a**, is from1465 Sutherland Drive. As discussed in the DEIR and shown on **Figure 3-13a**, Section C-C depicts the line of sight from residences and rear yards that are slightly below the Project site's finished grade. (DEIR, pp. 5.1-15–5.1-16.) Section D-D (6071 Kendrick Drive), as shown on DEIR **Figure 3-13a** is from the vicinity of 6071 Kendrick Drive (where Stockport Drive turns north). As discussed in the DEIR and shown on **Figure 3-13a**, the residence and flat portion of the rear yard in Section D-D are located downslope from the finished grade at the Project site and proposed buildings.

It is also important to note that the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site. Within this 100-foot setback, there will be 64 feet of landscaping adjacent to the property line, a 30-foot-wide drive aisle and a 6-foot-wide landscape area adjacent to Building 2. (see DEIR, **Figure 3-10 – Proposed Site Plan**). As shown on DEIR **Figure 3-13a, Line of Sight Exhibit**, the line of sight for Sections B-B through Section D-D shows that the trees (once matured) within the proposed 64-foot landscape buffer would screen the views of the proposed Building 2 from the ground level as well as from second stories.

In addition to these Line of Sight Exhibits, the DEIR Aesthetics Section includes photo simulations for line of sight locations A-A, B-B and C-C (DEIR **Figures 5.1-2a thru 5.1-2c**).

These photo simulations show the view from the second story windows of the residences and shows the decrease in size, due to the increased setback and shielding as a result of the landscaped buffer.

Additionally, the northern wall of Building 2 is located 100 feet south of the residential lots north of the Project site. Within this 100-foot setback, there is 64 feet of landscaping between the northern property line, abutting the residences, a 30-foot-wide drive aisle north of Building 2, and an additional 6-foot-wide landscape area between the drive aisle and the building (DEIR, **Figure 3-10 – Proposed Site Plan**). As shown on **Figure 3-13a, Sight -- Line of Exhibit**, the line of sight for Section D-D shows that the trees (once matured) within the 64-foot landscape buffer would screen the views of the proposed Building 2 from the ground level as well as from break up the views from the second stories.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 20-D:

The DEIR was prepared in accordance with the requirements of the *State CEQA Guidelines* and the City's local guidelines for implementing CEQA and contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise, aesthetics, and traffic as addressed in Response to Comments 20-A through 20-C above.

CEQA requires the lead agency to consider a range of alternatives to the Project (State *CEQA Guidelines* Section§ 15126.6(a). According to this section of the State CEQA Guidelines, "…an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. Four alternatives were identified but rejected from detailed consideration because they either: failed to meet basic project objectives, were infeasible, or would not avoid significant environmental impacts. The alternatives rejected from detailed consideration included:

- Original Project as Submitted: The Project Applicant originally proposed a two-building logistics center totaling 1.43 million square feet; however, during preparation of the DEIR the Project Applicant received feedback from the City encouraging additional setback and landscaping as well as a reduction in the size of Building 2 due to various environmental impacts. Thus, the Project was redesigned to reduce environmental impacts and the original 1.43 million square foot Project has been withdrawn from consideration.

- Alternative Location 1: Palmyrita Avenue/Michigan Avenue: Alternative Location 1 was rejected from further analysis in the DEIR because the site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Also, Alternative Location 1 is located further from Interstate 215 and State Route 60, which could cause greater transportation impacts.

- Alternative Location 2: Meridian Business Park, Phase 3: Alternative Location 2 was rejected from further analysis in the DEIR because this location is outside of the City's jurisdictional boundary and owned by another party, which means that securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site.

- Alternative Location 3: property along Alessandro Boulevard within the *Sycamore Canyon Business Park Specific Plan*: All of the vacant parcels along Alessandro Boulevard and within the *SCBPSP* are owned by other entities and are either currently under construction or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are also owned by other property owners and are oddly shaped, which makes assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife, making development difficult. (DEIR, pp. 8-6 – 8-9.)

The DEIR also contained detailed consideration of three alternatives to the proposed Project, as summarized below.

Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.) Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form or another. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. The GP 2025 designates the Project site for Business/Office Park and the *SCBPSP* designates the site as Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. (DEIR, p. 8-16.)

Alternative 2 would generate approximately twice as many trips as the proposed Project and none of this alternative's environmental impacts would be decreased in comparison to the

proposed Project. Additionally, this alternative does not meet any of the Project objectives associated with development and operation of a logistics center. Therefore, this alternative was rejected as infeasible. (DEIR, pp. 8-24 – 8-25.)

Alternative 3, the reduced density alternative, would reduce the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduced density alternative could be realized by scaling down both proposed buildings. (DEIR, p. 8-25.)

Because Alternative 3 reduces development by 30 percent in comparison to the proposed Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level. Additionally, Alternative 3 meets most of the Project objectives to a lesser degree than that of the proposed Project. The feasibility of this alternative is further reduced due to economic concerns: unless site coverages reaches at least 45 percent, the rate of return from the lease would be too low to justify the risk and cost of investment and there would be a loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on investment to below zero. Thus, Alternative 3 is rejected as infeasible. (DEIR, p. 8-33.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Comment Letter 21 – Yang Li

21

Brenes, Patricia

From: Yang Li <yli036@ucr.edu>
Sent: Thursday, September 22, 2016 4:05 PM
To: Brenes, Patricia
Subject: [External] Concerning the Warehouses in the Sycamore Canyon Business Park

City of Riverside September 22, 2016

Community Development Department Planning Division

Attn: Patricia Brenes, Principal Planner, pbrenes@riversideca.gov

Dear Ms. Brenes,

I am writing this email in response to the draft EIR for the two proposed warehouses in the Sycamore Canyon Business Park (Buildings 1 & 2, SCH No. 2015081042). 21-A

I am extremely concerned with the safety issues about the warehouse. Once it is built, there is very little control as to what will be stored there. To my knowledge, there will be regulations and the companies need to report or get certain kind of permit to store stuff. But these are just regulations. They are not going to be enough to ensure safety to our houses. In case anything goes wrong, such as, the air conditioner in one corner of the warehouse may go off without anyone's notice in the mid of the night, and the temperature may trigger some dangerous electronic devices or certain dangerous chemicals and lead to disastrous consequeses. Another example: A company may acquire a permit to store one kind of stuff, but secretly, replace it with a more dangerous product hiding inside of some packages. No one will no. No one will tear up all the boxes to examine and make sure. And I could go on and on and list countless examples like this. Regulations or any kind of safety precautions will not be enough. No one could guarantee that these situations will not happen.

The only way to ensure safety is to not build such a warehouse so close to a residential area. No one could bear the consequence if anything goes wrong in the warehouse. 21-B

I am also concerned with the air quality during construction period and when it is in real use. Hazardous chemicals may be released from the construction of the warehouse. The window of our bedroom, our bathroom, and our toilet room, will be directly facing the construction site. Even when the construction is finished, the outside of the walls will still be releasing hazardous chemicals from the paint. Unfortunately, the unusually high temperature of riverside adds greatly to this danger. Moreover, we as residents, ridiculously, have no control of what will be stored in the warehouse. If the 21-C

1

chemicals, or any products stored in the warehouse are releasing dangerous gases, we will be the ones suffering from it. It is not possible for us to run through air quality examinations for all the potentially harmful gas. It is not possible for us to go inside these warehouses and make sure they follow all the rules meticulously. It is also not possible for the city to make sure that every minute, every second, the warehouse is running perfectly. Therefore, it is not acceptable to have a warehouse built in the back area of our houses. 21-C cont.

Please, do not let them build any warehous that is near any residential area, for the health and welfare of the city residents, for the health and welfare of anyone who is currently living in riverside and for anyone who may want to move here, and for the children who will grow up in this residential area and in the city of riverside. 21-D

The draft EIR prepared by Albert WEBB Associates did not adequately address my concerns described above. I believe that the draft EIR should be rewritten and alternate mitigation strategies (including NO development) should be considered. 21-E

Sincerely,

Yang Li

1459 Sutherland Dr,

Riverside, CA 92507

Response to Comment Letter 21 – Yang Li

Response to Comment 21-A:

Because the exact tenants of the buildings are not known at this time, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products such as paint products, solvents, and cleaning products may be stored and transported in conjunction with the proposed logistics center use. These hazardous materials would only be stored and transported to and from the site. Manufacturing and other chemical processing will not be permitted under the provisions of the Sycamore Canyon Business Park Specific Plan. (DEIR, p. 5.8-17.) As part of the Tenant Improvement Process the City requires all businesses that handle, store, and/or use hazardous materials equal to or greater than 500 pounds, 200 cubic feet and/or 55 gallons at standard temperature and pressure or 5 gallons, 50 pounds or 20 cubic feet of an EHS (Extremely Hazardous Substance) to submit their Business Emergency Plan electronically in the California Environmental Reporting System (CERS), http://cers.calepa.ca.gov. This is pursuant to the State mandate requiring all businesses to submit their Business Emergency Plans electronically. First time user/handlers must submit their completed business emergency plan within thirty (30) days of becoming a user/ handler. Any business who does not submit by their assigned due dates may be subject to administrative penalties. These businesses are inspected annually by the Fire Department.

Although the overall quantity of hazardous materials and waste generated in the Project area may increase as a result of implementation of the proposed Project, all new implementing development that will handle or use hazardous materials would be required to comply with the regulations, standards, and guidelines established by the United States Environmental Protection Agency, the State of California, County of Riverside, and City of Riverside related to storage, use, and disposal of hazardous materials. (DEIR, p. 5.8-18.) Both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a hazardous material business plan (HMBP) to a regulating agency to enable a quick and accurate evaluation of each situation for an appropriate response in the event of an emergency. It is not anticipated that the tenants of the building would handle enough hazardous materials to necessitate preparation of an HMBP; however, any new business that meets the specified agency criteria would be required to submit an HMBP. Compliance with the environmental regulations as required by the United States Environmental Protection Agency, the State of California, County of Riverside, and City of Riverside would minimize hazardous risks.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the Draft Environmental Impact Report (DEIR).

Response to Comment 21-B:

The City of Riverside General Plan 2025 (the GP 2025) designates the Project site as Business/Office Park (B/OP), and the site is zoned Business and Manufacturing Park and Sycamore Canyon Business Park Specific Plan Zones (BMP-SP). (DEIR, **Figure 3-4 – Land**

Use Designation Map, DEIR **Figure 3-5 – Zoning Map**.) Development of the Project site is also guided by the City's *Sycamore Canyon Business Park Specific Plan* (SCBPSP), which was adopted in 1984 by the City to encourage and provide incentives for economic development in the area. The site is designated as Industrial in the SCBPSP. (DEIR, p. 3-14)

The proposed Project is consistent with the GP 2025 and the SCBPSP.

Additionally, the City adopted *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72.) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, the site has been designed to minimize impacts on the adjacent residential area including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

This comment expresses concerns about safety related to the Project. Although not an environmental issue under California Environmental Quality Act (CEQA), at some locations in the vicinity of the proposed Project, there are projected increases in vehicular volumes. Where there are more vehicles, there is the potential for more conflicts between vehicles and other travel modes, such as pedestrians, equestrians and bicyclists. All Project-related improvements will be designed and installed in accordance with existing design standards and would not introduce hazardous design elements, such as sharp curves, or increase safety hazards. Sight-lines along the roadway connections are not impeded, and the City traffic engineers did not identify problems with visibility in the area. Speed limits are planned in accordance with standard street design criteria, and no new significant impacts would occur. Any project-related improvements or mitigations would be designed to current standards. In addition, the City has the ability to add or widen sidewalks, crosswalks (at stop-controlled and signalized intersections), and bicycle lanes to accommodate the other travel modes in a safe manner and to respond to design elements and circulation conditions through the Neighborhood Traffic Management Program.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 21-C:

Air Quality: The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Accordingly, SCAQMD has developed regional thresholds that can be used to determine if a project will have significant air

quality impacts. The Air Quality Report (AQ Report, Appendix B to the DEIR) modeled Project-related emissions and compared estimated emissions to the SCAQMD thresholds.

The Project's short-term emissions are below regional and localized thresholds. However, the Project's long-term Oxides of Nitrogen (NO_x) emissions of 339.39 lbs/day in the winter and 325.95 lbs/day in the summer will exceed the SCAQMD regional threshold of 55 lbs/day even after incorporation of Project design features and feasible mitigation measures **MM AQ 1** through **MM AQ 15**, **MM AQ 18**, and **MM AQ 19** as well as additional **MM AQ 22** through **MM AQ 25.** (DEIR, pp. 5.3-26 - 5.3-27, 5.3-30, 5.3-35–5.3-40.) Mitigation Measures AQ-13 and AQ-22 were modified and new text is shown as double underlined and the text to be deleted is shown as ~~strikethrough~~. These revisions do not change the significance conclusions of the DEIR or result in the need for additional mitigation.

MM AQ 1: Solar or light-emitting diodes (LEDs) shall be installed for outdoor lighting. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 2: Indoor and outdoor lighting shall incorporate motion sensors to turn off fixtures when not in use. The site and buildings shall be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 3: Trees and landscaping shall be installed along the west and south exterior building walls to reduce energy use. Vegetative or man-made exterior wall shading devices or window treatments shall be provided for east, south, and west-facing walls with windows. Landscaping and/or building plans shall contain these features and are subject to City verification prior to building permit issuance.

MM AQ 4: Light colored "cool" roofs shall be installed over office area spaces and cool pavement shall be installed in parking areas. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 5: Energy efficient heating and cooling systems, appliances and equipment, and control systems that are Energy Star rated shall be installed in future office improvement plans. Refrigerants and heating, ventilation, and air conditioning (HVAC) equipment shall also be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global warming. The efficiency of the building envelope shall also be increased (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. The City shall verify tenant improvement plans

include these features. The City shall verify these features are installed prior to issuance of occupancy permits.

MM AQ 6: Energy Star rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment shall be installed. Prior to building permit issuance, the City shall verify building plans contain these features.

MM AQ 7: All buildings shall be designed with "solar ready" roofs that can structurally accommodate future installation of rooftop solar panels. Prior to building permit issuance, the City shall verify roofs are "solar ready." If future building operators are providing rooftop solar panels, they shall submit plans for solar panels to the City prior to occupancy.

MM AQ 8: The Project's landscaping plans shall incorporate water-efficient landscaping, with a preference for xeriscape landscape palette. Landscaping plans shall be approved by the City prior to building permit issuance.

MM AQ 9: All building owners shall provide education about water conservation and available programs and incentives to building operators to distribute to employees.

MM AQ 10: Interior and exterior waste storage areas shall be provided for recyclables and green waste. Prior to occupancy permits, the City shall verify interior and exterior storage areas are provided for recyclables and green waste. The property operator will also provide readily available information provided by the City for employee education about reducing waste and available recycling services.

MM AQ 11: Up to three electric vehicle charging stations shall be provided to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric vehicle charging stations.

MM AQ 12: Adequate bicycle parking near building entrances shall be provided at the site. Facilities that encourage bicycle commuting (e.g., locked bicycle storage or covered or indoor bicycle parking) shall be provided. Prior to building permit issuance, the City shall verify building plans contain adequate bicycle parking.

MM AQ 13: All facilities shall post signs informing users of requirements limiting idling to <u>three</u>~~five~~ minutes or less pursuant to Title 13 of the California Code of Regulations, Section 2485. The City shall verify signage has been installed prior to occupancy.

MM AQ 14: Electrical hookups shall be installed at all loading docks to allow transport refrigeration units (TRUs) with electric standby capabilities to plug in when TRUs

are in use. Trucks incapable of using the electrical hookups shall be prohibited from accessing the site as set forth in the lease agreement. The City shall verify electrical hookups have been installed prior to occupancy and shall confirm lease agreement includes such language.

MM AQ 15: Service equipment (i.e., forklifts) used within the site shall be electric or compressed natural gas-powered.

MM AQ 18: Locally produced and/or manufactured building materials shall be used for at least 10% of the construction materials used for the Project. Verification shall be submitted to the City prior to issuance of a building permit.

MM AQ 19: "Green" building materials shall be used where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way. Verification of the feasibility or infeasibility of securing these materials shall be submitted to the City prior to issuance of a building permit.

In addition to the Project design features, the following mitigation measures shall be implemented during Project operations to minimize air quality impacts.

MM AQ 22: The Project shall implement the following measures to reduce emissions from on-site heavy duty trucks within six months after operations commence:

a) Post signs informing truck drivers about the health effects of diesel particulates, the requirement that~~CARB diesel~~ idling times cannot exceed three minutes~~regulations~~, and the importance of being a good neighbor by not parking in residential areas.

b) Tenants shall maintain records on its fleet equipment and vehicle engine maintenance to ensure that equipment and vehicles serving the building are in good condition, and in proper tune pursuant to manufacturer's specifications. The records shall be maintained on site and be made available for inspection by the City.

c~~b~~) The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies, for example, by requiring attendance at California Air Resources Board approved courses (such as the free, one-day Course #512).

MM AQ 23: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time,

CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants will be required to use those funds, if awarded.

MM AQ 24: Any yard trucks used on-site to move trailers in or around the loading areas shall be electric in place of traditional diesel powered yard trucks.

MM AQ 25: The building operator shall provide signage or flyers that advise truck drivers of the closest restaurants, fueling stations, truck repair facilities, lodging, and entertainment.

Hence, regional air quality impacts from long-term operation are significant and unavoidable and the Project is considered to have a cumulatively considerable net increase on non-attainment pollutants in the region under applicable state and federal standards. Therefore, the impact is considered significant and unavoidable and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR, p. 5.3-40.)

SCAQMD has also developed localized significance thresholds (LSTs), which represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. Based on the air quality analysis prepared for this Project, neither the short-term construction nor long-term operation of the Project will exceed SCAQMD LST at sensitive receptors, such as the residences, within the Project vicinity for any criteria pollutants. (DEIR, p. 5.3-29.) The amount of pollution that would be released from the outside of the walls would be negligible.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Hazards (DEIR Section 5.8): See Response to Comment 21-A. The Project will operate as a logistics center and no manufacturing or chemical processing will be permitted at the site under the provisions of the Sycamore Canyon Business Park Specific Plan. Although the exact tenants are unknown, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizers, and other household hazardous products may be transported to and from the site in conjunction with the proposed logistics center use. Further, operation of the logistics center will be required to comply with all applicable federal, state, and local regulations related to hazardous substance transport and storage, which will reduce impacts to less than significant.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 21-D:

Comment noted. The City adopted its *Good Neighbor Guidelines Siting New and/or Modified Warehouse/Distribution Facilities* to provide the City and developers with a variety of strategies that can be used to reduce diesel emissions from heavy-duty trucks that deliver goods to and from warehouse and distribution centers, such as the proposed Project. (DEIR, p. 5.3-16.) As discussed in DEIR Appendix M, the proposed Project is consistent with all of the goals and strategies outlined in the City's *Good Neighbor Guidelines.* (DEIR Appendix M, pp. M-66–M-72.) Because each Project and property have different characteristics and circumstances, the City's *Good Neighbor Guidelines* do not include recommendations regarding setbacks between distribution center buildings and adjacent residential uses. Rather, it recommends that a Health Risk Assessment (HRA) be prepared for any warehouse project within 1,000-feet of residential properties. The HRA should indicate how the project can be designed to limit health risks. The site has been designed in order to minimize impacts on the adjacent residential area including placement of driveways and onsite parking areas away from the adjacent residential areas, consistent with the policies contained in the City's *Good Neighbor Guidelines.*

A health risk assessment (HRA) was prepared in June 2016 (included in Appendix B of the DEIR) and a revised HRA was prepared in November 2016 (found on the City's website at http://www.riversideca.gov/planning/pdf/eir/sycamorecanyon/Refined-HRA-Report-11-9-16.pdf) to evaluate cancer and non-cancer risks associated with the proposed Project. None of the SCAQMD cancer or non-cancer thresholds are exceeded as a result of Project construction or operation for workers or residents within the proposed Project vicinity. (DEIR, pp. 5.3-33 - 5.3-34.) Therefore, the Project will not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project construction or operation. This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.

Response to Comment 21-E:

The DEIR was prepared in accordance with the requirements of the *State CEQA Guidelines* and the City's local guidelines for implementing CEQA and contains a thorough analysis of the Project's potential environmental impacts, including impacts related to noise and light and as addressed in Response to Comments 12-A through 12-C above.

CEQA requires the lead agency consider a range of alternatives to the Project (State *CEQA Guidelines* § 15126.6(a)). In accordance with these guidelines, the DEIR considered three alternatives to the proposed Project. Alternative 1: No Project, No Build (i.e., no development at the Project site) was analyzed in the DEIR as required by State *CEQA Guidelines* Section 15126.6(e)(3)(B) to compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Although all environmental impacts would be less than significant with Alternative 1, this alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. (DEIR, p. 8-16.)

Section 15126.6(f)(1) of the *State CEQA Guidelines* states that among the factors that may be considered when addressing the feasibility of alternatives, are site suitability and economic viability. As discussed in the DEIR, Alternative 1 is neither suitable for the site nor economically viable. Although this alternative may be feasible in the short term, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible. (DEIR, p. 8-16.)

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.