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STALEY POINT CAPITAL
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Project:
**MASSACHUSETTS AVE.
& KANSAS AVE. BY
STALEY POINT**

CITY OF RIVERSIDE, CA

Consultants:

- CIVIL
- STRUCTURAL
- MECHANICAL
- PLUMBING
- ELECTRICAL
- LANDSCAPE
- FIRE PROTECTION
- SOIL ENGINEER

HUNTER

Title: OVERALL SITE PLAN

Project Number: 21074
Drawn by: AW
Date: 04/11/25
Revision:

Sheet:
3-DAB-A1.1

SITE PLAN KEYNOTES

1. NOT USED.
2. ASPHALT CONCRETE (AC) PAVING
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. 8'-0" HIGH METAL SLIDING GATES W/ A KNOX-BOX PER CITY OF RIVERSIDE SPECIFICATIONS. DRAWINGS AND CALCULATIONS TO DESIGN & DETAIL GATES, DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE.

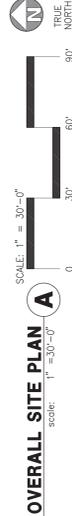
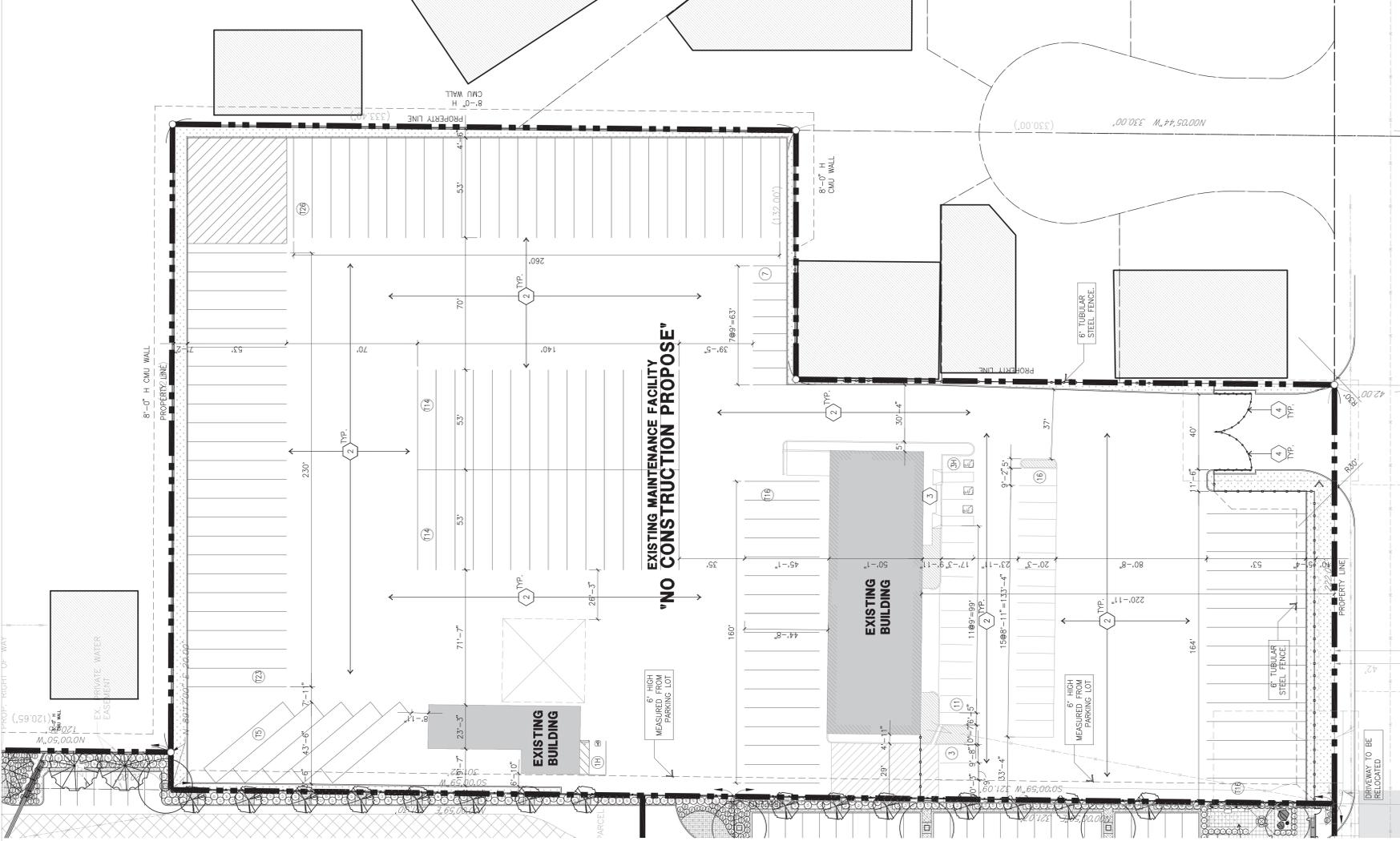
SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE UNLESS NOTED OTHERWISE.
4. ALL CONCRETE CURBS, GUTTERS AND SWALES, DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TORNED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAX FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT FOR PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AND ALL APPLICABLE GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. WALLS SHALL BE TREATED WITH A GRAFTH-PROOF COATING ON SURFACES THAT ARE NOT INTENDED TO BE PAINTED (E.G. SPILL-FACE BLOCK WALL, DECORATIVE TILE, COLORED PANELING MATERIAL, ETC.).
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED. HIGH CURB
19. UNVASCULATED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

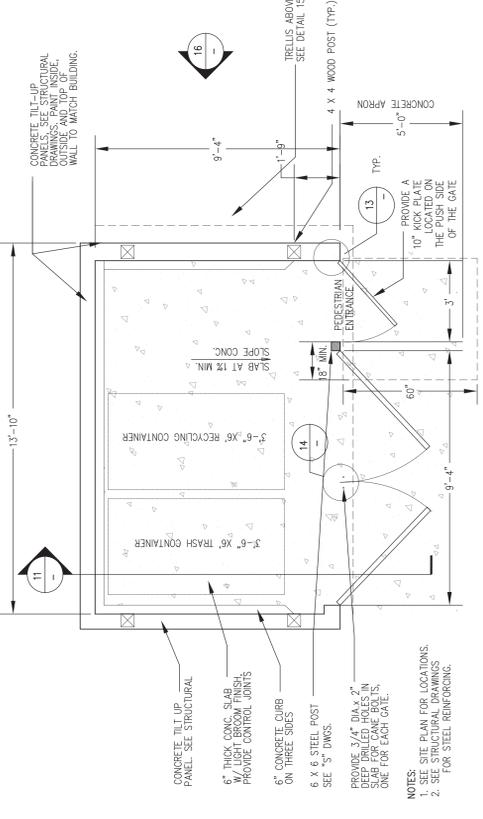
SITE PLAN GENERAL NOTES

- CONCRETE PAVING - RET. CIVIL
- DRAWINGS THICKNESS
- STANDARD PARKING STALL
- ACCESSIBLE PARKING STALL
- 9'X18' + 5' W ACCESSIBLE AISLE
- VAN ACCESSIBLE
- 12'X18' + 5' W ACCESSIBLE AISLE
- FUTURE EV CHARGING STATION
- 9' X 18'
- EV CHARGING STATION NEEDED
- 9' X 18'
- LIGHTING FIXTURE
- 26" WIDE FIRE LANE
- PROVIDE RED CURBS AND SIGNAGE
- LANDSCAPE
- PROPERTY LINE
- ACCESSIBILITY
- PATH OF TRAVEL

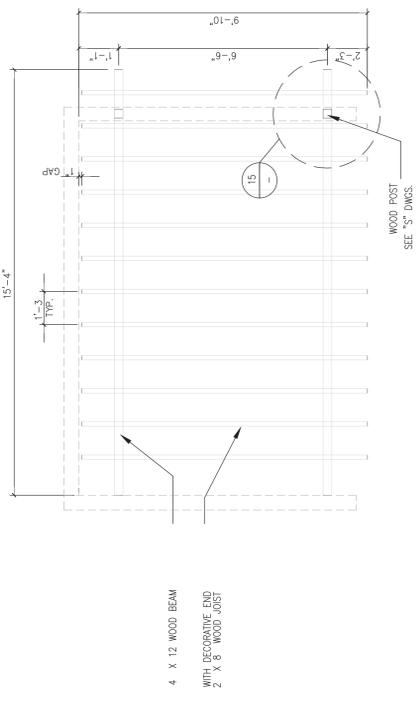
AERIAL MAP



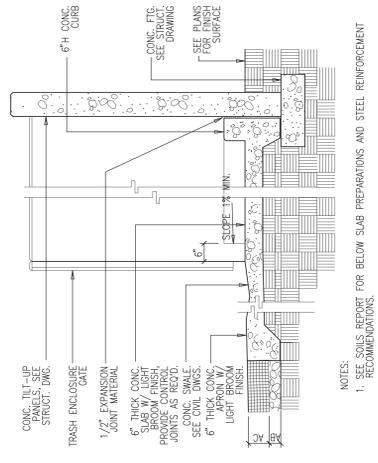
OVERALL SITE PLAN



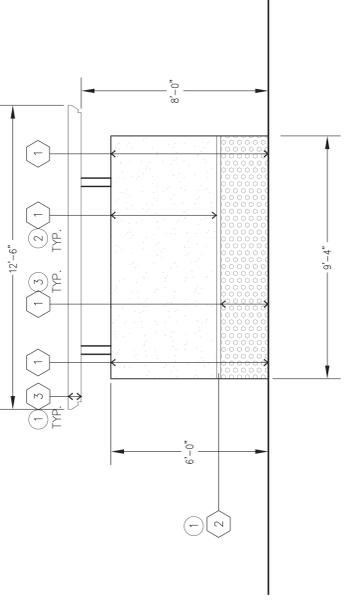
TRASH ENCLOSURE PLAN
SCALE: N.T.S.



TRASH ENCLOSURE ROOF PLAN
SCALE: N.T.S.



TRASH ENCLOSURE SECTION
SCALE: 1/2"=1'-0"



TRELLIS
SCALE: 3"=1'-0"

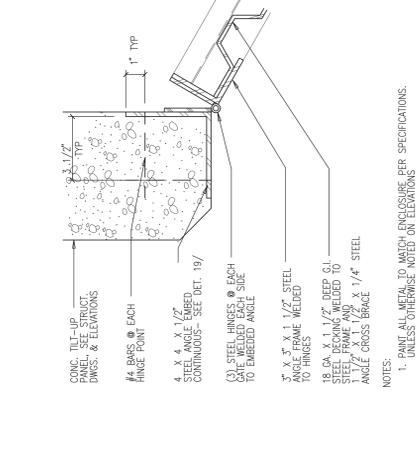
KEYNOTES - TRASH ENCLOSURE

- CONCRETE TILT-UP PANEL
- PANEL REVEAL PAINTED TO MATCH BUILDING.
- TRELLIS ABOVE

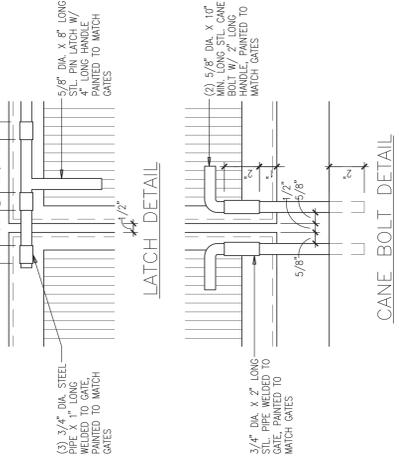
COLOR SCHEDULE - TRASH ENCLOSURE

- CONCRETE TILT-UP PANEL PAINT BRAND SW 7005 PURE WHITE
- CONCRETE TILT-UP PANEL PAINT BRAND SW 7647 CRUSHED ICE
- CONCRETE TILT-UP PANEL PAINT BRAND SW 7642 PAVESTONE

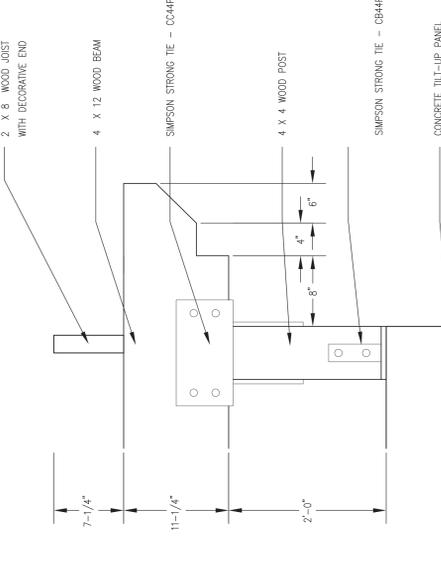
TRASH ENCLOSURE ELEVATION
SCALE: N.T.S.



TRASH ENCLOSURE GATE & HINGE
SCALE: 3"=1'-0"



TRASH ENCLOSURE GATE LATCHES
SCALE: 3"=1'-0"



TRASH ENCLOSURE ROOF LATCHES
SCALE: 3"=1'-0"

TRASH ENCLOSURE GATE ELEVATION
SCALE: N.T.S.

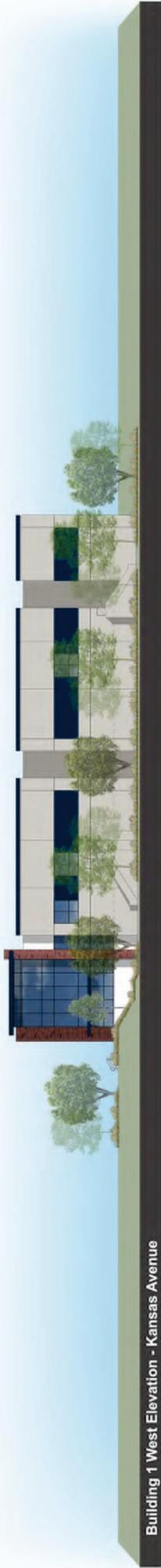
TRASH ENCLOSURE SECTION
SCALE: 1/2"=1'-0"

TRELLIS
SCALE: 3"=1'-0"

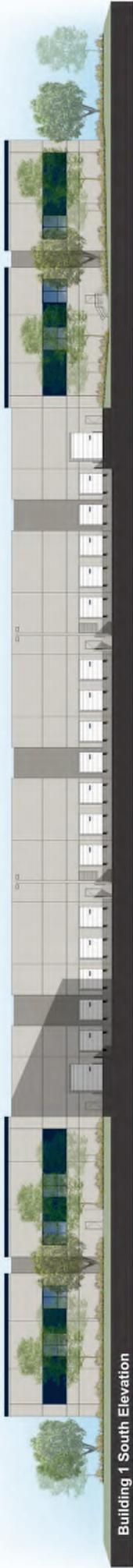
TRASH ENCLOSURE GATE & HINGE
SCALE: 3"=1'-0"



Building 1 North Elevation - Roberta Street



Building 1 West Elevation - Kansas Avenue



Building 1 South Elevation



Building 1 East Elevation



Conceptual Building 1 Colored Elevations

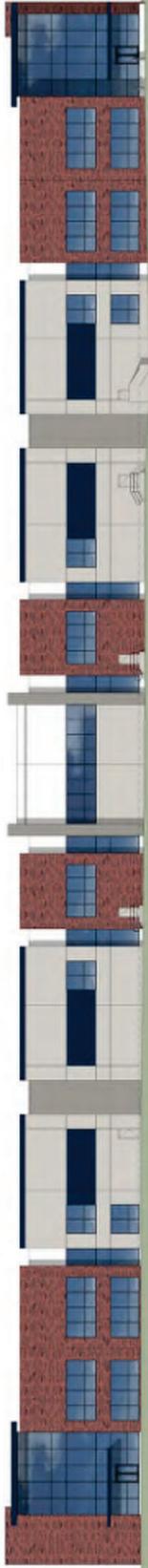
MASSACHUSETTS AVE. & KANSAS AVE.

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#21074 | 07.20.2024



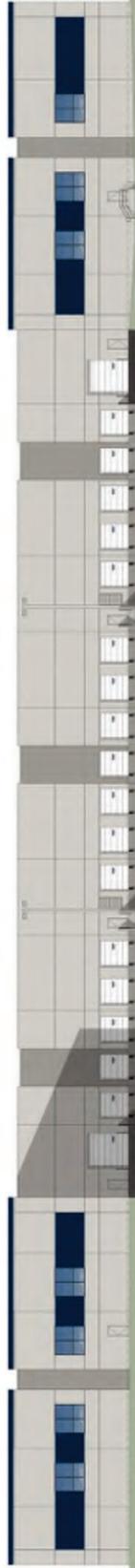
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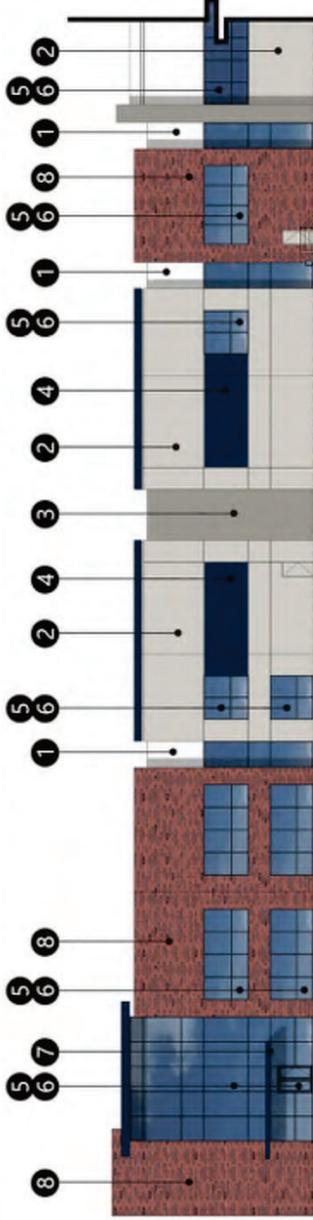
Building 1 North Elevation - Roberta Street



Building 1 West Elevation - Kansas Avenue



Building 1 South Elevation



Building 1 North Elevation - Roberta Street



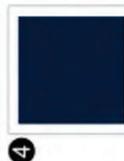
Sherwin Williams
SW 7005
Pure White



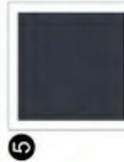
Sherwin Williams
SW 7043
Wordly Gray



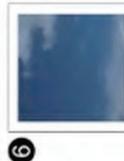
Sherwin Williams
SW 7045
Intellectual Gray



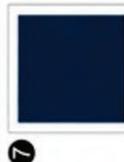
Sherwin Williams
SW 6524
Commandore
(Match Pantone 295)



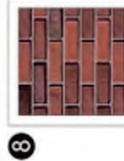
Anodized Aluminum
MILLION
Sherwin Williams SW 7076
Cyberspace
(BM Black Horizon)



Blue Reflective
GLAZING



Sherwin Williams
Acrylic Latex Systems
High Gloss/High Performance
in color: SW 6524 Commandore
(Match Pantone 295)



Coronado Stone
Style: Wirecut Brick
Color: La Jolla Blend
Size: 2 1/2" x 8"



Conceptual Building 1 Colored Elevations & Material Board

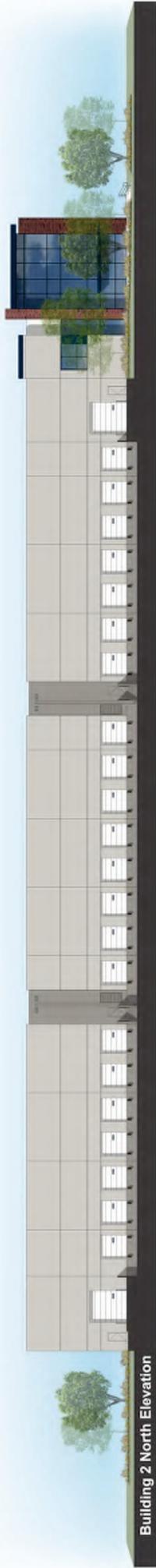
MASSACHUSETTS AVE. & KANSAS AVE.

Riverside, CA 92507

#21074 05-10-2024



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Building 2 North Elevation



Building 2 West Elevation - Kansas Avenue



Building 2 South Elevation - Massachusetts Avenue



Building 2 East Elevation



Conceptual Building 2 Colored Elevations

MASSACHUSETTS AVE. & KANSAS AVE.

Riverside, CA 92507

#21074 | 07-26-2024



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Building 2 North Elevation

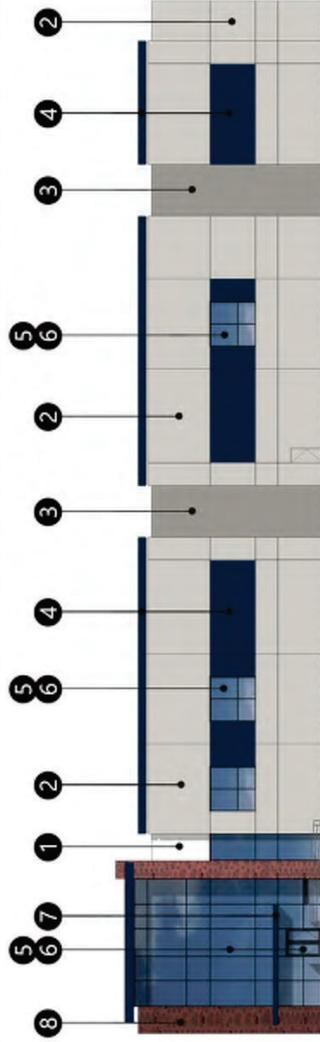


Building 2 West Elevation - Kansas Avenue



Building 2 East Elevation

Building 2 South Elevation - Massachusetts Avenue



Building 2 East Elevation - Kansas Avenue

- 1 Sherwin Williams SW 7005 Pure White
- 2 Sherwin Williams SW 7043 Wordly Gray
- 3 Sherwin Williams SW 7045 Intellectual Gray
- 4 Sherwin Williams SW 6524 Commodore (Match Pantone 295)
- 5 Sherwin Williams SW 6524 Commodore (Match Pantone 295)
- 6 Sherwin Williams SW 7076 Cyberspace (BM Black Horizon)
- 7 Sherwin Williams Acrylic Latex Systems High Gloss/High performance in color: SW 6524 Commodore (Match Pantone 295)
- 8 Coronado Stone Style: Wincut Brick Color: La Jolla Blend Size: 2 1/2" x 8"



Conceptual Building 2 Colored Elevations & Material Board

MASSACHUSETTS AVE. & KANSAS AVE.

Riverside, CA 92507

#21074 | 07-29-2024



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ARTICLE VI OVERLAY ZONES

Chapter 19.170 INNOVATION DISTRICT OVERLAY ZONE (ID)

19.170.010 Purpose.

The Innovation District (ID) Overlay Zone is established to:

- A. Implement the goals, policies, and principles of the General Plan.
- B. Enable and encourage new development in the ID Overlay Zone area.
- C. Support a mix of high-density residential, high-intensity employment/office, civic, entertainment, institutional and pedestrian-oriented retail uses.
- D. Encourage investment in public facilities through quality redevelopment and improvements.
- E. Ensure that new development and redevelopment are designed to minimize traffic, parking and impacts on surrounding residential neighborhoods, and create walkable environments.

If regulations or development standards are not included in this Chapter, refer to the standards in applicable Chapter of Title 19.

(Ord. 7573 § 1(Exh. A), 2021)

19.170.020 Application.

- A. *Application.* The Innovation District (ID) Overlay Zone may be applied to the area bounded to the west by the State Route 91, to the north by State Route 60/Interstate 215, and to the south by Third Street. The ID Overlay Zone may be applied in combination with any existing Base Zone.
- B. *Relationship to ID Master Plan.* The ID Overlay implements the intent and guidelines in the ID Master Plan document.
- C. *Permit requirements.*
 1. In addition to any other permits required by the Zoning Code, new building or structure construction, sign or exterior alterations, enlargement of an existing building, structure, or signs shall, pursuant to Chapters 19.710 require Design Review.
 2. Minor Conditional Use Permit may be required pursuant to and 19.730.
- D. *Design Standards.*
 1. All projects must comply with the standards listed in this Chapter and in effect at the time the development is submitted to the City.
 2. Design Review processing and approval does not preclude compliance with all regulations and permitting requirements applicable to the proposed development.
 3. When required by this chapter, street dedication and improvements for building permits, the public street or right-of-way must be dedicated and improved consistent with all applicable City standards.

E. *Existing and Entitled Industrial and Manufacturing Uses.* The ID Overlay Zone authorizes existing and entitled industrial and manufacturing land uses to continue and expand as legal, conforming land uses until such time as they are converted to uses permitted in the applicable ID Overlay Zone Sub-District as set forth in Section 19.170.040 (Permitted Uses).

(Ord. 7573 § 1(Exh. A), 2021)

19.170.030 Sub-districts.

The ID Overlay Zone is divided into Sub-Districts as set forth in Table 19.240.030.

Sub-District	Sub-District Description
IE - Industrial Emphasis	IE encourages a wide range of industrial, office, and commercial uses that may be integrated vertically and/or horizontally. While predominantly a mix of light industrial and office uses, other standalone uses, such as transportation services and energy-generation facilities, are encouraged. Clean & green industries, such as renewable energy, low-carbon, research and development, and public transportation infrastructure uses are encouraged in this Sub-District.
EE - Employment Emphasis	EE promotes high-intensity vertical mix of office, clean & green industrial, educational, and hospitality uses to be an employment center of regional importance with a limited mix of residential uses to compliment the employment focus. Clean & green industries, including renewable energy, low-carbon, education and training, and research and development are encouraged.
HE - Housing Emphasis	HE accommodates primarily residential housing development supported by ground-floor neighborhood-serving commercial uses and live work opportunities, with limited industrial functions.
ET - Eastside Transition	ET accommodates mid to low-rise buildings with a diverse array of uses, including residential, neighborhood-serving commercial, and limited office uses, that integrate more seamlessly with the neighboring Eastside Neighborhood.
CS - Civic Space	CS allows for greens, squares, and plazas with a variety of Civic Facilities.

(Ord. 7573 § 1(Exh. A), 2021)

19.170.040 Permitted uses.

The following table establishes the permitted land uses and uses permitted subject to the approval of a minor conditional use permit (Chapter 19.730 - Minor Conditional Use Permit) in the ID Overlay Zone Sub-Districts. Table 19.240.040 also identifies those uses that are specifically prohibited. Uses not listed in table are prohibited unless the Community & Economic Development Department Director, or his/her designee, pursuant to Chapter 19.060 (Interpretation of Code), determines that the use is similar and no more detrimental than a listed permitted or conditional use. Any use which is prohibited by state and/or federal law is also strictly prohibited.

District	IE	EE	HE	ET	CS
Civic Facilities					
Community Center and Services	X	P	P	P	P
Emergency Shelters	MC	MC	MC	X	P

Outdoor Auditorium and Performances	X	MC	MC	X	P
Public Parking Areas and Structured Garages	P	P	MC	MC	P
Transit Mobility Services and Stations	P	P	P	P	P
Commercial Functions					
-Alcohol Sales - On-Premises	P	P	P	MC	P
Assemblies of People - Entertainment (<500 people)	X	MC	MC	MC	MC
Assemblies of People - Non-Entertainment (<500 people)	X	MC	MC	MC	MC
Clean Energy Use	P	P	P	X	X
Day Care (child and senior)	MC	P	P	P	P
Education and Training Facilities	X	P	P	MC	MC
Home Occupations	X	P	P	P	X
Personal Services	P	P	P	P	X
Retail Sales	P	P	P	P	P
Restaurant (Full Service, Limit-Service, Small Shop, excluding drive-thru)	P	P	P	P	P
Shopkeeper Units (predominately work within a living space)	X	P	MC	P	
-Vehicle Repair (indoor only)	P	MC	X	X	X
Veterinarian/Small Animal Clinic	P	P	P	MC	X
Hospitality Functions					
-Convention Services	X	P	P	X	P
Hotel	X	P	P	X	X
Industrial Functions					
-Clean Energy Use	P	P	P	X	X
Heavy-Industries	MC	MC	X	X	X
Light-Industries	P	P	MC	X	X
Outdoor Storage	P	MC	X	X	X
Research Laboratories (wet laboratories/OSHA regulated)	P	P	MC	MC	X
Transportation Facilities	P	MC	X	X	X
Warehousing and Distribution Facilities	P	X	X	X	X
Office Functions					
-Administrative and Professional Facilities	P	P	P	MC	X
Medical Facilities	P	P	MC	MC	X
Research Laboratories (non-OSHA regulated)	P	P	MC	X	X
Residential Types					
-Attached Multiple-Family Dwelling	X	P	P	P	X
Detached Single and Multiple Family Dwelling	X	X	X	P	X
Live/Work Units (predominately living within a workspace)	X	MC	P	MC	X
Single-Room Occupancy Unit (Co-Living)	X	P	P	MC	X
C = Subject to the granting of a conditional use permit (CUP), Chapter 19.760 SP = Site Plan Review Permit, Chapter 19.770 MC = Subject to the granting of Minor Conditional Use Permit (MCUP), Chapter 19.730 sq. ft. = Square Feet P = Permitted					

(Ord. 7573 § 1(Exh. A), 2021)

19.170.050 Application Requirements and Processes.

All application requirements and processes identified in Article IX of this Title shall apply to this Chapter.

(Ord. 7573 § 1(Exh. A), 2021)

19.170.060 Building intensity and location standards.

Table 19.170.060 - Building Intensity and Location				
This table coordinates specific Building Functions, Intensities, and Location within each Zoning Sub-District.				
Sub-District Function	IE	EE	HE	ET
Civic	Civic space edges shall be completely or predominately bounded by buildings mid-block or at street corners.	Civic spaces may be hybrids and directly with public streetscape elements located mid-block and/or at corners.	Civic space edges shall be completely or partially bounded by buildings and/or located mid-block and street corners.	Civic space edges may be partially bounded by buildings and shall be directly accessible to 3rd Street walkways.
Commercial	1st floor of the primary building on corner lots may be commercial.	Up to 60% of the primary and accessory buildings may be commercial.	Up to 40% of the primary and/or accessory buildings may be commercial.	On corner lots up to 20% of the primary buildings 1st floor shall be commercial.
Hospitality	Not allowed.	Up to 60% of the primary and/or accessory buildings may be hospitality uses.	Up to 80% of the primary buildings may be hotel uses.	Not allowed.
Industrial	Up to 60% of the primary and accessory buildings shall be industrial. <u>Primary and accessory buildings may be industrial.</u>	Up to 60% of the primary buildings may be light industrial and/or clean and green industry. Only 1st floors of accessory buildings may be light industrial and/or clean and green industries.	Only 1st floors of accessory buildings may be light industrial and/or clean and green industries.	Not allowed.
Office	Up to 40% of the primary and accessory buildings may be office.	Up to 100% of the primary buildings may be office.	Up to 40% of the area of the primary and accessory buildings may be	Floors 1 - 2 of the primary buildings may be office. Up to 100% of

			office. Only floors 1-2 in the accessory buildings may be office	accessory buildings may be office.
Residential	Not allowed.	Up to 40% of the primary and/or accessory buildings shall be residential. Units are allowed to average >400 square feet.	Up to 100% of the primary buildings may be residential. Units are allowed to average >600 square feet	Up to 100% of the primary and accessory buildings may be residential, except corner lots. Units are allowed to average >800 square feet

(Ord. 7573 § 1(Exh. A), 2021)

19.170.070 Sub-district development standards.

The following diagram illustrates key terms used to define development areas on a lot for this Chapter:

Figure 19.170.070

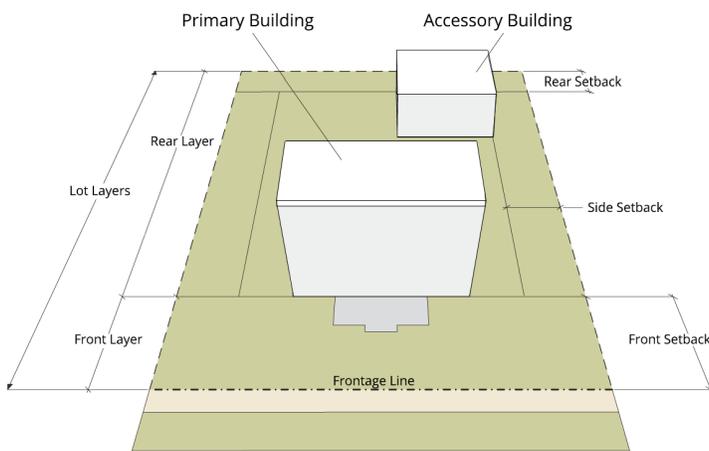
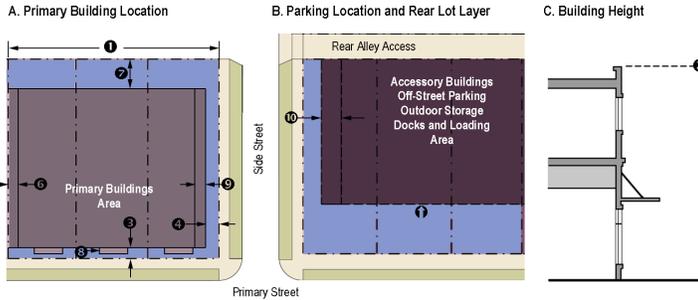


Table 19.170.070 IE - Industrial Emphasis (IE) Sub-District Development Standards



IE Development Standards		Minimum	Maximum	#
Lot and Density				
Lot Width (ft.)		25	-	①
Floor Area Ratio (FAR)	Sites under 5 acres	1.0	2.0	
	Sites over 5 acres	0.40	N/A	
Residential Density (Lots - Dwelling Units per Acre)		N/A	N/A	
Building Form and Location				
Building Height - Primary Building (Floors)		2 floors/N/A	5 floors/75-feet	②
Building Height - Accessory Building (Floors)			3 floors	
Build-to Lines and Setbacks (ft.)				
Front (Principal Building)		5	10	③
Front (Principal Building) ¹	Kansas, Massachusetts, and Chicago Avenues	5	10 ²	③
	All Other Frontages	Same as I – General Industrial Zone	N/A	
Front (Front Layer and Principal Building) Side Street		5	10	④
Side Street (Rear Layer and Accessory Building)		5	10	⑤
Interior Side		5	10	⑥
Rear		10	10	⑦
Architectural Feature Projection Front (Principal Building) Encroachment (%)		-	40% 5 feet	⑧
Storage and Loading Area (Principal Building – Front Lot Layer)		5	-	⑨
Outdoor Storage and Loading Area (Accessory Building – Rear Lot Layer)		10	-	⑩
Rear Lot Layer Setback from Primary Frontage Line		25	-	↑
Parking				
Off-Street Parking		2-1 spaces per 5-1000 sq ft or per Zoning Code, whichever is less	5 spaces per 1000 sq ft	
"#" in the table corresponds with the numbers on the graphic				
¹ Common ground floor open space may encroach into the setback area				

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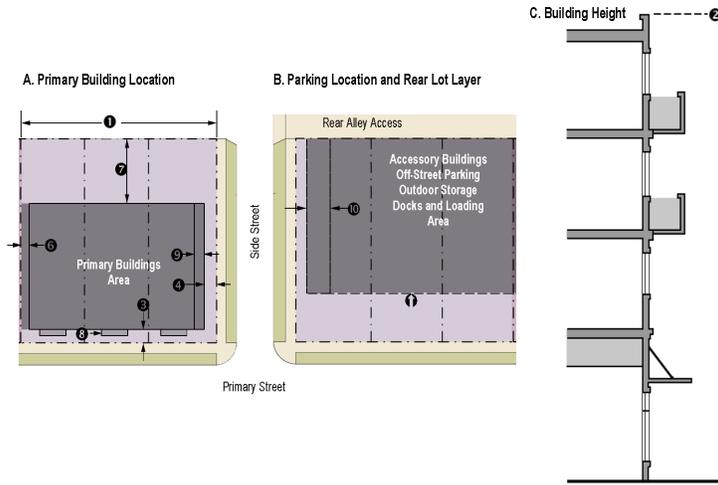
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² Eighty percent or more of the building façade shall comply.

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Table 19.170.070 EE - Employment Emphasis Sub-District Development Standards

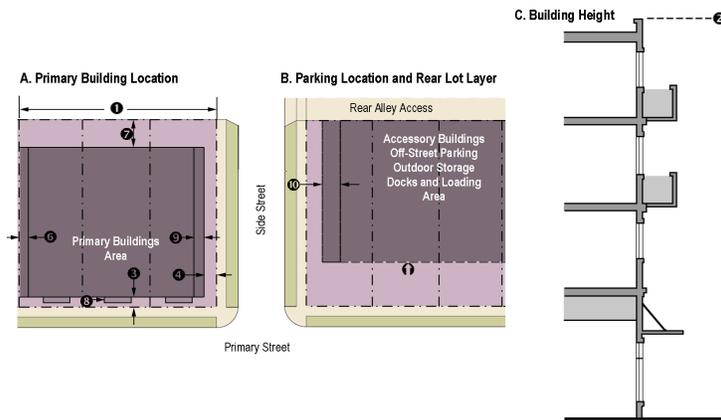


EE Development Standards	Minimum	Maximum	#
Lot and Density			
Lot Width (ft.)	25	300	①
Floor Area Ratio (FAR)	2.0	6.0	
Residential Density (Lots - Dwelling Units per Acre)	30	100	
Building Form and Location			
Building Height - Primary Building (Floors)	2 floors	12 floors/140-feet	②
Building Step-back	4th floor/+55 feet	6th floor/+75 feet	
Building Height - Accessory Building (Floors)	-	6 floors	
Build-to Lines and Setbacks (ft.)			
Front (Principal Building)	0	10	③
Front (Principal Building) Street Side (Primary Street)	0	10	④
Street Side (Secondary) Minimum	5	10	⑤
Interior Side	0	10	⑤
Rear Minimum	5	10	⑦
Front (Principal Building) Encroachment (%)	60%	80%	⑧
Storage and Loading Area (Principal Building - Front Lot Layer)	5	-	⑨
Outdoor Storage and Loading Area (Accessory Building - Rear Lot Layer)	10	-	⑩
Rear Lot Layer Setback from Primary Frontage Line	20	-	↑
Parking			

Off-Street Parking	3 spaces per 1,000 sq. ft. for Nonresidential	1.5 space per Residential Housing Unit	
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Table 19.170.070 HE - Housing Emphasis Sub-District Development Standards

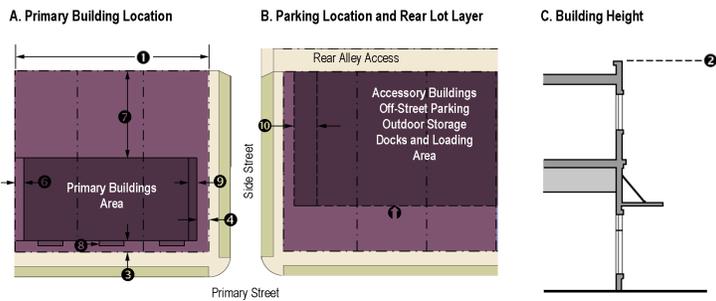


HE Development Standards	Minimum	Maximum	#
Lot and Density			
Minimum Lot Width (ft.)	25	300	①
Maximum Floor Area Ratio (FAR)	2.0	5.0	
Residential Density (Lots - Dwelling Units per Acre)	30	150	
Building Form and Location			
Building Height - Primary Building (Floors)	2 floors	24 floors/240-feet	②
Building Step-back - Primary Building (Floors and approximate feet)	4 th floor/+55 feet	6 th floor/+75 feet	
Building Height - Accessory Building (Floors)	-	6 floors	
Build-to Lines and Setbacks (ft.)			
Front (Principal Building)	0	10	③
Front (Principal Building) Street Side (Primary Street)	0	10	④
Street Side (Secondary) Minimum	5	10	⑤
Interior Side	0	10	⑥
Rear Minimum	5	10	⑦
Front (Principal Building) Encroachment (%)	60%	80%	⑧
Storage and Loading Area (Principal Building - Front Lot Layer)	5	-	⑨
Outdoor Storage and Loading Area (Accessory Building - Rear Lot Layer)	10	-	⑩
Rear Lot Layer Setback from Primary Frontage Line	30	-	↑
Parking			

Off-Street Parking	2 spaces per 1,000 sq. ft. for Nonresidential	1.5 spaces per Residential Housing Unit	
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Table 19.170.070 ET - Eastside Transition Sub-District Development Standards



D. ET Development Standards	Minimum	Maximum	#
Lot and Density			
Minimum Lot Width (ft.)	25	50	①
Maximum Floor Area Ratio (FAR)	0.5	1.5	
Residential Density (Lots - Dwelling Units per Acre)	15	60	
Building Form and Location			
Building Height - Primary Building (Floors)	1 floor	4 floors/55-feet	②
Building Height - Accessory Building (Floors)	1 floor	4 floors	
Build-to Lines and Setbacks (in Feet)			
Front (Principal Building)	5	10	③
Front (Principal Building) Street Side (Primary Street)	0	10	④
Street Side (Secondary) Minimum	5	10	⑤
Interior Side	10	10	⑥
Rear Minimum	5	15	⑥
Front (Principal Building) Encroachment (%)	0	60	⑦
Storage and Loading Area (Principal Building - Front Lot Layer)	5	-	⑨
Outdoor Storage and Loading Area (Accessory Building - Rear Lot Layer)	10	-	⑩
Rear Lot Layer Setback from Primary Frontage Line	20	-	↑
Parking			
Off-Street Parking	2 spaces per 1,000 sq. ft. for Nonresidential	2 spaces per Residential Housing Unit	

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(Ord. 7573 § 1(Exh. A), 2021)

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(Supp. No. 23, Update 1)

19.170.080 Additional standards.

In addition to the requirements outlined in Section 19.240.060, the following shall apply to building placement. The following diagram illustrates key terms used to define development areas on a lot:

A. Additional setback requirements.

~~1. The façade of the primary building shall be built parallel to the primary Frontage Line.~~

~~2.1.~~ Façade width.

- a. In the EE and HE Sub-Districts, the minimum façade width shall be 80 percent of the lot width.
- b. In the IE and ET Sub-Districts, the minimum façade width shall be 60 percent of the lot width.

~~3.2.~~ Permitted encroachments into the front setback include the following private building frontage elements: stoops (exterior stairs), forecourt terraces (at grade space), light court terraces (below grade space and stairs), recessed arcades and walkways, outdoor dining, green walls, artistic expressions, parking access screening, and planter boxes.

~~4.3.~~ ~~Maximum-B~~ building setbacks.

~~a. Buildings shall be located no farther from frontage line than the maximum setback.~~

~~a. (1)~~ For buildings fronting on two primary streets, the front setback shall apply on both frontages.

~~b. (2)~~ For buildings fronting on three or more streets, the front setback shall apply on at least two of the frontages.

~~5.4.~~ Accessory buildings.

- a. Accessory buildings in the rear setback shall be a minimum of 15 feet measured from the centerline of the rear alley easement.
- b. In the absence of a rear alley, the rear setback for accessory buildings, the setback shall be a minimum of ten feet.

~~6. Windows and entryways.~~

~~a. All new buildings shall have windows on all perimeter walls oriented towards streets and courtyards.~~

~~b. All new buildings shall have clearly identifiable entry doorways on front façades.~~

~~7.5.~~ Exceptions.

- a. Outdoor eating areas - Where an outdoor eating area is installed, a portion of the building may be set back up to 12 feet from the frontage line, if at least 80 percent of the building facade is at the frontage line.
- ~~b. Temporary mixed use areas - A temporary use may be allowed on vacant lots in EE and/or HE Sub-Districts to activate the site if it meets the Sub-District's general intent as defined in this title.~~

B. Façade width.

1. In the EE and HE Sub-Districts, the minimum façade width shall be 80 percent of the lot width.

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~~2.~~ In the IE and ET Sub-Districts, the minimum façade width shall be 60 percent of the lot width.

C. Building heights.

1. Heights do not apply to attics, parapets, belfries, clock towers, chimney flutes, water tanks, elevator bulkheads or tower.
2. Residential building floor to finished ceiling height must be a minimum of ten feet in HE, EE, and ET Sub-Districts, except for ground or first floor live-work uses which do not have a minimum.
3. For development projects in all Sub-Districts that adjoin the ET Sub-District, the maximum building height shall be 65 feet within 20 feet of the ET Sub-district.

D. Façade glazing and openings.

1. The ground floor façade of primary buildings with commercial and/or office uses shall be a minimum of 70 percent glazed area.
2. Ground floor openings shall have transparent glazing and provide views into work areas, display areas, sales areas, lobbies, or similar active spaces, or into window displays that are three feet deep or more.
- ~~3. Openings above the first floor shall not exceed 70 percent of the total building front wall, with each façade being calculated independently.~~
4. In the EE, HE and ET Sub-Districts, a continuous plane of any building façade shall not exceed 20 feet without an opening.
5. Exceptions to glazing.
 - a. In the ~~HE~~ Sub-District, multi-level parking facilities, where permitted, are not required to meet the ground-floor transparency requirement (refer to development standard, C1 above).
 - b. If buildings are in rear layer ~~behind primary buildings~~, and not visible from the adjacent public street, the building ground-floor transparency requirement shall not ~~apply~~ be required (refer to development standard, C1 above).

E. Windows and entryways.

- ~~a1.~~ All new buildings shall have windows on all perimeter walls oriented towards streets and courtyards.
- ~~a2.~~ All new buildings shall have clearly identifiable entry doorways on front façades.

F. Loading areas.

1. Truck docks, loading, storage yards, and service areas are permitted within the rear layer on rear alley and lanes.
2. Loading, storage yards, and service areas shall be located on the side or rear of buildings and shall not face a ~~primary~~ street.

G. Open space.

1. Common ground floor open space.
 - ~~a.~~ Common ground floor open space is to be used for enhanced landscaping and passive/active gathering areas. Common ground floor open space does not include land occupied by streets, driveways, parking areas, service areas, required landscape areas or required front and street side yards.

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~~a~~b. Common ground floor open space may be provided in lieu of providing individual open space for each unit within the first four floors above the ground floor.

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~~b~~c. In the IE, EE and HE Sub-Districts, common ground floor open space, including, but not limited to terraces, courtyards, plazas, and patios, is required and must be directly accessible from within the primary building.

~~d~~. In the IE Sub-district, common ground floor open space adjacent to the public right-of-way shall be screened with decorative wall compliant with the development standards below (Section L.3).

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e. Minimum Dimensions

~~i~~. Common ground floor open space shall be provided at a rate of 70 square feet per 1,000 square feet of building area or a minimum of 7,000 square feet, whichever is less.

~~ii~~. Each ~~c~~Common ground floor open space ~~area~~ shall have a minimum horizontal dimension of 20 feet ~~in width-in width and shall be a minimum of 7,000 square feet.~~

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2. Common upper floor open space—Mixed-use buildings.

a. In the EE and HE Sub-Districts, common upper floor open space, including, but not limited to, balconies, decks, terraces, common open space, and rooftops, is required for every five floors above the first four floors and the on the rooftop.

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b. Common upper floor open space is required for every for every five floors above the first four floors and the on the rooftop, in addition the private open space required in this section.

c. Common upper floor private open space shall have a minimum horizontal dimension of six feet in width and shall be a minimum of 2,000 square feet.

3. Private upper floor open space—Residential units.

a. Private upper floor open space shall include a balcony, deck, patio, porch that is directly accessible by a doorway from a habitable room within the residential unit.

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b. For each residential unit located on the fifth floor or higher, a private upper floor open space shall be a minimum 24 square feet.

~~F~~H. Outdoor retail sales and merchandise display.

1. All outdoor retail sales and merchandise displays shall be directly accessible to the primary business.

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2. Outdoor retail sales and merchandise displays shall not obstruct ingress and egress to a building, hinder accessibility, obstruct fire lanes, interfere with vehicular circulation, or sight distance, or be in landscaped areas.

3. Outdoor retail sales and merchandise displays shall not exceed five percent of the total gross floor area of the business, or 200 square feet, whichever is less.

4. Display merchandise shall not exceed a height of six feet above finished grade.

5. The temporary use of a parking or undeveloped area for outdoor retail sales, merchandise displays, and entertainment is permitted with a temporary use permit as defined in ~~this title~~the Zoning Code.

~~G~~L. Outdoor storage.

~~1. 1.~~ For nonresidential uses, storage shall be located in the rear layer of the lot and not visible from streets.

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~~2. 2.~~ Storage shall be located behind the rear most wall of the building, or 50 feet, whichever is less.

~~3. 2.~~ In the EE, HE and ET Sub-Districts, storage shall be a maximum ten percent of the gross floor area of the use or 600 square feet, whichever is less.

~~4. 3.~~ In the IE Sub-District, storage shall be a maximum ~~40-10~~ percent of the ~~gross floor area of the use or 1,000 square feet, whichever is less~~ lot area.

HJ. Parking.

1. Screening.

a. For lots without a primary building, parking shall be fully screened using landscaping, ~~a decorative~~, opaque walls, or other rigid materials to screen any parking spaces located in the front layer.

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b. Screening shall be a minimum ~~40-36~~ inches in height.

c. Screening shall be setback a minimum of two-feet from the ~~frontage~~ property line.

2. Off-street parking shall be ~~set in the rear layer and~~ set-back a minimum of 25 feet from the ~~frontage~~ property line.

~~a. Parking may be setback a minimum of 10 feet from the street adjacent property lines, if a decorative wall compliant with the development standards below (Section L.3) is provided to screen the parking.~~

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~~3. Exceptions to off street parking requirement may be granted for short term customer parking, drop off, and public private partnership car share spaces.~~

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K. Pedestrian network connectivity.

1. An internal network of pedestrian walkways shall connect: 1) all buildings on a site; 2) on-site automobile and bicycle parking areas; 3) sidewalks; and 4) any on-site common open space or amenity.

2. Private, internal walkways shall be a minimum of six feet wide, hard surfaced/paved with concrete, stone, tile, brick, or comparable material.

3. When walkways cross driveways, parking areas, or loading areas, clearly identifiable markings shall be required and may include a raised crosswalk, a different paving material, or similar method.

4. Where a walkway is parallel and immediately adjacent to an ~~auto access alley drive aisle~~, clearly identifiable markings shall be required to separate the walkway from the auto travel lane using a raised curb, bollards, or other physical barriers.

L. Edge conditions.

~~1. Building pads sited along Massachusetts Avenue, between Kansas and Chicago Avenues, shall be equal to the grade of the public right-of-way.~~

~~2. All developments shall provide parkway adjacent sidewalks along Massachusetts Avenue.~~

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~~3. Fences and walls facing public rights-of-way require a minimum setback of 5-feet from the property line.~~

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~~a. Fences and walls are not permitted to be located between the building and the public right-of-way.~~

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b. Height of fences and walls facing public rights-of-way may be a maximum of 6-feet in height. Provided that the bottom 2/3s of the wall is solid, and the upper 1/3 of the wall is openwork.

c. Fences and walls facing public rights-of-way shall be constructed of a minimum of two decorative materials.

4. Site Plan shall be designed to prevent the queuing of trucks on streets or elsewhere outside of facility.

M. Temporary mixed-use areas.

1. A temporary use may be allowed on vacant lots in EE and/or HE Sub-Districts to activate the site if it meets the Sub-District's general intent.

(Ord. 7573 § 1(Exh. A), 2021)

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19.170.090 Nonconformities.

- A. Land uses and structures legally established that do not conform to this chapter may continue to exist and operate as legal, conforming uses.
- B. Expansion of such uses and structures shall be limited as follows:
 - 1. The gross floor area may be expanded up to ten percent of the existing gross floor area of structures on the premises through a design review.
 - 2. The gross floor area of previously conforming uses and structures may be expanded up to 50 percent of the existing gross floor area of structures on the premises through a minor conditional use permit.
 - 3. Within the HE Sub-district, existing conforming nonresidential uses may be replaced with other conforming, nonresidential uses without complying with the 80 percent residential land use requirement for new development.

(Ord. 7573 § 1(Exh. A), 2021)



South Coast Air Quality Management District

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SENT VIA E-MAIL:

August 07, 2025

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Riverside, CA 92522

Draft Environmental Impact Report (EIR) for the Proposed Massachusetts Point Project (Proposed Project) (SCH No.: 2024120391)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project site encompasses approximately 14.42 acres¹ and consists of demolishing the existing structures and constructing two light industrial buildings for a total of 199,850 square feet (sf) of warehouse and office uses on approximately 10.21 acres.² Building 1 would consist of 99,900 sf with 17 dock doors along the southern side of the building, and Building 2 would consist of 99,950 sf with 22 dock doors along the northern side of the building.³ The Proposed Project assumes 20 percent (%) of the warehouses for cold storage.⁴ The Proposed Project site is located at 2626 Kansas Avenue, 2069 Massachusetts Avenue, and 1989 Massachusetts Avenue.⁵ Based on the review of the aerial photograph, the nearest sensitive receptor (e.g., residence) is approximately 680 feet northeast of the Proposed Project site. Construction of the Proposed Project is anticipated to take approximately 14 months, with operations beginning in 2027.⁶

South Coast AQMD Comments

Incorrect Land Use Type Used in CalEEMod

According to the CalEEMod detailed report provided in Appendix B – Air Quality, Energy, and GHG Report, the land use type selected for the unrefrigerated portion of the warehouses is

¹ Draft EIR, p. 3-1.

² *Ibid.* p. 3-25.

³ *Ibid.* p. 3-25 and 3-27.

⁴ *Ibid.* p. 3-45.

⁵ *Ibid.* p. 3-1.

⁶ *Ibid.*

categorized as General Heavy Industry.⁷ However, based on the CalEEMod User Guide, the General Heavy Industry land use type is defined as: “Heavy industrial facilities usually have a high number of employees per industrial plant and are generally limited to the manufacturing of large items.”⁸

This classification does not accurately reflect the Proposed Project, which involves the development of two warehouse buildings with 20% of cold storage. The appropriate land use category for this project in CalEEMod should therefore be Unrefrigerated Warehouse and Refrigerated Warehouse, which more accurately represent the expected operational characteristics and associated emission factors.

Use of the incorrect land use category may lead to underestimation of construction and operational emissions in the environmental impact analysis. To ensure a more accurate assessment of air quality impacts, the Lead Agency is recommended to revise the CalEEMod inputs accordingly, rerun the model using the appropriate land use classification, and incorporate the updated results into the Final EIR.

Potentially Underestimated Construction Emissions

According to Section 5.9: Hazards and Hazardous Materials of the Draft EIR, its Phase I Environmental Site Assessment found that the Proposed Project site contains volatile organic compounds (VOCs) at concentrations that exceed their applicable regulatory screening thresholds⁹, specifically:

- At 2626 Kansas Avenue, elevated concentrations of trichloroethene (TCE) have been identified in shallow soil vapor in the northwest portion of the site; tetrachloroethene (PCE) and TCE have been detected in the south-central and southeastern exterior areas; and 1,1-dichloroethene (1,1-DCE) has been detected in groundwater monitoring wells on the northwest portion of the site.
- At 2069 and 1989 Massachusetts Avenue, PCE and TCE have also been detected.

The Lead Agency has proposed Mitigation Measure HAZ-1, which requires preparation of a Soil Management Plan (SMP) and a Health and Safety Plan (HSP), both of which must be reviewed and approved by the Santa Ana Regional Water Quality Control Board prior to issuance of any grading or excavation permits.¹⁰ However, the Draft EIR does not evaluate the potential air quality impacts associated with site cleanup and remediation activities during construction.

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) detailed report, the Lead Agency used the default one-way truck trip length of 20 miles to quantify the Proposed Project’s construction emissions from hauling

⁷ Appendix B – Air Quality, Energy, and GHG Report. CalEEMod Detailed Report.

⁸ CalEEMod User Guide. P. 23.

⁹ *Ibid.* p. 5.9-18.

¹⁰ *Ibid.* p. 5.9-26.

construction materials and importing soil. According to Section 5.19: Utilities and Service Systems of the Draft EIR, it is identified that Badlands Landfill, Lamb Canyon Landfill, the El Sobrante Landfill, and Mid-Valley Sanitary Landfill are the municipal waste landfills that could serve the Proposed Project.¹¹ If cleanup activities include the removal and disposal of contaminated soil, depending on the type of contamination, these landfills may not accept the contaminated soil. In that case, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside Riverside County, which could require a one-way trip significantly longer than 20 miles.

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod¹² model inputs to reflect the actual distance to a known and permitted hazardous waste disposal facility expected to be used by the project. The selected trip length should be clearly disclosed and justified in the Final EIR. Should the Lead Agency elect not to revise the default 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the default assumption in the context of the project-specific conditions.

Unsupported Truck Trip Distance Assumption Used in Emissions Modeling

Accurately estimating truck trip lengths is a key parameter when quantifying emissions from mobile sources, especially diesel particulate matter (DPM), oxides of nitrogen (NOx), and greenhouse gas (GHG). The mischaracterization of average trip length, for example, can lead to a significant underestimation of the project's air quality impacts. According to the Draft EIR, the truck emissions are calculated with the truck trip length as the weighted average of 15.3 miles for 2-axle, 14.2 miles for 3-axle, and 40 miles for 4-axle trucks.¹³ However, the analysis lacks critical information regarding the supporting basis for determining the trip origins and destinations and whether the assumed distances are reflective of actual or anticipated routing patterns of the facility's current or future truck fleet.

As such, the Final EIR should include a clear and defensible rationale for the use of the truck trip length assumption. The rationale should be supported by documentation such as empirical data from fleet operations, transportation logistics studies, regional freight movement data, or other sources that demonstrate the applicability and appropriateness of the selected distances. Additionally, if any truck trips associated with the Proposed Project will include port-related activities, the Final EIR should explain this detail, and the modeled trip lengths should accurately reflect the mileage between the project site and the relevant port(s), such as the Ports of Los Angeles or Long Beach, located approximately 65-70 miles one-way from the Proposed Project site.

Therefore, it is recommended that the Lead Agency either revise the trip distance assumptions to more accurately reflect realistic operational conditions or provide additional evidence substantiating that the selected distances are representative of actual or reasonably foreseeable truck travel patterns associated with the Proposed Project. Failure to provide supporting evidence

¹¹ *Ibid.* p. 5.19-16.

¹² CalEEMod free of charge available at <https://www.caleemod.com/>

¹³ *Ibid.* p. 5.3-22.

to validate these assumptions may compromise the accuracy of the emission estimates, conclusion, and the overall integrity of the air quality analysis presented in the Final EIR.

Truck Idling Duration and Emissions Modeling

Appendix C – Health Risk Assessment indicates that a default assumption of 15 minutes of idling per truck per day, including Transport Refrigeration Unit (TRU) trucks, was used to estimate DPM emissions for the operational health risk assessment.¹⁴ While this assumption may be consistent with regulatory idling limits, it may not accurately reflect actual operating conditions for a facility of the Proposed Project's scale. The Proposed Project is anticipated to generate approximately 342 truck trips per day, with 20% of all heavy-duty diesel trucks assumed to be equipped with a TRU,¹⁵ representing a substantial volume of heavy-duty vehicle activity. For a high-throughput logistics or distribution facility, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

Although the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), this regulation provides exemptions for trucks equipped with engines that meet the optional low-NOx idle emission standard, typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.¹⁶ Furthermore, CARB’s EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.¹⁷

Accurate characterization of idling activity is essential to fully assess a project’s potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

Inconsistency in Cancer Risk Results Presented in Draft EIR and Its Appendices

The health risk assessment for the Proposed Project includes evaluation of both short-term and long-term DPM emissions associated with construction and operational activities. The estimated cancer risk results are presented in the Draft EIR and its technical appendices. However, upon staff

¹⁴ Appendix C – Health Risk Assessment, p. 23.

¹⁵ Appendix C – Health Risk Assessment, p. 22.

¹⁶ CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling available at <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling>

¹⁷ CARB. EMFAC2021 Volume III Technical Document, Page 161. Table 4.4.2-5 available at [EMFAC2021 Volume III Technical Document](#)

review, inconsistencies were identified between the Draft EIR, Appendix C - Health Risk Assessment, and Appendix B - Air Quality, Energy, and Greenhouse Gas Report. Specifically, the Draft EIR and Appendix C both show cancer risks of 0.63 in one million for construction and 5.59 in one million for operation.^{18,19} In contrast, Appendix B shows 0.54 in one million for construction and 3.55 in one million for operation.²⁰

To ensure transparency, accuracy, and consistency across all CEQA documents, the Lead Agency is recommended to reconcile these discrepancies and include the updates in the Final EIR to reflect the correct and consistent cancer risk values throughout the CEQA document and all supporting appendices.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given CARB's clean truck rules and regulations, aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

¹⁸ *Ibid.* p. 5.3-28.

¹⁹ Appendix C – Health Risk Assessment. p. 31 and 32.

²⁰ Appendix B – Air Quality, Energy, and GHG Report. p. 27.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

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

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act²¹
2. South Coast AQMD 2022 Air Quality Management Plan,²² specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast

²¹ State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

²² South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.²³*Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program*

Since the Proposed Project consists of developing a total of 199,850 sf warehouses, once the warehouses are occupied, the Proposed Project’s warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program²⁴ and Rule 316 – Fees for Rule 2305.²⁵ Rule 2305 and Rule 316 aim to reduce regional and local emissions of NOx and particulate matter (PM), including DPM, so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they so choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD’s WAIRE Program webpage.

South Coast AQMD Air Permits and Role as a Responsible Agency

According to the Draft EIR, the Proposed Project would utilize two diesel fire pumps and two emergency generators,²⁶ for which air permits from the South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,²⁷

²³ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation available at <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

²⁴ South Coast AQMD. Rule 2305 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>

²⁵ South Coast AQMD. Rule 316 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf>

²⁶ Ibid. p. 5.3-22.

²⁷ South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

Rule 203 – Permit to Operate,²⁸ Rule 401 – Visible Emissions,²⁹ Rule 402 – Nuisance,³⁰ Rule 403 – Fugitive Dust,³¹ Rule 461 – Gasoline Transfer and Dispensing,³² Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,³³ Rule 1113 – Architectural Coatings,³⁴ Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil,³⁵ Regulation XIII – New Source Review,³⁶ Rule 1401 – New Source Review of Toxic Air Contaminants,³⁷ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,³⁸ etc.

In addition, it is important to note that since air permits from South Coast AQMD are required, South Coast AQMD's role under CEQA is as a Responsible Agency. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types

²⁸ South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

²⁹ South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

³⁰ South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

³¹ South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

³² South Coast AQMD. Rule 461 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>

³³ South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

³⁴ South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

³⁵ South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

³⁶ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

³⁷ South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

³⁸ South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

RVC250625-03

Control Number

From: [Casas, Yesenia](#)
To: [Assadzadeh, Candice](#)
Cc: [Vega, Jaqueline](#)
Subject: [EXTERNAL] PR-2024-001666
Date: Monday, July 21, 2025 12:13:16 PM
Attachments: [Outlook-pzpkutr.png](#)
[SLAS14AD4M25072111140.pdf](#)
[ALUC application 5-13-24.pdf](#)

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Hello,

Thank you for transmitting the above referenced project to ALUC for review. Please note that the proposed project is located within zone E of March Air Reserve airport influence area, and although the city of Riverside is consistent with the compatibility plan for the March Airport Land Use Compatibility Plan, review by the ALUC is still required because the project proposes a legislative actions (Change of Zone).

Attached is an application, please contact ALUC planner Jackie Vega cc'd here for any questions regarding your application.

Best regards,
Yesenia Casas
Executive Assistant I



Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951)955-5132
Ycasas@rivco.org
www.rcaluc.org

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[County of Riverside California](#)



Sierra Club – San Geronio Chapter – Box Springs Group
R-NOW – Riverside Neighbors Opposing Warehouses

SENT VIA EMAIL
August 11, 2025

Candice Assadzadeh – Senior Planner
Donesia Gause – City Clerk
City of Riverside
Email: cassadzadeh@riverside.ca.gov; city_clerk@riversideca.gov

RE: Public comment for the Massachusetts Point Project, SCH# 2024120391 - DEIR

Dear City of Riverside Planning Staff,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Massachusetts Point Project ('The Project'), SCH # 2024120391.

The Project aims to demolish an existing building to develop two ~99,900 sq.ft. warehouses on the property adjacent to Roberta Street and Kansas Avenue in the Hunter Industrial Park neighborhood of Riverside. The community census tract 06065030502 on which the project occurs is in the 99th percentile for cumulative impact score in CalEnviroScreen4.0- it is literally a top 1% Environmental Justice (EJ) neighborhood in the state.¹ The project is within an industrial zone, adjacent to a Homeless Service Campus, and is within an employment emphasis and housing emphasis overlay subdistrict. The project requires an overlay zone change to industrial emphasis subdistrict, a development agreement, design review, and an EIR.

In our review, the Sierra Club Box Springs Group and R-NOW appreciate that this project is an industrial infill project and therefore has lower potential impacts than projects that are greenfield development. However, we remain concerned that project objectives and analysis are biased towards an industrial warehouse project that is incompatible with the overlay zone goals, local and regional air quality, and perpetuate a legacy of industrial harm to this community.

1. Environmental Justice was not included as its own topic area to be analyzed as an environmental impact in the draft EIR, despite the community status as a 99th percentile community in CalEnviroScreen4.0 and similar designation in the General Plan EJ element. Our NOP comment letter and the California Department of Justice asked for an analysis relative to the Warehouse Best Practice Document. Environmental Justice was instead

¹ <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

treated as a piecemeal set of objectives and best practices do not appear to be addressed substantively in the DEIR. Additionally, please compare the project to the Office of the Attorney General's Warehouse Projects: Best Practices document².

2. The Cumulative Impacts Project list omitted tens of millions of square feet of regional warehouses that are approved and under environmental review that were submitted as part of our comment letter on the project. This project's impacts are not limited to a 2-mile radius of the project. There are over 4,000 warehouses already in the Inland Empire with over 1,000 in Riverside County. There are 13,000 acres of warehouses approved or under environmental review. The Cumulative Impacts of these projects are not limited to the local streets of the neighborhood in which they are located, as indicated by the scope of the air quality, greenhouse gas, jobs, and other analyses. Please include a more comprehensive analysis of the regional impacts of warehouses on transportation, jobs, air quality, and greenhouse gas emissions. Here is a partial list of warehouse projects that are nearby to include.
 - a. World Logistics Center – 40.4M square feet – Approved – Moreno Valley
 - b. Bloomington Business Park – 2.4M square feet – Approved – San Bernardino County
 - c. West Valley Logistics Center – 2.1M - Fontana
 - d. Sycamore Hills Distribution Center – 600,000 sq. ft. - Riverside
 - e. Moreno Valley Business Park Building 5 – 425,000 sq.ft. – Moreno Valley
 - f. Harvest Landing Retail Project – 5.7M square ft. – Perris
 - g. Beaumont Pointe – 5.0M square ft. – Beaumont
 - h. The District at Jurupa Valley – 1.5M sq. ft. – Jurupa Valley
 - i. Agua Mansa Logistics Center – 1.2M sq.ft. – Colton
 - j. Merwin Property Project – 1.0M sq.ft. -Moreno Valley
 - k. Crystal Windows HQ project – 400,000 sq.ft. – Moreno Valley
 - l. All the projects along Old 215
 - i. Old 215 Business Park
 - ii. Cottonwood and Edgemont Project
 - iii. Bay & Day Commerce Center
 - iv. Old 215 Industrial Park Project
 - v. Moreno Valley Business Center Project
 - vi. First Industrial Warehouse at Day Street Project
3. The Project land-use analysis handwaves away the problems of the overlay zone. The site is within the Employment and Housing Emphasis overlay zones. The problem with ignoring this overlay zone is that adjacent land-uses in these overlay zones become less probable as the industrial zone expands and erodes the adjacent land-use compatibility. Warehouses and industrial uses beget warehouses and industrial uses; people don't want to live next to these land uses. The project undermines the existing overlay zone and plan; it is less likely that the overlay zone will ever be implemented if the first project approved in the overlay zone is nonconforming.
4. While the City of Riverside Good Neighbor Policy does not preclude housing near industrial zones, it does preclude building warehouses within certain setbacks of residential zoning. Current proposed guidelines would also add a cumulative impact standard that might impact

² <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

the suitability of the parcel splitting shenanigans involved in keeping the two buildings in this project just below the 100,000 square foot threshold³.

5. Table 5.14-6 indicates that the City of Riverside is jobs-rich, with more than the 1.5 jobs per dwelling unit considered housing-rich. There is no indication that the City of Riverside is on-track to add 43,000+ units. In the last 4 years, the City has added just over 600 constructed units per year⁴. At the current pace of construction, the City will add about 15,000 units by 2050. Thus, the 2050 projections in Connect SoCal 2024 are aspirational and not based on actual trends in unit construction of over 20,000 units. The assertion that this area needs more warehouse jobs is absurd and unsupported in the present. The City of Riverside is not jobs-poor and certainly doesn't need more low-density warehouse jobs when that is the largest sector of employment in the region.

Summary

Thank you again for the opportunity to provide comments on the Project. Please keep the Sierra Club Box Springs Group and R-NOW notified of all documents and meetings related to the Massachusetts Point Project.

Sincerely,

Michael McCarthy, PhD
Sierra Club - Box Springs Group - Co-Conservation Chair
R-NOW – Vice-Chair
Email: mikem@radicalresearch.llc

P.O. Box 1325
Moreno Valley, CA 92556-1325

³ <https://riversideca.legistar.com/LegislationDetail.aspx?ID=7508406&GUID=3590D12D-A435-43D3-BB52-8D292F48AAEB&Options=&Search=>

⁴ <https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard>

Exhibit 13 - Draft Environmental Impact Report –

Available on the City's Website:

<https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents>

Massachusetts Point Project

Final EIR

Prepared For
City of Riverside

November 2025



E | P | D
SOLUTIONS, INC

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1. Introduction

This Final Environmental Impact Report (Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Massachusetts Point Project (proposed Project).

According to CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft EIR;
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began June 26, 2025, and ended on August 11, 2025. A Notice of Availability of the Draft EIR was published concurrently with distribution of the Draft EIR. This document has been prepared in accordance with CEQA, the State CEQA Guidelines, and represents the independent judgment of the lead agency, which is the City of Riverside. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines, Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following chapters are contained within this document:

Section 1.0, Introduction. This section describes CEQA requirements and the content of the Final EIR.

Section 2.0, Revisions to the Draft EIR. This section contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Section 2.0, and/or errors and omissions discovered since release of the Draft EIR for public review.

The City of Riverside has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material clarifies existing information prepared in the Draft EIR and does not present any new substantive information. None of this new material indicates that the Project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Section 3.0, Response to Comments. This section provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Section 4.0, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of

project approval in order to mitigate or avoid significant effects on the environment” (CEQA Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in the Draft EIR and finalized in this Final EIR.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be “*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*”

CEQA Guidelines Section 15204(c) further advises, “*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*” Section 15204(d) also states, “*Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.*” Section 15204(e) states, “*This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.*”

In accordance with Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA.

2. Errata

2.1 INTRODUCTION

As provided in Section 15088(c) of the CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter option and provides changes to the Draft EIR shown as strikethrough text (i.e., ~~strikethrough~~) signifying deletions and red bold text (i.e., **bold**) signifying additions. These changes are meant to provide clarification, corrections, or minor revisions made to the Draft EIR initiated by the Lead Agency, City of Riverside, reviewing agencies, the public, and/or consultants based on their review. Text changes are presented in the section and page order in which they appear in the Draft EIR. None of the corrections or additions constitute significant new information or substantial project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions of or all of the Draft EIR.

2.2 CHANGES TO THE DRAFT ENVIRONMENTAL IMPACT REPORT

2.2.1 Section 1.0 Executive Summary

Location: Page 1-22, Section 1.5, Summary of Impacts, is revised as follows:

Explanation for Change and Discussion: Revised table for consistency with threshold analysis.

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3 Air Quality				
<p>Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard?</p>	<p>PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:</p> <ul style="list-style-type: none"> All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. The contractor shall ensure that all disturbed unpaved roads 	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.</p> <ul style="list-style-type: none"> The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less. <p>PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.</p>			
<p>Threshold C: Would the Project expose sensitive receptors to substantial pollutant concentrations?</p>	<p>PPP AQ-3: Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.</p> <p>PDF AQ-3: The Project would be designed to include the installation of signs at</p>	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.</p> <p>PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.</p> <p>PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit</p>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>was taken in the air quality analysis for this design feature.</p>			
<p>Threshold D: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	<p>PPP AQ-4: Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.</p> <p>PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.</p> <p>PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy</p>	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.</p>			
Cumulative	<p>PPP AQ-1: As listed previously PPP AQ-2: As listed previously PPP AQ-3: As listed previously PPP AQ-4: As listed previously PDF AQ-1: As listed previously PDF AQ-2: As listed previously PDF AQ-3: As listed previously PDF AQ-4: As listed previously PDF AQ-5: As listed previously</p>	Less than significant	None required	Less than significant

5.5 Cultural Resources

<p>Threshold C: Would the Project disturb any human remains, including those interred outside of formal cemeteries?</p>	<p>PPP CUL-1: Human Remains. If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code</p>	Less than significant	None required	Less than significant
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Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.</p> <p>Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then</p>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall</p>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.</p> <p>The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.</p> <p>According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).</p>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.9 Hazards and Hazardous Materials				
<p>Threshold A: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>	<p>PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.</p> <p>PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that it has applied for and obtained a SCAQMD Rule 1166 Contaminated Soil Mitigation Plan that includes but is not limited to the following, as required by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of</p>	<p>Potentially significant.</p>	<p>Mitigation Measure HAZ-1: SARWQCB Concurrence. Prior to the issuance of a grading permit or the commencement of any ground-disturbing activities, the City of Riverside shall obtain SARWQCB concurrence with proposed mitigation measures and project design features directly related to environmental conditions regulated by this agency to ensure compliance with applicable regulatory requirements. No grading or construction activities shall begin until written confirmation of regulatory concurrence has been received and verified by the City.</p> <p>Mitigation Measure HAZ-2: Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board. The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations</p>	<p>Less than significant.</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and covered with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.</p>		<p>Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities). Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities.</p> <p>Mitigation Measure HAZ-3: Health and Safety Plan (HSP). Prior to ground-disturbing activities, including grading, trenching, excavation, or structure demolition, a HSP shall be approved by the City of Riverside Fire Department as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management. The Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). HSPs shall be a condition of the well abandonment, grading, construction, and/or demolition permit(s). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>disturbing activities from exposure to hazardous materials, including vapor and soil contamination.</p> <p>Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board.</p> <p>The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities). Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities. As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.</p>	
<p>Threshold B: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<p>PPP HAZ-1: As listed previously.</p> <p>PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.</p>	<p>Less than significant Potentially significant</p>	<p>None required Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). As listed previously.</p>	<p>Less than significant</p>
<p>Threshold C: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>		<p>No impact</p>	<p>None required</p>	<p>No impact</p>
<p>Threshold D: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5</p>		<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
and, as a result, create a significant hazard to the public or the environment?				
<p>Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?</p>		Potentially significant	<p>Mitigation Measure HAZ-4-HAZ-2: Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.</p> <p>Mitigation Measure HAZ-5-HAZ-3: Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site:</p> <ol style="list-style-type: none"> 1. 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 or visual approach slope indicator. 2. 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 	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>towards a landing at an airport.</p> <p>3. 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. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.</p> <p>4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.</p> <p>5. Highly noise sensitive outdoor nonresidential uses.</p> <p>6.5. Any use which results in a hazard to flight, including physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations</p> <p>Mitigation Measure HAZ-6-HAZ-4: Notice of</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>Airport in Vicinity. The “Notice of Airport in Vicinity” shall be provided to all prospective purchasers and occupants of the property.</p> <p>Mitigation Measure HAZ-7: Stormwater Basin Design and Airport Compatibility. Any proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the stormwater basins that would provide food or cover for birds is incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the stormwater basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries. Landscaping in the stormwater basin, if not rip-rap, shall be in accordance with the guidance provided in ALUC “LANDSCAPING NEAR AIRPORTS” brochure, and the “AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT” brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>qualified wildlife hazard biologist.</p> <p>A notice sign shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign shall also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.</p> <p>Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.</p>	
<p>Threshold F: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>		No impact	None required	<p>Less than significant</p> <p>No impact</p>
<p>Threshold G: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death</p>		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
involving wildland fires?				
Cumulative	PPP HAZ-2: As listed previously PPP HYD-1: As listed previously	Potentially significant	Mitigation Measure HAZ-1: As listed previously. Mitigation Measure HAZ-2: As listed previously. Mitigation Measure HAZ-3: As listed previously. Mitigation Measure HAZ-4: As listed previously. Mitigation Measure HAZ-5: As listed previously. Mitigation Measure HAZ-6: As listed previously.	Less than significant
5.12 Mineral Resources				
Threshold A: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?		No impact Less than significant	None required	No impact Less than significant

2.2.2 Section 3.0, Project Description

Location: Page 3-45, Section 3.3.8, Construction, is revised as follows:

Explanation for Change and Discussion: Revised export values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Project development is estimated to take approximately 14 months, beginning April 2026 and concluding June 2027. Construction activities for the Project would occur over one phase and include demolition and removal of existing structures, foundations, asphalt/pavement, utilities, and other subsurface improvements; site preparation, which includes clearing any remaining infrastructure, utilities, and trenching for the new utilities and services; grading and excavation; building construction; and landscape installation, paving, and application of architectural coatings. Grading work of soils is expected to result in cut of 15,065 cubic yards (CY) and fill of 24,108 CY of soils for a net import of 9,043 CY. **Additionally, the site preparation phase is assumed to result in a maximum export of 500 CY of potentially contaminated soil and the demolition phase is anticipated to result in an export of 24,092 tons of debris.**

Location: Page 3-46, Section 3.5, Discretionary Approvals and Permits, is revised as follows:

Explanation for Change and Discussion: Added applicable responsible agencies for reference.

The City of Riverside is expected to use the information contained in this EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map
- Design Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.
- ~~In addition, the Project is subject to review and approval by the Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments.~~

The Following approvals are anticipated from responsible agencies:

- **Riverside Airport Land Use Commission (ALUC) approval of Project's proposed Zoning Code Map and text amendments.**
- **SCAQMD approval and issuance of permits for installation and operation of backup generators and fire pumps as well as compliance with all applicable regulatory requirements related to air quality and toxic air contaminates.**

2.2.3 Section 5.3, Air Quality

Location: Page 5.3-8, Section 5.3.2.3, Regional Regulations, is revised as follows:

Explanation for Change and Discussion: Revised to include additional SCAQMD Rules and Regulations included per response to comment letter A1.

SCAQMD Rules and Regulations

All projects are subject to SCAQMD rules and regulations. Specific rules applicable to the Project include the following:

Rule 201- Permit to Construct. A person shall not construct, alter, or operate equipment that may cause the issuance of air contaminants without first obtaining a permit from SCAQMD. This permitting requirement ensures review of potential air quality impacts prior to equipment installation or operation.

Rule 203 – Permit to Operate. A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer or except as provided in Rule 202. The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.

Rule 401 – Visible Emissions. A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 402 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such

persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust. SCAQMD Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices (BMP), such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires project applicants to control fugitive dust using the best available control measures such that dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Applicable Rule 403 dust suppression (and PM10 generation) techniques to reduce impacts on nearby sensitive receptors may include, but are not limited to, the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspend all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Provide bumper strips or similar best management practices where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replant disturbed areas as soon as practical.
- Sweep on-site streets (and off-site streets if silt is carried to adjacent public thoroughfares) to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

Rule 445 – Wood Burning Devices. This rule prohibits the installation of wood-burning devices in any new development and is intended to reduce particulate matter emissions from such devices. Therefore, all new development must comply with SCAQMD Rule 445.

Rule 461 – Gasoline Transfer. This rule governs the transfer of gasoline into and out of stationary storage tanks and vehicle fuel tanks within the SCAQMD. The rule requires the use of CARB certified enhanced vapor recovery systems to control VOCs emissions during gasoline transfer operations. The rule establishes equipment, operation, maintenance, testing, and recordkeeping requirements for both storage tanks and dispensing systems to ensure they are vapor- and liquid-tight.

Rule 481 – Spray Coating. This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300

feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

- Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

Rule 1108 - Volatile Organic Compounds. This rule governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the Basin. This rule also regulates the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the Project must comply with SCAQMD Rule 1108.

Rule 1110.1 – Stationary Combustion Emissions. This rule governs emissions from stationary internal combustion engines and establishes emission limits for NO_x, VOCs, and CO. This rule requires monitoring and testing to demonstrate compliance.

Rule 1113 – Architectural Coatings. No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule.

Rule 1143 – Paint Thinners and Solvents. This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

Rule 1166 – VOC Emissions from Soil Excavation and Handling. This rule sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. Pursuant to SCAQMD Rule 1166, excavating or grading soil containing VOC materials shall:

- **Apply for, obtain, and operate pursuant to a mitigation plan pursuant to the requirements of SCAQMD Rule 1166. Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and adequately cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.**

Rule 1470 – Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines. This rule applies to any person who owns or operates a stationary compression ignition engine in the SCAQMD with a rated brake horsepower greater than 50. This rule sets operational hour requirement stating that new stationary emergency diesel engines shall not operate more than 50 hours a year for maintenance and testing. Additionally, under this rule, emergency generators shall operate for a maximum of 200 hours a year.

Rule 2305 – Warehouse Associated Mobile Sources. This rule outlines the reduction of local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions with warehouses and associated mobile sources. As the Project proposes one 99,850-SF building and one 99,950-SF building, it would thus be exempt from this rule as it applies to warehouses with greater than or equal to 100,000 SF of indoor floor space in any single building.

Regulation XIII – New Source Review. This regulation governs New Source Review (NSR) for new, relocated, or modified facilities that emit air contaminants. This regulation requires the application of Best Available Control Technology (BACT), analysis of potential emission increases, and the use of emission reduction credits to offset increases in nonattainment pollutants.

Location: Page 5.3-23, Section 5.3.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised export values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Construction of the Project would occur over an approximately 14-month period. Construction activities associated with the Project would result in emissions of CO, ROG, NO_x, SO_x, PM₁₀, and PM_{2.5}. Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coatings. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of 9,043 CY of soil during the grading phase ~~and from export of 24,092 tons of debris during the demolition of the existing building,~~ **a maximum export of 500 CY of potentially contaminated soil during the site preparation phase, and export of 24,092 tons of debris during the demolition phase.**

Location: Page 5.3-24, Section 5.3.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-1: Regional Project Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2026						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Preparation	3.9	34.7 35.9	32.0 32.2	0.1	7.7 8.0	4.4 4.5
Grading	3.5	33.0	30.5	0.1	5.0	2.6
Building Construction	1.5	12.1	20.4	<0.1	1.8	0.7
Maximum Daily Emissions 2026	3.9	44.9	32.0 32.2	0.2	24.1	5.4
2027						
Building Construction	1.4	11.6	18.6	<0.1	1.8	0.7
Paving	1.4	7.0	10.7	<0.1	0.5	0.3
Architectural Coating	54.7	1.2	2.3	<0.1	0.2	0.1
Maximum Daily Emissions 2027	54.7	11.6	18.6	<0.1	1.8	0.7
Maximum Daily Emission 2026-2027	54.7	44.9	32.0 32.2	0.2	24.1	5.4
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG_s = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.3-25, Section 5.3.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-2: Regional Project Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	<0.1 0.0	<0.1 0.0
Energy	0.1	2.1	1.8	<0.1	0.2	0.2
Off-Road	<0.1	17.7	176.2	<0.1	<0.1	<0.1
Stationary	1.6	4.4	4.0	<0.1	0.2	0.2
Total Project Operational Emissions	11.3	52.4	232.7	0.3	17.2	5.1
Existing Use Operational Emissions	1.9	31.6	61.0 65.3	0.4	23.1	6.3
Net New Emissions	9.3	20.8	171.8 167.4	<0.1	-6.0	-1.3
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG_s = reactive organic gases, CO = carbon monoxide, SO₂ = sulfur dioxide, NO_x = nitrogen oxides, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns)
Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.3-3: Localized Project Construction Emissions

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2026				
Demolition	20.7	19.0	17.9	3.4
Site Preparation	34.6	31.0	7.4	4.3
Grading	30.0	28.7	4.1	2.3
Building Construction	10.7	28.1	0.8	0.8
Maximum Daily Emissions 2026	34.6	31.0	17.9	4.3
2027				
Building Construction	10.2	14.0	0.4	0.3
Paving	6.9	10.0	0.3	0.3
Architectural Coating	1.1	1.5	<0.1	<0.1
Maximum Daily Emissions 2027	10.2	14.0	0.4	0.3
Maximum Daily Emission 2026-2027	34.6	31.0	17.9	4.3
SCAQMD Localized Significance Thresholds	45.17 268	6,285.3 1,827.7	89 33.3	28.3 8.7

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Threshold Exceeded?	No	No	No	No

Notes: NO_x = nitrogen oxides, CO = carbon monoxide, PM₁₀ = particulate matter (10 microns), PM_{2.5} = particulate matter (2.5 microns).

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.3-32, Section 5.3.9, Project Design Features, is revised as follows:

Explanation for Change and Discussion: Revised to include Project Design Features the Project Applicant is voluntarily including to further reduce potential Air Quality impacts.

5.3.9 Project Design Features

None.

PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

2.2.4 Section 5.5, Cultural Resources

Location: Page 5.5-13, Section 5.5.8, Existing Regulations and Plans, Programs, or Policies, is revised as follows:

Explanation of Change and Discussion: Revised PPP CUL-1 per City's standard language.

5.5.8 Existing Regulations and Plans, Programs, or Policies

Existing Regulations

- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98

Plans, Programs, or Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to cultural resources. These actions will be included in the Project's Mitigation Monitoring and Reporting Program:

PPP CUL-1: Human Remains. ~~If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the San Bernardino County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the San Bernardino County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant." The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.~~ **Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.**

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

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

2.2.5 Section 5.6, Energy

Location: Page 5.6-6, Section 5.6.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised fuel construction values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

The energy analysis modeling for the proposed Project (included as Appendix B) shows that construction-related use of construction vehicles and off-road equipment would utilize approximately ~~59,818~~ **75,047** gallons of diesel fuel and ~~15,304~~ **22,470** gallons of gasoline, as detailed in Table 5.6-1 below.

Table 5.6-4: Construction Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	21,839 37,068	15,304 22,470
Off-Road Construction Equipment	37,979	0
Total	59,818 75,047	15,304 22,470

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

2.2.6 Section 5.8, Greenhouse Gas Emissions

Location: Page 5.8-11 to 5.8-12, Section 5.8.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised emissions values for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Construction

Implementation of the proposed Project would generate GHG emissions from demolition, construction activities, haul trips, vendor trips, and construction worker vehicle trips. For construction emissions, the SCAQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions, which is done within this analysis. Table 5.8-1 provides the estimated construction emissions from the Project. As shown, the Project would emit a total of ~~844~~ **850** Annual MTCO_{2e} over the duration of construction, with 2026 having the highest emission level (~~821~~ **826** MTCO_{2e}). Amortized over 30 years, the Project’s construction emissions would be approximately 28 MTCO_{2e} per year.

Table 5.8-5: Project Construction Greenhouse Emissions

Activity	Annual GHG Emissions (MTCO _{2e})
2026	821 826
2027	23
Total Emissions	844 850
Total Emissions Amortized Over 30 Years	28

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Operation

The proposed Project would construct two warehouse buildings with a combined total building square footage of 199,850 square feet (SF) that would accommodate approximately 194 employees. Operation of the proposed Project would generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the proposed Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal are associated with the anaerobic breakdown of material.

The Air Quality, Energy, and GHG Impact Analysis prepared for the proposed Project (Appendix B) describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Table 5.8-2. As shown, operation of the Project, including amortized construction emissions, would generate a net total of approximately ~~7,272~~ **7,269** MTCO₂e per year, which would not exceed the screening threshold of 10,000 MTCO₂e per year. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 MTCO₂e. As such, the net new emissions (proposed Project minus existing) from the proposed Project are ~~5,457~~ **5,484** MTCO₂e per year. The proposed Project's net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 MTCO₂e per year. Therefore, impacts would be **less than significant**.

Table 5.8-6: Project Greenhouse Gas Emissions

Activity	Annual GHG Emissions (MTCO₂e)
Project Operational Emissions	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183
Off-Road	461
Stationary	18 45
Total Project Gross Operational Emissions	7,214
Amortized Construction Emissions	28
Total Project Emissions	7,242 7,269
Existing Emissions	1,785
Net New Emissions (Gross - Existing)	5,457 5,484
Significance Threshold	10,000
Threshold Exceeded?	No

Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

Location: Page 5.8-13 to 5.8-16, Section 5.8.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised typo for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.8-7: Project Consistency with the CARB 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 energy requirements, as well as Title 24, Part 11 building standards, along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal.
Smart Growth/Vehicle Miles Traveled (VMT)	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. The proposed Project would provide bicycle racks and bicycle parking spaces to encourage alternative modes of transportation. The Project is consistent with the growth and land use assumptions in the Southern California Association of Government’s 2022 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (which was utilized for growth estimates in the CARB Scoping Plan) including reductions in VMT per capita. The plan aims to reduce VMT per capita by 25% below 2019 levels by 2030 and 30% by 2045, which aligns with targets set in the CARB Scoping Plan. Thus, the Project would not interfere with VMT reduction targets and measures.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	Consistent. The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of LDV ZEVs. The future tenant would be required to comply with the CARB’s Advanced Clean Truck Regulation that requires truck manufacturers to transition from diesel trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Truck ZEVs	
100% of medium- and heavy-duty vehicle (MHDV) sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. The proposed Project is a speculative industrial building that could potentially involve the manufacturing and storage of MHDV ZEVs. The future tenant would be required to comply with the CARB’s Advanced Clean Truck Regulation that would require truck manufacturers to transition from diesel trucks to zero emission trucks, and would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The proposed Project would not utilize aviation fuel.

Action	Consistency
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Not Applicable. The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed Project would not involve any rail operations.
Oil and Gas Extraction	
Not Applicable. The proposed Project would not involve oil and gas extraction operations. Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Not Applicable. The proposed Project would not involve oil and gas extraction operations.
Petroleum Refining	
Carbon capture and sequestration (CCS) on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MTCO _{2e}) in 2030 and 30 MTCO _{2e} in 2035. Retail sales load coverage 134 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The Project would not generate electricity. The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements, including installing electrical wiring for all built in appliances.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve the operation any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would be consistent and comply with Title 24 Section 6 requirements for commercial buildings, including complying with 100% electric appliances beginning in 2029, replacing an existing building that was not constructed to be consistent with the current 2022 Title 24 Building Code requirements.

Action	Consistency
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	Consistent. The Project would include up to 20% of the total building area for cold storage, which has the potential to store food products. The proposed Project would comply with the 2022 Title 24 Building Codes in Section 6 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the storage of food products as speculative cold storage warehouses.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. The proposed Project would be required to use construction equipment that is registered by CARB and meet CARB’s standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% in 2045.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	Consistent. As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of chemicals and allied products like pulp and paper. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would comply with the electricity and hydrogen requirement by 2045 for the production of chemicals and allied products.
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Consistent. As the Project proposes speculative industrial buildings, there is a potential for the Project to involve the production and/or storage of stone, clay, glass and/or cement. The Project would comply with the energy demands of the 2022 Title 24 Section 6 Building Codes and would promote the implementation and use of CCS for operations by 2035 and on all operations and facilities by 2045.
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	Consistent. The proposed Project is a speculative industrial building that could allow for manufacturing. A future manufacturing tenant would be required to meet the energy demand goals of 50% by 2045, and the proposed Project would be constructed to comply with Title 24, Part 6 Building energy requirements, including increases in onsite energy generation requirements and improved insulation reducing energy consumption in industrial manufacturing operations.
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	Not Applicable. The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed Project would not involve any production of biofuels.

Action	Consistency
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane ¹³⁵ blended in pipeline. Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	Not Applicable. The proposed Project would not involve any production of fuels for buildings and industry.
Non-Combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	Not Applicable. The proposed Project would not involve any production of non-combustion methane emissions or organic waste.
High Global Warming Potential (GWP) Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating hydrofluorocarbon (HFC) emissions.	Consistent. The proposed Project includes refrigeration and would be consistent with the 2022 Title 24 Section 6 Building Codes for 2022 and would be required to meet increasing standards set by the State. Therefore, the Project would be consistent with meeting current and future policies concerning the use of low GWP refrigerants.

Location: Page 5.8-17, Section 5.8.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised to include an additional Policy for consistency with updated Air Quality, Energy, and GHG Impact Analysis (Appendix B).

Table 5.8-8: Project Consistency with the City General Plan Policies Related to GHGs

General Plan Goal or Policy	Consistency
Policy AQ-1.10: Encourage job creation in job-poor areas as a means of reducing vehicle miles traveled.	Consistent. As discussed in Section 5.14, <i>Population and Housing</i> , the City of Riverside is housing-rich, meaning that more housing is provided than employment opportunities in the area. Implementation of the proposed Project would create up to an additional 194 jobs. Therefore, the proposed Project would create jobs in a job-poor area, consistent with this policy.
Policy AQ-1.15: Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.	Consistent. As discussed in Section 5.17, <i>Transportation</i> , existing bus services near the Project site would allow Project site residents convenient access to transit.
Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
Policy AQ-5.6: Support the use of automated equipment for conditioned facilities to control heating and air conditioning.	Consistent. The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.

General Plan Goal or Policy	Consistency
Policy AQ-5.7: Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.	Not Applicable. The proposed Project does not propose residential buildings.
Policy AQ-8.17: Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.	Consistent. The proposed Project would comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.

2.2.7 Section 5.9, Hazards and Hazardous Materials

Location: Page 5.9-22, Section 5.9.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised nearest runway based on more detailed information provided in the May 5, 2025, RCALUC director’s determination letter for accuracy and consistency.

The Project site is located approximately 2.9 miles east of the Flabob Airport, a small public-use airport in the City of Jurupa Valley. The **nearest runway at Flabob Airport, Runway 6-24**, has an ~~easterly runway~~ elevation of ~~768~~ **approximately 750** feet above mean sea level (AMSL). In June 11, 2024, an Application for Major Land Use Action Review was submitted to the Riverside County Airport Land Use Commission (ALUC) for the proposed Project pursuant to ALUC Review Procedures. On May 5, 2025, ALUC determined that FAA review is required for structures exceeding 1,039 feet AMSL at the project’s distance from the Flabob Airport runway, however, the proposed building’s top elevation is 935 feet AMSL, so FAA Obstruction Evaluation Service review is not warranted.

Location: Page 5.9-24, Section 5.9.7, Cumulative Impacts, is revised as follows:

Explanation for Change and Discussion: Revised reference to closest cumulative projects for accuracy and consistency.

The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. As shown in Figure 5-1, Cumulative Projects, in Section 5.0, Environmental Impact Analysis, of this Draft EIR, **there are two** closest cumulative projects, ~~both~~ **is**-located at 2610 Durahart Street, approximately 0.25 miles east of the Project site.

The commencement of construction of the adjacent cumulative project is unknown; however, it is possible that construction activities involving hazardous materials from both the proposed Project and the adjacent cumulative project or other nearby cumulative projects would occur simultaneously that could have the potential to cumulatively contribute to an impact. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety, which are verified by the City during the construction and development permitting process.

Thus, if hazardous materials are found to be present on any of the cumulative or future project sites, appropriate remediation activities would be required pursuant to standard federal, State, and regional regulations that would reduce potential impacts, such as the activities which would be done by the proposed Project. In addition, regulatory compliance **and implementation of Mitigation Measure HAZ-1**, the SMP and HSP would be implemented for the proposed Project to ensure that hazardous soil from the site would be handled and disposed of in a manner which would reduce the potential of the proposed Project to result in a hazard to the public or environment that could cumulatively combine. As such, the potential impacts from the proposed Project would be **less than significant and not cumulatively considerable**.

In regard to potential cumulative impacts associated with the Project's proximity to Flabob Airport and March Air Reserve Base/Inland Port Airport, future development projects in the area, like the proposed Project, would be subject to consistency review by ALUC. As part of this process, ALUC would provide conditions to ensure that future projects are designed and operated in a manner that avoids significant impacts related to airport safety and land use compatibility. With implementation of Mitigation Measures HAZ-2 through HAZ-5, the proposed Project would not result in significant impacts, and its contribution to cumulative impacts related to airport proximity would not be cumulatively considerable.

2.2.8 Section 5.17, Transportation

Location: Page 5.17-7, Section 5.17.6, Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised to include consistency with transportation related General Plan policies.

City of Riverside General Plan

The proposed Project is also consistent with the General Plan designations of the site. The Project site has a General Plan land use designation Industrial (I). The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations. Once approved by the Development Agreement, the Project site would be within one of these specific locations. The Project proposes to construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. No development is proposed on 1989 Massachusetts Avenue. As described in Section 3.0, *Project Description*, a warehouse is used for the storage, receiving, shipping or wholesaling of goods and merchandise, and any incidental or accessory activities. The proposed light industrial warehouses are consistent with the intended uses of the Industrial land use designation. **In addition, the Project would be consistent with the following applicable City of Riverside 2025 General Plan Circulation and Community Mobility Element Policies: CCM-2.2, CCM-2.3, CCM-2.4, CCM-2.7, CCM-5.2, CCM-6.2, CCM-9.10, CCM-10.12, CCM-12.1, CCM-12.2, CCM-13.1, CCM-13.3.** As such, the proposed Project would not conflict with the City of Riverside General Plan, and **no impact** would occur.

2.2.9 Section 5.19, Utilities

Location: Page 5.19-13, Section 5.19.4.5, Stormwater Drainage Environmental Impacts, is revised as follows:

Explanation for Change and Discussion: Revised the number and location description of the Project's proposed on-site underground detention/infiltration systems to correct discrepancies and ensure document consistency.

As stated above, the northern portion of the Project site is developed with two buildings and asphalt concrete while the southern portion of the site is undeveloped and pervious. In the existing condition, stormwater on the northern portion of the site is directed to existing on-site v-gutters and is conveyed to Roberta Street and Kansas Avenue. Stormwater flow for the southern portion of the site is overland flow that is generally conveyed in the southeast-to-northwest direction to Kansas Avenue. Off-site flows are directed to an existing gutters that runs along Kansas Avenue. The proposed Project would collect drainage via proposed grate inlets and catch basins, which would convey storm water to an on-site underground storm drain system. The storm drain system would discharge to ~~one~~ **two** proposed on-site underground detention/infiltration systems. ~~This~~ **Detention**/infiltration ~~System A~~ **System A** would be located under the passenger drive aisle in the ~~south~~ **north**west portion of the site ~~adjacent to Building 2~~ and would direct overflow to ~~Kansas Avenue~~

Roberta Street. Detention/Infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic square feet (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows (Appendix I, Page 5). Therefore, the proposed stormwater system would provide improved infiltration compared to existing conditions.

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3. Response to Comments

This section of the Final Environmental Impact Report (FEIR; Final EIR) for the Massachusetts Point Project (Project) includes a copy of all comment letters that were submitted during the public review period for the Draft Environmental Impact Report (DEIR), along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 45-day review period for the DEIR began on June 26, 2025, and ended on August 11, 2025. A total of three comment letters were received in response to the DEIR during the 45-day public review period. Responses to all three comment letters are provided below.

The responses amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are noted for the record. Where text changes in the DEIR are warranted based on comments received, updated Project information, or other information provided by City staff, those changes are noted in the response to comment and the reader is directed to Section 2.0, *Errata*, of this FEIR.

These changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the DEIR is not required.

All written comments received on the DEIR are listed in Table 3-1. All comment letters received on the DEIR have been coded with a number to facilitate identification and tracking. The comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid readers and commenters, electronically bracketed comment letters have been reproduced in this document with the corresponding responses provided immediately following each comment letter.

Table 3-1: Comments Received on the DEIR

Comment Letter	Agency/Organization/Commenter	Date
Agencies		
A1	South Coast Air Quality Management District (SCAQMD)	August 7, 2025
A2	Riverside County Airport Land Use Commission (ALUC)	July 21, 2025
Organizations		
O1	Sierra Club and R-NOW	August 11, 2025

To finalize the EIR for the Project, the following responses were prepared to address these comments.

Comment Letter A1: South Coast Air Quality Management District, Dated August 7, 2025



SENT VIA E-MAIL:

August 07, 2025

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City of Riverside

Community & Economic Development Department Planning Division

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**Draft Environmental Impact Report (EIR) for the Proposed
 Massachusetts Point Project (Proposed Project)
 (SCH No.: 2024120391)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project site encompasses approximately 14.42 acres¹ and consists of demolishing the existing structures and constructing two light industrial buildings for a total of 199,850 square feet (sf) of warehouse and office uses on approximately 10.21 acres.² Building 1 would consist of 99,900 sf with 17 dock doors along the southern side of the building, and Building 2 would consist of 99,950 sf with 22 dock doors along the northern side of the building.³ The Proposed Project assumes 20 percent (%) of the warehouses for cold storage.⁴ The Proposed Project site is located at 2626 Kansas Avenue, 2069 Massachusetts Avenue, and 1989 Massachusetts Avenue.⁵ Based on the review of the aerial photograph, the nearest sensitive receptor (e.g., residence) is approximately 680 feet northeast of the Proposed Project site. Construction of the Proposed Project is anticipated to take approximately 14 months, with operations beginning in 2027.⁶

A1.1

South Coast AQMD Comments

Incorrect Land Use Type Used in CalEEMod

According to the CalEEMod detailed report provided in Appendix B – Air Quality, Energy, and GHG Report, the land use type selected for the unrefrigerated portion of the warehouses is

A1.2

¹ Draft EIR, p. 3-1.

² *Ibid.*, p. 3-25.

³ *Ibid.*, p. 3-25 and 3-27.

⁴ *Ibid.*, p. 3-45.

⁵ *Ibid.*, p. 3-1.

⁶ *Ibid.*

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categorized as General Heavy Industry.⁷ However, based on the CalEEMod User Guide, the General Heavy Industry land use type is defined as: “Heavy industrial facilities usually have a high number of employees per industrial plant and are generally limited to the manufacturing of large items.”⁸

This classification does not accurately reflect the Proposed Project, which involves the development of two warehouse buildings with 20% of cold storage. The appropriate land use category for this project in CalEEMod should therefore be Unrefrigerated Warehouse and Refrigerated Warehouse, which more accurately represent the expected operational characteristics and associated emission factors.

A1.2
cont.

Use of the incorrect land use category may lead to underestimation of construction and operational emissions in the environmental impact analysis. To ensure a more accurate assessment of air quality impacts, the Lead Agency is recommended to revise the CalEEMod inputs accordingly, rerun the model using the appropriate land use classification, and incorporate the updated results into the Final EIR.

Potentially Underestimated Construction Emissions

According to Section 5.9: Hazards and Hazardous Materials of the Draft EIR, its Phase I Environmental Site Assessment found that the Proposed Project site contains volatile organic compounds (VOCs) at concentrations that exceed their applicable regulatory screening thresholds⁹, specifically:

- At 2626 Kansas Avenue, elevated concentrations of trichloroethene (TCE) have been identified in shallow soil vapor in the northwest portion of the site; tetrachloroethene (PCE) and TCE have been detected in the south-central and southeastern exterior areas; and 1,1-dichloroethene (1,1-DCE) has been detected in groundwater monitoring wells on the northwest portion of the site.
- At 2069 and 1989 Massachusetts Avenue, PCE and TCE have also been detected.

The Lead Agency has proposed Mitigation Measure HAZ-1, which requires preparation of a Soil Management Plan (SMP) and a Health and Safety Plan (HSP), both of which must be reviewed and approved by the Santa Ana Regional Water Quality Control Board prior to issuance of any grading or excavation permits.¹⁰ However, the Draft EIR does not evaluate the potential air quality impacts associated with site cleanup and remediation activities during construction.

A1.3

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) detailed report, the Lead Agency used the default one-way truck trip length of 20 miles to quantify the Proposed Project’s construction emissions from hauling

⁷ Appendix B – Air Quality, Energy, and GHG Report. CalEEMod Detailed Report.

⁸ CalEEMod User Guide. P. 23.

⁹ *Ibid.* p. 5.9-18.

¹⁰ *Ibid.* p. 5.9-26.

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construction materials and importing soil. According to Section 5.19: Utilities and Service Systems of the Draft EIR, it is identified that Badlands Landfill, Lamb Canyon Landfill, the El Sobrante Landfill, and Mid-Valley Sanitary Landfill are the municipal waste landfills that could serve the Proposed Project.¹¹ If cleanup activities include the removal and disposal of contaminated soil, depending on the type of contamination, these landfills may not accept the contaminated soil. In that case, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside Riverside County, which could require a one-way trip significantly longer than 20 miles.

A1.3
cont.

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod¹² model inputs to reflect the actual distance to a known and permitted hazardous waste disposal facility expected to be used by the project. The selected trip length should be clearly disclosed and justified in the Final EIR. Should the Lead Agency elect not to revise the default 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the default assumption in the context of the project-specific conditions.

Unsupported Truck Trip Distance Assumption Used in Emissions Modeling

Accurately estimating truck trip lengths is a key parameter when quantifying emissions from mobile sources, especially diesel particulate matter (DPM), oxides of nitrogen (NOx), and greenhouse gas (GHG). The mischaracterization of average trip length, for example, can lead to a significant underestimation of the project’s air quality impacts. According to the Draft EIR, the truck emissions are calculated with the truck trip length as the weighted average of 15.3 miles for 2-axle, 14.2 miles for 3-axle, and 40 miles for 4-axle trucks.¹³ However, the analysis lacks critical information regarding the supporting basis for determining the trip origins and destinations and whether the assumed distances are reflective of actual or anticipated routing patterns of the facility’s current or future truck fleet.

A1.4

As such, the Final EIR should include a clear and defensible rationale for the use of the truck trip length assumption. The rationale should be supported by documentation such as empirical data from fleet operations, transportation logistics studies, regional freight movement data, or other sources that demonstrate the applicability and appropriateness of the selected distances. Additionally, if any truck trips associated with the Proposed Project will include port-related activities, the Final EIR should explain this detail, and the modeled trip lengths should accurately reflect the mileage between the project site and the relevant port(s), such as the Ports of Los Angeles or Long Beach, located approximately 65-70 miles one-way from the Proposed Project site.

Therefore, it is recommended that the Lead Agency either revise the trip distance assumptions to more accurately reflect realistic operational conditions or provide additional evidence substantiating that the selected distances are representative of actual or reasonably foreseeable truck travel patterns associated with the Proposed Project. Failure to provide supporting evidence

¹¹ *Ibid.* p. 5.19-16.

¹² CalEEMod free of charge available at <https://www.caleemod.com/>

¹³ *Ibid.* p. 5.3-22.

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to validate these assumptions may compromise the accuracy of the emission estimates, conclusion, and the overall integrity of the air quality analysis presented in the Final EIR.

A1.4
cont.

Truck Idling Duration and Emissions Modeling

Appendix C – Health Risk Assessment indicates that a default assumption of 15 minutes of idling per truck per day, including Transport Refrigeration Unit (TRU) trucks, was used to estimate DPM emissions for the operational health risk assessment.¹⁴ While this assumption may be consistent with regulatory idling limits, it may not accurately reflect actual operating conditions for a facility of the Proposed Project's scale. The Proposed Project is anticipated to generate approximately 342 truck trips per day, with 20% of all heavy-duty diesel trucks assumed to be equipped with a TRU,¹⁵ representing a substantial volume of heavy-duty vehicle activity. For a high-throughput logistics or distribution facility, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

Although the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), this regulation provides exemptions for trucks equipped with engines that meet the optional low-NOx idle emission standard, typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.¹⁶ Furthermore, CARB’s EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.¹⁷

A1.5

Accurate characterization of idling activity is essential to fully assess a project’s potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

Inconsistency in Cancer Risk Results Presented in Draft EIR and Its Appendices

The health risk assessment for the Proposed Project includes evaluation of both short-term and long-term DPM emissions associated with construction and operational activities. The estimated cancer risk results are presented in the Draft EIR and its technical appendices. However, upon staff

A1.6

¹⁴ Appendix C – Health Risk Assessment. p. 23.

¹⁵ Appendix C – Health Risk Assessment. p. 22.

¹⁶ CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling available at <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling>

¹⁷ CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5 available at [EMFAC2021 Volume III Technical Document](#)

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review, inconsistencies were identified between the Draft EIR, Appendix C - Health Risk Assessment, and Appendix B - Air Quality, Energy, and Greenhouse Gas Report. Specifically, the Draft EIR and Appendix C both show cancer risks of 0.63 in one million for construction and 5.59 in one million for operation.^{18,19} In contrast, Appendix B shows 0.54 in one million for construction and 3.55 in one million for operation.²⁰

A1.6
cont.

To ensure transparency, accuracy, and consistency across all CEQA documents, the Lead Agency is recommended to reconcile these discrepancies and include the updates in the Final EIR to reflect the correct and consistent cancer risk values throughout the CEQA document and all supporting appendices.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project’s air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

A1.7

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB’s adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

A1.8

Note: Given CARB’s clean truck rules and regulations, aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

A1.9

Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

A1.10

¹⁸ *Ibid.* p. 5.3-28.

¹⁹ Appendix C – Health Risk Assessment. p. 31 and 32.

²⁰ Appendix B – Air Quality, Energy, and GHG Report. p. 27.