

Candice Assadzadeh, Senior Planner

August 07, 2025

- 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. | A1.11

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

- 1. Maximize the use of solar energy by installing solar energy arrays. | A1.12
- 2. Use light-colored paving and roofing materials. | A1.13
- 3. Utilize only Energy Star heating, cooling, and lighting devices and appliances. | A1.14

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.). | A1.15
- 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. | A1.16
- 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. | A1.17
- 4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors. | A1.18
- 5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site. | A1.19

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 Act<sup>21</sup> | A1.20
- 2. South Coast AQMD 2022 Air Quality Management Plan,<sup>22</sup> 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

<sup>21</sup> 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>

<sup>22</sup> 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>

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- 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.<sup>23</sup>

A1.20 cont.

*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 Program<sup>24</sup> and Rule 316 – Fees for Rule 2305.<sup>25</sup> 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](mailto:waire-program@aqmd.gov). For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD’s WAIRE Program webpage.

A1.21

*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,<sup>26</sup> 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,<sup>27</sup>

A1.22

<sup>23</sup> 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>

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

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

<sup>26</sup> Ibid. p. 5.3-22.

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

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

A1.22  
cont.

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.

A1.23

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

<sup>28</sup> South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>  
<sup>29</sup> South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>  
<sup>30</sup> South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>  
<sup>31</sup> South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>  
<sup>32</sup> South Coast AQMD. Rule 461 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>  
<sup>33</sup> South Coast AQMD. Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)  
<sup>34</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>  
<sup>35</sup> South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>  
<sup>36</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>  
<sup>37</sup> South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>  
<sup>38</sup> South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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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>.

A1.23  
cont.

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.

A1.24

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](mailto: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

### 3.1 Response to Comment Letter A1: South Coast Air Quality Management District, Dated August 7, 2025

**Comment A1.1:** This comment provides an introduction to the comment letter and states that the South Coast Air Quality Management District (SCAQMD) is appreciative of their opportunity to comment.

**Response A1.1:** The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the EIR, no further response is required or provided.

**Comment A1.2:** This comment states that the Draft EIR used the “General Heavy Industry” land use type in CalEEMod for the unrefrigerated warehouse portion of the Project. The comment states that this category represents large-scale manufacturing facilities and does not reflect the Project’s characteristics. The comment states that the appropriate land use types are “Unrefrigerated Warehouse” and “Refrigerated Warehouse,” consistent with the Project’s inclusion of 20 percent cold storage. The comment states that use of the incorrect land use type may underestimate emissions and recommends revising the CalEEMod inputs, rerunning the model, and updating the Final EIR.

**Response A1.2:** The proposed Project is currently planned as a speculative industrial development, meaning no specific tenant or end user has been identified at this time. For the Air Quality, Energy, and Greenhouse Gas Analysis (Appendix B), the California Emissions Model (CalEEMod) Land Use Subtype inputs used correspond to the Institute of Transportation Engineers (ITE) Trip Generation Hand Book (11th Edition) trip rate for the Land Use Codes used in the Project’s Traffic Analysis (Appendix K), in addition to the Project’s characteristics. This approach ensures consistency between the modeling assumptions of the traffic trips generated and the emission generated from those trips.

Additionally, the CalEEMod (Version 2022.1) User Guide identifies which ITE Land Use Codes correspond to the CalEEMod Land Use Subtypes. The CalEEMod Land Use Subtype “Unrefrigerated Warehouse-No Rail” corresponds with ITE Land Use Code 150 – Warehouse. However, to provide a conservative analysis, the Project’s Traffic Analysis utilized the ITE trip rate for Land Use Code 110 – General Light Industrial (GLI), which is 4.87 trips per 1,000 square feet (tsf), as it is higher than the trip rate for Land Use Code 150 Warehouse (1.71 trips/tsf). As a result, applying the GLI land use rate generates more trips (and higher mobile-source emissions) than would reasonably be expected for the Project’s proposed warehouse use.

Accordingly, the CalEEMod Land Use Subtype that correspondence with ITE Land Use Code 110 – GLI used in the Traffic Analysis would be “General Light Industry.” However, per the CalEEMod User Guide, for a project with a lot size greater than 50,000 square feet, the user must select a different land use type such as general heavy industry, industrial park, or manufacturing.<sup>1</sup> As such, the Air Quality, Energy, and Greenhouse Gas Analysis utilized the CalEEMod Land Use Subtype of “General Heavy Industry,” as opposed to “Unrefrigerated Warehouse-No Rail,” in addition to “Refrigerated Warehouse-No Rail,” in accordance with the CalEEMod User Guide to ensure a conservative analysis and maintain consistency with the corresponding ITE trip rate used in the Project’s Traffic Analysis.

Therefore, the CalEEMod Land Use Subtype of “General Heavy Industry” is appropriate for the Project, and no changes to the land use types executed in the modeling of the Project are warranted. Therefore, no changes to the EIR are warranted.

**Comment A1.3:** This comment states that the Draft EIR does not evaluate potential air quality impacts associated with site cleanup and remediation activities during construction, despite the presence of VOCs

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<sup>1</sup> California Air Pollution Control Officers Association (CAPCOA). (2022, April). *CalEEMod User Guide (Version 2022.1)*. ICF & partners. [https://www.caleemod.com/documents/user-guide/CalEEMod\\_User\\_Guide\\_v2022.1.pdf](https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf)

identified in the Phase I Environmental Site Assessment. The comment states that cleanup activities would likely require additional equipment and truck hauling beyond typical construction activities, potentially resulting in underestimated construction emissions. The comment states that use of the default 20-mile haul distance in CalEEMod may not reflect the longer trip lengths required if contaminated soil must be transported to a permitted hazardous waste disposal facility outside Riverside County. The comment recommends revising the CalEEMod inputs to reflect the actual disposal distance or providing substantial evidence to justify the use of the 20-mile assumption in the Final EIR.

**Response A1.3:** This comment has been addressed through revisions to the CalEEMod construction trip length assumptions. Specifically, the proposed Project will result in export of approximately 500 cubic yards (CY) of contaminated soil. As such, the CalEEMod default 20-mile hauling distance has been updated to 56-mile hauling distance during the site preparation phase to account for the distance to the Soil Safe Landfill in Adelanto, identified by the Riverside County Department of Waste Resources as the appropriate disposal facility for potentially contaminated soil.

These revisions ensure that construction-related emissions associated with site cleanup and remediation activities are analyzed in the EIR analysis and technical studies. The Project’s Health Risk Assessment (HRA) (Appendix C) has been updated to reflect the correct site preparation volumes and trip lengths. The updated HRA analysis resulted in a nominal increase of particulate matter 10 exhaust (PM10E). As no significant changes were found in the updated analysis, the update did not result in a change from the previously disclosed health risk results nor a change in the HRA conclusion.

The Projects’ Air Quality, Energy, and Greenhouse Gas (GHG) Report (Appendix B) has also been updated to reflect the correct site preparation volumes and trip lengths. As shown in the updated Appendix B, the conclusions from the original Air Quality, Energy, and GHG Report remain less than significant. Therefore, recirculation of the Draft EIR is not warranted.

Draft EIR Sections 5.3, *Air Quality*, 5.6, *Energy*, and 5.8 *Greenhouse Gas Emissions*, have been revised to reflect the updated Appendix C and Appendix B in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

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

### 5.3.6 Environmental Impacts

**Table 5.3-2: Regional Project Construction Emissions**

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2026</b>						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Preparation	3.9	<del>34.7</del> <b>35.9</b>	<del>32.0</del> <b>32.2</b>	0.1	<del>7.7</del> <b>8.0</b>	<del>4.4</del> <b>4.5</b>
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	<del>32.0</del> <b>32.2</b>	0.2	24.1	5.4
<b>2027</b>						
Building Construction	1.4	11.6	18.6	<0.1	1.8	0.7

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
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
<b>Maximum Daily Emission 2026-2027</b>	<b>54.7</b>	<b>44.9</b>	<del>32.0</del> <b>32.2</b>	<b>0.2</b>	<b>24.1</b>	<b>5.4</b>
SCAQMD Significance Thresholds	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: ROG<sub>s</sub> = reactive organic gases, CO = carbon monoxide, SO<sub>2</sub> = sulfur dioxide, NO<sub>x</sub> = nitrogen oxides, PM<sub>10</sub> = particulate matter (10 microns), PM<sub>2.5</sub> = particulate matter (2.5 microns)  
 Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B)

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

### 5.3.6 Environmental Impacts

**Table 5.3-3: Regional Project Operational Emissions**

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	<del>&lt;0.1</del> <b>0.0</b>	<del>&lt;0.1</del> <b>0.0</b>
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
<b>Total Project Operational Emissions</b>	<b>11.3</b>	<b>52.4</b>	<b>232.7</b>	<b>0.3</b>	<b>17.2</b>	<b>5.1</b>
Existing Use Operational Emissions	1.9	31.6	<del>61.0</del> <b>65.3</b>	0.4	23.1	6.3
<b>Net New Emissions</b>	<b>9.3</b>	<b>20.8</b>	<del>171.8</del> <b>167.4</b>	<b>&lt;0.1</b>	<b>-6.0</b>	<b>-1.3</b>
SCAQMD Significance Thresholds	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: ROG<sub>s</sub> = reactive organic gases, CO = carbon monoxide, SO<sub>2</sub> = sulfur dioxide, NO<sub>x</sub> = nitrogen oxides, PM<sub>10</sub> = particulate matter (10 microns), PM<sub>2.5</sub> = particulate matter (2.5 microns)  
 Source: Air Quality, Energy, and GHG Impact Analysis (Appendix B).

**Table 5.3-4: Localized Project Construction Emissions**

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2026</b>				
Demolition	20.7	19.0	17.9	3.4

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
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
<b>2027</b>				
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
<b>Maximum Daily Emission 2026-2027</b>	<b>34.6</b>	<b>31.0</b>	<b>17.9</b>	<b>4.3</b>
SCAQMD Localized Significance Thresholds	<del>45.17</del> <b>268</b>	<del>6,285.3</del> <b>1,827.7</b>	<del>89</del> <b>33.3</b>	<del>28.3</del> <b>8.7</b>
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: NO<sub>x</sub> = nitrogen oxides, CO = carbon monoxide, PM<sub>10</sub> = particulate matter (10 microns), PM<sub>2.5</sub> = particulate matter (2.5 microns).

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

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

### 5.6.6 Environmental Impacts

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 5.6-5: Construction Fuel Consumption**

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

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

**Page 5.8-11, Section 5.8.6, Environmental Impacts, is revised as follows:**

### 5.8.6 Environmental Impacts

#### 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<sub>2e</sub> over the duration of construction, with 2026 having the highest emission level (~~821~~ **826** MTCO<sub>2e</sub>). Amortized over 30 years, the Project’s construction emissions would be approximately 28 MTCO<sub>2e</sub> per year.

**Table 5.8-6: Project Construction Greenhouse Emissions**

Activity	Annual GHG Emissions (MTCO <sub>2e</sub> )
2026	<del>821</del> <b>826</b>
2027	23
<b>Total Emissions</b>	<del>844</del> <b>850</b>
<b>Total Emissions Amortized Over 30 Years</b>	<b>28</b>

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

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

### 5.8.6 Environmental Impacts

#### 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** MTCO<sub>2e</sub> per year, which would not exceed the screening threshold of 10,000 MTCO<sub>2e</sub> per year. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 MTCO<sub>2e</sub>. As such, the net new emissions (proposed Project minus existing) from the proposed Project are ~~5,457~~ **5,484** MTCO<sub>2e</sub> per year. The proposed Project’s net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 MTCO<sub>2e</sub> per year. Therefore, impacts would be **less than significant**.

**Table 5.8-7: Project Greenhouse Gas Emissions**

Activity	Annual GHG Emissions (MTCO <sub>2e</sub> )
<b>Project Operational Emissions</b>	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183

Activity	Annual GHG Emissions (MTCO <sub>2e</sub> )
Off-Road	461
Stationary	<del>18</del> 45
<b>Total Project Gross Operational Emissions</b>	<b>7,214</b>
<b>Amortized Construction Emissions</b>	<b>28</b>
<b>Total Project Emissions</b>	<del>7,242</del> <b>7,269</b>
Existing Emissions	1,785
<b>Net New Emissions (Gross - Existing)</b>	<del>5,457</del> <b>5,484</b>
Significance Threshold	10,000
<b>Threshold Exceeded?</b>	<b>No</b>

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

**Comment A1.4:** This comment states that the Draft EIR relies on average truck trip lengths of 15.3 miles for 2-axle, 14.2 miles for 3-axle, and 40 miles for 4-axle trucks, but states that the Draft EIR does not provide supporting evidence for these assumptions. The comment states that inaccurate trip length assumptions can result in underestimated emissions of Diesel Particulate Matter (DPM), NO<sub>x</sub>, and GHGs. The comment recommends that the Final EIR include documentation to support the trip length assumptions, such as fleet data or regional freight studies, or revise the assumptions to reflect realistic operational conditions. The comment further states that if the Project includes port-related truck trips, the analysis should account for distances of approximately 65–70 miles to the Ports of Los Angeles or Long Beach.

**Response A1.4:** As discussed in Section 3.0, *Project Description*, of the Draft EIR, no tenants have been identified for the proposed warehouses. Therefore, the specific type of businesses that would occupy the proposed general light industrial and refrigerated warehouse uses and their associated fleet operations are unknown.

The types of warehousing that could occur within the Project range from high-cube warehouses to light manufacturing, and goods could enter the region through multiple gateways, including the Ports of Los Angeles and Long Beach or by air through Ontario International Airport or March Inland Port. Due to the uncertainty in actual trip distances, applying SCAQMD's recommended trip length provides an acceptable and regionally representative basis for analysis.

As acknowledged by the commenter, the trip distance of 39.9 miles per truck trip utilized for the Project is from SCAQMD Rule 2305 WAIRE Implementation Guidelines, which is the SCAQMD's indirect source review program used to help control and minimize air quality impacts from mobile source emissions associated with trucks from warehouses. The 39.9-mile trip length is based on SCAQMD's own studies that concluded that the average heavy duty truck trip length in the entire South Coast Air Basin was 39.9 miles. Therefore, 39.9 miles represent reasonably foreseeable average truck travel patterns associated with projects within the South Coast Air Basin, and thus are applicable and reasonably estimate the truck trip length for heavy-duty vehicles for the proposed Project.

Therefore, the Project's truck trip length assumptions more accurately reflect the anticipated average trip lengths than the commenter's suggested 65–70 miles, which is not based on SCAQMD's methodology. As such, no updates to the Draft EIR are warranted.

**Comment A1.5:** This comment states that the Health Risk Assessment assumes 15 minutes of truck idling per day, including for trucks, but that this may underestimate actual idling behavior at a high-throughput logistics facility. The comment states that trucks may experience extended idling during queuing, security checks, staging, loading, and unloading, leading to higher DPM emissions than modeled. The comment notes that CARB regulations allow exemptions for “clean idle” trucks and that heavy-duty trucks can idle for significantly longer periods under certain conditions. The comment recommends that the Final EIR either revise the emissions modeling to assume at least 30 minutes of idling per truck per day or provide empirical evidence to substantiate that the 15-minute assumption is representative of expected operations.

**Response A1.5:** This comment does not provide substantial evidence that the 15-minute idling assumption used in the Health Risk Assessment results in a substantial underestimation of DPM emissions or health risk impacts within the Draft EIR. As acknowledged by the commenter, statewide idling restrictions established by CARB’s Airborne Toxic Control Measure limit diesel truck idling to five minutes, with exemptions for certain “clean idle” engines. The HRA appropriately applied a conservative 15-minute per truck per day idling assumption, which complies with the applicable regulatory standard and reflects a conservative approach to estimating potential emissions from truck operations.

In addition, truck idling on the Project site would be managed through site design and operational management, including designated on-site loading areas, to ensure compliance with the City’s zoning code and CARB idling restrictions minimizing potentially extended idling times. Although the City Planning Division and Engineering Department have evaluated the proposed queue length and further analysis would be prepared prior to building permit issuance, the Project Applicant is voluntarily incorporating a check-in point inside the Project Site, included as PDF AQ-4, to further reduce idling on surrounding roadways. Ultimately, all trucks accessing the Project site would be required to comply with the City’s and CARB’s 5-minute idling limit pursuant to Riverside Municipal Code Section 19.435.030. For these reasons, the assumption used in the HRA remains conservative and consistent with regulatory requirements, and no revisions are warranted.

**Comment A1.6:** This comment states that the cancer risk results presented in the Draft EIR are inconsistent with those reported in its technical appendices. The comment states that while the Draft EIR and Appendix C show risks of 0.63 in one million for construction and 5.59 in one million for operation, Appendix B reports 0.54 in one million for construction and 3.55 in one million for operation. The comment recommends reconciliation of these discrepancies in order to ensure the Final EIR and all appendices present consistent cancer risk values.

**Response A1.6:** This comment has been addressed through revisions to Appendix B to ensure consistency across the EIR and all applicable technical studies. The Final EIR now reflects uniform cancer risk values of 0.63 in one million for construction and 5.59 in one million for operation throughout the Draft EIR, HRA (Appendix C), and the Air Quality, Energy and GHG Report (Appendix B). These revisions reconcile the discrepancies noted by the commenter and ensure that the health risk assessment results are presented accurately and consistently across the document and supporting appendices. Appendix B has been revised to be consistent with the cancer risk values listed in the Draft EIR and Appendix C. This correction does not change the conclusions of the EIR, and the findings remain the same.

**Comment A1.7:** This comment states CEQA requires that all feasible mitigation measures be utilized to reduce or minimize any significant air quality impacts and that the SCAQMD recommends certain mitigation measures and project design features be incorporated into the Final EIR.

**Response A1.7:** While CEQA requires that all feasible mitigation measures be utilized to minimize or eliminate any significant adverse impacts, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required. However, the Project Applicant has agreed to incorporate some of the

recommendations as Project Design Features (PDFs), as discussed in responses to comments A1.5, A1.13, A1.14, A1.15, A1.16, A1.17, A1.19, A1.20.

**Comment A1.8:** This comment suggests that the Project require zero emission or near zero emission heavy duty trucks if and when feasible. The comment further states that CARB's clean truck rules and regulations will lead to zero emission and near zero emission trucks becoming more available for use.

**Response A1.8:** As discussed in Sections 5.3, 5.6, and 5.8 of the Draft EIR, the Project would not result in significant impacts to air quality, energy, or GHG. Therefore, CEQA does not require that the Project implements mitigation measures for air quality, energy, or GHG impacts. Additionally, as of 2025, the use of zero-emission heavy-duty trucks in support of uses such as those proposed by the Project remains infeasible given the extremely limited commercial availability of zero-emission trucks, as well as infrastructure limitations, including limited truck-accessible charging/refueling stations and electrical grid capacity.

While heavy-duty truck manufacturers have released zero-emission battery electric and hydrogen-powered trucks, these vehicles have yet to reach large scale production, and their use remains extremely limited. Further, the availability of truck accessible vehicle charging stations and hydrogen refueling stations in California and the United States as a whole severely limits the feasibility of zero-emission trucks.

Requiring the Project to utilize emerging technology as mandatory mitigation when the various types of technological advancements and their timeframes for commercial availability are not known with any certainty is not a feasible mitigation measure and compliance would be speculative. Lastly, the Project would not require zero emission or near zero emission heavy duty trucks as the Project's construction and operational air quality and GHG emissions and energy consumption would not result in significant impacts that trigger the need for mitigation measures. This comment does not warrant any changes to the Draft EIR.

**Comment A1.9:** This comment suggests that the Lead Agency require a phase in schedule for cleaner operating trucks to reduce any significant air quality impacts and that SCAQMD staff is available to discuss the availability of current and upcoming truck technologies.

**Response A1.9:** As stated in Response A1.8, implementation of this mitigation measure is unfeasible at this time as the types of technological advancements and the associated timeframes for commercial availability for zero emission and near zero emission trucks are not known with any certainty and are highly speculative. In addition, the Project does not require mitigation measures for Air Quality, Energy, or GHG because the Project's construction and operational air quality and GHG emissions and energy consumption would not result in significant impacts. This comment does not warrant any changes to the Draft EIR.

**Comment A1.10:** This comment suggests that the Lead Agency limit the daily number of trucks to levels analyzed in the Draft EIR and if a higher number of trucks are anticipated to visit the site, the Lead Agency shall commit to reevaluating the Project through CEQA.

**Response A1.10:** CEQA does not require mitigation measures for Air Quality and GHG for the Project because the Project would not result in significant Air Quality or GHG Impacts, as discussed in Sections 5.3 and 5.8 of the Draft EIR

In addition, there are no mechanisms in place beyond that required for SCAQMD Rule 2305 (which the proposed buildings would be exempt from) for documenting, tracking and monitoring the number of truck trips that access any site. CEQA requires that an EIR evaluate the Project based on reasonable assumptions and foreseeable actions. The trip generation estimates uses trip generation rates listed in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11<sup>th</sup> Edition. The comment does not present any evidence that truck trips associated with the Project would be greater than disclosed in the Draft EIR. There is no substantial evidence presented by this comment or by any of the information in the Project's administrative record that contradicts the reasonable assumptions made in the Draft EIR about the expected

number of truck trips. Introducing a cap on the number of trucks that can access the proposed buildings is not required under CEQA, nor would it be reasonable or feasible for the City to monitor and enforce such a requirement. Therefore, implementation of this measure is not feasible and the measure itself is not enforceable. This comment does not warrant any changes to the Draft EIR.

**Comment A1.11:** This comment suggests that the Lead Agency require the provision of electric vehicle charging stations or provide electrical infrastructure and appropriately sized electric panels. The comment suggests also requiring electrical hookups for truckers to plug in any onboard auxiliary equipment.

**Response A1.11:** As discussed on page 5.3-6 of the Draft EIR, the Project is required to comply with the 2022 CALGreen Code, adopted by the City of Riverside Municipal Code in Chapter 16.07: Green Code, which requires the installation of electric truck charging infrastructure within truck parking areas to support future installation of charging stations when electric heavy-duty trucks are available. Regarding electric hookups for truckers to plug in onboard auxiliary equipment, Title 24 requires the installation of conduit at truck loading docks and correct electrical room sizing to ensure that tenants are able to provide plug ins at loading docks. Therefore, no additional mitigation measures are warranted.

**Comment A1.12:** This comment suggests that the Project include mitigation maximizing the use of solar energy by installing solar arrays.

**Response A1.12:** As discussed in Section 5.6, *Energy*, of the Draft EIR, the Project would be designed to be solar-ready, and the Project would be designed and built in such a manner as to facilitate the installation of solar photovoltaics in the future at the time a tenant occupies each building in accordance with Title 24. It should be noted that as of 2022, approximately one third of the power generated by Southern California Edison is from renewable sources, and this is anticipated to continue to increase under the State's Renewable Portfolio Standard, which requires retail sellers of electric services to increase procurement from eligible renewable resources to 44 percent of total retail sales by 2024. The amount of retail electricity provided from renewable sources is expected to further increase significantly in order to meet the state goal of carbon neutrality by 2045. Additionally, as discussed in Section 5.6 of the Draft EIR, the Project would not have unusual Project characteristics that would cause the use of construction equipment to be less energy efficient compared with other similar construction sites in other parts of the state, and would result in a less-than-significant impact related to energy usage and no mitigation would be required. Therefore, implementation of this measure at this time is not feasible and the measure itself is not required.

**Comment A1.13:** This comment suggests that the Project include mitigation requiring use of light-colored paving and roofing materials.

**Response A1.13:** The analysis determined that the Project would not result in significant impacts that would necessitate additional mitigation measures such as those suggested by the commenter. Nevertheless, the Project Applicant is voluntarily incorporating light-colored paving and roofing materials as Project Design Feature (PDF) AQ-1 to further reduce potential operational air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the EIR, and the findings remain the same.

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

### 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.**

**Comment A1.14:** This comment suggests that the Project includes mitigation requiring use of only Energy Star heating, cooling, and lighting devices.

**Response A1.14:** As discussed in Section 5.6 of the Draft EIR, the Draft EIR includes an analysis of the Project's energy demand and demonstrates that energy consumption would not result in a significant impact under CEQA. Furthermore, the Project will be required to comply with the most recent Title 24 Building Energy Efficiency Standards and CALGreen Code, which establish rigorous energy efficiency requirements for building systems, cooling, and lighting. As the Project's energy impacts are less than significant and subject to compliance with mandatory state energy codes, the suggested mitigation measures would not be required. In addition, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required. Nevertheless, the Project Applicant is voluntarily incorporating the use of Energy Star heating, cooling, lighting and appliances as PDF AQ-2 to further reduce potential operational air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the EIR, and the findings remain the same.

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

### 5.3.9 Project Design Features

None.

**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.**

**Comment A1.15:** This comment suggests that the Project clearly marks truck routes with signs so that trucks do not travel next to or near sensitive land uses.

**Response A1.15:** Project Design Feature (PDF AQ-3) which states that the Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes, has been added to the Project and included in the updated Air Quality, Energy, and GHG Analysis (Appendix B). This PDF is meant to 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. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

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

### 5.3.9 Project Design Features

None.

**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.**

**Comment A1.16:** This comment recommends that the Project is designed such that truck entrances and exits are not facing sensitive receptors in order to avoid trucks traveling past sensitive land uses to enter or leave the Project.

**Response A1.16:** Trucks would access the site regionally via SR-91 to Spruce Street and I-215 to 3<sup>rd</sup> Street, and are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3<sup>rd</sup> Street to access the site, as discussed in Section 5.17 of the Draft EIR. The Project proposes five new driveways: Driveway 1 would be located to the northeast of the Project site, along Roberta Street; Driveway 2 would be located on the northwest of the Project site, along Roberta Street; Driveway 3 would be located along Kansas Avenue (center); Driveway 4 would be located to the southwest of the Project site, along Kansas Avenue; Driveway 5 would be located along Massachusetts Avenue, near the southeast corner of the site (refer to Section 3.0 of the Draft EIR).

Of the five proposed driveways, Driveway 5 is closest to the nearest sensitive receptor, a housing assistance shelter located at 2801 Hulen Place east of the Project site, and to the nearest residential area located south of 3<sup>rd</sup> Street. Driveway 5 would provide both passenger vehicle and truck access, as discussed in Section 3.0 of the Draft EIR. This driveway would be located approximately 67.3 meters west of the housing assistance shelter on Hulen Place and approximately 505.7 meters north of the sensitive receptors on 3<sup>rd</sup> Street. Therefore, the Project is designed such that the driveways are not adjacent to the sensitive receptors located on Hulen Place or 3<sup>rd</sup> Street. Additionally, the Project site is currently an existing industrial facility, surrounded by other existing industrial uses, and would generate a nominal amount of new truck trips as compared to the existing condition. Furthermore, the Project Applicant is voluntarily including the following measures as Project Design Features (PDFs) to further reduce potential exposure of nearby sensitive receptors.

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.

**Comment A1.17:** This comment recommends that the Project is designed so that truck check-in points are inside the Project to avoid queuing.

**Response A1.17:** As discussed on page 5.17-9 of the Draft EIR, onsite truck driveways have been evaluated by the City Planning Division and Engineering Department to ensure that the necessary queue length is provided to ensure trucks accessing the business park buildings do not back onto Chicago Avenue, Massachusetts Avenue, or 3<sup>rd</sup> Street. In addition, once tenants are known for the proposed buildings, a tenant-specific queuing analysis would be prepared and reviewed by City Engineering prior to issuance of a building permit.

In addition, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts. As such, mitigation measures to mitigate air quality impacts are not required.

Nevertheless, although the City Planning Division and Engineering Department have evaluated the proposed queue length and further analysis would be prepared prior to building permit issuance, the Project Applicant is voluntarily incorporating a check-in point inside the Project Site as PDF AQ-4 to further reduce potential air quality impacts in response to this comment. Draft EIR Section 5.3, *Air Quality*, has been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and shown below. This correction does not change the conclusion of the Draft EIR, and the findings remain the same.

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

### 5.3.9 Project Design Features

None.

**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.**

**Comment A1.18:** This comment recommends that the Project be designed so that truck circulation is located as far away as feasible from sensitive receptors.

**Response A1.18:** As discussed in Response A1.16, the Project would be designed such that Project driveways are not adjacent to or directly facing sensitive receptors. The City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020.

The goals of the City's GNG-2020 are to ensure that new industrial: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's GNGs are codified in the City's Municipal Code Title 19, Zoning. Air quality and health risk GNGS include the following: (1) Minimize exposure to diesel emissions for residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals, and other public places (Sensitive Receptors) situated in close proximity to the industrial uses; (2) In compliance with CEQA, conduct SCAQMD URBEMIS and EMFAC computer models to identify the significance of air quality impacts on Sensitive Receptors; (3) Minimize the air quality impacts of trucks on Sensitive Receptors; (4) Promote the installation of on-site electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading of cargo and when trucks are not in use – especially where transport refrigeration units (TRUs) are proposed to be used.

The City's Planning division has reviewed the Project plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy. Additionally, the Project is located on site of an existing industrial facility, surrounded by other existing industrial uses, and would generate a nominal amount of new truck trips past existing sensitive/residential receptors. The Project would follow existing City truck routes and would be routed away from sensitive receptors. No changes to the design would be required and no further response is warranted.

**Comment A1.19:** This comment recommends that the Project restrict overnight truck parking in sensitive areas by providing overnight truck parking inside the Project site.

**Response A1.19:** PDF AQ-5 which states that the Project would be designed to provide overnight truck parking inside the Project Site, has been added to the Project. This PDF is meant to encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature. Draft EIR Sections 5.3, *Air Quality*, has

been revised to reflect this update in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

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

### 5.3.9 Project Design Features

None.

**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.**

**Comment A1.20:** This comment suggests that the City of Riverside conduct a review of the following references: (1) State of California – Department of Justice: Warehouse Project: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, (2) SCAQMD 2022 Air Quality Management Plan (specifically Appendix IV-A, Appendix IV-B, and Appendix IV-C), and (3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation, and to incorporate additional mitigation measures as applicable to the Project.

**Response A1.20:** The City considered the references provided by SCAQMD when developing the mitigation measures for the Project. In addition, SCAQMD does not specify which mitigation measures they are recommending within the references. Furthermore, CEQA does not require adoption of every potential mitigation measure and only requires adoption of feasible mitigation that will “substantially lessen” a project’s significant impacts (CEQA Guidelines Section 15041). The Draft EIR’s mitigation measures are consistent with and support the overarching recommendations in the provided references, as further discussed below.

(1) *State of California – Department of Justice: Warehouse Project: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*

The Draft EIR’s Air Quality analysis concluded that the Project would have less than significant impacts and determined that no mitigation is required. In addition, the Project is consistent with the State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.

The purpose of the Attorney General’s Warehouse Projects: Best Practices document (Best Practices document) is to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals; while CEQA analysis is project-specific, the Attorney General’s Warehouse Projects: Best Practices document provides information on feasible best practices and mitigation measures which have been adapted from other warehouse projects in California (Department of Justice, 2022, page 2).

The Best Practices document encourages jurisdictions to engage in proactive planning by adopting land use designations and zoning that channel development into appropriate areas, and setting minimum standards for logistics projects through general plan policies, local ordinances, and good neighbor policies (Department of Justice, 2022, page 3). As stated in Section 3, *Project Description*, of the Draft EIR, the Project site has a General Plan Land Use designation of Industrial (I) and is zoned as General Industrial. The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools,

parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities. In addition, the City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020. The goals of the City's GNG-2020 are to ensure that new industrial developments: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy.

The Best Practices document also encourages robust community engagement and provides examples of best practices for community engagement for CEQA compliance (Department of Justice, 2022, page 4). The City engaged in community engagement, per CEQA Guidelines and City policies. A Notice of Preparation was published on December 12, 2024 to notify the public and other agencies about the Project, request their input/comments, and invite them to a virtual scoping meeting, which was held on Thursday, January 9, 2025. The notice included a project description and was provided by mail to residents and posted on the City's website. In addition, the Draft EIR was also circulated for a 45-day public and public-agency review from Thursday, June 26<sup>th</sup> to Monday, August 11<sup>th</sup>, 2025. As set forth above, in response to public comments to the Draft EIR, the Project implemented new Project Design Features, including [add.]

The Best Practices document provides warehouse siting and design considerations to reduce environmental and air quality impacts and recommends siting warehouse facilities at least 1,000 feet from property lines of the nearest sensitive receptor (Department of Justice, 2022, page 5). As discussed on page 5.3-19 of the Draft EIR, the closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters (or 221 feet) east of the Project site; however, while the 1,000 feet distance may be appropriate for larger industrial development, the Project-specific Air Quality, Energy, and GHG Report determined that the Project will not result in significant impacts to Air Quality, Energy, and GHG, nor will it result in significant health risk impacts, even to nearby sensitive receptors (Draft EIR page 5.3-22 through 5.3-21).

In addition, consistent with the warehouse siting and design considerations included in the Best Practices document, the Project's design provides adequate amounts of on-site parking and complies with setbacks established by the City's Code of Regulations. The truck courts are located in between the two buildings to shield trucking operations from public views (refer to Draft EIR Figure 3-8, *Conceptual Site Plan*). The Project would also include approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas (refer to Draft EIR Figure 3-12, *Conceptual Landscape Plan*).

In addition, the Project Applicant is voluntarily including PDF AQ-4, as discussed above in Response A1.17, to incorporate a truck check-in point inside of the Project site, consistent with Best Practices for siting and designing warehouse facilities, to further reduce potential air quality impacts.

(2) *SCAQMD 2022 Air Quality Management Plan (Appendix IV-A, Appendix IV-B, and Appendix IV-C)*

The Project would be consistent with the SCAQMD 2022 Air Quality Management Plan (AQMP), specifically Appendix IV-A, IV-B, and IV-C as follows:

a) Appendix IV-A – SCAQMD's Stationary and Mobile Source Control Measures, included with the 2022 AQMP, aims to achieve the 2015 8-hour ozone National Ambient Air Quality Standards by 2037. As the Project would not result in significant impacts for construction or operational VOC or NO<sub>x</sub> for stationary and mobile sources, the Project would therefore be consistent with the SCAQMD's Stationary and Mobile Source Control Measures featured in Appendix IV-A of the 2022 AQMP.

b) Appendix IV-B – CARB's Strategy for South Coast, similarly to Appendix IV-A, identifies the strategies and controls to reduce ozone, specifically ground-level ozone. Ground-level ozone is

generated from NO<sub>x</sub> and VOC emissions. As the Project does not exceed SCAQMD's thresholds of significance for NO<sub>x</sub> and VOC (refer to Section 5.3 of the Draft EIR), the Project is consistent with Appendix IV-B and would not conflict with CARB's strategy for ground-level ozone control in the South Coast Air Basin.

c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure ensures consistency within the AQMP with the Southern California Association of Government's (SCAG's) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Transportation Control Measures which addresses the 2015 8-hour ozone standards in the South Coast Air Basin. As discussed in Section 5.3 of the Draft EIR, the Project is consistent with SCAG's RTP/SCS; in addition, the Project would not exceed SCAQMD's significance thresholds of NO<sub>x</sub> or VOC emissions. As such, the Project would be consistent with SCAG's Regional Transportation Strategy and Control Measures outlined in Appendix IV-C of the 2022 AQMP.

*(3) United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation*

Regarding the United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation, the Project's potential environmental justice effects are social issues that are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of environmental justice. Further, while CEQA requires that all feasible mitigation measures be utilized to minimize or eliminate any significant adverse impacts, as discussed in Section 5.3, *Air Quality*, of the Draft EIR, the Project would result in less than significant air quality impacts, including health risk impacts. As such, mitigation measures to mitigate air quality impacts are not required.

**Comment A1.21:** This comment discusses the applicability of South Coast Rule 2305 to the proposed Project and summarizes the requirements of Rule 2305 Warehouse Indirect Source Rule WAIRE Program. The comment states that project requirements, design features, and CEQA mitigation measures can be identified and implemented to help future warehouse operators meet their compliance obligations.

**Response A1.21:** The comment is informational in nature and does not raise a specific issue with the adequacy of the Draft EIR. South Coast Rule 2305 is applicable to buildings greater than 100,000 SF in size, as neither of the two buildings featured in the Project are greater than 100,000 SF in total building area, and are located on separate lots, Rule 2305 WAIRE Program would not be applicable. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is required or provided.

**Comment A1.22:** This comment states that SCAQMD is a Responsible Agency since air permits are required and SCAQMD will be required to make a decision on the adequacy of the CEQA document for its own use in issuing discretionary approvals. The comment summarizes other requirements for a Responsible Agency under CEQA. The comment states due to the requirements for Responsible Agencies, the Final EIR should be revised to include a discussion about any new stationary and portable equipment requiring SCAQMD permits and provide an evaluation of the air quality and greenhouse gas impacts.

**Response A1.22:** As described in Section 5.3, *Air Quality*, of the Draft EIR, it is anticipated that the proposed buildings would utilize two diesel-fueled fire pumps and two diesel-fueled emergency generators. To ensure a conservative analysis, the Draft EIR assumed that for the operation of the Project, the two diesel-fueled 238-horsepower emergency generators would individually operate for up to 200 hours per year, which is conservative and consistent with SCAQMD's Rule 1470, which limits stationary sources. The assumed two diesel-fueled 238-horsepower fire pumps would individually operate for up to 50 hours per year, which

would also be consistent with SCAQMD's Rule 1470. These assumptions were incorporated into the Project's Air Quality, Energy, GHG, and HRA analyses to provide a conservative estimate of potential operational emissions. Pages 8 through 10 of the Draft EIR Section 5.3, *Air Quality*, already include a summary of potentially applicable SCAQMD rules.

In response to this comment, Section 2.0, *Errata*, of this Final EIR has been updated to include additional SCAQMD rules identified by the commenter that were not featured in the Draft EIR, including Rules 201, 445, 461, 1110.2, 1166, 2305, and Regulation XIII, as shown below. Section 2.0 has also been updated to identify SCAQMD as a Responsible Agency, with potential subsequent approvals including issuance of permits for installation and operation of backup generators and fire pumps. The Project will remain subject to SCAQMD's permitting authority, which ensures compliance with all applicable regulatory requirements related to air quality and toxic air contaminants. As the proposed Project is speculative industrial at this time, the applicable South Coast AQMD permits will be requested once a future tenant is identified. Accordingly, the Draft EIR provides a sufficient project description and analysis for reliance by SCAQMD in its role as a Responsible Agency under CEQA. Given these conservative assumptions and regulatory safeguards, the Draft EIR adequately addresses the comment, and no further revisions are warranted.

Draft EIR Sections 3.0, *Project Description*, and 5.3, *Air Quality*, have been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

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

### 3.5 Discretionary Approvals and Permits

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 contaminants.**

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

#### 5.3.2.3 Regional Regulations

*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<sub>x</sub>, 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 – Volatile Organic Compound Emissions from Decontamination of Soil.** 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 per 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 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.**

**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.

**Comment A1.23:** The commenter states that because SCAQMD will issue air permits, it will serve as a CEQA Responsible Agency. The comment references CEQA Guidelines Section 15096 regarding the duties of Responsible Agencies, including making findings, issuing a Statement of Overriding Considerations if necessary, and filing a Notice of Determination. The commenter further states that the Final EIR should identify SCAQMD as a Responsible Agency, evaluate all new stationary and portable equipment requiring air permits, and provide analysis of associated air quality, energy, and greenhouse gas impacts to ensure the adequacy of the CEQA document for AQMD's approvals.

**Response A1.23:** As discussed, in Response A1.22, Section 2.0, *Errata*, has been updated to adequately address SCAQMD as a responsible agency under CEQA, and no further revisions are warranted.

Draft EIR Section 3.0, *Project Description*, has been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and as shown below. This correction does not change the conclusions of the EIR, and the findings remain the same.

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

### 3.5 Discretionary Approvals and Permits

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 contaminants.**

**Comment A1.24:** This comment concludes the SCAQMD's discussion and summarizes the standard practice for Lead Agencies when responding to Public Agencies comments. The comment also thanks the Lead Agency for giving the SCAQMD the opportunity to comment on the Draft EIR and contact information if future questions arise.

**Response A1.24:** The comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is required or provided.

**Comment Letter A2: Riverside County Airport Land Use Commission, Date July 21, 2025**

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-pzpkubrf.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).

C1.1

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, 14<sup>th</sup> Floor  
 Riverside, Ca 92501  
 (951)955-5132  
[Ycasas@rivco.org](mailto:Ycasas@rivco.org)  
[www.rcaluc.org](http://www.rcaluc.org)

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[County of Riverside California](#)

### 3.2 Response to Comment Letter A2: Riverside County Airport Land Use Commission, Date July 21, 2025

**Comment A2.1:** This comment introduces the comment letter and states that the proposed Project is located within Zone E of March Air Reserve airport influence area. The comment states that due to the Project's location and proposed legislative action (Change of Zone), the Riverside County Airport Land Use Commission (ALUC) is required to review the Project for consistency with the March Airport Land Use Compatibility Plan. This comment included the application and contact information necessary to initiate the required compatibility review.

**Response A2.1:** The proposed Project was reviewed and approved by the Riverside County Airport Land Use Commission on May 5, 2025. The ALUC Director's Determination letter has been included as Appendix A of this Final EIR.

The following revisions have been included in Chapter 2, Errata:

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.

The Draft EIR analyzed the proposed Project buildings at a height of 46 feet. In accordance with the Conditions of Approval provided by the ALUC, incorporated as Mitigation Measures HAZ-2 through HAZ-5, the Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Thus, this comment does not contain any information requiring further changes to the EIR. No further response is warranted.

**Comment Letter O1: Sierra Club and R-NOW, Dated August 11, 2025**



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 99<sup>th</sup> percentile for cumulative impact score in CalEnviroScreen4.0- it is literally a top 1% Environmental Justice (EJ) neighborhood in the state.<sup>1</sup> 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.

O1.1

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.

O1.2

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 99<sup>th</sup> 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

O1.3

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

- |  |                                |
|--|--------------------------------|
| <p>treated as a piecemeal set of objectives and best practices do not appear to addressed substantively in the DEIR. Additionally, please compare the project to the Office of the Attorney General’s Warehouse Projects: Best Practices document<sup>2</sup>.</p>   | <p>O1.3<br/>cont.<br/>O1.4</p> |
| <p>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.</p> <ul style="list-style-type: none"> <li>a. World Logistics Center – 40.4M square feet – Approved – Moreno Valley</li> <li>b. Bloomington Business Park – 2.4M square feet – Approved – San Bernardino County</li> <li>c. West Valley Logistics Center – 2.1M - Fontana</li> <li>d. Sycamore Hills Distribution Center – 600,000 sq. ft. - Riverside</li> <li>e. Moreno Valley Business Park Building 5 – 425,000 sq.ft. – Moreno Valley</li> <li>f. Harvest Landing Retail Project – 5.7M square ft. – Perris</li> <li>g. Beaumont Pointe – 5.0M square ft. – Beaumont</li> <li>h. The District at Jurupa Valley – 1.5M sq. ft. – Jurupa Valley</li> <li>i. Agua Mansa Logistics Center – 1.2M sq.ft. – Colton</li> <li>j. Merwin Property Project – 1.0M sq.ft. -Moreno Valley</li> <li>k. Crystal Windows HQ project – 400,000 sq.ft. – Moreno Valley</li> <li>l. All the projects along Old 215             <ul style="list-style-type: none"> <li>i. Old 215 Business Park</li> <li>ii. Cottonwood and Edgemont Project</li> <li>iii. Bay &amp; Day Commerce Center</li> <li>iv. Old 215 Industrial Park Project</li> <li>v. Moreno Valley Business Center Project</li> <li>vi. First Industrial Warehouse at Day Street Project</li> </ul> </li> </ul> | <p>O1.5</p>                    |
| <p>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.</p>   | <p>O1.6</p>                    |
| <p>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</p>  | <p>O1.7</p>                    |

<sup>2</sup> <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 threshold<sup>3</sup>.

O1.7  
cont.

- 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 year<sup>4</sup>. 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.

O1.8

### 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.

O1.9

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

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

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

### 3.3 Response to Comment Letter O1: Sierra Club and R-NOW, Dated August 11, 2025

**Comment O1.1:** This comment provides an introduction to the comment letter and provides a summary of the proposed Project. The comment also states that the Project site is located in a census tract ranked in the 99th percentile for cumulative impacts in CalEnviroScreen4.0, making it one of the top one percent Environmental Justice neighborhoods in California.

**Response O1.1:** The comment is introductory in nature, provides a summary of the proposed Project, and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issues. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

**Comment O1.2:** The comment acknowledges that the Project, as an industrial infill development, would have lower potential impacts compared to greenfield projects. The comment expresses concern that the Project objectives and analysis are biased towards the Project. The comment also states that the Project is incompatible with the overlay zone goals, local and regional air quality, and perpetuates industrial harm to the community.

**Response O1.2:** This comment does not provide any substantial evidence that the Project would result in significant environmental impacts. The Project's proposed Zone Change would correct the existing inconsistency between the site's General Plan Land Use designation of Industrial (I), zoning designation of I - General Industrial, and Innovation District (ID) Overlay Zone subdistricts Employment Emphasis (EE) and Housing Emphasis (HE). As described in Section 5.3, Air Quality, of the Draft EIR, implementation of the proposed Project would not exceed thresholds related to air quality and impacts related to regional and localized air quality would be less than significant with implementation of existing regulations related to air quality, included as PPPs AQ-1 through AQ-4. These include compliance with SCAQMD Rules 403 (dust control), 1113 (low-volatile organic compounds paints), and 1470 (regulation of diesel-fuel internal combustion engines). The comment does not contain any information requiring changes to the EIR. No further response is warranted.

**Comment O1.3:** The comment states that environmental justice was not analyzed as a standalone topic in DEIR. The comment also states that warehouse best practices were not substantively addressed in the DEIR and requests that the Project be compared to Office of the Attorney General's Warehouse Projects: Best Practices document.

**Response O1.3:** This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). Moreover, CEQA also requires a project to evaluate its impacts in relation to changes in an area's population, housing needs and coverage under adequate public services. The Project's potential environmental justice effects are social issues that are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of environmental justice.

The purpose of the Attorney General's Warehouse Projects: Best Practices document (Best Practices document) is to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals; while CEQA analysis is project-specific, the Attorney General's Warehouse Projects: Best Practices document provides information on feasible best practices and mitigation measures which have been adapted from other warehouse projects in California (Department of Justice, 2022, page 2).

The Best Practices document encourages jurisdictions to engage in proactive planning by adopting land use designations and zoning that channel development into appropriate areas, and setting minimum standards for logistics projects through general plan policies, local ordinances, and good neighbor policies (Department of Justice, 2022, page 3). As stated in Section 3.0, *Project Description*, of the Draft EIR, the Project site has a General Plan Land Use designation of Industrial (I) and is zoned as General Industrial. The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities only at specific locations. The purpose of the Industrial zone is to provide areas appropriate for a wide variety of industrial, manufacturing, and support uses that have the potential to provide jobs and generate tax revenue in Riverside, while protecting residential neighborhoods, schools, parks, playgrounds, day care centers, nursing homes, hospitals and other public places from nuisances or hazards associated with such activities. In addition, the City of Riverside adopted Good Neighbor Guidelines (GNG-2020) in November 2020. The goals of the City's GNG-2020 are to ensure that new industrial: (1) ensure air quality and health risks are evaluated, (2) evaluate and minimize noise impacts, and (3) protect residential uses and neighborhood character of the City. The City's Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City's Good Neighbor Policy.

The Best Practices document also encourages robust community engagement and provides examples of best practices for community engagement for CEQA compliance (Department of Justice, 2022, page 4). The City engaged in community engagement, per CEQA Guidelines and City policies. A Notice of Preparation was published on December 12, 2024 to notify the public and other agencies about the Project, request their input/comments, and invite them to a virtual scoping meeting, which was held on Thursday, January 9, 2025. The notice included a project description and was provided by mail to residents and posted on the city's website. In addition, the Draft EIR was also circulated for a 45-day public and public-agency review from Thursday, June 26th, 2025 and ending Monday, August 11th, 2025.

The Best Practices document provides warehouse siting and design considerations to reduce environmental and air quality impacts and recommends siting warehouse facilities at least 1,000 feet from property lines of the nearest sensitive receptor (Department of Justice, 2022, page 5). As discussed on page 5.3-19 of the Draft EIR, the closest sensitive receptors to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters (or 221 feet) east of the Project site; however, while the 1,000 feet distance may be appropriate for larger industrial development, the Project-specific Air Quality, Energy, and GHG Report determined that the Project will not result in significant impacts to Air Quality, Energy, and GHG, nor will it result in significant health risk impacts (Draft EIR page 5.3-22 through 5.3-21).

In addition, consistent with the warehouse siting and design considerations included in the Best Practices document, the Project's design provides adequate amounts of on-site parking and complies with setbacks established by the City's Code of Regulations. The truck courts are located in between the two buildings to shield trucking operations from public views (refer to Draft EIR Figure 3-8, *Conceptual Site Plan*). The Project would also include approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas (refer to Draft EIR Figure 3-12, *Conceptual Landscape Plan*).

Lastly, the Best Practices document provides a list of suggested mitigation measures for air quality and greenhouse gas emissions, noise impacts, traffic impacts, and other significant environmental impacts (Department of Justice, 2022, page 7-13). As summarized in Table 1-1 of the Draft EIR, implementation of the proposed Project would not exceed any CEQA thresholds with implementation of the following Mitigation Measures (MM): MM BIO-1, MM CUL-1, MM GEO-1, MM HAZ-1, MM HAZ-2, MM HAZ-3, MM HAZ-4, MM HAZ-5, MM HAZ-6, MM HAZ-7, MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4. All impacts related to the following topics would be less than significant with implementation of the above-mentioned mitigation measures: Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Tribal Cultural Resources. All other environmental topics were found to have

no impacts or less than significant impacts without mitigation in the Draft EIR. Although the Air Quality Report prepared for the Project determined that impacts to air quality would be less than significant, the Project Applicant is voluntarily including the following measures as Project Design Features (PDFs) to further reduce potential impact.

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.

Draft EIR Section 5.3, *Air Quality*, has been revised to reflect these updates in Section 2.0, *Errata*, of this Final EIR and shown in the following Responses above: A1.13, A1.14, A1.15, A1.17, and A1.19. This correction does not change the conclusion of the EIR, and the findings remain the same. No further response is warranted.

**Comment O1.4:** The comment states that the cumulative project list omitted tens of millions of square feet of regional warehouse development. The comment states that Project impacts are not limited to a two-mile radius of the Project site and that there are over 4,000 warehouses in the Inland Empire, including over 1,000 warehouses in Riverside county, as well as 13,000 acres of warehouse projects approved or under review. The comment requests a more comprehensive analysis of regional impacts of warehouses on transportation, jobs, air quality, and greenhouse gas emissions and provides a list of warehouse projects to be included.

**Response O1.4:** CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

Pursuant to CEQA Guidelines Section 15355(b) cumulative impacts must be assessed by taking into account “the project when added to other closely related past, present, and reasonably foreseeable probably future projects.” In deciding which Related Projects must be analyzed, CEQA Guidelines Section 15130(b)(3) instructs the lead agency to “define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.”

When assessing Related Projects lists specifically, courts ask “whether it was reasonable and practical to include the projects and whether, without their inclusion, the severity and significance of the cumulative impacts were reflected adequately.” (*City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 906 (“*Long Beach*”), quoting *Environmental Protection & Information Center v. California Dept. of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 525.) But the selection of the assessment area for cumulative impacts is “left to the agencies’ expertise,” and “[a]bsent a showing of arbitrary action, [courts] assume that the agencies have exercised this discretion appropriately.” (*Long Beach* at 908, quoting in part *Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2004) 123 Cal.App.4th 1331, 1351.)

The City’s 2025 Traffic Impact Analysis Guidelines (TIA Guidelines) were utilized to determine the cumulative projects listed in Draft EIR Table 5-1, *Cumulative Projects List* (Draft EIR Section 5.0, *Environmental Impact Analysis*). As discussed on page 14 of the TIA Guidelines, the City requires all projects within a one-mile radius from any project boundary to be included in the cumulative project’s list. For a conservative analysis (and as standard practice) the City’s Traffic Division requires a radius measuring one mile plus half of the longest side of the project. For this Project, following City’s guidance and standard practices, the radius for cumulative projects was determined to be 5,655 feet.

As such, the Project has adequately analyzed cumulative project impacts, including impacts on transportation, jobs, air quality, and greenhouse gas emissions. The comment does not identify substantial evidence showing that a cumulative impact would occur from its list of other projects located at a significant distance beyond the 5,655-foot radius from the Project, and does not contain any information requiring changes to the EIR. No further response is warranted.

**Comment O1.5:** This comment states that the Project’s land-use analysis dismisses the Employment and Housing Emphasis overlay zones. The comment also states that the approval of the Project could impact the implementation of the overlay zoning plan and compatibility of adjacent land uses.

**Response O1.5:** This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The Zone Change Amendment was discussed in the Draft EIR on pages 3-1, 3-25, 3-46, 5.11-10, 5.11-26, 5.14-8, 5.14-9. As discussed in Section 3.0, *Project Description*, the proposed Project has a General Plan Land Use designation of Industrial (I) and is zoned I - General Industrial. The site is also located within the Innovation District (ID) Overlay Zone, specifically within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The proposed Zone Change is still in alignment with the existing General Plan Land Use Designation. The proposed Zone Change would not affect the zoning designations or existing land uses of the neighboring parcels. The comment does not contain any information requiring changes to the EIR. No further response is warranted.

**Comment O1.6:** This comment states that the City of Riverside’s Good Neighbor Policy restricts the development of warehouses within certain setbacks of residential zoning. The comment also states that the City is proposing new guidelines that would introduce a cumulative impact standard that may affect the Project’s proposed parcel split and building sizes.

**Response O1.6:** Compliance with the City’s Good Neighbor Policy is to be verified by the City’s Planning division during the Design Review process. The City’s Planning division has reviewed the plans and determined that the proposed Project is in compliance with the City’s Good Neighbor Policy. The proposed

site design does not identify potential significant environmental impacts. Thus, potential impacts related to compliance with the City's Good Neighbor Policy would not occur.

The comment also references the Riverside City Council Meeting Agenda for August 19, 2025. The referenced guideline is a Planning Commission recommendation for revisions to industrial development standards that has not yet been adopted. As such, it is not applicable to the proposed Project. The comment does not present new information requiring changes to the Draft EIR. No further response is warranted.

**Comment O1.7:** This comment states that Draft EIR Table 5.14-6 indicated that the City of Riverside is job rich. The comment states that the City is not on track to add 43,000 plus units and that the 2050 projections in Connect SoCal 2024 are not based on actual trends. The comment states that the City is not job poor and does not need more warehousing jobs.

**Response O1.7:** This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As seen in Table 5.14-6 of the Draft EIR, the City of Riverside had a jobs to housing ratio of 1.68 in 2019, which would be considered job-rich. Based on SCAG's 2024-2050 RTP/SCS population and growth forecast, the job to housing ratio is projected to decrease to 1.49 by 2050, which would be considered housing-rich. The proposed Project would contribute to achieving a more balanced job to housing ratio by additional employment opportunities the community.

The comment expresses disagreement with SCAG's long-range projections, stating they are not based on "actual trends." The RTP/SCS is the region's official growth forecast, developed through an extensive process, and has been adopted by SCAG for use by local agencies. Reliance on these adopted forecasts is consistent with CEQA practice and ensures consistency with regional planning assumptions. The comment does not present substantial evidence that SCAG's projections are invalid, nor does it provide an alternative data source that would be more appropriate for the cumulative analysis.

The comment does not identify any new significant impact or deficiency in the Draft EIR analysis, and no further response or revision is required.

**Comment O1.8:** This comment concludes the letter by requesting that the Sierra Club Box Springs Group and R-NOW be notified of all documents and meetings related to the Project.

**Response O1.8:** The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR evaluation. As substantiated by the responses above, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented; there is no substantial increase in the severity of an environmental impact; no feasible project alternative or mitigation measure considerably different from others previously analyzed that would lessen the environmental impacts of the proposed Project; and the Draft EIR is not fundamentally inadequate or conclusory in nature.

Sierra Club Box Springs Group and R-NOW will be added to the notification list for the Project and no further response is warranted.

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## 4. Mitigation Monitoring and Reporting Summary

### 4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report (EIR) has been certified, which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "...reporting or 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" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented. The City of Riverside is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

### 4.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the City of Riverside for the Project. The table identifies mitigation measures required by the City of Riverside to mitigate or avoid significant impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Plans, Programs, and Policies, Project Design Features (PDF), and mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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**Table 4-1: Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<b>AESTHETICS</b>				
<b>PPP AES-1: Light and Glare.</b> All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of Riverside Municipal Code Chapter 19.556, Outdoor Lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AES-1: Lighting Design.</b> The Project’s lighting would be designed to adhere to the recommended lighting practices in the Attorney General’s Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>AIR QUALITY</b>				
<b>PPP AQ-1: Rule 403.</b> The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: <ul style="list-style-type: none"> <li>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.</li> <li>The contractor shall ensure that all disturbed unpaved roads 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.</li> <li>The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.</li> </ul>	Prior to demolition, grading, and construction permits.	City of Riverside Engineering Division and Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PPP AQ-2: Rule 1113.</b> 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.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PPP AQ-3: Rule 1470.</b> The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators	Prior to issuance of certificate of occupancy.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.				Date: _____
<b>PPP AQ-4: Rule 402.</b> 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.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AQ-1:</b> 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.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AQ-2:</b> 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.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AQ-3:</b> 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.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AQ-4:</b> 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.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
<b>PDF AQ-5:</b> 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	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
quantitative credit was taken in the air quality analysis for this design feature.				
<b>BIOLOGICAL RESOURCES</b>				
<p><b>Mitigation Measure BIO-1: Nesting Birds.</b> Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered “take” and is potentially punishable by fines and/or imprisonment.</p> <p>If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have</p>	Prior to issuance of grading permits.	City of Riverside Engineering Division and Building & Safety Division.	Submittal of Pre-construction Clearance Survey report to City by Qualified Biologist.	Initials: _____  Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.				
<b>CULTURAL RESOURCES</b>				
<p><b>PPP CUL-1: Discovery of Human Remains:</b> 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 &amp; 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.</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>	<p>During ground-disturbing activities.</p>	<p>City of Riverside Community &amp; Economic Development Department and Building &amp; Safety Division.</p>	<p>Provide evidence to the City that developer/permit holder has complied with State Health and Safety Code Section 7050.5.</p> <p>Provide evidence to the City that the San Bernardino County Coroner has contacted the Native American Heritage Commission within 24 hours of discovery.</p>	<p>Initials: _____</p> <p>Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p><b>Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource.</b> During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior’s Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a “resource” the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant’s expense.</p>	<p>During ground-disturbing activities.</p>	<p>City of Riverside Community &amp; Economic Development Department and Building &amp; Safety Division.</p>	<p>Provide evidence to the City that a qualified Archeological has been retained.</p> <p>Submittal of report that documents the finding to the City.</p>	<p>Initials: _____</p> <p>Date: _____</p>
<p><b>GEOLOGY AND SOILS</b></p>				
<p><b>PPP GEO-1: CBC Compliance.</b> The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.</p>	<p>Prior to grading and construction permits.</p>	<p>City of Riverside Engineering Division and Building &amp; Safety Division.</p>	<p>City approval of construction plans.</p>	<p>Initials: _____</p> <p>Date: _____</p>
<p><b>Mitigation Measure GEO-1: Paleontological Resources.</b> Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology’s (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution</p>	<p>During ground-disturbing activities.</p>	<p>City of Riverside Community &amp; Economic Development Department and Building &amp; Safety Division.</p>	<p>City approval of construction plans.</p> <p>Halt any work in the event of paleontological resource discovery.</p> <p>Provide evidence to the City that a</p>	<p>Initials: _____</p> <p>Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.</p> <p>If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources.</p> <p>After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.</p>			<p>qualified paleontologist has been retained.</p> <p>Submittal of report that documents the finding to the City.</p>	
<b>HAZARDS AND HAZARDOUS MATERIALS</b>				
<p><b>PPP HYD-1: NPDES/SWPPP.</b> 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 coverage under the construction general 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>Prior to issuance of any grading permits.</p>	<p>City of Riverside Public Works Department.</p>	<p>Provide evidence of compliance with the NPDES requirement to the City Public Works Department.</p> <p>Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.</p>	<p>Initials: _____</p> <p>Date: _____</p>
<p><b>PPP HAZ-1: SCAQMD Rule 1166.</b> Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that the planned excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan. The excavation contractor’s Rule 1166 plan would provide for</p>	<p>Prior to issuance of grading or excavation permits.</p>	<p>City of Riverside Building and Safety Division.</p>	<p>Submit verification to the City Building and Safety Division that the planned</p>	<p>Initials: _____</p> <p>Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>compliance with these requirements provided the plan remains valid and is approved by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading in areas where VOCs are suspected to potentially be present 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 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.</p>			<p>excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan.</p>	
<p><b>PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS).</b> A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.</p>	<p>Prior to Project approval.</p>	<p>City of Riverside Planning Division.</p>	<p>City approval of Final plans.</p>	<p>Initials: _____ Date: _____</p>
<p><b>Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP).</b> 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 previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).</p>	<p>Prior to issuance of a grading or excavation permit.</p>	<p>Santa Ana Regional Water Quality Control Board.</p>	<p>Santa Ana Regional Water Quality Control Board approval of SMP and HSP.</p>	<p>Initials: _____ Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>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.</p> <p>As part of the SMP, 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). 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><b>Mitigation Measure HAZ-2: Outdoor lighting.</b> 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>Prior to Project approval.</p>	<p>City of Riverside Planning Division.</p>	<p>City approval of Final plans.</p>	<p>Initials: _____ Date: _____</p>
<p><b>Mitigation Measure HAZ-3: Prohibited Uses/Activities.</b> 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"> <li>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.</li> <li>Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or</li> </ol>	<p>Prior to Project approval.</p>	<p>City of Riverside Planning Division.</p>	<p>City approval of Final plans and Conditions of Approval.</p>	<p>Initials: _____ Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>towards an aircraft engaged in a straight final approach 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. Any use which results in a hazard to flight.</p>				
<p><b>Mitigation Measure HAZ-4: Notice of Airport in Vicinity.</b> The “Notice of Airport in Vicinity” shall be provided to all prospective purchasers and occupants of the property.</p>	Prior to Occupancy.	Project Applicant.	Provide evidence to RCALUC that the “Notice of Airport in Vicinity” has been provided to prospective purchasers and occupants of the property.	Initials: _____ Date: _____
<p><b>Mitigation Measure HAZ-5: Electromagnetic Component Notification.</b> 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>	Prior to Occupancy.	Project Applicant.	Provide notification of any land use having electromagnetic radiation to RCALUC.	Initials: _____ Date: _____
<p><b>HYDROLOGY AND WATER QUALITY</b></p>				
<p><b>PPP HYD-1: NPDES/SWPPP.</b> 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)</p>	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	
<b>PPP HYD-2: WQMP.</b> Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City’s Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	City’s Public Works Department approval of WQMP.	Initials: _____ Date: _____
<b>PUBLIC SERVICES</b>				
<b>PPP PS-1:</b> The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is \$0.84 per SF, which would equal approximately \$167,874 for the Project.	At the time of building permit issuance.	Riverside Unified School District.	Provide evidence to City that the school impact fees have been paid.	Initials: _____ Date: _____
<b>RECREATION</b>				
<b>PPP R-1: Park and Recreation Development Fees.</b> Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.	Prior to the issuance of a building permit.	City of Riverside Parks and Recreation Department.	Provide evidence to City that the park development fees have been paid.	Initials: _____ Date: _____
<b>TRANSPORTATION</b>				
<b>PDF TRA-1: Chicago Avenue/Massachusetts Avenue Intersection Improvements:</b> The Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____
<b>PDF TRA-2: Chicago Avenue/3rd Street Intersection Improvements:</b> The Project would implement protected-permissive left-turn phasing for the northbound and southbound left-turn approaches by installing flashing yellow signal head and “Left Turn Yield On Flashing” sign on Chicago Avenue/3rd Street intersection.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<b>TRIBAL CULTURAL RESOURCES</b>				
<p><b>Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource.</b> As listed in Section 5.5, <i>Cultural Resources</i>.</p>	<p>During ground-disturbing activities.</p>	<p>City of Riverside Community &amp; Economic Development Department and Building &amp; Safety Division.</p>	<p>Halt any work in the event of inadvertent discoveries of archeological resources.</p> <p>Provide evidence to the City that a qualified Archeological has been retained.</p> <p>Submittal of report that documents the finding to the City.</p>	<p>Initials: _____</p> <p>Date: _____</p>
<p><b>MM-TCR-1:</b> Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.</p>	<p>Prior to grading permit issuance.</p>	<p>City of Riverside Engineering Division and Building &amp; Safety Division.</p>	<p>Provide copy of consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation Halt any work in the event of inadvertent discoveries of archeological resources.</p>	<p>Initials: _____</p> <p>Date: _____</p>
<p><b>MM-TCR-2: Project Archaeologist:</b> Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the</p>	<p>Prior to the issuance of a grading permit.</p>	<p>City of Riverside Building &amp; Safety Division.</p>	<p>Provide a letter to the City from a certified Archaeologist and Paleontologist</p>	<p>Initials: _____</p> <p>Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities.</p>				
<p><b>MM-TCR-3: Treatment and Disposition of Cultural Resources:</b> In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. <b>Consulting Tribes Notified:</b> Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need approval of the consulting tribe(s); and</li> <li>3. <b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources to the consulting tribe(s). The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:                         <ol style="list-style-type: none"> <li>a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</li> <li>b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation</li> </ol> </li> </ol>	<p>During ground-disturbing activities.</p>	<p>City of Riverside Community &amp; Economic Development Department and Building &amp; Safety Division.</p>	<p>Provide the City that with evidence of notification to consulting tribes in the event of inadvertent discoveries; a copy of the completed Phase IV Monitoring Report.</p>	<p>Initials: _____ Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and</p> <p>d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.</p>				
<p><b>MM-TCR-4: Cultural Sensitivity Training:</b> The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder’s contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>	<p>Prior to start of grading.</p>	<p>City of Riverside Planning Division.</p>	<p>Provide City with sign-in sheet from Cultural Sensitivity Training for all construction personnel and included in the Phase IV Monitoring Report.</p>	<p>Initials: _____ Date: _____</p>
<p><b>UTILITIES AND SERVICE SYSTEMS</b></p>				
<p><b>PPP HYD-1: NPDES/SWPPP.</b> 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 coverage under the construction general 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</p>	<p>Prior to issuance of any grading permits.</p>	<p>City of Riverside Public Works Department.</p>	<p>Provide evidence of compliance with the NPDES requirement to the City Public Works Department.</p>	<p>Initials: _____ Date: _____</p>

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
<p>a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.</p>			<p>Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.</p>	
<p><b>PPP HYD-2: WQMP.</b> Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City’s Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.</p>	<p>Prior to issuance of any grading permits.</p>	<p>City of Riverside Public Works Department.</p>	<p>City’s Public Works Department approval of WQMP.</p>	<p>Initials: _____ Date: _____</p>

Massachusetts Point

# Air Quality, Energy, and GHG Impact Analysis

Prepared for City of Riverside,  
Planning Division



September 9, 2024

**Prepared by**

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# 1 INTRODUCTION

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This *Air Quality, Energy, and Greenhouse Gas (GHG) Impact Analysis* has been prepared by EPD Solutions, Inc. (EPD) to analyze the potential impacts of the proposed Massachusetts Point Industrial Project (Project). The proposed Project is located at the northeast corner of Kansas Avenue and Massachusetts Avenue in the City of Riverside, which is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

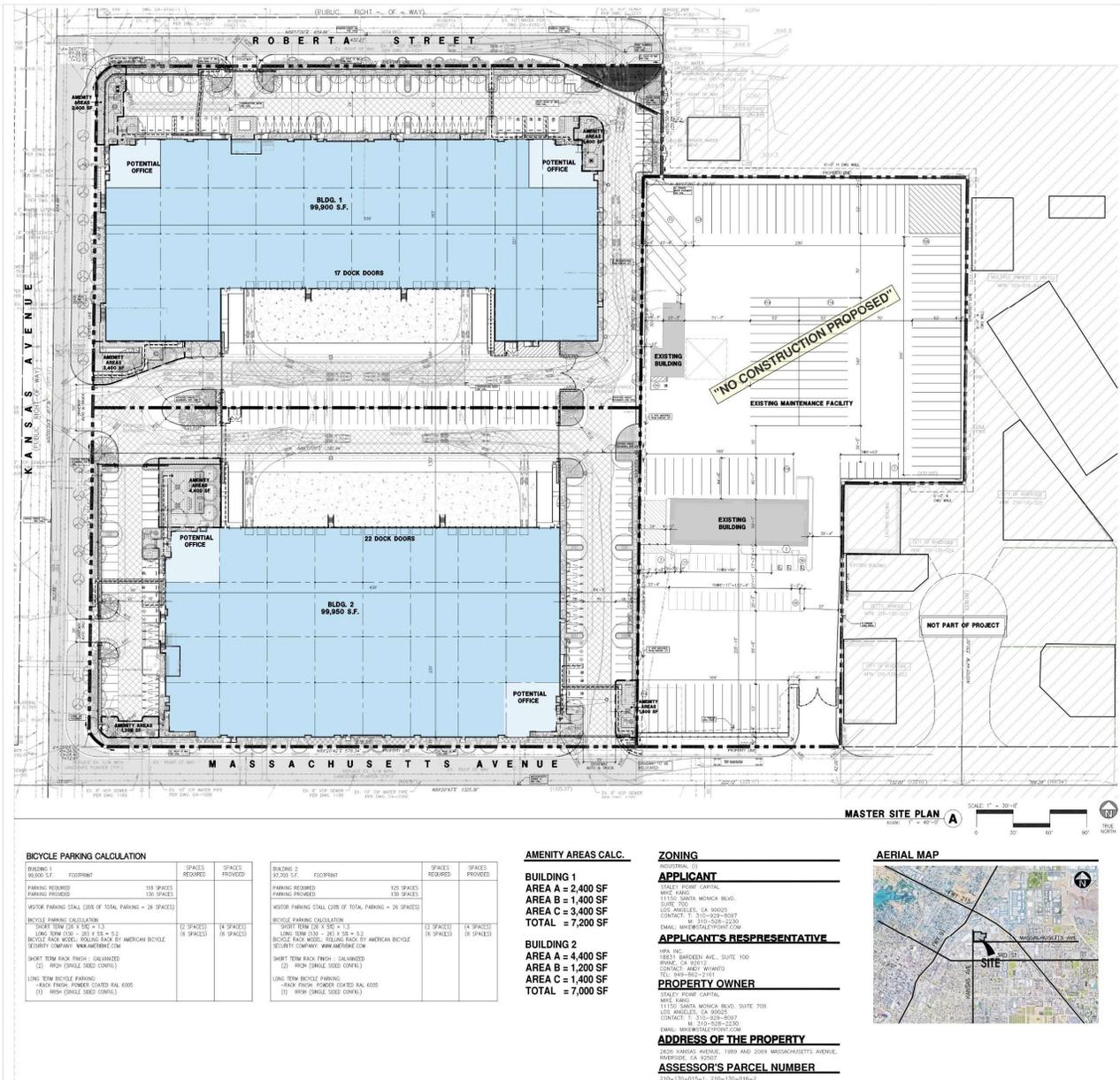
The Project site is identified by Assessor's Parcel Numbers (APN) 210-130-015, 210-130-016, and 210-130-020, and totals an area of approximately 14.42 acres. The Project proposes to demolish the existing buildings located on-site totaling 99,850 square feet (SF) and construct two speculative industrial buildings totaling 199,850 SF on APN 210-130-015 and 210-130-016 (10.21-acre portion of site). Building 1 would be 99,900 SF and Building 2 would be 99,950 SF. No development is proposed on APN 210-130-020 and the existing use would remain in operation.

To provide a conservative analysis, the Project was assumed to allocate 20% of the total building area to cold storage. Development of the site would also include landscaping, utility connections, stormwater facilities, and pavement of parking areas and drive aisles. The regional location and site plan are provided in Figure 1, *Project Location*, and Figure 2, *Project Site Plan*.

Figure 1: Project Location



**Figure 2: Project Site Plan**



## 1.1 Purpose of the Report

To support the CEQA document for the proposed Project, this report analyzes the proposed Project's construction and operational impacts on air quality (emissions of criteria pollutants), energy usage, and greenhouse gas (GHG) emissions using the California Emissions Estimator Model (CalEEMod) Version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants, energy usage, GHG emissions from direct and indirect sources, and quantify applicable air quality and GHG reductions achieved from mitigation. The thresholds of significance used are the adopted thresholds by the SCAQMD, California Air Resources Board (CARB), and the City of Riverside.

## 1.2 Summary of Conclusions

The conclusions of this analysis are as follows:

**Air Quality:** The Project's maximum daily and annual regional construction and net operational emissions would not exceed the SCAQMD's regional thresholds of significance. All construction activities would comply with applicable rules and regulations, including Rule 402 which governs emissions of air contaminants or other material that may cause injury or nuisance to any considerable number of persons or to the public, Rule 403 to minimize fugitive dust emissions, Rule 1113 which allows only low-volatile organic compounds (VOC) paints and Rule 1166 which sets requirements to control the emissions of VOC deposition from excavating, grading, handling, and treating VOC-contaminated soil (South Coast Air Quality Management District).

Projects that do not exceed the regional thresholds are assumed to not have a significant impact on a project level and cumulative level. All construction activities would comply with applicable SCAQMD rules and regulations. The toxic air contaminant (TAC) emissions generated by the Project would have a lower increased cancer risk than the SCAQMD health risk threshold. Odors produced by the construction would be minimal and temporary, and operation of the site would be minimal and similar to the surrounding land uses. Therefore, the proposed Project would have a less-than-significant air quality impact, and no mitigation would be required.

**Energy:** The proposed Project's energy consumption for construction activities related to redevelopment of the site for new industrial warehousing uses would be required to comply with existing fuel standards, machinery efficiency standards, and CARB requirements that limit idling of trucks. The Project would not result in significant impacts related to the State CEQA Guidelines thresholds for energy consumption:

- a) Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than any other development projects in Southern California.
- b) The proposed Project would be required to meet the California Code of Regulations (CCR) Title 24 energy efficiency standards and comply with all applicable City energy codes, and the Project buildings would be solar ready in compliance with current Title 24 requirements. Therefore, the Project would not inhibit the use of and would allow for future flexibility relating to renewable energy.

The proposed Project would consume more electricity, natural gas, gasoline fuel, and diesel fuel than the two existing buildings currently occupying the site. However, through compliance with existing standards, the

Project would not result in a fuel demand on a per-development basis that is greater than other similar development projects in Southern California. Additionally, there are no unusual Project characteristics that would cause the use of construction equipment that would be less energy-efficient compared with other similar construction sites in other parts of the state. Therefore, the construction and operation of the Project would result in a less-than-significant impact related to inefficient, wasteful, or unnecessary energy use, and no mitigation would be required.

**Greenhouse Gas:** The proposed Project's construction and operational GHG emissions would total 7,269 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>). Considering the emissions resulting from the existing buildings, the net new emissions generated by the proposed Project would result in an increase of 5,484 MTCO<sub>2e</sub> per year. The Project's net and total GHG emissions are below the SCAQMD's significance threshold of 10,000 MTCO<sub>2e</sub> per year. Additionally, the proposed Project would be consistent with the City's GHG reduction plans and policies within the City's General Plan and CARB's 2022 Scoping Plan. Therefore, the Project would have a less-than-significant impact on GHG emissions, and no mitigation would be required.

## 2 AIR QUALITY

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### 2.1 Environmental Setting

#### Local Climate and Meteorology

##### *Climate*

The proposed Project is located within the South Coast Air Basin (SCAB), which incorporates all of Orange County, and parts of Los Angeles, Riverside, and San Bernardino Counties. The City of Riverside and the SCAB are under the jurisdiction of the SCAQMD.

As described in the City of Riverside General Plan 2025 Air Quality Element:

*The Basin is topographically bounded by the Pacific Ocean to the west, with the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east. The topography and climate of the region combine to create an area of high air pollution potential in the Basin. Due to the low average wind speeds in the summer and a persistent daytime temperature inversion, emissions of hydrocarbons and oxides of nitrogen — the major by-products of vehicle engine combustion — have an opportunity to combine with sunlight in a complex series of reactions. These reactions produce a photochemical oxidant commonly known as "smog." Since the greater Los Angeles metropolitan region and the Inland Empire experience more days of sunlight than any other major urban area in the United States, except Phoenix, the smog potential in the region is higher than in most other major metropolitan areas in the country. (City of Riverside, 2007)*

##### *Meteorology*

Meteorological data used for the Project baseline was obtained from the City of Riverside's closest meteorological station, Riverside Municipal Airport. Based on data from this station, the temperatures in this region generally range from an average high of 80 degrees Fahrenheit (°F) in July to an average low of 51 °F in December. Annual precipitation averages approximately 10.34 inches, with the majority of precipitation accumulation occurring from December through March (U.S. Climate Data, 2025).

#### Criteria Pollutants

Criteria pollutants are air pollutants with State and national air quality standards that define allowable concentrations of these substances in ambient air. These criteria pollutants include:

- **Reactive Organic Gases (ROGs).** ROGs are hydrocarbon compounds that contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) are a precursor to ozone (O<sub>3</sub>). ROGs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Not all ROGs have health effects; however, breathing some ROGs can irritate the eyes, nose and throat, can

cause difficulty breathing and nausea, and can damage the central nervous system or cause cancer. The United States Environmental Protection Agency (USEPA) and SCAQMD both use the terms VOC (volatile organic compounds) and ROG interchangeably in their regulatory frameworks (United States Environmental Protection Agency, 2024a). While there are nuanced differences in application, both agencies recognize VOC and ROG as equivalent terms within the scope of air quality management. Thus, the remainder of this report will reference the pollutant as VOC or ROG interchangeably.

- **Oxides of nitrogen (NO<sub>x</sub>).** NO<sub>x</sub> consists of nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>) and five other compounds, which are formed when nitrogen combines with oxygen. NO<sub>x</sub> is typically created during combustion processes and are major contributors to smog formation and acid deposition. Increase in resistance to air flow and airway contraction occurs after short-term exposure to NO<sub>x</sub> in healthy subjects and an increase in acute respiratory illness, including infections and respiratory symptoms in children, is associated with long-term exposure to NO<sub>x</sub>.
- **Ozone (O<sub>3</sub>):** O<sub>3</sub> is a highly reactive gas and a major component of smog. It is formed in the atmosphere through photochemical reactions involving Reactive Organic Gases ROGs and NO<sub>x</sub> in the presence of sunlight. Prolonged exposure to ground-level ozone is known to cause difficulty in breathing, aggravate asthma, and contribute to the development of certain chronic respiratory diseases. The formation of ozone is reliant on low-level atmospheric ROGs and NO<sub>x</sub> concentrations, and therefore controlling emissions of these precursors is critical to reducing ozone pollution and improving air quality.
- **Carbon monoxide (CO).** CO is a colorless, odorless gas produced by sources that burn fuel such as vehicles, construction equipment, and building heating. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Motor vehicles are the primary source of CO in the SCAB and the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen (O<sub>2</sub>) transport and competing with O<sub>2</sub> to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Conditions with an increased demand for O<sub>2</sub> supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (O<sub>2</sub> deficiency).
- **Sulfur dioxide (SO<sub>2</sub>).** SO<sub>2</sub> is a respiratory irritant generated by burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. Exposure to SO<sub>2</sub> can result in a reduction in breathing capacity leading to breathing difficulties.
- **Particulate matter (PM<sub>10</sub>).** PM<sub>10</sub> is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. PM pollution is a major cause of reduced visibility (haze) which is caused by the scattering of light and consequently the significant reduction in air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects that include respiratory infections, asthma, lung cancer.
- **Particulate matter (PM<sub>2.5</sub>).** PM<sub>2.5</sub> consists of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include SO<sub>4</sub> formed from SO<sub>2</sub> release from power plants and industrial facilities and nitrates that are formed from NO<sub>x</sub> release from power plants, automobiles, and other types of combustion sources. PM<sub>2.5</sub> results in a similar array of health impacts as PM<sub>10</sub>.

- **Lead.** Lead is a toxic metal that, when released into the air, can cause developmental delays and learning difficulties amongst children from short term exposure. In adults, lead exposure can lead to high blood pressure, kidney damage, and reproductive complications. The accumulation of lead in the body over prolonged exposure can result in serious health problems, including neurological damage and an increased risk of cardiovascular diseases. Lead primarily comes from sources like industrial activities, lead-based paints, and vehicle emissions (leaded gasoline).

The emissions of these criteria pollutants were estimated using CalEEMod (Version 2022.1) to identify the construction and net operational emissions that would be generated by the proposed Project.

## Sensitive Receptors

A sensitive receptor is defined as an individual who is most susceptible to negative health effects when exposed to air pollutants including children, the elderly, and adults with chronic health issues. Such receptors include residences, schools, elderly care centers, and hospitals where an individual can remain for 24 hours.

The sensitive receptor located nearest to the Project site is a short-term housing shelter that is 67.3 meters (221 meters) east of the Project site boundary, located at 2801 Hulen Place, where an individual could remain for up to 90 days.

## Existing Air Quality

### Regional Air Quality

The USEPA and the State have established air quality standards for six criteria pollutants and the SCAQMD monitors levels of various criteria pollutants at monitoring stations. The air quality in a region is considered to be in attainment if the measured ambient air pollutant levels do not exceed the air quality standards. Conversely, nonattainment means that an area has monitored air quality that does not meet the USEPA or State standards. In order to improve air quality in nonattainment areas, a State Implementation Plan (SIP) was drafted by the CARB. The SIP outlines the measures that the State will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the USEPA designates the area as a maintenance area. As shown in Table 1, the Project site is in a federal nonattainment area for 1-hour and 8-hour ozone, PM<sub>2.5</sub>, and lead, and a State nonattainment area for 1-hour and 8-hour ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>.

**Table 1: Attainment Status of Criteria Pollutants in the South Coast Air Basin**

Pollutant	State	Federal
Ozone (1-hour)	Nonattainment	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment

Pollutant	State	Federal
SO <sub>2</sub>	Attainment	Attainment
Lead	Attainment	Nonattainment
All others	Unclassified/Unclassified	No Standards

Source: California Air Resources Board. (2023). *Maps and Tables of Area Designations for State and National Ambient Air Quality Standards*. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/areades/appc.pdf>

### Local Air Quality

The Project site is located within the Source Receptor Area (SRA) 23, Metropolitan Riverside. The closest monitoring station for O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> is the SCAQMD Riverside County 1 Rubidoux Station (within SRA 23), approximately 3.4 miles northwest of the Project site. This station was identified as the closest monitoring station that would be most applicable to the City of Riverside air quality conditions.

The most recent three years of data available is shown in Table 2, *Project Area Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables (South Coast Air Quality Management District, 2021-2023). Data for SO<sub>2</sub> has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO<sub>2</sub> concentrations.

**Table 2: Project Area Air Quality Monitoring Summary 2021-2023**

Pollutant	Standard	Year		
		2021	2022	2023
<b>O<sub>3</sub></b>				
Maximum Federal 1-Hour Concentration (ppm)		0.117	0.122	0.139
Maximum Federal 8-Hour Concentration (ppm)		0.097	0.095	0.106
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	20	30	48
Number of Days Exceeding Federal 8-Hour Standard	> 0.070 ppm	55	70	69
Number of Days Exceeding State 8-Hour Standard	> 0.070 ppm	57	72	70
<b>CO</b>				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.1	3.3	1.4
Maximum Federal 8-Hour Concentration	> 20 ppm	1.8	1.2	1.2
<b>NO<sub>x</sub></b>				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.052	0.056	0.055
<b>PM<sub>10</sub></b>				
Maximum Federal 24-Hour Concentration (µg/m <sup>3</sup> )	> 150 µg/m <sup>3</sup>	76	153	166
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m <sup>3</sup>	0	1	1

Pollutant	Standard	Year		
		2021	2022	2023
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m <sup>3</sup>	16	55	43
<b>PM<sub>2.5</sub></b>				
Maximum Federal 24-Hour Concentration (µg/m <sup>3</sup> )	> 35 µg/m <sup>3</sup>	82.1	38.5	48.7
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m <sup>3</sup>	10	1	1

ppm= parts per million

µg/m<sup>3</sup>= micrograms per cubic meter of air

Source: SCAQMD Historical Air Quality Data by Year, Air Quality Data Tables for Metropolitan Riverside 1- SRA 23 Rubidoux Monitoring Station (AQ5 06058001) (South Coast Air Quality Management District, 2023a).

## 2.2 Regulatory Setting

### Federal

The USEPA is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The USEPA standards, along with the California standards, are shown in Table 3, *California and National Ambient Air Quality Standards*. The USEPA draws primarily from the Clean Air Act (CAA) to create their air quality mandates. As explained previously, the USEPA requires each State with federal nonattainment areas to prepare and submit an SIP as a part of its enforcement responsibilities. The SIP demonstrates the means to attain and maintain the federal standards set by the USEPA, and must integrate federal, State, and local plan components and regulations to reduce pollution within the SIP identified timeframe. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS and Title II provisions are related to mobile source emissions and require use of cleaner-burning gasoline and fuels.

### State

The CARB is a department of the California Environmental Protection Agency and oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the California Clean Air Act (CCAA), which requires CARB to establish the California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the criteria air pollutants described previously in Section 2.1, *Environmental Setting*. Applicable CAAQS are shown in Table 3, *Ambient Air Quality Standards*.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance of local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

**Table 3: Ambient Air Quality Standards**

<b>Ambient Air Quality Standards</b>						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> ) <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	—	—	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>11</sup>	—	
Lead <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	<b>No National Standards</b>		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

See footnotes on next page ...

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1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from  $15 \mu\text{g}/\text{m}^3$  to  $12.0 \mu\text{g}/\text{m}^3$ . The existing national 24-hour PM2.5 standards (primary and secondary) were retained at  $35 \mu\text{g}/\text{m}^3$ , as was the annual secondary standard of  $15 \mu\text{g}/\text{m}^3$ . The existing 24-hour PM10 standards (primary and secondary) of  $150 \mu\text{g}/\text{m}^3$  also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour  $\text{SO}_2$  standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971  $\text{SO}_2$  national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.  
  
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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### *Title 13, California Code of Regulations*

The CARB adopted updates to Title 13 of the California Code of Regulations in response to the state's ongoing efforts to reduce greenhouse gas emissions and improve air quality in 2008. These regulations, which impact diesel-fueled commercial vehicles, have been designed to help reduce PM, NO<sub>x</sub>, and other vehicle emissions from the transportation sector, were initially adopted on September 19, 2011, with implementation phases beginning on January 1, 2012, and continuing through subsequent years.

### *Title 17, California Code of Regulations*

Title 17 of the California Code of Regulations aims to reduce the harmful effects of diesel particulate matter (DPM), which is a significant public health concern. On August 27, 1998, CARB identified diesel PM as a toxic air contaminant, and in 2001, the board adopted a Risk Reduction Plan to significantly reduce diesel PM emissions from engines and vehicles.

### *Title 24, California Building Standards Code*

The California Building Energy Efficiency Standards, set forth in Title 24 of the California Code of Regulations (CCR) (California Building Standards Code), establish energy performance requirements for residential and non-residential buildings within the state with the goal of enhancing energy conservation and sustainability. These standards are organized into two key components: Part 6 and Part 11. Part 6 pertains to energy efficiency regulations for both residential and nonresidential buildings, addressing aspects of building design and operation to minimize energy consumption. Part 11, known as the California Green Building Standards Code (CALGreen), is comprised of provisions for water efficiency, waste management, and construction practice. Both are described in further detail below.

CCR Title 24 is updated every three years to incorporate new energy efficient technologies and construction methods. The most recent approved update is the 2022 California Building Standards Code, which went into effect January 1, 2023.

### *Title 24, Part 6, California Energy Code*

The 2022 Energy Code was approved by the California Energy Commission on August 11, 2021. Buildings whose permit applications are applied for on or after January 1, 2023 (and prior to future updates), such as what would occur with the proposed Project, must comply with the 2022 Energy Code. The 2022 Title 24 standards result in less energy use, thereby reducing air pollutant emissions associated with energy consumption. Title 24 standards require solar ready photovoltaic system roofs and encourages demand responsive technologies for new residential and industrial structures.

### *Title 24, Part 11, California Green Building Standards Code (CALGreen)*

Title 24, Part 11 (CALGreen) focuses on promoting sustainable building practices in California. It outlines mandatory measures for energy efficiency, water conservation, material conservation, and indoor environmental quality in both residential and non-residential construction projects. CALGreen aims to reduce the environmental impact of buildings, enhance occupant health and comfort, and encourage resource efficiency throughout the State's building industry. CALGreen was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The current version of CALGreen is the 2022

California Green Building Standards Code, effective January 1, 2023. The 2022 CALGreen Building Standards Code has been adopted by the City of Riverside by reference of Municipal Code Section 16.07.020, excluding Appendix A4, A5, and A6.1, which were not adopted by the City of Riverside.

## Regional

The SCAQMD is the air pollution control agency for the portion of the SCAB where the Project site is located. The role of the local air district is to protect the people and the environment of the SCAB from the effects of air pollution. SCAQMD shares responsibility with CARB for ensuring that air quality standards are achieved and maintained within the SCAB.

SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. The 2022 AQMP is the most recent and was adopted on December 2, 2022. The 2022 AQMP includes a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures, to meet the following NAAQS:

- 1-hour ozone (120 parts per billion [ppb]) by 2023
- 8-hour ozone (70 ppb) by 2038
- 8-hour ozone (75 ppb) by 2032
- 8-hour ozone (80 ppb) by 2024
- 24-hour PM<sub>2.5</sub> (35 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ]) by 2023
- Annual PM<sub>2.5</sub> (12  $\mu\text{g}/\text{m}^3$ ) by 2025

The SCAQMD establishes a program of rules and regulations to obtain attainment of the State and federal standards along with the AQMP. The rules and regulations applicable to this Project include, but are not limited to, the following:

- **SCAQMD Rule 201** requires any person constructing, altering, or operating equipment that may cause the issuance of air contaminants to first obtain a permit from SCAQMD. This permitting requirement ensures review of potential air quality impacts prior to equipment installation or operation (South Coast Air Quality Management District, 2004).
- **SCAQMD Rule 402** governs emissions of air contaminants or other material which cause injury, determinant, nuisance, or annoyance to any considerable number of persons or to the public. These apply to any odors that would be deemed objectionable to a substantial number of people. This rule does not apply to agricultural operations necessary for the growing of crops or the raising of fowl or animals (South Coast Air Quality Management District, 1976).
- **SCAQMD Rule 403** governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, 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 (South Coast Air Quality Management District, 2005).
- **SCAQMD Rule 445** restricts wood burning devices from being installed into any new development and is intended to reduce the emissions of particulate matter for wood burning devices (South Coast Air Quality Management District, 2020).

- **SCAQMD Rule 461** 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 emissions of VOCs during gasoline transfer operations. Rule 461 establishes equipment, operation, maintenance, testing, and recordkeeping requirements for both storage tanks and dispensing systems to ensure they are vapor tight and liquid tight (South Coast Air Quality Management District, 2022b).
- **SCAQMD Rule 1110.2** governs emissions from stationary internal combustion engines. The rule establishes emission limits for NO<sub>x</sub>, VOCs, and CO, and requires monitoring and testing to demonstrate compliance (South Coast Air Quality Management District, 2019).
- **SCAQMD Rule 1113** allows the use of only Low-Volatile Organic Compounds “(VOC)” paints (no more than 50 grams/liter (g/L) of VOC) (South Coast Air Quality Management District, 2016).
- **SCAQMD Rule 1166** 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 (South Coast Air Quality Management District, 2001).
- **SCAQMD Rule 1470** sets operational hour requirements, stating that new stationary emergency diesel engines shall not operate more than 50 hours a year for maintenance and testing. Additionally, permits for Emergency Generators typically limit total operational hours to less than 200 hours a year (South Coast Air Quality Management District, 2021 a).
- **SCAQMD Rule 2305** 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 to this rule as it applies to warehouses with greater than or equal to 100,000 SF of indoor floor space in any single building (South Coast Air Quality Management District, 2021b).
- **Regulation XIII governs** New Source Review (NSR) for new, relocated, or modified facilities that emit air contaminants. Regulation XIII 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 (South Coast Air Quality Management District , 2020).

## Toxic Air Contaminants

The SCAQMD also requires projects to analyze toxic air contaminants (TACs) and the health risks resulting from them. In the SCAB, SCAQMD has prepared a series on in-depth analysis called the Multiple Air Toxics Exposure Studies (MATES) these include MATES I-V. In these reports, diesel particulate matter (DPM) and other air toxics' relation to cancer risk incidence were analyzed. Reductions of cancer risk incidence of 54% between MATES IV and MATES V can be seen due to the increasingly stringent DPM emission regulations and improved DPM emission control technologies. The MATES V data shows that exposure to TACs in the SCAB increased the chances of developing cancer by 455 chances in one million, with DPM comprising 67.3% of the TACs analyzed in the report (South Coast Air Quality Management District, 2021c).

## 2.3 Significance Thresholds

### Regional Emissions Thresholds

SCAQMD has adopted regional significance thresholds that identified the maximum daily emissions (pounds/day) for the criteria pollutants during construction and operation of a project. While incremental regional air quality impacts of an individual project are generally very small and difficult to measure, SCAQMD's regional maximum emission thresholds set standards to reduce the burden of SCAQMD to attain and maintain ambient air quality standards. Therefore, the adopted thresholds are both project specific and cumulative thresholds. If a project does not exceed the regional thresholds, then the project would be considered to have a less-than-significant project specific and cumulative impact (South Coast Air Quality Management District, 2023b). The regional thresholds are listed in Table 4, *SCAQMD Regional Emission Significance Thresholds*. These thresholds include the Project emissions generated both from on-site sources (such as off-road construction equipment and fugitive dust) and off-site sources (such as vehicle travel to and from the site).

**Table 4: SCAQMD Regional Emissions Significance Thresholds**

Air Pollutant	Maximum Daily Emissions (pounds/day)	
	Construction	Operational
ROGs	75	55
NO <sub>x</sub>	100	55
CO	550	550
SO <sub>2</sub>	150	150
PM <sub>10</sub>	150	150
PM <sub>2.5</sub>	55	55

Source: South Coast Air Quality Management District. (2023). *South Coast AQMD Air Quality Significance Thresholds*. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>

## Localized Significance Thresholds

Localized significance thresholds (LSTs) were also adopted by SCAQMD due to the potential of project-related construction or operational air emissions to exceed the State and national air quality standards in the Project vicinity, while not exceeding the regional emission significance thresholds adopted by the SCAQMD. These thresholds set the maximum rates of daily construction or operational emissions from a project site that would not exceed a national or State ambient air quality standard (South Coast Air Quality Management District, 2023a). The differences between regional thresholds and LSTs are as follows:

- Regional thresholds include all sources of project construction and operational emissions generated from on-site and off-site emission sources whereas the LSTs only consider the emissions generated from on-site emission sources.
- LSTs only apply to CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, while regional thresholds include both ROG and SO<sub>2</sub>.
- Regional thresholds apply to emission sources located anywhere within the SCAQMD whereas the LSTs are location dependent and depend on the size of the project, and emission location relative to the nearest sensitive receptor.

SCAQMD provides screening look up tables in Appendix C of the *SCAQMD Final Localized Significance Threshold Methodology* (South Coast Air Quality Management District, 2008b) for projects that disturb less than or equal to 5 acres in size in a day. These tables were created to easily determine if the daily emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from a project could result in a significant impact to the local air quality. To calculate the area to be disturbed, *The SCAQMD Fact Sheet for Applying CalEEMod to Localized Significance Threshold* (South Coast Air Quality Management District, 2011) was used to calculate the appropriate disturbed area. The thresholds are determined by:

- Source receptor area (SRA), the geographic area within the SCAQMD that can act as both a source of emissions and a receptor of emission impacts (the Project site is located within SRA 23, Metropolitan Riverside);
- Size of the project; and
- Distance to the nearest sensitive receptor, which is defined as an individual who is most susceptible to negative health effects when exposed to air pollutants and includes children, the elderly, and adults with chronic health issues. Locations for such receptors include residences, schools, elderly care centers, and hospitals.

Table 5, *Construction Equipment Modeled in CalEEMod and Acres Disturbed per Day*, shows the amount of grading that would occur during the demolition, site preparation, and grading phases. As can be seen in Table 5, the phase with the most ground disturbance would be the grading phase, with a maximum of 4.0 acres of ground disturbance per day. Distance to the nearest sensitive receptor also determines the emission thresholds. The sensitive receptors closest to the Project site is a shelter, located at 2801 Hulen Place, where individuals can reside for over 24 hours, located 67.3 meters (221 feet) east of the Project's boundary. The construction and operation emission thresholds for 50 meters were used to provide a conservative analysis. Table 6, *Construction Localized Significance Thresholds*, show the thresholds for construction emissions for the proposed Project.

**Table 5: Construction Equipment Modeled in CalEEMod and Acres Disturbed per Day**

Activity	Equipment Type	Equipment Quantity	Operating Hours per Day	Acres Disturbed per Piece of Equipment per Day	Acres Disturbed per Day
Demolition	Concrete/Industrial Saws	1	8	0	0
	Excavators	3	8	0	0
	Rubber Tired Dozers	2	8	0.5	1.0
Total Acres Disturbed Per Day					1.0
Site Preparation	Rubber Tired Dozers	3	8	0.5	1.5
	Crawler Tractors	4	8	0.5	2.0
Total Acres Disturbed Per Day					3.5
Grading	Excavators	2	8	0	0
	Graders	1	8	0.5	0.5
	Rubber Tired Dozers	1	8	0.5	0.5
	Scrapers	2	8	1.0	2.0
	Crawler Tractors	2	8	0.5	1.0
Total Acres Disturbed Per Day					4.0
<b>Maximum Acres Disturbed Per Day</b>					<b>4.0</b>

Source: CalEEMod Output Sheets (Appendix C),

**Table 6: Construction Localized Significance Thresholds**

Air Pollutant	Maximum Daily Emissions (pounds/day)
NO <sub>x</sub>	268
CO	1,872.7
PM <sub>10</sub>	33.3
PM <sub>2.5</sub>	8.7

Source: Localized Significance Threshold Methodology, Appendix C, LST Lookup Tables (South Coast Air Quality Management District, 2008a)

According to the SCAQMD LST methodology, LSTs apply to Project stationary and on-site mobile sources. Projects that involve mobile sources spending long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds. As the Project's site is 10.21-acres, the threshold for 5-acres was utilized to yield a conservative analysis, and again utilizing the 50-meter distance from the nearest sensitive, which is 68 meters east of the Project site's boundary. These thresholds were calculated and are listed below, using the same LST methodology suggested by SCAQMD mentioned above utilizing the 5-acre threshold and 50-meter

distance from nearest receptor. Table 7, *Operational Localized Significance Thresholds*, show the thresholds for operational localized emissions for the proposed Project.

**Table 7: Operational Localized Significance Thresholds**

Air Pollutant	Maximum Daily Emissions (pounds/day)
NO <sub>x</sub>	302
CO	2,178
PM <sub>10</sub>	10
PM <sub>2.5</sub>	3

Source: Localized Significance Threshold Methodology, Appendix C: LST Lookup Tables (South Coast Air Quality Management District, 2008a)

## 2.4 Emissions Modeling Methodology

### California Emissions Estimator Model

As previously described, CalEEMod Version 2022.1 was used to calculate emissions that would be generated by the proposed Project. The model runs for both construction and operational activity are attached (Appendix C and D).

The following non-default model assumptions were incorporated into the analysis:

- Land Use: The lot acreage was adjusted to match the site plan provided by the client.
- Construction Equipment: It was assumed that all equipment would be used for 8 hours per workday. Tractors/loaders/backhoes were replaced with crawler tractors in the site preparation and grading phases.
- Construction Phases: The building construction phase was shortened from 300 days to 200 days, to adhere to the approximately 14-month construction schedule provided by the client. Architectural coating phase was extended from 20 days to 35 days, to account for the size of the building façade.
- Demolition: The demolition of the existing buildings and hardscape is anticipated to amount to 24,902 tons of debris. See Appendix A for demolition calculations.
- Construction Earthmoving Activity: The Project would require 9,043 cubic yards (CY) of material imported during the grading phase. Approximately 500 CY of exported earthwork was included in the site preparation of the Project to conservatively account for potentially contaminated soil.
- Trips and Vehicle Miles Traveled (VMT): The default hauling trip length for the site preparation phase was increased from 20.0 miles to 56 miles to represent the travel distance of the Project to the Soil Safe landfill for contaminated soils in Adelanto, California, as recommended by Riverside County Department of Waste Resources (Riverside County Department of Waste Resources, 2025)
- Operational Trip Rates: The trip rate was adjusted to match the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, auto trip rates for general light industrial land use. Truck trip lengths were obtained from the WAIRE Menu Technical Report Appendix B, Truck Trip Lengths

(South Coast Air Quality Management District, 2021 d). Vehicle splits were obtained using the daily trip total from EPD Solutions' Massachusetts Point VMT Memorandum (EPD Solutions, Inc., 2024). Truck trips were applied to the User Defined Industrial land use in CalEEMod, where two-axle trucks with a 15.3-mile trip length and a trip percentage of 34.50%, were applied to non-residential H-W (home to work trips); three-axle trucks with a 14.2-mile trip length and a trip percentage of 11.11% were applied to non-residential W-O (work to other); and four+ axle trucks with a 40-mile trip length and a trip percentage of 54.39% were applied to non-residential O-O (other to other trips).

- **Operational Fleet Mixes:** For fleet mix, vehicle splits were updated to match the operational trip generation provided by the VMT Memorandum that was prepared for the Project. The User Defined Industrial land use was utilized to analyze 100% of trucks (heavy-heavy duty truck [HHDT], medium-heavy duty trucks [MHDT], and light-heavy duty trucks 1 and 2 [LHDT1 and LHDT2]), and general heavy industrial and refrigerated warehouse land use defaults were utilized with the CalEEMod defaults to analyze 100% passenger vehicles only.
- **Operational Off-Road Equipment:** Assumed one compressed natural gas (CNG) forklift per 10,000 SF of warehouse area will be used for operational purposes, for a total of 20 forklifts (South Coast Air Quality Management District, 2014). The 20 forklifts were assumed to operate for 8 hours a day.
- **Operational Equipment:** Two diesel fire pumps and two diesel emergency generators were assumed for the Project, to provide a conservative estimate. The two fire pumps were assumed to each operate for 1 hour a day and would not exceed 50 hours per year of operating time for testing. The two emergency generators were each assumed to operate for 1 hour a day and would not exceed 200 hours per year of operating time for testing.

## Emission Factors Model

The 2021 version of the Emissions Factor model (EMFAC) web database for use in SIP and transportation conformity analyses was released in January 2021. EMFAC2021 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is used by the CARB. EMFAC2021 is incorporated into CalEEMod Version 2022.1, and thus, included in the modeling that is provided in the appendices.

## 2.5 Project Impacts

### Construction Emissions

Table 8, *Construction Schedule*, lists the Project's proposed estimated construction schedule from the CalEEMod output. Construction of the Project would occur over an approximately 14-month period. The proposed construction equipment list in Table 9, *Construction Equipment Inventory*, was generated from CalEEMod defaults. Table 10, *Construction Vehicle Trips*, is a summary of the worker, vendor, and hauling vehicles used throughout the Project's construction phases. Total hauling trips for demolition, site preparation, and grading phases are featured in Table 9 are calculated off-model and incorporate the anticipated soil import and export trips for the construction of the Project.

**Table 8: Construction Schedule**

Activity	Start Date	End Date	Total Days
Demolition	1/1/2026	1/29/2026	20
Site Preparation	1/30/2026	2/13/2026	10
Grading	2/14/2026	3/28/2026	30
Building Construction	3/29/2026	1/1/2027	200
Paving	1/4/2027	1/29/2027	20
Architectural Coating	2/1/2027	3/19/2027	35

Source: CalEEMod Output Sheets (Appendix C)

**Table 9: Construction Equipment Inventory**

Activity	Equipment	Number per day	Hours per day	Horse-power	Load Factor
Demolition	Concrete/Industrial Saws	1	8	33	0.73
	Excavators	3	8	36	0.38
	Rubber Tired Dozers	2	8	367	0.4
Site Preparation	Rubber Tired Dozers	3	8	367	0.4
	Crawler Tractors	4	8	84	0.37
Grading	Excavators	2	8	36	0.38
	Graders	1	8	148	0.41
	Rubber Tired Dozers	1	8	367	0.4
	Scrapers	2	8	423	0.48
	Crawler Tractors	2	8	87	0.43
Building Construction	Cranes	1	8	367	0.29
	Forklifts	3	8	82	0.2
	Generator Sets	1	8	14	0.74
	Tractors/Loaders/Backhoes	3	8	84	0.37
	Welders	1	8	46	0.45
Paving	Pavers	2	8	81	0.42
	Paving Equipment	2	8	89	0.36
	Rollers	2	8	36	0.38
Architectural Coating	Air Compressors	1	8	37	0.48

Source: CalEEMod Output Sheets (Appendix C)

**Table 10: Construction Vehicle Trips**

Activity	Daily Worker Trips <sup>1</sup>	Daily Vendor Trips <sup>1</sup>	Total Haul Trips <sup>2</sup>
Demolition	15	0	2,223
Site Preparation	18	0	63
Grading	20	0	1,130
Building Construction	84	33	0
Paving	15	0	0
Architectural Coating	17	0	0

Source: CalEEMod Output Sheets (Appendix C)

<sup>1</sup> One-way trips per day.

<sup>2</sup> Total trips over entirety of Project construction phase, total haul trips were calculated off-model based on the import/export volumes to and from the Project site.

The Project's estimated maximum daily regional and localized construction emissions are shown in Table 11, *Regional Construction Emission Estimates*, and Table 12, *Localized Construction Emission Estimates*. As shown in Table 12, the construction of the Project would not exceed the SCAQMD localized emission significance thresholds and would therefore have a less-than-significant localized construction air quality impact. All CalEEMod output sheets can be found in Appendix C and D.

**Table 11: Regional Construction Emission Estimates**

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2026</b>						
Demolition	2.7	44.9	25.6	0.2	24.1	5.4
Site Prep	3.9	35.9	32.2	0.1	8.0	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	32.2	0.2	24.1	5.4
<b>2027</b>						
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
<b>Maximum Daily Emission 2026-2027</b>	<b>54.7</b>	<b>44.9</b>	<b>32.2</b>	<b>0.2</b>	<b>24.1</b>	<b>5.4</b>
SCAQMD Significance Thresholds	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Output Sheets (Appendix C)

**Table 12: Localized Construction Emission Estimates**

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2026</b>				
Demolition	20.7	19.0	17.9	3.4
Site Prep	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
<b>2027</b>				
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
<b>Maximum Daily Emission 2026-2027</b>	<b>34.6</b>	<b>31.0</b>	<b>17.9</b>	<b>4.3</b>
SCAQMD Localized Significance Thresholds	268	1,827.7	33.3	8.7
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Output Sheets (Appendix C)

## Operational Emissions

Long-term operational emissions would be generated resulting from the day-to-day operations, which include:

- Mobile-source emissions: automobiles traveling to and from the Project site.
- Area-source emissions: landscaping maintenance activities and periodic architectural coatings.
- Energy-source emissions: natural gas and electricity consumption.
- Off-Road-source emissions: equipment used during operational activities and maneuvering, including CNG forklifts.
- Stationary-source emissions: stationary combustion sources located on the Project site, including diesel emergency generators and diesel fire pumps.

Based on the Project trip generation, the Project is expected to generate 974 daily trips and a net increase of 487 trips when considering the existing buildings (EPD Solutions, Inc., 2024). The mix of vehicles includes passenger vehicles, light-duty trucks, medium-duty trucks, and heavy-duty trucks, all types of vehicles that would be associated with an industrial project. For the regional analysis of operational emissions, the default vehicle trip distances provided in the CalEEMod model were applied to the Project passenger trips. Heavy

Truck trips utilized the SCAQMD recommended truck trips lengths discussed in Section 2.4, *Emissions Modeling Methodology*. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1 & LHDT2)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle.

The Project’s estimated maximum daily regional operational emissions are shown in Table 13, *Regional Operational Emission Estimates*. As noted in Table 13, *Regional Operational Emissions Estimates*, the operation of the Project would not exceed the SCAQMD regional or localized emission significance thresholds. All CalEEMod output sheets can be found in Appendix C and D.

**Table 13: Regional Operational Emission Estimates**

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	3.3	28.1	42.1	0.3	16.8	4.7
Area	6.2	0.1	8.7	<0.1	0.0	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
<b>Total Project Operational Emissions</b>	<b>11.3</b>	<b>52.4</b>	<b>232.7</b>	<b>0.3</b>	<b>17.2</b>	<b>5.1</b>
Existing Use Operational Emissions	1.9	31.6	65.3	0.4	23.1	6.3
<b>Net New Emissions</b>	<b>9.3</b>	<b>20.8</b>	<b>167.4</b>	<b>&lt;0.1</b>	<b>-6.0</b>	<b>-1.3</b>
SCAQMD Significance Thresholds	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Output Sheets (Appendix C, D)

The Project’s estimated maximum daily localized operational emissions are shown in Table 14, *Localized Operational Emissions Estimates*. As discussed previously in Section 2.3, *Significance Thresholds*, the Project’s site is 10.21-acres, the thresholds for 5-acres were utilized to yield a conservative analysis and utilizing the 50-meter distance from the nearest sensitive receptor, which is 68 meters east of the Project site’s boundary. Additionally, no credit was taken for the existing use. As seen in Table 14, the net operation of the Project would not exceed the SCAQMD regional or localized emission significance thresholds. All CalEEMod output sheets can be found in Appendix C and D.

**Table 14: Localized Operational Emission Estimates**

Operational Activity	Maximum Daily Localized Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile	3.6	6.6	0.2	<0.1
Area	0.1	8.7	<0.1	<0.1
Energy	2.1	1.8	0.2	0.2
Off-Road	17.7	176.2	<0.1	<0.1
Stationary	4.4	4.0	0.2	0.2
<b>Total Project Operational Emissions</b>	<b>27.8</b>	<b>197.3</b>	<b>0.6</b>	<b>0.4</b>
SCAQMD Localized Significance Thresholds	302	2,178	10	3
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Output Sheets (Appendix C, D)

## Toxic Air Contaminants

The construction of the Project would result in short-term diesel particulate matter (DPM) emissions from the use of off-road heavy-duty equipment and medium heavy-duty vendor truck vehicles. DPM is a listed carcinogen and TAC in the State of California. To determine the health risk associated with a project, the two important factors to consider are the dose of the substance and the duration of the exposure. According to the Office of Environmental Health Hazard Assessment (OEHHA), Health Risk Assessments (HRAs) are used to determine the impact of exposure of TAC emissions on sensitive receptors. The period/duration of the assessment is based on a 30-year exposure.

The DPM emissions from construction equipment and mobile emissions would be the most significant TAC emissions on sensitive receptors during the construction and long-term operation of the Project. The HRA prepared for the Project concluded that the maximum cancer risk for a sensitive receptor during construction was 0.63 per million for a 1.21-year exposure, a 5.59 per million maximum cancer risk for operation, and a combined construction and operational cancer risk of 3.82 per million. These would be less than the 10 per million threshold (EPD Solutions, Inc., 2025). Therefore, the construction, operation, and combined construction and operational results of the Project would be presumed to have a less-than-significant impact.

## Air Quality Management Plan Consistency

As described previously, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. Currently, SCAQMD has adopted the 2022 AQMP (South Coast Air Quality Management District, 2022a). The 2022 AQMP is focused on attaining the 2015 8-hour ozone standard of 70 parts per billion. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO<sub>x</sub> technologies in other applications), best management practices, co-benefits from

existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 8-hour ozone standard.

SCAQMD's CEQA Handbook provides the following two criteria to determine whether a project would be in conflict with the AQMP:

- The project would generate population and employment growth that would be inconsistent with Southern California Association of Governments' (SCAG) growth forecasts; or
- The project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG's growth forecasts, and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG's growth projections, which are based, in part, on the general plans of cities located within the SCAG region. Therefore, if the level of housing and employment growth related to a project is consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP.

According to the City's current General Plan, the Project site has a General Plan land use of Industrial (I) and is zoned as Industrial (I)-Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project proposes an amendment to the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings. The proposed zone change also includes modification of the development standards in the IE overlay zone. The General Plan land use designation of Industrial (I) would allow for a maximum floor area ratio (FAR) of 0.6. The proposed Project includes two new industrial buildings – Building 1 would have footprint of 99,900 SF with a FAR of 0.45 and Building 2 would have a footprint of 97,700 SF with a FAR of 0.45. Therefore, the proposed Project is consistent with the land use designation for the site. Additionally, the proposed Project would be consistent with the zoning for the site, with the approval of the change of zone. Thus, the proposed Project would not induce unplanned growth in the area.

Based on employment generation rates listed in Table 3.G of the Riverside County General Plan EIR, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF, implementation of the proposed Project would generate 194 jobs (County of Riverside, 2015). The site's existing use was estimated to accommodate approximately 97 employment opportunities, thus, the Project would result in an increase of 97 additional employment opportunities upon operation. According to the SCAG, employment in the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050 (Southern California Association of Governments, 2024). Based on these growth projections, full buildout of the Project would represent approximately 0.4 percent of projected employment growth within the City of Riverside. Additionally, it is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in the region. Thus, implementation of the Project would not exceed the SCAG's employment growth assumptions. As a result, the proposed Project would be consistent with Consistency Criterion No. 1.

Consistency Criterion No. 2 refers to the California Ambient Air Quality Standards. An impact would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for operation-phase emissions. The quantified air quality emissions analysis shows that the proposed Project would not exceed any air quality standards. Therefore, the proposed project would be consistent with Criterion No. 2.

As the Project would be consistent with both Criterion No. 1 and 2, impacts related to consistency with the AQMP would be less than significant.

## Odors

Odors would be produced during the construction of the Project due to the operation of heavy-duty off-road equipment. The primary odor emitted would be diesel particulate matter (DPM) from the vendor trucks and heavy-duty off-road equipment. This odor may be noticeable by nearby residents; however, these odors would be expected and not necessarily objectionable and would not be a new nuisance to the area as the existing operation is also truck intensive. These odors would also dissipate quickly and would be temporary. Therefore, due to the temporary and non-objectionable to a substantial number of people nature of the odor produced during construction, the odor impact would be less than significant.

For operational odor emissions, the SCAQMD CEQA *Air Quality Handbook* associates the following land uses with odor complaints:

- Agricultural Uses
- Chemical Plants
- Composting Activities
- Dairies
- Fiberglass Molding
- Food Processing Plants
- Landfills
- Refineries
- Wastewater Treatment Plants

The Project does not propose any of the above land uses, would be similar to the existing and surrounding land uses, and is required to comply with SCAQMD Rule 402, Nuisance, which states:

*A person 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. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.*

Thus, impacts associated with odor sources produced by the Project would be less than significant.

## 2.6 Conclusion

The proposed Project's maximum daily regional and localized construction and operational emissions would not exceed SCAQMD's regional thresholds of significance, as detailed in Tables 11 through 14. All construction and operational activities will comply with applicable SCAQMD rules and regulations and not exceed any criteria pollutant thresholds. Additionally, the proposed Project is consistent with SCAQMD'S 2022 AQMP, reflecting adherence to regional air quality management goals and standards.

The following PDF is proposed and would prevent impacts related to operational air quality emissions:

**PDF AQ-1:** 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.

Finally, odors produced during construction would be temporary and not significantly objectionable, and during operation, the proposed Project involves land uses that typically do not generate significant odor complaints and would comply with SCAQMD Rule 402. Therefore, the proposed Project would result in less-than-significant air quality impacts without requiring mitigation.

# 3 ENERGY

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## 3.1 Environmental Setting

The operation of the proposed Project would consume three main sources of energy in the form of electricity, natural gas, and transportation energy resources (gasoline and diesel).

### Electricity

Electricity in the Project area is provided by Riverside Public Utilities (RPU). RPU provides electric power to more than 300,000 customers within its 82 square-mile service area (Riverside Public Utilities, 2025). RPU purchases a mix of renewable sources (solar, wind, hydro, etc.) as well as non-renewable sources (coal, natural gas, nuclear, etc.). The Power Content Label (City of Riverside Riverside Public Utilities, 2023) states that the power mix for RPU as of 2023 is as follows:

- Non-Renewable Sources (53.6%)
- Eligible renewable (46.4%: biomass, biowaste, geothermal, hydroelectricity, solar, wind)

The California Independent Service Operator (ISO) is a nonprofit public benefit corporation that is tasked with the operation of California's power grid and is responsible for maintaining grid reliability. They are also responsible for approving improvements and additions to the power grid required to accommodate the State's electrical needs. The ISO works with other western US states to ensure grid reliability in cases of over and under production within the state. The California Energy Commission (CEC) *Total System Electric Generation* table (City of Riverside Riverside Public Utilities, 2023) shows that the California in-state annual generation was 203,257 GWh and the total import amount is 83,962 GWh, for a total 287,220 GWh of energy for California in 2022.

### Natural Gas

The California Public Utilities Commission (CPUC) serves as the regulator of natural gas for the Southern California Gas Company (SoCalGas), Pacific Gas & Electric, San Diego Gas & Electric (SDG&E), and several smaller and independent utilities and storage operators. The Project area is served by SoCalGas, which serves 21 million customers (Southern California Gas Company, 2022).

Natural gas is provided by both in-state and out-of-state sources, allocated by market supply and demand. The CPUC is tasked with overseeing the purchase and transmission of natural gas, by working with in-state sources and the Federal Energy Regulatory Commission to acquire out-of-state sources through multiple interstate and international pipelines.

According to the *2022 California Gas Report* (California Gas and Electric Utilities, 2022), the 2021 Gas Supply Taken for SoCalGas in billion cubic feet (Bcf) is as follows:

- Core Residential Customers – demand was 224 Bcf
- Core Commercial Customers – demand was 77 Bcf
- Core Industrial Customers – demand was 20.4 Bcf

- Noncore Commercial Customers – demand was 17.4 Bcf
- Noncore Industrial Customers – demand was 48.6 Bcf
- Refinery Industrial Customers – demand was 91.7 Bcf
- Industrial/Commercial/Cogeneration <20 megawatts (MW) – demand was 25.4 Bcf
- Refinery-Related Cogeneration – demand was 23 Bcf
- Enhanced Oil Recovery-Related Cogeneration – demand was 4.1 Bcf
- Electric Generation, Including Large Cogeneration <20 MW – demand was 191 Bcf
- Wholesale/International – demand was 132.6 Bcf

## Transportation Energy Resources

In addition to consuming electricity and natural gas, the construction and operation of the Project would consume fuel for transportation, predominately petroleum (gasoline and diesel fuel). As of January 2024, the Department of Motor Vehicles stated that there were 35.7 million registered vehicles in California (California Department of Motor Vehicles, 2024), which would consume an estimated 17.7 billion gallons of fuel a year (calculated using the EMFAC 2021 projection estimates). Of the 17.7 billion gallons consumed, 14.5 billion gallons are gasoline, and 3.2 billion gallons are diesel fuel.

## 3.2 Regulatory Setting

Energy use and consumption are regulated by federal and State agencies. The federal agencies that impact energy policies and programs include the US Department of Transportation, US Department of Energy, and US Environmental Protection Agency. The State agencies that impact energy policies include the CPUC and California Energy Commission (CEC). The following are energy-related regulations applicable to the proposed Project.

**Title 24, Part 6 (California Energy Code) and Part 11 (CALGreen).** As described above in Section 2.2, [*Air Quality*] *Regulatory Setting*, the Title 24 Building Standards Codes, which include the California Energy Code and CALGreen that make up the California Building Energy Efficiency Standards, are updated every three years to incorporate new energy efficiency methods.

**AB 1493 Pavley Fuel Efficiency Regulations.** California AB 1493 required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. The Pavley standards implement improvements in fuel efficiency intended to result in less fuel consumption, thus reducing GHG emissions.

**City of Riverside Municipal Code Chapter 6.06** The provisions of Chapter 6.06 apply to all businesses, including industrial and commercial facilities, requiring the separation of recyclables, organic materials, and general waste. Businesses are expected to provide adequate waste containers, implement waste diversion practices, and ensure proper training for employees to minimize contamination in recycling and composting streams as to meet the state's diversion goals.

**California Renewable Portfolio Standard.** These standards require retail sellers of electric services to provide 33% of total retail sales of electricity from renewable resources by 2020.

**Clean Energy and Pollution Reduction Act of 2015.** The standards implemented by this Act (SB 350) requires the State to:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 45% by 2027.
- Achieve a 100% clean, zero-carbon electricity grid by 2045, with an interim target of 60% by 2030, in alignment with the goals of SB 100 (2018)
- Double the energy efficiency in existing buildings by 2030.
- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

### 3.3 Assumptions and Thresholds

The State CEQA Guidelines do not have specific thresholds for energy consumption. Rather, the question in Appendix G, VI Energy (a) asks, “[Would the project] Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?” and (b) “[Would the project] Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?” (California Energy Commission, 2023). Therefore, for the purpose of this analysis, a significant impact would occur if:

- a) The project design and/or location encourages wasteful, inefficient, and unnecessary consumption of energy, especially fossil fuels such as coal, natural gas, and petroleum, as well as the use of fuel by vehicles anticipated to travel to and from the project.
- b) The project design impedes the growth of future renewable energy developments.

The following assumptions were used to calculate the energy consumption of the proposed Project:

- Construction equipment fuel consumption derived from ARB Offroad2021 emission model.
- Fuel Consumption from vehicle travel derived from ARB EMFAC2021 emission model.
- Electrical, natural gas, and fuel usage was derived from the CalEEMod model Version 2022.1.

### 3.4 Project Impacts

#### Construction Consumption

##### *Electricity and Natural Gas Usage*

Due to the Project size and the fact that construction is temporary, the electricity used would be substantially less than that required for Project operation and would have a negligible contribution to the Project’s overall energy consumption. The electric power used would be for as-necessary construction tools, lighting, and electronic equipment such as computers used inside temporary construction trailers. Natural gas is not anticipated to be needed for construction activities. Any consumption of natural gas would be minor and negligible in comparison to the operation of the proposed Project.

## *Petroleum Fuel Usage*

The construction equipment associated with construction activities (off-road/heavy duty vehicles) would rely on diesel fuel as would vendor and haul trucks involved in delivering building materials and removing the demolition debris from the Project site. Construction workers would travel to and from the Project site throughout the duration of construction, and for a conservative analysis it is assumed that construction workers would travel in gasoline-powered passenger vehicles.

Table 15, *Construction Equipment Fuel Usage*, used the total fuel consumption and horsepower-hour data contained within the ARB OffRoad2021 emission model for specific types of diesel construction equipment. It should be noted that the total fuel consumption is a conservative analysis and would likely overstate the amount of fuel usage, as specific construction equipment is not expected to operate during the entire duration of the construction activity (i.e., crane) but instead would be more limited in duration and frequency. Table 16, *Estimated Project Construction Vehicle Fuel Usage*, summarizes the Project's construction vehicle fuel usage based on vehicle miles traveled and fuel usage factors contained in the ARB EMFAC2021. The trips included are those from worker vehicles, vendor vehicles, and haul vehicles. Table 17, *Total Construction Fuel Usage*, shows the overall fuel consumption for construction of the proposed Project. Fuel calculations can be found in Appendix B.

**Table 15: Construction Equipment Fuel Usage**

Activity	Phase Duration (Days)	Equipment	Number Per Day	Hours per day	Horse-power	Load Factor	Total Horse power-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Demolition	20	Concrete/Industrial Saws	1	8	33	0.73	3,854	0.04190252	161
		Excavators	3	8	36	0.38	6,566	0.05110175	336
		Rubber Tired Dozers	2	8	367	0.4	46,976	0.04695772	2,206
Site Preparation	10	Rubber Tired Dozers	3	8	367	0.4	35,232	0.046957715	1,654
		Crawler Tractors	4	8	84	0.37	9,946	0.05036589	501
Grading	30	Excavators	2	8	36	0.38	6,566	0.05110175	336
		Graders	1	8	148	0.41	14,563	0.05205489	758
		Rubber Tired Dozers	1	8	367	0.4	35,232	0.04695772	1,654
		Scrapers	2	8	423	0.48	97,459	0.04779533	4,658
		Crawler Tractors	2	8	87	0.43	17,957	0.09054728	1,626
Building	200	Cranes	1	8	367	0.29	170,288	0.05349335	9,109
		Forklifts	3	8	82	0.2	78,720	0.03375829	2,657
		Generator Sets	1	8	14	0.74	16,576	0.09054728	1,501
		Tractors/Loaders/Backhoes	3	8	84	0.37	149,184	0.05163856	7,704
		Welders	1	8	46	0.45	33,120	0.05129285	1,699
Paving	20	Pavers	2	8	81	0.42	10,886	0.05360434	584
		Paving Equipment	2	8	89	0.36	10,253	0.05349335	548
		Rollers	2	8	36	0.38	4,378	0.030686275	134
Architectural Coating	35	Air Compressors	1	8	37	0.48	4,973	0.030686275	153
<b>Total</b>									<b>37,979</b>

Source: Fuel Calculation Sheet (Appendix B), CalEEMod Output Sheets (Appendix C)

**Table 16: Estimated Project Construction Vehicle Fuel Usage**

Construction Source	Total Trips	VMT	Fuel Rate	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Haul Trucks	3,416	141,151	6.35	22,225	0
Vendor Trucks	6,600	136,640	9.07	14,842	0
Worker Vehicles	18,775	694,675	30.92	0	22,470
<b>Total</b>				<b>37,068</b>	<b>15,304</b>

Source: Fuel Calculation Sheet (Appendix B), CalEEMod Output Sheets (Appendix C)

**Table 17: Total Construction Fuel Usage**

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	37,068	22,470
Off-Road Construction Equipment	37,979	0
<b>Total</b>	<b>75,047</b>	<b>22,470</b>

Source: Fuel Calculation Sheet (Appendix B), CalEEMod Output Sheets (Appendix C)

As seen in Table 17, the Project is estimated to consume approximately 22,470 gallons of gasoline and approximately 75,047 gallons of diesel fuel. According to fuel consumption information obtained from EMFAC2021, approximately 500,969,721 gallons of gasoline and 135,661,936 gallons of diesel fuel would be consumed in Riverside County in 2027. Thus, the construction of the Project would marginally increase the annual fuel usage within the county by <0.01% for annual gasoline consumption, and 0.06% for annual diesel consumption. The Project construction would have a negligible effect on local and regional energy supplies within Riverside County.

### *Construction Energy Efficiency*

CARB regulates emissions from construction equipment and the equipment used for Project construction would comply with CARB regulations and California fuel economy/emissions standards, which would be verified through the City's construction permitting process. The Project does not include any unusual construction processes that would require a substantial increased need for energy resources. The construction equipment and methods used by the Project would not be more energy intensive than typical construction activities. The Project would require an estimated 24,902 tons of debris to be removed from the Project site over the demolition phase duration of 20 days. Additionally, this analysis conservatively assumes 500 CY of export during the site preparation phase occurring over 10 days, to account for potentially contaminated soil on the site. Lastly, the Project also would require 9,043 CY of soil import that would occur over 30 days during the grading phase. That import and export of materials is a typical construction use of energy and is not more intensive than typical excavation activities and truck trips that would comply with CARB and SCAQMD Rules. The import of this material would not be wasteful or unnecessary, as it is required for construction of the buildings and loading docks for operational efficiency of energy resources. It would not be inefficient as it would occur during a definitive, and temporary period of construction and in accordance with applicable regulations.

Construction contractors would be required to comply with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that “grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.” In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Idling restrictions and the use of newer engines and equipment would result in less fuel consumption and wasteful or unnecessary consumption of energy would not occur. Overall, Project construction would not result in inefficient, wasteful, or unnecessary consumption of energy.

## Operational Consumption

The operation of the proposed Project would consume electricity, natural gas, and petroleum. The energy consumption is provided in Table 18, *Project Annual Operational Energy Requirements*. Electricity and natural gas consumption were determined by the annual CalEEMod output sheets in Appendix C and the EMFAC fuel rates in Appendix B for all on-road vehicles. The gasoline consumption rates utilize the same assumptions that were used for the worker vehicles, and can be found in Appendix B. The utilization and operation of 20 CNG forklifts, as well as two diesel fire pumps and two emergency generators, were incorporated into the Project’s annual operational energy usage. Similarly to the proposed Project, the existing building’s annual energy consumption of electricity and natural gas was determined using CalEEMod, found in Appendix D, while the EMFAC was utilized to determine annual diesel and gasoline consumption rates of on-road vehicles, which can also be found in Appendix B. As shown in Table 18, the proposed Project is expected to require more electricity, natural gas, gasoline, and diesel fuel than the existing on-site use. However, it would remain consistent with that of similar sized projects, would result in a marginal increase in fuel usage in Riverside County, and would thus not constitute an inefficient use of energy. These fuel rates were also retrieved from EMFAC and can be found in Appendix B.

**Table 18: Project Annual Operational Energy Requirements**

<b>Electricity (Kilowatt-Hours)</b>		
Proposed Project	2,493,702	
Existing Use	955,472	
<b>Natural Gas (Thousands British Thermal Units)</b>		
Proposed Project	7,924,546 <sup>(1)</sup>	
Existing Use	4,288,590	
<b>Petroleum (Gasoline) Consumption</b>		
	Annual VMT	Gallons of Gasoline Fuel
Proposed Project	4,042,423	130,759
Existing Use	2,952,844	95,515
<b>Petroleum (Diesel) Consumption</b>		
	Annual VMT	Gallons of Diesel Fuel <sup>(2)</sup>
Proposed Project	3,568,847	453,441
Existing Use	281,430	35,145
<b>Net Total Energy Use</b>		
	<b>Net Electricity (Kilowatt-Hours)</b>	<b>1,538,230</b>
	<b>Net Natural Gas (Thousands British thermal Units)</b>	<b>3,635,956</b>
	<b>Net Gasoline Consumption (Gallons)</b>	<b>35,244</b>
	<b>Net Diesel Consumption (Gallons)</b>	<b>418,296</b>

Source: Fuel Calculation Sheet (Appendix B), CalEEMod Output Sheets (Appendix C)

<sup>1</sup> Inclusive of the 20 on-site CNG forklifts presumed for the operation of the Project. See Fuel Calculation Sheet (Appendix B).

<sup>2</sup> Inclusive of the two diesel emergency generators and two diesel fire pumps presumed for the operation of the Project. See Fuel Calculation Sheet (Appendix B).

## Future Renewable Energy Developments

The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of proposed Project and comply with all applicable City energy codes. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. In addition, Project design and operation would comply with State Building Energy Efficiency Standards, including appliance efficiency regulations and green building standards. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As such, the Project would not inhibit the use of and would allow for future flexibility relating to renewable energy.

## 3.5 Conclusion

As described above, the Project would not result in significant impacts related to energy. Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than any other development projects in Southern California. Additionally, the Project would comply with regulations implemented that reduce emissions, such as those related to construction vehicle idling.

The Project's energy consumption for construction activities related to redevelopment of the site for new industrial warehousing uses would be permitted to require compliance with existing fuel standards, machinery efficiency standards, and CARB requirements that limit idling of trucks. Through compliance with existing standards, the Project would not result in a fuel demand on a per-development basis that is greater than other similar development projects in Southern California. There are no unusual Project characteristics that would cause the use of construction equipment to be less energy efficient compared with other similar construction sites in other parts of the state. Therefore, the construction and operation of the Project would result in a less-than-significant impact related to inefficient, wasteful, or unnecessary energy use, and no mitigation would be required.

The proposed Project would consume more electricity, natural gas, gasoline, and diesel than the site's existing use than the buildings currently occupying the site. However, the operation of the Project would also be similar to other similarly sized industrial projects within the City. Additionally, the Project would be required to meet the CCR Title 24 energy efficiency standards and comply with all applicable City energy codes, and the Project buildings would be solar ready in compliance with current Title 24 requirements. Therefore, the Project would not inhibit the use of and would allow for future flexibility relating to renewable energy and would result in a less-than-significant impact related to the impediment of future renewable energy development.

# 4 GREENHOUSE GAS EMISSIONS

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## 4.1 Environmental Setting

Gases that trap heat in the atmosphere are often referred to as greenhouse gases (GHGs). GHGs are released into the atmosphere by both natural and anthropogenic activity. The primary GHGs from development projects are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). These GHGs are considered the leading contributors to the increase in global average temperatures observed during the 20th and 21st centuries. In addition, the International Panel on Climate Change (IPCC) recognizes other GHGs that contribute to global warming to a lesser extent are nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (International Panel on Climate Change, 2001). A brief overview of the major GHGs relevant to the development Project are defined below:

- CO<sub>2</sub> is an odorless and colorless GHG that is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include burning of coal, oil, natural gas, and wood.
- CH<sub>4</sub> is reactive with oxidizers, halogens, and other halogen-containing compounds and is released as part of the biological processes. Anthropogenic processes such as growing rice, raising cattle, fossil-fuel combustion, and biomass burning have added to the atmospheric concentration of CH<sub>4</sub>.
- N<sub>2</sub>O is produced by microbial processes in soil and water, fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions. It is used as an aerosol spray propellant in whipped cream cans, in potato chip bags to keep chips fresh, and in rocket engines and race cars.

The CARB compiles GHG inventories for the State of California. Based upon the 2023 GHG inventory data for the 2000-2021 GHG emissions period, California emitted an average 381.3 million metric tons of CO<sub>2</sub> equivalent (MMTCO<sub>2e</sub>) – CO<sub>2</sub> and other GHG emissions converted into CO<sub>2</sub> based on impact on global warming – per year (California Air Resources Board, 2023a).

SCAG prepared a report to analyze and project GHG emissions through 2035 (Southern California Association of Governments, 2012). The last year of historical emissions data available in this report was 2008, where California emissions were 480.9 MMTCO<sub>2e</sub> and SCAG GHG emissions were 230.2 MMTCO<sub>2e</sub>, which equates to 48% of California's GHG emissions. The report projected that by 2020, SCAG would emit 215.8 MMTCO<sub>2e</sub>, a reduction of 6.26%, and using the CARB 2021 GHG inventory data, would comprise 56.6% of California's total GHG emissions (California Air Resources Board, 2023b).

The cumulative effect of GHGs is global climate change that has the potential to cause adverse effects to human health. Increases in the Earth's ambient temperatures are anticipated to result in shifts in weather patterns such as more intense heat waves, greater droughts and wildfires in some areas, and flooding in others. Higher ambient temperatures can cause more heat-related deaths, increase disease survival rates, and result in food shortages from agricultural losses.

## 4.2 Regulatory Setting

### Federal

#### *Clean Air Act*

In 2007, through *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), the United States Supreme Court held that the United States Environmental Protection Agency (USEPA) has authority to regulate GHGs. As such, the United States Supreme Court ruled that the USEPA should be required to regulate CO<sub>2</sub> and other GHGs as pollutants under Section 202(a)(1) of the federal Clean Air Act.

### State

#### *California Assembly Bill 1493 - Pavley*

The California Legislature adopted AB 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. CARB, EPA, and the United States Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

The regulation reduces GHGs from new cars by 34% from 2016 levels by 2025. The regulation improves emissions and fuel economy of gasoline and diesel-powered cars, and provides for zero-emission technologies, such as full battery electric cars, plug-in hybrid electric vehicles (EV), and hydrogen fuel cell cars.

#### *California Executive Order S-3-05 – Statewide Emission Reduction Targets*

Executive Order S-3-05 was signed by Governor Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80% below 1990 levels.

#### *California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)*

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required CARB to develop a Scoping Plan that describes the approach California will take to reduce GHGs. The 2017 Scoping Plan identifies how the State will reach the 2030 climate target to reduce GHG emissions by 40% from 1990 levels and substantially advance toward the 2050 climate goal to reduce GHG emissions by 80% below 1990 levels.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions. The Scoping Plan also relies on the requirements of Senate Bill 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the current GHG reduction goal. In 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflected the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32.

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, the 2022 Scoping Plan advocates for compliance with a local GHG reduction strategy consistent with CEQA Guidelines Section 15183.5.

#### *SB 375 – Sustainable Communities and Climate Protection Act of 2008*

According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.” SB 375 does the following: (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions; (2) aligns planning for transportation and housing; and (3) creates specified incentives for the implementation of the strategies.

#### *Executive Order B-30-15 – 2030 Statewide Emission Reduction Target*

Executive Order B-30-15 established an interim statewide GHG reduction target of 40% below 1990 levels by 2030. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State's 2050 target. According to the Governor's Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

#### *Senate Bill 32 (Chapter 249, Statutes of 2016)*

SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. A related bill that was also approved in 2016,

AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that CARB is not only responsive to the Governor, but also the Legislature.

#### *Executive Order B-55-18 and SB 100*

SB 100 raises California's Renewable Portfolio Standards requirement to 50% renewable resources by December 31, 2026, and to achieve 60% by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total amount sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. Executive Order B-55-18 establishes a carbon neutrality goal for the State of California by 2045 and sets a goal to maintain net negative emissions thereafter.

#### *Title 24, Part 6, California Energy Code*

Title 24 Part 6, the California Energy Code, was adopted to reduce California's energy consumption. Measures that the California Energy Code requires development projects to implement include, but are not limited to, the following:

- **Short-term bicycle parking.** Provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack.
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.
- **Designated parking for clean air vehicles.** Provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Title 24 Part 6 Table 5.106.5.2.
- **Electric vehicle charging stations.** Facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. Additionally, installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment would be required for warehouses, grocery stores, and retail stores.
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight, and glare ratings per Title 24 Part 6 Table 5.106.8.
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste.
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- **Recycling by occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals.
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
- **Water closets.** The effective flush volume of all water closets shall not exceed 1.28 gallons per flush.

- **Urinals.** The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush. The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush.
- **Showerheads.** Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute at 80 psi. When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi.
- **Faucets and fountains.** Non-residential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi. Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 60 psi. Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute. Metering faucets shall not deliver more than 0.20 gallons per cycle. Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle.
- **Outdoor potable water use in landscaped areas.** Non-residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent.
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or where any tenant within a new building or within an addition is projected to consume more than 1,000 gallons per day.
- **Outdoor water use in rehabilitated landscape projects equal to or greater than 2,500 SF.** ~~Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit.~~ Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF require the landscape to comply with water efficiency standards outlined in the California Department of Water Resources' MWELo.
- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building Project to verify that the building systems and components meet the owner's or owner representative's Project requirements.

*Title 24, Part 11, California Green Building Standards Code (CALGreen)*

Title 24, Part 11 (CALGreen) focuses on promoting sustainable building practices in California. It outlines mandatory measures for energy efficiency, water conservation, material conservation, and indoor environmental quality in both residential and non-residential construction projects. CALGreen aims to reduce the environmental impact of buildings, enhance occupant health and comfort, and encourage resource efficiency throughout the state's building industry. CALGreen was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The current version of CALGreen is the 2022 California Green Building Standards Code, effective January 1, 2023.

## Local

### *City of Riverside General Plan*

The City adopted the *2025 General Plan* in November 2007. The 2025 General Plan currently recognizes the need for the City to reduce energy use and GHG emissions (City of Riverside, 2007).

## *Riverside Restorative Growth: Economic Prosperity Action Plan and Climate Action Plan*

The 2016 *Riverside Restorative Growth: Economic Prosperity Action Plan and Climate Action Plan* (CAP) outlines strategies to strengthen the city's economy while addressing climate change. The Economic Prosperity Action Plan focuses on job creation, business development, and sustainable infrastructure improvements. The CAP sets goals to reduce greenhouse gas emissions through energy efficiency, renewable energy, and sustainable transportation. Together, these plans aim to ensure Riverside's growth aligns with environmental sustainability for a resilient and prosperous future.

### 4.3 Significance Thresholds

The SCAQMD Greenhouse Gas Emissions (GHG) CEQA Significance Threshold Working Group has identified GHG emissions thresholds for land use projects in the *SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold* that could be used by lead agencies (Southern California Air Quality Management District, 2010). The Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold.

The City of Riverside utilizes the SCAQMD Air Quality Significance Thresholds document as threshold guidance for TACs, odor, and GHG emissions.

The 10,000 MTCO<sub>2e</sub>/year threshold was developed and recommended by SCAQMD based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (Greenhouse) document and subsequent Working Group meetings, the latest of which occurred in 2010 being Working Group #15. This guidance document established the recommendation that all lead agencies adopt the 10,000 MTCO<sub>2e</sub>/year threshold for industrial projects. SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for greenhouse gas analyses (and where all SCAQMD significance thresholds for regional and local criteria pollutants and TACs are also listed) (South Coast Air Quality Management District, n.d.). The City of Riverside has utilized the SCAQMD 10,000 MTCO<sub>2e</sub> for previous industrial projects within the city; therefore, this analysis utilizes 10,000 MTCO<sub>2e</sub> as the threshold.

### 4.4 Project Impacts

#### Project GHG Emissions

To analyze the GHG impacts of the proposed Project, CalEEMod Version 2022.1 was used. The Project's construction GHG emissions are shown in Table 19, *Project Construction GHG Emissions*, and the overall construction and net operational emissions are shown in Table 20, *Project GHG Emissions*. The CalEEMod outputs are attached in Appendix C and D. The construction emissions are amortized over 30 years pursuant to SCAQMD methodology. Table 19 shows that the Project would emit a total of 850 annual MTCO<sub>2e</sub> over the duration of construction, with 2026 having the highest emission level (826 MTCO<sub>2e</sub>). Amortized over 30 years, the Project's construction emissions would be approximately 28 MTCO<sub>2e</sub> per year.

As shown in Table 21, the amortized construction emissions added to the operational emissions (mobile, area, energy, water, waste, refrigeration, off-road, and stationary sources) would result in a total of 7,241 MTCO<sub>2e</sub>, which would not exceed the SCAQMD adopted GHG threshold of 10,000 MTCO<sub>2e</sub>. The primary source of emissions generated by the proposed Project is mobile emissions, with an annual emission rate of 5,426 MTCO<sub>2e</sub>. The existing operational GHG emissions from the existing buildings were estimated to be 1,785 MTCO<sub>2e</sub>, resulting in a net increase of 5,484 MTCO<sub>2e</sub> per year when taking the existing industrial buildings into consideration. The Project's net and total GHG emission results are both below the SCAQMD significance threshold of 10,000 MTCO<sub>2e</sub> per year.

**Table 19: Project Construction GHG Emissions**

Activity	Annual GHG Emissions (MTCO <sub>2e</sub> )
2026	826
2027	23
<b>Total Emissions</b>	<b>850</b>
Total Emissions Amortized Over 30 Years	28

Source: CalEEMod Output Sheets (Appendix C)

**Table 20: Project GHG Emissions**

Activity	Annual GHG Emissions (MTCO <sub>2e</sub> )
<b>Project Operational Emissions</b>	
Mobile	5,426
Area	4
Energy	921
Water	127
Waste	74
Refrigeration	183
Off-Road	461
Stationary	45
<b>Total Project Gross Operation Emissions</b>	<b>7,241</b>
Amortized Construction Emissions	28
<b>Total Project Emissions</b>	<b>7,269</b>
Existing Emissions	1,785
<b>Net New Emissions</b>	<b>5,484</b>
Significance Threshold	10,000
<b>Threshold Exceeded?</b>	<b>No</b>

Source: CalEEMod Output Sheets

## Project Consistency with 2022 CARB Scoping Plan

As stated previously, in 2016 the City of Riverside adopted the Riverside Restorative Growthprint (RRG), which consisted of a GHG emission inventory for the city and a Climate Action Plan (CAP) which builds on the Western Riverside Council of Governments (WRCOG) Subregional CAP commitments. The CAP includes an inventory of existing 2007 CAP emissions from community-wide operations, which includes residents and businesses within the City, as well as emissions from governmental operations. The CAP also provides community-wide and government operations emissions forecasts for 2020 and 2035 based on growth associated within the City (Western Riverside Council of Governments, 2022). The CAP establishes a reduction goal of approximately 26 percent below 2007 baseline emission levels (3,024,066 MTCO<sub>2e</sub> community-wide, and 122,525 MTCO<sub>2e</sub> for government operations) by 2020 to reach the goals set forth in AB 32 (1990 levels by 2020). While the City's CAP is not a qualified reduction plan as defined by the State CEQA Guidelines, it does propose measures and policies on community-wide and government levels that will support the City's reduction goals. The proposed Project is consistent with the RRG CAP measures are detailed in Table 21, *Riverside Restorative Growthprint CAP Consistency Summary*.

The City of Riverside's General Plan policies related to GHG and the Project's consistency with these actions are featured below in Table 22, *Project Consistency with City General Plan Policies*. These six policies set goals to identify GHG emission activities and reduction measures, which the proposed Project would not interfere with (City of Riverside, 2007).

The 2022 CARB Scoping Plan Update sets the GHG emission reduction target for 2045 at 85% below 1990 levels, which was codified by SB 32. Table 22, *2022 Scoping Plan Consistency Summary*, shows Project consistency with CARB's 2022 Scoping Plan. As seen in Table 22, the Project would be consistent with the 2022 Scoping Plan.

**Table 21: Riverside Restorative Growthprint CAP Consistency Summary**

Goal or Policy	Consistency
<b>Measure T-2: Bicycle Parking.</b> Provide additional options for bicycle parking.	<b>Consistent.</b> The proposed Project would provide bicycle racks and bicycle parking spaces.
<b>Measure T-3: End of Trip Facilities.</b> Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	<b>Consistent.</b> The proposed Project would provide bicycle racks and bicycle parking spaces for commuters to encourage alternative modes of transportation including non-motorized transportation modes.
<b>Measure T-6: Density.</b> Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	<b>Consistent.</b> The Project is located within the City of Riverside, a housing-rich region, 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
<b>Measure T-19: Alternative Fuel &amp; Vehicle Technology and Infrastructure.</b> Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.	<b>Consistent.</b> The proposed Project would provide a total of 42 electric vehicle charging stations (EVCS) (38 EVCS, 2 EVCS Standard Accessible, and 2 EVCS Van Accessible), which will promote the use of electric vehicles by employees and visitors of the site.

Goal or Policy	Consistency
<b>Measure W-1: Water Conservation and Efficiency.</b> Reduce per capita water use by 20% by 2020.	<b>Consistent.</b> Project would be designed and constructed to meet all applicable standards under the City's Municipal Code and CALGreen.
<b>Measure SW-1: Yard Waste Collection.</b> Provide green waste collection bins community-wide.	<b>Consistent.</b> The Project would comply with applicable solid waste requirements from the City and State.
<b>Measure SR-2: 2013 California Building Energy Efficiency Standards (Title 24, Part 6).</b> State's energy efficiency building standards as codified in the Code of Regulations, Title 24, Part 6 (referred to as Title 24).	<b>Consistent.</b> The proposed Project would be designed and constructed to meet all applicable standards under Title 24. The most recent update was the 2022 California Green Building Code Standards that became effective on January 1, 2023.

**Table 22: Project Consistency with City General Plan Policies**

General Plan Goal or Policy	Consistency
<b>Policy AQ-1.10:</b> Encourage job creation in job-poor areas as a means of reducing vehicle miles traveled.	<b>Consistent.</b> The Project is located in the City of Riverside, a housing-rich region, 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.
<b>Policy AQ-1.15:</b> Establish land use patterns that reduce the number and length of motor vehicle trips and promote alternative modes of travel.	<b>Consistent.</b> The Project site is located near an existing bus services, which would allow Project site employees convenient access to transit.
<b>Policy AQ-5.3:</b> Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	<b>Consistent.</b> The Project would comply with the 2022 Title 24, Part 6 building energy including efficiency and renewable energy requirements.
<b>Policy AQ-5.6:</b> Support the use of automated equipment for conditioned facilities to control heating and air conditioning.	<b>Consistent.</b> The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.
<b>Policy AQ-5.7:</b> Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.	<b>Not Applicable.</b> The proposed Project does not propose residential buildings.
<b>Policy AQ-8.17:</b> 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.	<b>Consistent.</b> The proposed Project would comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.

**Table 23: 2022 Scoping Plan Consistency Summary**

Action	Consistency
<b>GHG Emissions Reductions Relative to the SB 32 Target</b>	
40% Below 1990 levels by 2030.	<b>Consistent.</b> 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.
<b>Smart Growth/Vehicle Miles Traveled VMT</b>	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	<b>Consistent.</b> 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.
<b>Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)</b>	
100% of LDV sales are ZEV by 2035.	<b>Consistent.</b> 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 would require truck manufacturers to transition from diesel trucks to zero emission trucks. Additionally, the Project would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes constructing infrastructure to allow for electric vehicle charging.
<b>Truck ZEVs</b>	
100% of medium- and heavy-duty vehicle (MHDV) sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	<b>Consistent.</b> 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. Additionally the Project, would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes constructing infrastructure to allow for electric vehicle charging.
<b>Aviation</b>	
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	<b>Not Applicable.</b> The proposed Project would not utilize aviation fuel.

Action	Consistency
aviation fuel demand that has not already transitioned to hydrogen or batteries.	
<b>Ocean-Going Vessels (OGV)</b>	
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.	<b>Not Applicable.</b> The proposed Project would not utilize any OGVs.
<b>Port Operations</b>	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	<b>Not Applicable.</b> The proposed Project would not directly impact operations at the closest major port (Port of Long Beach).
<b>Freight and Passenger Rail</b>	
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.	<b>Not Applicable.</b> The proposed Project would not involve any freight or passenger rail operations.
<b>Oil and Gas Extraction</b>	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	<b>Not Applicable.</b> The proposed Project would not involve oil and gas extraction operations.
<b>Petroleum Refining</b>	
Carbon capture and sequestration (CCS) on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	<b>Not Applicable.</b> The proposed Project would not involve any petroleum refining.
<b>Electricity Generation</b>	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO <sub>2e</sub> ) in 2030 and 30 MMTCO <sub>2e</sub> in 2035. Retail sales load coverage 13420 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	<b>Not Applicable.</b> The Project would not generate electricity.
<b>New Residential and Commercial Buildings</b>	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	<b>Consistent.</b> The Project would comply with the 2022 Title 24, Section 6 Building Codes energy requirements, including installing electrical wiring for all built in appliances.
<b>Existing Residential Buildings</b>	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035.	<b>Not Applicable.</b> The proposed Project would not involve any existing residential buildings.

Action	Consistency
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.	
<b>Existing Commercial Buildings</b>	
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.	<b>Consistent.</b> 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.
<b>Food Products</b>	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	<b>Consistent.</b> The Project would potentially include up to 20% of the total building area for cold storage (which was conservatively included in this analysis), 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.
<b>Construction Equipment</b>	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	<b>Consistent.</b> 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.
<b>Chemicals and Allied Products; Pulp and Paper</b>	
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.	<b>Consistent.</b> 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.
<b>Stone, Clay, Glass, and Cement</b>	
CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	<b>Consistent.</b> 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.
<b>Other Industrial Manufacturing</b>	

Action	Consistency
0% energy demand electrified by 2030 and 50% by 2045.	<b>Consistent.</b> The proposed Project is a speculative industrial building that could potentially 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.
<b>Combined Heat and Power</b>	
Facilities retire by 2040.	<b>Not Applicable.</b> The proposed Project would not involve any existing combined heat and power facilities.
<b>Agriculture Energy Use</b>	
25% energy demand electrified by 2030 and 75% by 2045.	<b>Not Applicable.</b> The proposed Project would not involve any agricultural uses.
<b>Low Carbon Fuels for Transportation</b>	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	<b>Not Applicable.</b> The proposed Project would not involve any production of biofuels.
<b>Low Carbon Fuels for Buildings and Industry</b>	
<p>In 2030s, biomethane 135 blended in pipeline.</p> <p>Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040.</p> <p>In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.</p>	<b>Not Applicable.</b> The proposed Project would not involve any production of fuels for buildings and/or industry.
<b>Non-Combustion Methane Emissions</b>	
<p>Increase landfill and dairy digester methane capture.</p> <p>Some alternative manure management deployed for smaller dairies.</p> <p>Moderate adoption of enteric strategies by 2030.</p> <p>Divert 75% of organic waste from landfills by 2025.</p> <p>Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.</p>	<b>Not Applicable.</b> The proposed Project would not involve any production of non-combustion methane emissions or organic waste.
<b>High Global Warming Potential (GWP) Emissions</b>	
Low GWP refrigerants introduced as building electrification increases, mitigating hydrofluorocarbon (HFC) emissions.	<b>Consistent.</b> 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.

Source: California's 2022 Climate Change Scoping Plan Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory Sectors

## 4.5 Conclusion

The Project is consistent with the actions and measures of the City's General Plan and the CARB 2022 Scoping Plan and would not interfere with the policies and goals set within those plans. Additionally, the proposed Project's GHG emissions of 7,269 MTCO<sub>2e</sub> per year and a net increase in emissions of 5,484 MTCO<sub>2e</sub> per year are both below the SCAQMD significance threshold of 10,000 MTCO<sub>2e</sub> per year. Therefore, the Project would have a less-than-significant impact related to GHG emissions.

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*APPENDIX A – DEMO CALCULATIONS*

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# Massachusetts Riverside

## Estimates of Demolition Debris

### Building Demolition

Building	Height(ft)	Area (ft2)	Volume (ft3)	Demo Building Volume (cy)			
1	20	93444	1868880	22842			
2	25	6406	160150	1957	5'5"	0.416667	5.42
					3.5		18.97 ft
<b>Total</b>		<b>99850</b>	<b>2029030</b>	<b>24799</b>			

Weight of the Building Demolition Debris (ton/cy): 0.5

**Total Weight of Building Debris 12400 tons**

Note 1: Total square footage of existing school buildings contained in the project description  
 Note 2: FEMA Debris Estimating Field Guide, FEMA 329. September 2010  
 Note 3: CalEEMod User Guide

Front Building:	54219	
Back ones	39225	
Tall Back	6406	
Existing Building	99850 SF	10.21
Existing Hardscape	344899.379	7.92
		2.29

### Hardscape Demolition

Weight of Hardscape 145 lb/ft3

Area	Height (ft)	Area (ft2)	Volume (cf)	Weight (lbs)	Weight (tons)
1	0.5	344899.379	172450	25005205	12503
2	0	0	0	0	0
3	0	0	0	0	0
<b>Total</b>		<b>344899.379</b>	<b>172450</b>	<b>25005205</b>	<b>12503 tons</b>

**Total Demolition Weight 24902 tons**

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APPENDIX B – FUEL CALCULATIONS

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Model Output: OFFROAD2021 (v1.0.9) Emissions Inventory

Updated: 1.28.25

Region Type: Sub-Area

Region: Riverside (SC)

Calendar Year: 2026

<- Construction Start Year

Scenario: All Adopted Rules - Exhaust

Vehicle Classification: OFFROAD2021 Equipment Types

Units: tons/day for Emissions, gallons/year for Fuel, hours/year for Activity, Horsepower-hours/year for Horsepower-hours

Region	Calendar Year	VehClass	MdlYr	HP_Bin	Fuel	gallons/year Fuel Consumption	hp-hr/years Horsepower Hours	Fuel Rate
Riverside (SC)	2026	Construction and Mining - Rubber Tired Dozers	Aggregate	Aggregate	Diesel	145195.8007	3092054.186	0.046957715
Riverside (SC)	2026	Construction and Mining - Tractors/Loaders/Backhoes	Aggregate	Aggregate	Diesel	3921789.209	73313578.04	0.053493354
Riverside (SC)	2026	Construction and Mining - Graders	Aggregate	Aggregate	Diesel	590014.3749	11334466.21	0.052054888
Riverside (SC)	2026	Construction and Mining - Excavators	Aggregate	Aggregate	Diesel	3966491.274	77619473.32	0.051101755
Riverside (SC)	2026	Construction and Mining - Scrapers	Aggregate	Aggregate	Diesel	1510799.89	31609777.42	0.047795335
Riverside (SC)	2026	Industrial - Forklifts	Aggregate	Aggregate	Diesel	295688.1019	5530024.49	0.053469583
Riverside (SC)	2026	Light Commercial - Misc - Generator Sets	Aggregate	Aggregate	Diesel	165003.2177	1822288.05	0.090547275
Riverside (SC)	2026	Construction and Mining - Cranes	Aggregate	Aggregate	Diesel	457832.6905	8435601.804	0.054273862
Riverside (SC)	2026	Light Commercial - Misc - Welders	Aggregate	Aggregate	Diesel	1.68E+05	4976556	0.033758286
Riverside (SC)	2026	Construction and Mining - Pavers	Aggregate	Aggregate	Diesel	256924.835	4975445.09	0.051638563
Riverside (SC)	2026	Construction and Mining - Paving Equipment	Aggregate	Aggregate	Diesel	284636.2109	5549237.545	0.05129285
Riverside (SC)	2026	Construction and Mining - Rollers	Aggregate	Aggregate	Diesel	691357.3788	12897415.4	0.053604335
Riverside (SC)	2026	Light Commercial - Misc - Air Compressors	Aggregate	Aggregate	Diesel	3.13E+04	1.02E+06	0.030686275
Riverside (SC)	2026	Construction and Mining - Misc - Concrete/Industrial Saws	Aggregate	Aggregate	Diesel	1811.93	43241.55	0.041902522
Riverside (SC)	2026	Construction and Mining - Crawler Tractors	Aggregate	Aggregate	Diesel	1249738.473	24813191.05	0.050365891
Riverside (SC)	2026	Construction and Mining - Off-Highway Trucks	Aggregate	Aggregate	Diesel	1646158.204	33940558.14	0.048501212
Riverside (SC)	2026	Light Commercial - Misc - Pumps	Aggregate	Aggregate	Diesel	90314.13107	1066354.8	0.08469426

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Sub-Area

Region: Riverside (SC)

Calendar Year: 2027

2026 Construction start year

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVM Calendar Year

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	VMT	Fuel Consumption	Fuel Rate
Riverside (SC)	2027	MHDT	Aggregate	Aggregate	Diesel	580928.627	64.04015234	9.07
Riverside (SC)	2027	HHDT	Aggregate	Aggregate	Diesel	2023648.424	318.6419902	6.35
Riverside (SC)	2027	LHDT1	Aggregate	Aggregate	Diesel	526713.4197	25.29557179	20.82
Riverside (SC)	2027	LHDT2	Aggregate	Aggregate	Diesel	241624.1987	13.88203265	17.41

Average MGP From Vehicle Splits

8.007699695

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Sub-Area

Region: Riverside (SC)

Calendar Year: 2027

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	VMT	Fuel Consumption	Fuel Rate
Riverside (SC)	2027	LDA	Aggregate	Aggregate	Gasoline	20354484.89	646.3182298	31.49
Riverside (SC)	2027	LDT1	Aggregate	Aggregate	Gasoline	1456606.871	56.00411545	26.01
Riverside (SC)	2027	LDT2	Aggregate	Aggregate	Gasoline	9414153.484	360.272054	26.13
Riverside (SC)	2027	MCY	Aggregate	Aggregate	Gasoline	135933.3741	3.223711537	42.17

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APPENDIX C – PROPOSED CALEEMOD OUTPUT SHEETS

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# 24-113 Massachusetts Riverside Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	24-113 Massachusetts Riverside
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.20
Precipitation (days)	14.2
Location	33.98719479573735, -117.35639090186527
County	Riverside-South Coast
City	Riverside
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5400
EDFZ	11
Electric Utility	City of Riverside
Gas Utility	Southern California Gas
App Version	2022.1.1.30

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	160	1000sqft	4.88	159,880	52,534	—	—	—

Parking Lot	261	Space	2.35	0.00	0.00	—	—	—
Other Asphalt Surfaces	2.07	Acre	2.07	0.00	0.00	—	—	—
User Defined Industrial	200	User Defined Unit	0.00	0.00	0.00	—	—	—
Refrigerated Warehouse-No Rail	40.0	1000sqft	0.92	39,970	0.00	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	1.53	12.1	20.4	0.03	1.80	0.73	4,848
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	54.7	44.9	32.2	0.18	24.1	5.40	25,739
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	5.32	12.8	15.2	0.04	2.93	1.02	4,991
Annual (Max)	—	—	—	—	—	—	—
Unmit.	0.97	2.33	2.78	0.01	0.53	0.19	826
Exceeds (Daily Max)	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	150	55.0	—
Unmit.	No	No	No	No	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	150	55.0	—

Unmit.	No	No	No	No	No	No	—
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## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—
2026	1.53	12.1	20.4	0.03	1.80	0.73	4,848
Daily - Winter (Max)	—	—	—	—	—	—	—
2026	3.91	44.9	32.2	0.18	24.1	5.40	25,739
2027	54.7	11.6	18.6	0.03	1.76	0.68	4,709
Average Daily	—	—	—	—	—	—	—
2026	1.36	12.8	15.2	0.04	2.93	1.02	4,991
2027	5.32	0.52	0.85	< 0.005	0.05	0.03	141
Annual	—	—	—	—	—	—	—
2026	0.25	2.33	2.78	0.01	0.53	0.19	826
2027	0.97	0.09	0.16	< 0.005	0.01	< 0.005	23.3

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	11.3	51.1	233	0.33	17.2	5.09	45,947
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	9.70	52.3	218	0.32	17.1	5.08	45,239
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	9.65	44.7	172	0.32	16.9	4.91	43,735
Annual (Max)	—	—	—	—	—	—	—
Unmit.	1.76	8.16	31.3	0.06	3.08	0.90	7,241

Exceeds (Daily Max)	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	150	55.0	—
Unmit.	No	No	No	No	No	No	—
Exceeds (Average Daily)	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	150	55.0	—
Unmit.	No	No	No	No	No	No	—
Exceeds (Annual)	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	Yes

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Mobile	3.35	26.9	42.1	0.30	16.8	4.69	33,325
Area	6.24	0.07	8.69	< 0.005	0.02	0.01	35.9
Energy	0.12	2.13	1.79	0.01	0.16	0.16	5,560
Water	—	—	—	—	—	—	765
Waste	—	—	—	—	—	—	445
Refrig.	—	—	—	—	—	—	1,107
Off-Road	0.00	17.7	176	0.00	0.00	0.00	3,907
Stationary	1.56	4.37	3.98	0.01	0.23	0.23	802
Total	11.3	51.1	233	0.33	17.2	5.09	45,947
Daily, Winter (Max)	—	—	—	—	—	—	—
Mobile	3.21	28.1	35.9	0.30	16.8	4.69	32,653
Area	4.81	—	—	—	—	—	—
Energy	0.12	2.13	1.79	0.01	0.16	0.16	5,560

Water	—	—	—	—	—	—	765
Waste	—	—	—	—	—	—	445
Refrig.	—	—	—	—	—	—	1,107
Off-Road	0.00	17.7	176	0.00	0.00	0.00	3,907
Stationary	1.56	4.37	3.98	0.01	0.23	0.23	802
Total	9.70	52.3	218	0.32	17.1	5.08	45,239
Average Daily	—	—	—	—	—	—	—
Mobile	3.20	28.5	37.0	0.30	16.6	4.66	32,776
Area	5.79	0.05	5.95	< 0.005	0.01	0.01	24.6
Energy	0.12	2.13	1.79	0.01	0.16	0.16	5,560
Water	—	—	—	—	—	—	765
Waste	—	—	—	—	—	—	445
Refrig.	—	—	—	—	—	—	1,107
Off-Road	0.00	12.6	126	0.00	0.00	0.00	2,783
Stationary	0.53	1.50	1.36	< 0.005	0.08	0.08	275
Total	9.65	44.7	172	0.32	16.9	4.91	43,735
Annual	—	—	—	—	—	—	—
Mobile	0.58	5.20	6.74	0.05	3.03	0.85	5,426
Area	1.06	0.01	1.09	< 0.005	< 0.005	< 0.005	4.07
Energy	0.02	0.39	0.33	< 0.005	0.03	0.03	921
Water	—	—	—	—	—	—	127
Waste	—	—	—	—	—	—	73.6
Refrig.	—	—	—	—	—	—	183
Off-Road	0.00	2.30	22.9	0.00	0.00	0.00	461
Stationary	0.10	0.27	0.25	< 0.005	0.01	0.01	45.5
Total	1.76	8.16	31.3	0.06	3.08	0.90	7,241

### 3. Construction Emissions Details

## 3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	2.29	20.7	19.0	0.03	0.84	0.78	3,438
Demolition	—	—	—	—	17.1	2.58	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.13	1.13	1.04	< 0.005	0.05	0.04	188
Demolition	—	—	—	—	0.93	0.14	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.21	0.19	< 0.005	0.01	0.01	31.2
Demolition	—	—	—	—	0.17	0.03	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.07	0.82	0.00	0.20	0.05	193
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.32	24.2	5.79	0.14	6.05	1.99	22,108
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.01	< 0.005	10.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	1.33	0.31	0.01	0.33	0.11	1,212
Annual	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	1.77
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.24	0.06	< 0.005	0.06	0.02	201

### 3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	3.83	34.6	31.0	0.05	1.77	1.62	5,551
Dust From Material Movement	—	—	—	—	5.66	2.69	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.95	0.85	< 0.005	0.05	0.04	152
Dust From Material Movement	—	—	—	—	0.16	0.07	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.17	0.16	< 0.005	0.01	0.01	25.2
Dust From Material Movement	—	—	—	—	0.03	0.01	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.07	0.08	0.95	0.00	0.23	0.05	225
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.01	1.20	0.21	0.01	0.34	0.11	1,234
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.01	< 0.005	6.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	33.8
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	5.60

### 3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	3.39	30.0	28.7	0.06	1.38	1.27	6,738
Dust From Material Movement	—	—	—	—	2.67	0.98	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.28	2.46	2.36	0.01	0.11	0.10	554
Dust From Material Movement	—	—	—	—	0.22	0.08	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.45	0.43	< 0.005	0.02	0.02	91.7
Dust From Material Movement	—	—	—	—	0.04	0.01	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.08	0.09	1.09	0.00	0.26	0.06	257
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.93	0.70	0.02	0.73	0.24	2,677
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.09	0.00	0.02	< 0.005	21.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.24	0.06	< 0.005	0.06	0.02	220
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	3.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.04	0.01	< 0.005	0.01	< 0.005	36.5

### 3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	1.16	10.7	14.1	0.03	0.41	0.38	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	1.16	10.7	14.1	0.03	0.41	0.38	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.63	5.81	7.65	0.01	0.22	0.20	1,436

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.11	1.06	1.40	< 0.005	0.04	0.04	238
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	0.36	0.33	6.03	0.00	1.10	0.26	1,175
Vendor	0.02	1.05	0.33	0.01	0.29	0.09	1,035
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.33	0.37	4.57	0.00	1.10	0.26	1,077
Vendor	0.02	1.10	0.34	0.01	0.29	0.09	1,033
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.18	0.22	2.60	0.00	0.59	0.14	594
Vendor	0.01	0.60	0.18	< 0.005	0.16	0.05	562
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	0.03	0.04	0.47	0.00	0.11	0.03	98.4
Vendor	< 0.005	0.11	0.03	< 0.005	0.03	0.01	93.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—

Off-Road Equipment	1.11	10.2	14.0	0.03	0.36	0.34	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.03	< 0.005	< 0.005	< 0.005	5.16
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.85
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.32	0.33	4.21	0.00	1.10	0.26	1,057
Vendor	0.02	1.06	0.33	0.01	0.29	0.09	1,013
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	2.10
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.98
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.35
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.33
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.11. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.74	6.94	9.95	0.01	0.30	0.27	1,516
Paving	0.58	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.38	0.55	< 0.005	0.02	0.02	83.1
Paving	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.10	< 0.005	< 0.005	< 0.005	13.8
Paving	0.01	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.06	0.75	0.00	0.20	0.05	189
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.01	< 0.005	10.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	1.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.13. Architectural Coating (2027) - Unmitigated

## Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	0.15	1.11	1.50	< 0.005	0.03	0.02	179
Architectural Coatings	54.5	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.11	0.14	< 0.005	< 0.005	< 0.005	17.1
Architectural Coatings	5.22	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.03	< 0.005	< 0.005	< 0.005	2.84
Architectural Coatings	0.95	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	0.06	0.07	0.84	0.00	0.22	0.05	211
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.02	< 0.005	20.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	3.40

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
General Heavy Industry	2.01	1.24	26.8	0.06	6.19	1.58	6,285
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.78	25.0	8.79	0.23	8.98	2.70	25,218
Refrigerated Warehouse-No Rail	0.56	0.66	6.44	0.02	1.58	0.41	1,823
Total	3.35	26.9	42.1	0.30	16.8	4.69	33,325
Daily, Winter (Max)	—	—	—	—	—	—	—
General Heavy Industry	1.93	1.37	21.8	0.06	6.19	1.58	5,793
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.76	26.1	8.81	0.23	8.98	2.70	25,152
Refrigerated Warehouse-No Rail	0.53	0.71	5.28	0.02	1.58	0.41	1,708

Total	3.21	28.1	35.9	0.30	16.8	4.69	32,653
Annual	—	—	—	—	—	—	—
General Heavy Industry	0.35	0.26	4.14	0.01	1.12	0.29	972
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.14	4.80	1.60	0.04	1.63	0.49	4,169
Refrigerated Warehouse-No Rail	0.10	0.13	1.00	< 0.005	0.29	0.07	286
Total	0.58	5.20	6.74	0.05	3.03	0.85	5,426

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	1,849
Parking Lot	—	—	—	—	—	—	108
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	1,056
Total	—	—	—	—	—	—	3,013
Daily, Winter (Max)	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	1,849

Parking Lot	—	—	—	—	—	—	108
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	1,056
Total	—	—	—	—	—	—	3,013
Annual	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	306
Parking Lot	—	—	—	—	—	—	17.9
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	175
Total	—	—	—	—	—	—	499

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
General Heavy Industry	0.10	1.84	1.55	0.01	0.14	0.14	2,207
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Refrigerated Warehouse-No Rail	0.02	0.28	0.24	< 0.005	0.02	0.02	340
Total	0.12	2.13	1.79	0.01	0.16	0.16	2,547
Daily, Winter (Max)	—	—	—	—	—	—	—
General Heavy Industry	0.10	1.84	1.55	0.01	0.14	0.14	2,207
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Refrigerated Warehouse-No Rail	0.02	0.28	0.24	< 0.005	0.02	0.02	340
Total	0.12	2.13	1.79	0.01	0.16	0.16	2,547
Annual	—	—	—	—	—	—	—
General Heavy Industry	0.02	0.34	0.28	< 0.005	0.03	0.03	365
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Refrigerated Warehouse-No Rail	< 0.005	0.05	0.04	< 0.005	< 0.005	< 0.005	56.3
Total	0.02	0.39	0.33	< 0.005	0.03	0.03	422

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Consumer Products	4.29	—	—	—	—	—	—
Architectural Coatings	0.52	—	—	—	—	—	—
Landscape Equipment	1.43	0.07	8.69	< 0.005	0.02	0.01	35.9
Total	6.24	0.07	8.69	< 0.005	0.02	0.01	35.9
Daily, Winter (Max)	—	—	—	—	—	—	—
Consumer Products	4.29	—	—	—	—	—	—
Architectural Coatings	0.52	—	—	—	—	—	—
Total	4.81	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Consumer Products	0.78	—	—	—	—	—	—
Architectural Coatings	0.10	—	—	—	—	—	—
Landscape Equipment	0.18	0.01	1.09	< 0.005	< 0.005	< 0.005	4.07
Total	1.06	0.01	1.09	< 0.005	< 0.005	< 0.005	4.07

## 4.4. Water Emissions by Land Use

### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	613
Parking Lot	—	—	—	—	—	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	152
Total	—	—	—	—	—	—	765

Daily, Winter (Max)	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	613
Parking Lot	—	—	—	—	—	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	152
Total	—	—	—	—	—	—	765
Annual	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	102
Parking Lot	—	—	—	—	—	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00
Refrigerated Warehouse-No Rail	—	—	—	—	—	—	25.2
Total	—	—	—	—	—	—	127

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
General Heavy Industry	—	—	—	—	—	—	374
Parking Lot	—	—	—	—	—	—	0.00