



NOTICE OF PREPARATION AND EIR SCOPING MEETING

DATE: March 22, 2019

TO: Reviewing Agencies and State Clearinghouse

FROM: City of Norco

SUBJECT: Notice of Preparation of an Environmental Impact Report for the Palomino Business Park Project

NOTICE IS HEREBY GIVEN that the City of Norco is the Lead Agency responsible for preparing an Environmental Impact Report (EIR) to evaluate the potential environmental impacts of the proposed Palomino Business Park project (Project). The purpose of this Notice of Preparation (NOP) is to solicit input from those public agencies as to the scope and content of the environmental information to be included in the EIR (Ref: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375). As specified by the CEQA Guidelines, the NOP will be circulated for a 30-day public review period. In order to identify environmental issues that may be associated with approval and development of the proposed project, an Initial Study was prepared pursuant to the requirements of CEQA and is also provided for public review.

The City welcomes input from agencies during this period regarding the scope and content of information to be included and analyzed in the EIR. Agencies should comment on the elements of the environmental information that are relevant to their statutory responsibility in connection with the project.

REVIEW PERIOD: The public comment period is from **March 22, 2019 to April 22, 2019**. Please send all written responses, referencing the "Palomino Business Park EIR" and include any comments you may have **by 4 p.m. on Monday, April 22, 2019** to:

Steve King, Planner Director
City of Norco Planning Department
2870 Clark Avenue
Norco, CA 92860
Email: sking@ci.norco.ca.us

Please include the name and email address of a contact person at your agency along with any submitted comments.

Copies of the NOP and Initial Study are available for review online at www.norco.ca.us and at the following locations:

Norco City Hall, City Clerk's Office
2870 Clark Avenue
Norco, CA 92860

Norco Community Library
3240 Hamner Avenue, Suite 101B
Norco, CA 92860

Norco Fire Station #47
3902 Hillside Avenue
Norco, CA 92860

Norco Senior Center
2690 Clark Avenue
Norco, CA 92860

PROJECT LOCATION / DESCRIPTION: The Palomino Business Park Project site is located in southwestern Riverside County within the southwestern portion of the City of Norco. The Project site encompasses approximately 103 acres and is located south of Second Street, east of Pacific Avenue, generally north of First Street and either west of and bisected by Mountain Avenue. Additionally, the site is located within the Corona North USGS 7.5-Minute Quadrangle; Section 13, Township 3 South, Range 7 West, San Bernardino Baseline and Meridian. A vicinity map is provided in Figure 1, Local Vicinity.

The Palomino Business Park Project would redevelop approximately 103 acres of land within the City of Norco for a new business park that would provide industrial, commercial, and office uses. The Project would provide 26 industrial buildings and 3 commercial buildings that would include commercial and office uses. The Project includes construction of approximately 1,900,000 square feet of new building space and related on- and offsite improvements. Implementation of the Project would include demolition of 36 existing single-family residences, industrial warehouse buildings, related improvements, and building remnants (e.g., foundations, etc.) from previous uses. The Project would be implemented in one development phase.

A 97.4-acre portion of the 103-acre Project site is located within the City of Norco Gateway Specific Plan. The Project includes an amendment to the Gateway Specific Plan to amend the parking standards for warehouse uses. In addition, the Project includes: a Conditional Use Permit (CUP), a Tentative Tract Map (TTM), Site Plan Review, and a Development Agreement.

Project Applicant: CapRock Acquisitions, 1300 Dove Street, Suite 200, Newport Beach, CA 92660

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: As identified through the analysis presented in the Initial Study, it is anticipated that no significant impacts associated with Agriculture and Forest Resources, Mineral Resources, Population and Housing, Recreation, and Wildfire would occur as a result of the Project, and therefore these topic areas will not be evaluated further in the EIR.

The following environmental factors may be affected by this project and these topic areas will be evaluated in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

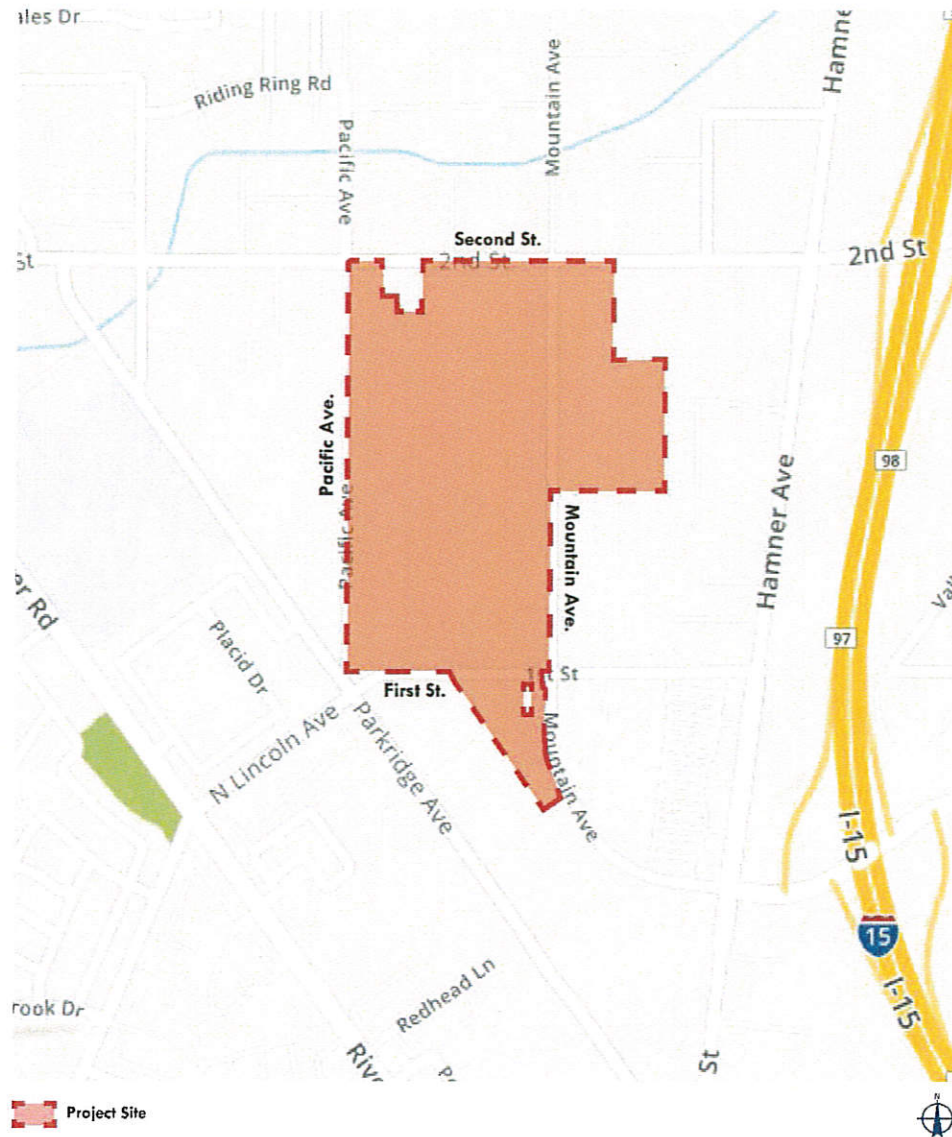
The Initial Study provides additional information regarding the scope of the topical areas to be addressed in the EIR.

Pursuant to Section 15082(a) of the CEQA Guidelines, the City will be the Lead Agency and will prepare an EIR for the project described above. This NOP has been prepared to solicit comments from agencies, organizations, and other interested parties on the proposed Project.

SCOPING MEETING: The City will hold an Agency Scoping Meeting for the EIR to describe the proposed Project, the environmental process, and to receive input on the scope and content of the EIR in conformance with Section 21083.9 of the Public Resources Code. The Scoping Meeting is scheduled for **April 18, 2019 at 10 a.m. at Norco City Hall in Conference Rooms A and B**. The City encourages all agencies to attend the meeting.

Figure 1

Local Vicinity



PALOMINO BUSINESS PARK

INITIAL STUDY



Lead Agency:

City of Norco
2870 Clark Avenue,
Norco, CA 92860

Project Sponsor:

CapRock Acquisitions
1300 Dove Street, Suite 200
Newport Beach, CA 92660

March 22, 2019

E | P | D SOLUTIONS, INC.

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ACRONYM LIST

A-1-20	Agricultural – Low Density 20,000 square feet
A-P	Alquist-Priolo Earthquake Fault Zoning Act
AQMP	Air Quality Management Plan
AB	Assembly Bill
APN	Assessor's Parcel Numbers
BMPs	Best Management Practices
CARB	California Air Resources Board
CBC	California Building Code
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CUP	Conditional Use Permit
dBA	A-weighted decibel
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse Gas
HDO	Housing Development Overlay
I	Gateway Specific Plan Industrial
I-15	Interstate 15
LHMP	Local Hazard Mitigation Plan
MBTA	Migratory Bird Treaty Act
MGD	Millions of gallons per day
MSHCP	Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrous Oxides

O ₃	Ozone
PM	Particulate Matter
R	Gateway Specific Plan Residential
RA	Residential Agricultural
RCFD	Riverside County Fire Department/CalFire
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SR	State Route
SR-91	State Route 91
SP	Specific Plan
SWPPP	Stormwater Pollution Prevention Plan
TTM	Tentative Tract Map
TPZ	Timberland Production Zone
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
WRCRWA	Western Riverside County Regional Wastewater Authority
WQMP	Water Quality Management Plan

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1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines, Sections 15000 et seq.) as amended and approved on December 28, 2018.

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed commercial/industrial business park project described in greater detail in Section 3.0 below. As required by State CEQA Guidelines ("Guidelines") Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Norco, in consultation with other jurisdictional agencies, to determine if a Mitigated Negative Declaration or an Environmental Impact Report is required for the project.

This Initial Study informs City of Norco decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the project. A "significant effect" or "significant impact" on the environment means *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project"* (Guidelines Section 15382).

Given the project's broad scope and level of detail, combined with previous analyses and current information about the site and environs, the State's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Public Resources Code Section 21003.1)
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (Guidelines Section 15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (Guidelines Section 15126.4)

1.2 DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared by the State of California to evaluate the proposed Project's potential impact to the physical environment, and to determine if an Environmental Impact Report (EIR) is required.

Section 2. Environmental Setting

Provides information about the proposed Project's location.

Section 3. Project Description

Includes a description of the proposed Project's physical features and characteristics.

Section 4. Environmental Checklist

Includes the Environmental Checklist from the CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment and identifies if an EIR is required, and if one is, what environmental topics need to be analyzed in the EIR.

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The Project site is located in southwestern Riverside County, within the southwestern portion of the City of Norco. The City of Norco is located approximately 45 miles east of downtown Los Angeles, 20 miles west of downtown San Bernardino, and 30 miles northeast of Orange County. Regional access to the Project site is provided via Interstate 15 (I-15) located 0.4 miles to the east and State Route 91 (SR-91), approximately 2.0 miles to the south.

The Project site encompasses approximately 103 acres and is located south of Second Street, east of Pacific Avenue, generally north of First Street and either west of or bisected by Mountain Avenue. Additionally, the site is located within the Corona North USGS 7.5-Minute Quadrangle; Section 13, Township 3 South, Range 7 West, San Bernardino Baseline and Meridian. Regional location and local vicinity maps are provided in Figure 1, Regional Location, Figure 2, Local Vicinity, and Figure 3, Aerial Photograph, respectively.

2.2 EXISTING LAND USES

The 103-acre Project site is currently developed with 36 single-family residential structures and a chicken egg warehouse and distribution facility for Hidden Villa Ranch. The Hidden Villa Ranch facility is located on the northern central portion of the site on the west side of Mountain Avenue and south of Second Street and is served by a parking lot on the east side Mountain Avenue. Operations at the Hidden Villa Ranch facility includes: receiving, cleaning, inspecting, repackaging, and distribution of fresh eggs, and distribution of dairy products. In addition, Hidden Villa Ranch performs limited fueling and vehicle repair activities for its fleet of delivery trucks and trailers.

Residential structures are located along First Street, Second Street, and Pacific Avenue, some of which are occupied, and some are vacant. Several of the onsite residential parcels contain chickens, horses, goats, ponies, and dog raising activities; however, none are commercial operations. The site also includes several dilapidated former farm buildings, stables, chicken sheds, and concrete pads from previous uses. Additionally, a large portion of the site consists of undeveloped vacant land, a portion of which includes remnants of building foundations.

An existing equestrian trail runs along Pacific Avenue and Second Street. In addition, a drainage channel passes through culverts in First Street and Mountain Avenue, crossing the southwest corner of the site. The channel is located northwest of the First Street and Mountain Avenue intersection, drains east to west, and conveys drainage to a Riverside County Flood Control District open channel.

The Project site's existing conditions are shown in Figure 4, Photo Location Map and Figures 4A through 4C, Site Photos. The Assessor's Parcel Numbers (APN) within the Project site are listed in Table 2-1.

Table 2-1 Assessor's Parcel Numbers

126-240-002	126-170-019	126-200-004
126-240-001	126-170-005	126-200-026
126-210-010	126-170-004	126-200-006
126-210-009	126-170-003	126-200-022
126-210-008	126-170-002	126-200-023
126-210-007	126-170-001	126-200-025
126-210-006	126-180-001	126-200-024
126-210-005	126-180-002	126-200-021
126-210-004	126-180-003	126-200-013
126-210-003	126-180-004	126-200-015
126-210-001	126-180-005	126-200-020
126-170-010	126-180-006	126-190-003
126-170-011	126-180-007	126-190-002
126-170-012	126-200-016	126-190-001
126-170-013	126-200-017	126-170-015
126-170-009	126-200-018	122-030-016
126-170-008	126-200-019	122-030-017
126-170-033	126-200-002	122-030-018
126-170-034	126-200-003	122-030-011

2.3 SURROUNDING LAND USES

The surrounding land uses are shown on Figure 5, Surrounding Land Uses, and described below.

- North: Second Street followed by single-family residential uses. General Plan Land Use designation of Residential Agricultural (RA) and Zoned Agricultural – Low Density 20,000 square feet (A-1-20).
- West: Pacific Avenue and single-family residential uses. General Plan Land Use designation of Residential Agricultural (RA) and Zoned Agricultural – Low Density 20,000 square feet (A-1-20).
- South: First Street and single-family residential. General Plan Land Use designation of Residential Agricultural (RA) and Zoned Agricultural – Low Density 20,000 square feet (A-1-20) and Gateway Specific Plan designation of Residential (R).
- East: A portion of Mountain Avenue, single-family residential, and industrial development. Gateway Specific Plan designation of Industrial (I) with a Housing Development Overlay (HDO).

2.4 EXISTING LAND USE AND ZONING

A 97.4-acre portion of the 103-acre Project site is designated by the General Plan as Specific Plan (SP); the remaining 4-parcel, 5.6-acre area south of First Street is not within the Gateway Specific Plan and is designated as Residential Agricultural (RA) with an Agricultural – Low Density 20,000 square feet (A-1-20) zoning designation. See Figure 6, Existing General Plan Designation and Figure 7, Existing Zoning Within Project Site.

The 97.4-acre portion of the Project site is within the Gateway Specific Plan, which serves as the zoning. The Gateway Specific Plan is a broad planning document that was approved in 1991

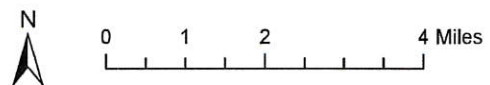
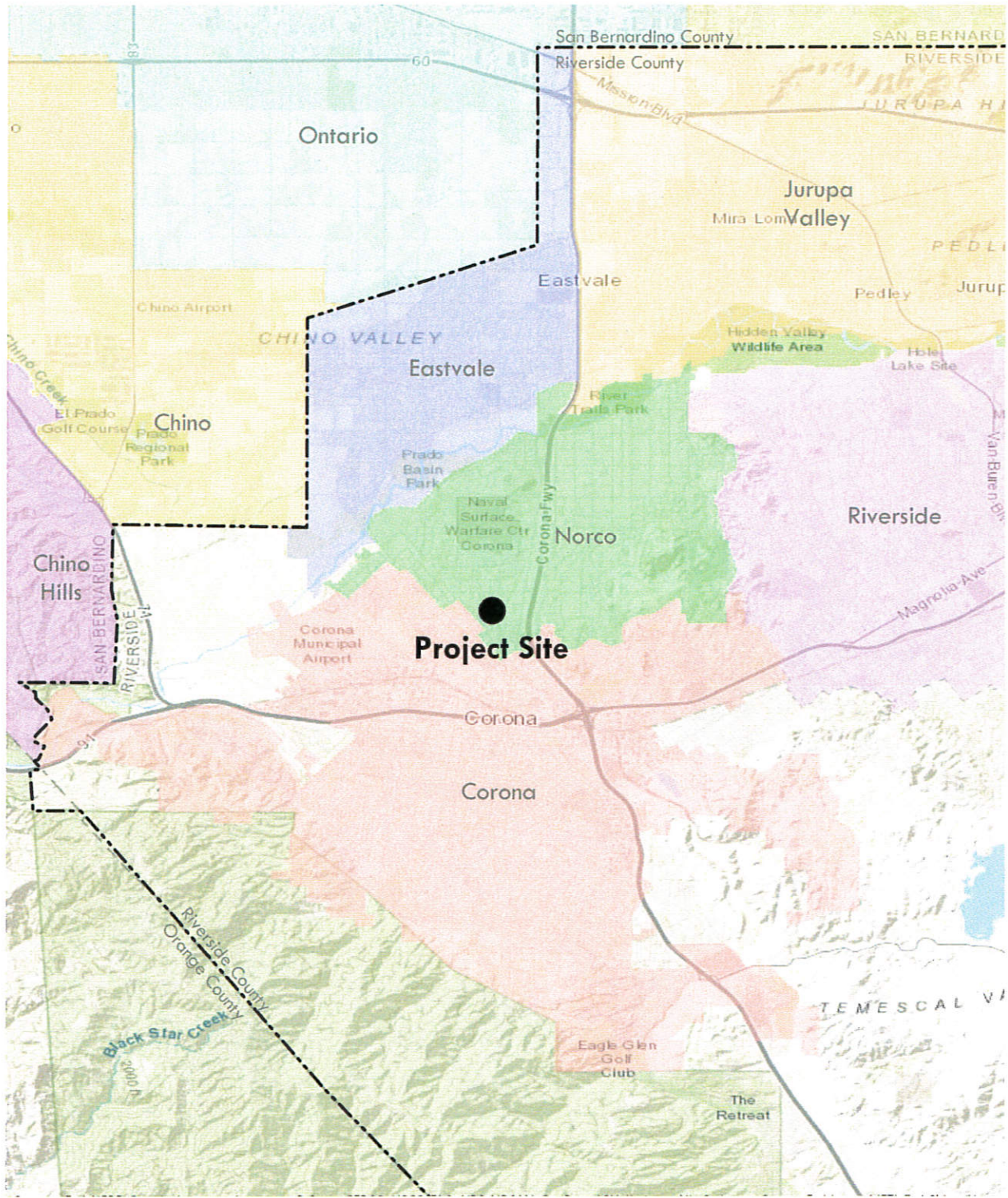
and has been amended 10 times since its adoption. The Specific Plan area encompasses 317 acres of uses zoned for Industrial, Residential, Commercial, and Office Park in an area that is generally bounded by Second Street to the north, Pacific Avenue on the west, Parkridge Avenue to the southwest, I-15 to the southeast, and Hamner Avenue on the east. See Figure 8, Gateway Specific Plan Land Use Map. The Gateway Specific Plan zones the majority of the Project site as industrial, with a small area of commercial on the northwest corner of Mountain Avenue and First Street, and a small area of residential on Second Street to the east of Pacific Avenue.

The Norco General Plan and Gateway Specific Plan designate a portion of the Project site that is zoned industrial, east of Mountain Avenue, with a Housing Development Overlay (shown on Figure 7). The Housing Development Overlay, as outlined in Chapter 18.64 of the Norco Municipal Code, is intended to facilitate development of affordable housing within a mixed-use context. Residential development allowed within this overlay may include development of housing at a density of 20 to 30 dwelling units per acre, including single-family, multi-family homes, condominiums, townhomes, and courtyard residential projects.

Additionally, the western half of the Project site is located within the boundary of the Corona Municipal Airport Influence Area.

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Regional Map



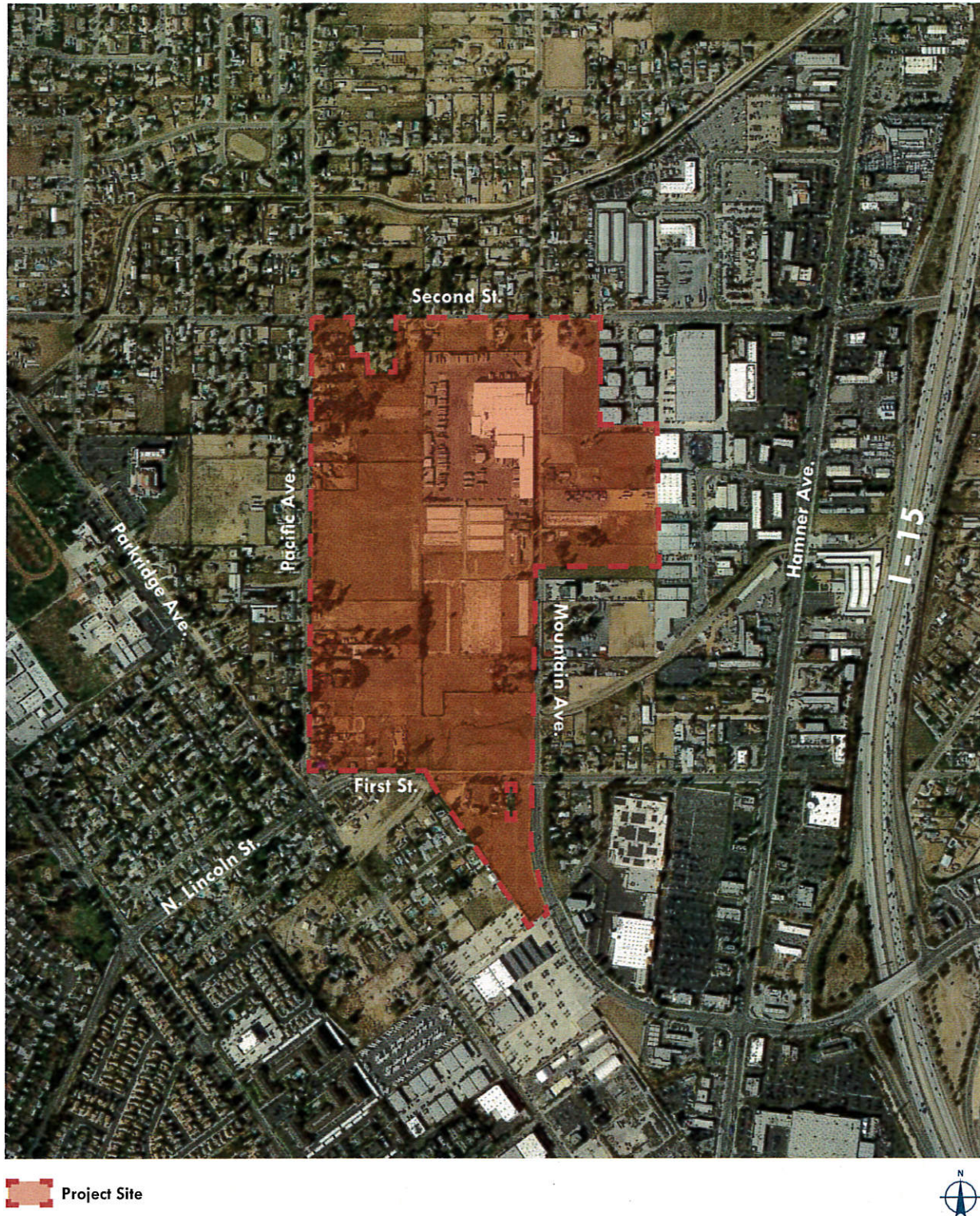
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Local Vicinity



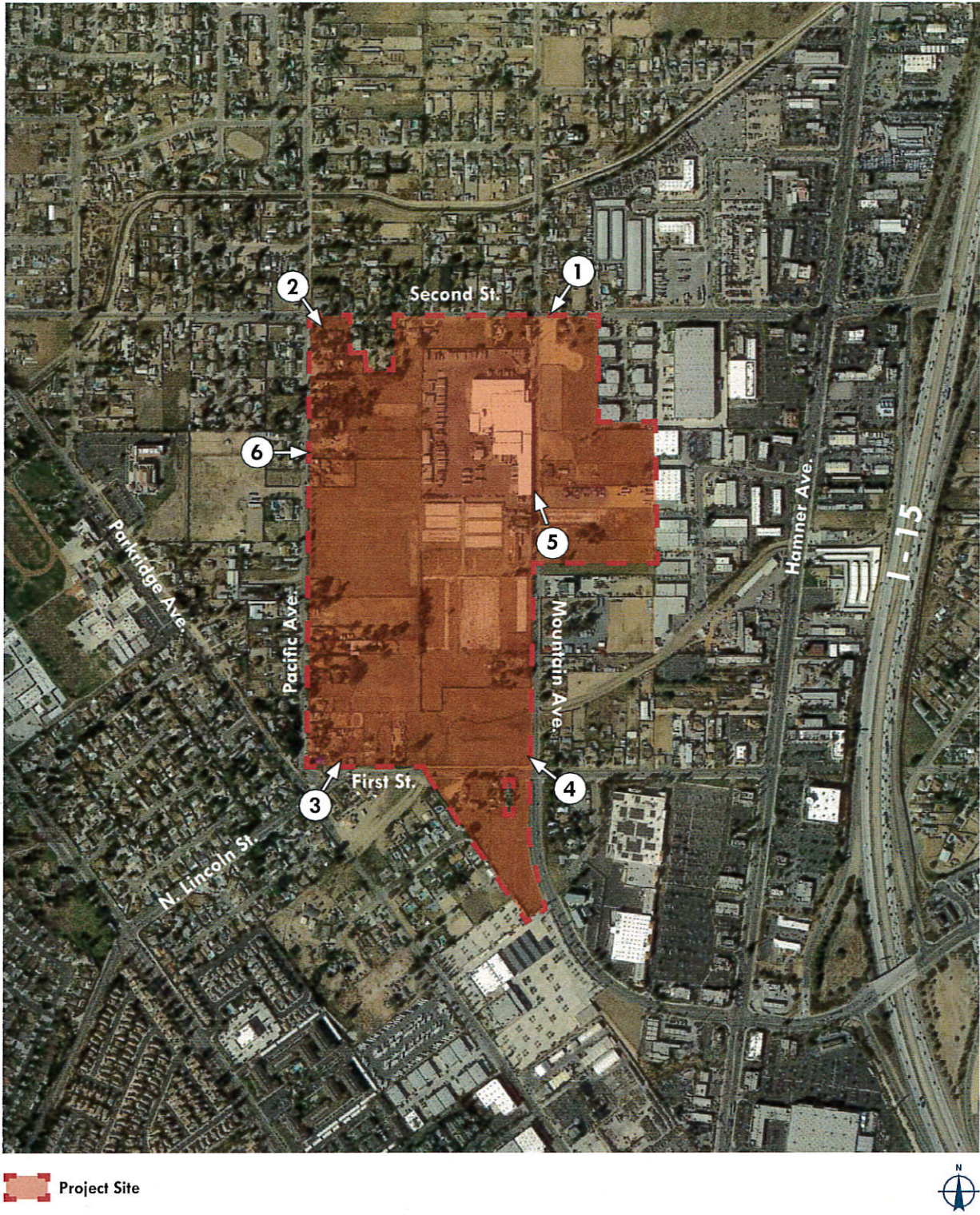
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Aerial Photograph



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Photo Location Map



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Site Photos

1



View looking southwest at the intersection of Second Street and Mountain Avenue. Existing residences, equestrian trail, overhead utility poles, and ornamental trees onsite.

2



View looking southeast at the intersection of Second Street and Pacific Avenue. Existing residences, equestrian trail, overhead utility poles, and ornamental trees onsite.

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Site Photos



View looking northeast on First Street. The end Pacific Avenue's cul-de-sac is visible in the background. Existing residences, overhead utility poles, and ornamental trees onsite



View looking northwest at the intersection of First Street and Mountain Avenue. Existing Conditions include vacant land, overhead utility poles, and ornamental trees onsite

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Site Photos



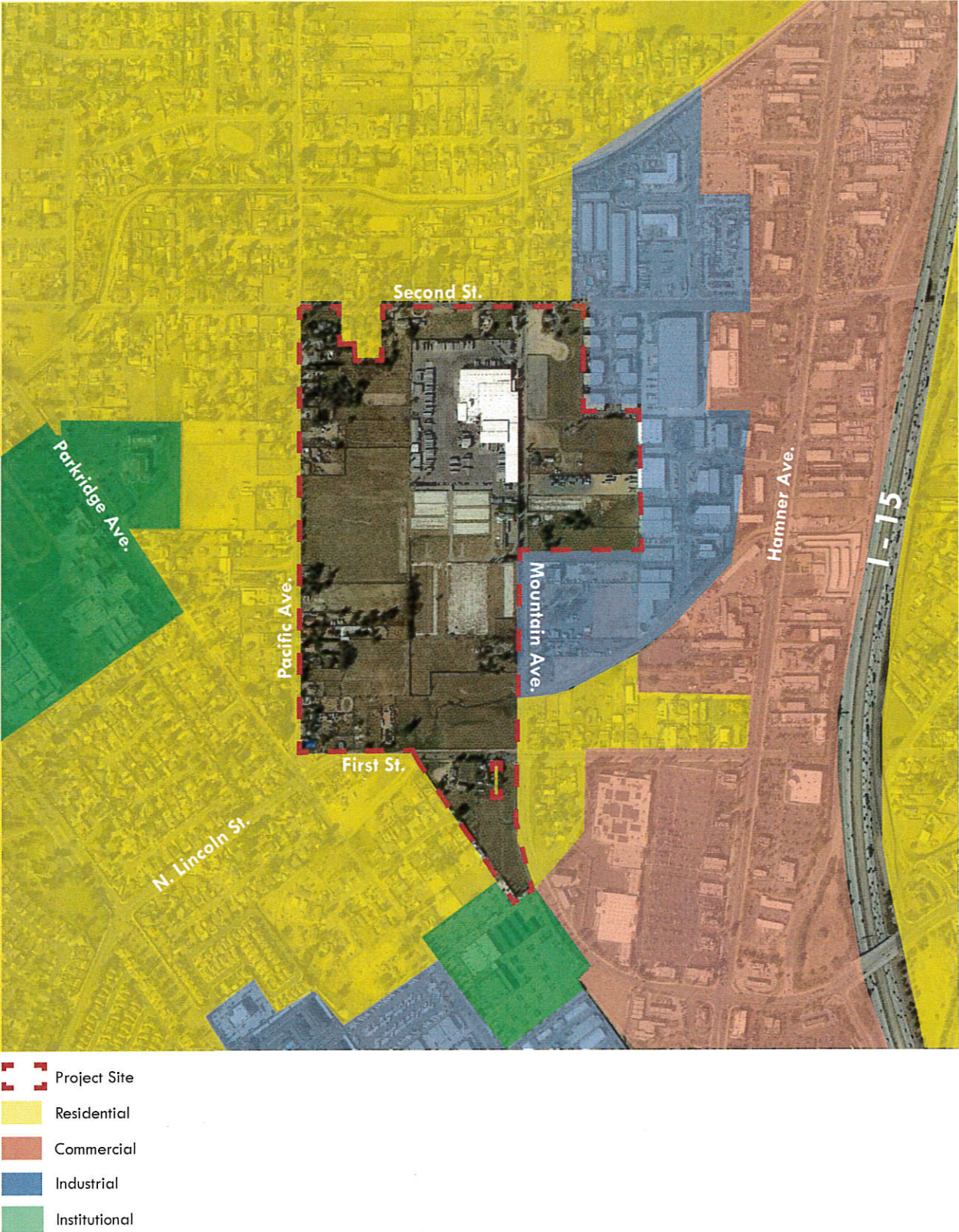
View looking northwest on Mountain Avenue. Existing conditions include chicken egg operation structures, overhead utility poles, and ornamental trees onsite.



View looking east on Pacific Avenue. Existing conditions include residences, overhead utility poles, and ornamental trees onsite.

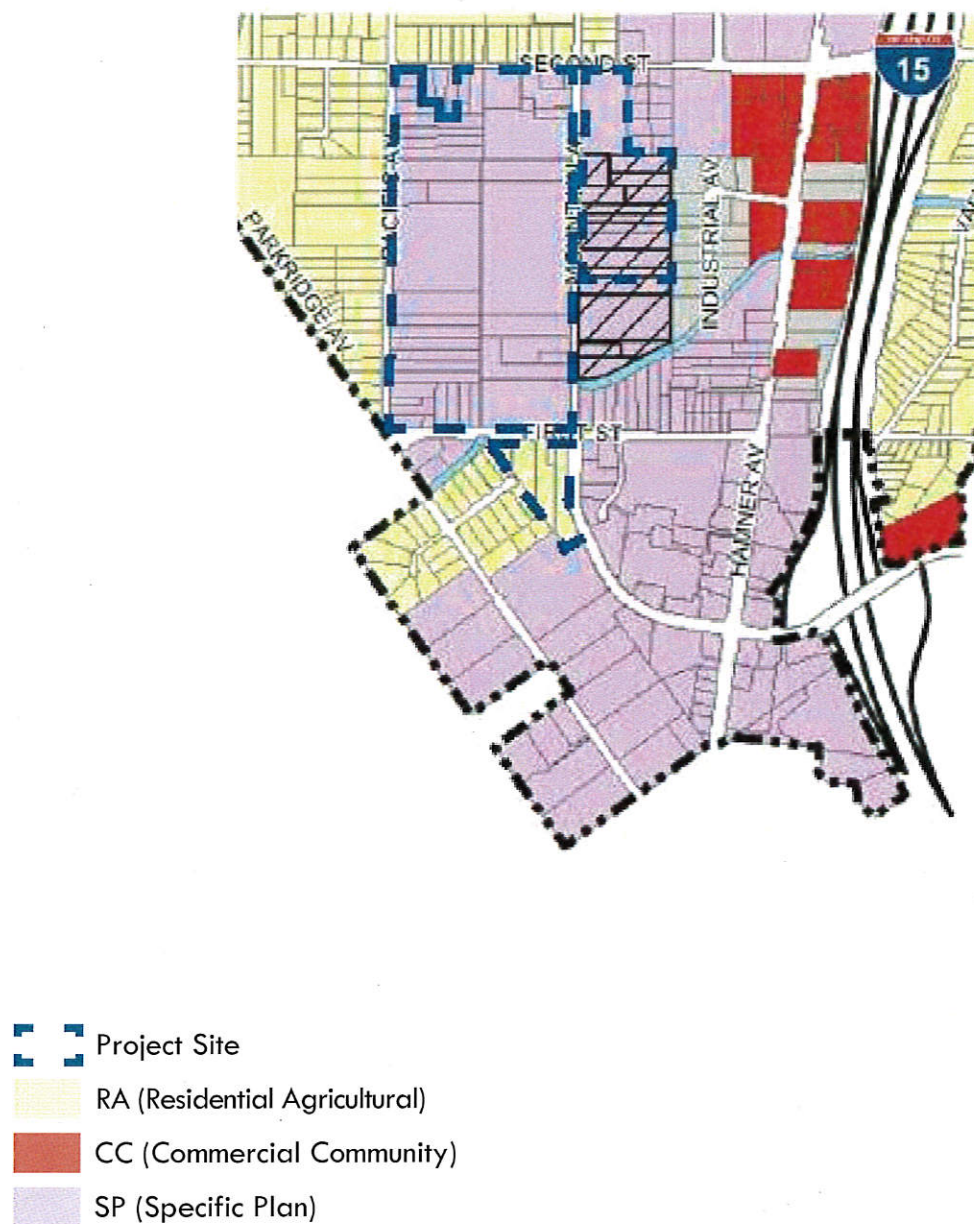
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Surrounding Land Uses



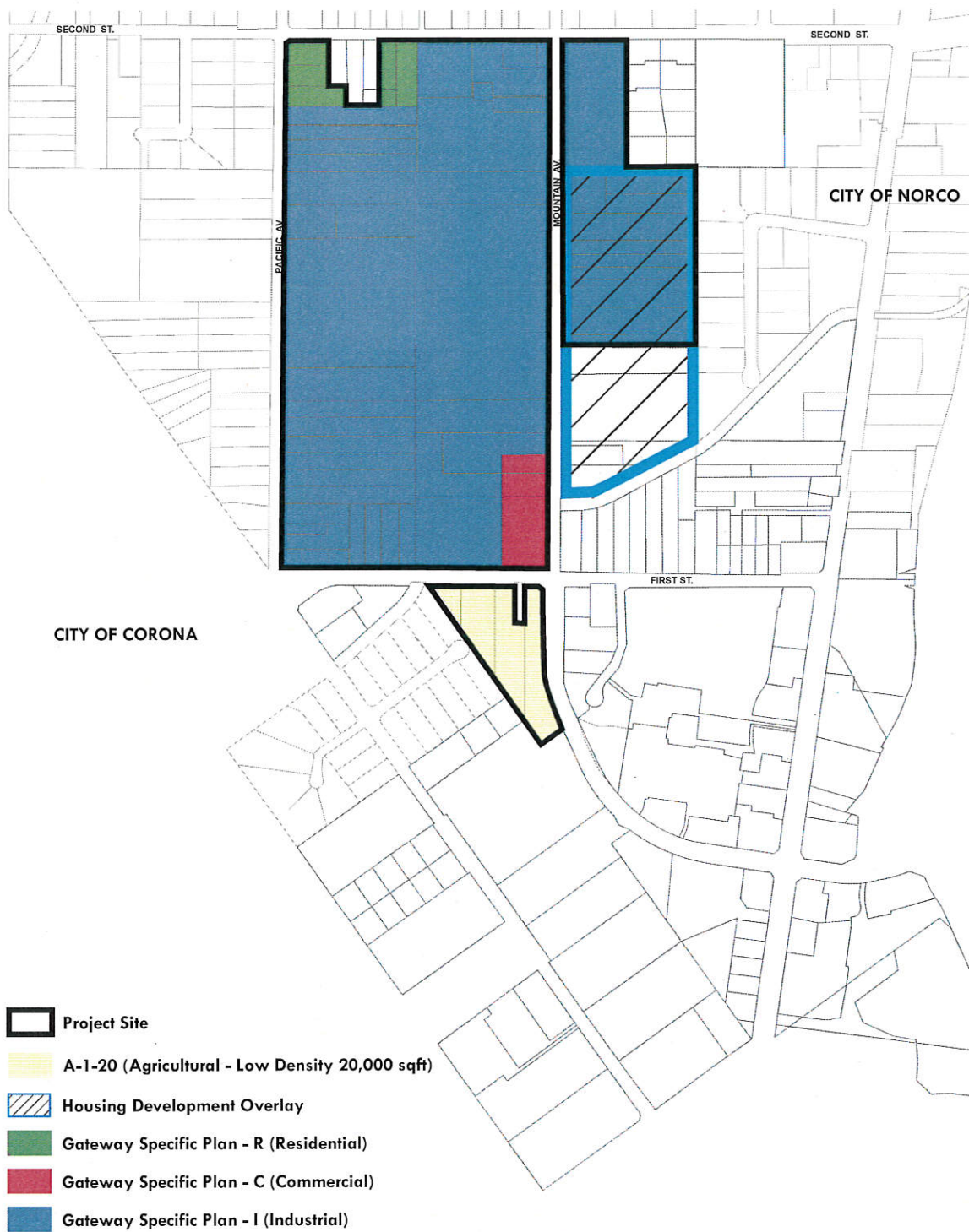
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Existing General Plan Designations



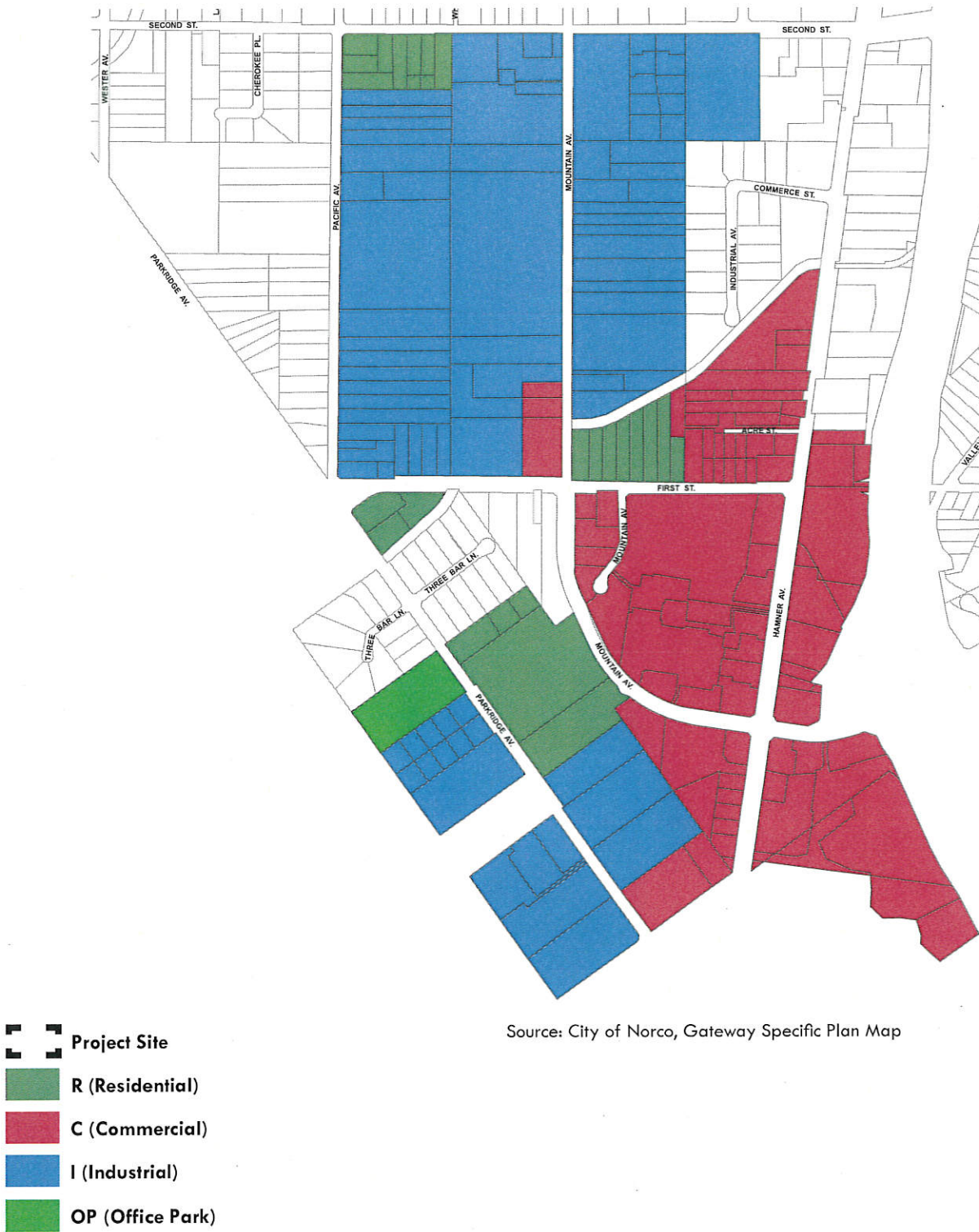
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Existing Zoning Within Project Site



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Gateway Specific Plan Land Use Map



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3 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The Palomino Business Park (Project) would redevelop approximately 103 acres of land within the City of Norco for a new business park that would provide industrial, commercial, and office uses. The business park would provide 26 industrial buildings and 3 commercial buildings that would include commercial and office uses. The Project includes construction of approximately 1,900,000 square feet of new building space and related on- and offsite improvements. Implementation of the Project would include demolition of 36 existing single-family residences, industrial warehouse buildings, related improvements, and building remnants (e.g., foundations, etc.) from previous uses. The Project would be implemented in one development phase. See Figure 9, *Conceptual Site Plan*.

The majority of the Project site (with the exception of 5.6 acres on the southwest corner of First Street and Mountain Avenue) is located within the City of Norco Gateway Specific Plan. The Project includes an amendment to the Gateway Specific Plan to amend the parking standards for warehouse uses. In addition, the Project includes: a Conditional Use Permit (CUP), a Tentative Tract Map (TTM), Site Plan Review, and a Development Agreement.

3.2 PROJECT FEATURES

Development Summary

The Palomino Business Park Project would demolish all of the existing residential and industrial warehouse structures on the site and construct approximately 1,900,000 square feet of industrial, office, and commercial uses in as many as 26 industrial business park buildings and 3 commercial buildings of various size and orientation within the Project site. The estimated size of the proposed industrial and office buildings ranges from approximately 13,000 square feet to 158,000 square feet and the commercial building range in size from 4,000 square feet to 13,000 square feet.

The proposed buildings would have a maximum height to of 50-feet, a minimum setback of 15-foot landscaped area along First Street, 25-foot landscaped area along Second Street, 50-foot landscaped area along Pacific Avenue, and a 10-foot landscaped area along Mountain Avenue.

Circulation and Parking

As depicted in Figure 9, *Conceptual Site Plan*, Mountain Avenue is a north-south roadway that bisects the Project site. Access to the Project site would be provided from 7 driveways along Mountain Avenue. One driveway access from First Street to the commercial building is also proposed, for a total of 8 driveways providing access to the site.

The Project proposes approximately 1,800 parking spaces. The Project is seeking an amendment to update the Gateway Specific Plan's warehouse parking requirements to reflect the expected parking demands of a contemporary industrial business park with commercial and office uses. Parking and loading dock facilities would be located at each building and proposed at the following ratios:

- Commercial: 4 parking spaces per 1,000 square feet
- Office: 4 parking spaces per 1,000 square feet

- Warehouse First 20,000 square feet: 1 parking space per 1,000 square feet
- Warehouse Area Over 20,000 square feet: 1 parking space per 2,000 square feet

The current parking standard is 1 space for every 750 square feet of warehouse or storage area.

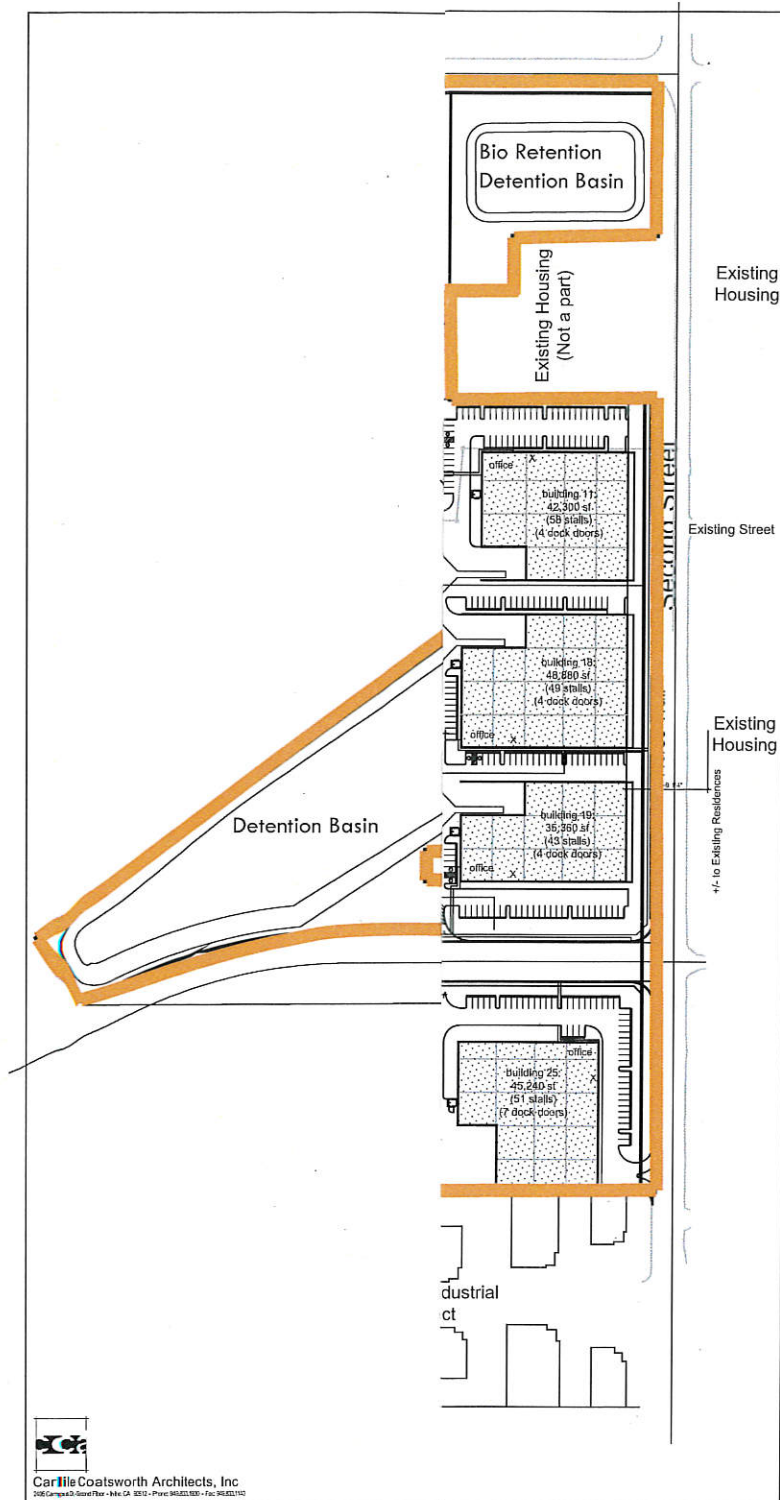
The Project includes installation of traffic signals at the intersections of First Street and Mountain Avenue, Second Street and Mountain Avenue, and at the main entrance on Mountain Avenue. In addition, the project would provide half-width improvements along the roadways surrounding the project site, which include replacement of the pavement, curb, and gutters. The Project also includes improvement of the existing equestrian trails and development of new equestrian trails, where none currently exist, along the perimeter of the site. See Figure 7, *Conceptual Site Plan*.

Infrastructure Improvements

Water

The Project would be served by existing water infrastructure located in the surrounding right-of-way. Second Street contains a 12-inch water line and First Street, Pacific Avenue, and Mountain

Conceptual Site Plan



Project Boundary

Avenue contain 6-inch water lines. The Project would provide offsite improvements by replacing the existing 6-inch water lines in Mountain Avenue and First Street with 12-inch water lines. In addition, a public 12-inch water line would bisect the Project site and connect to the existing lines in First Street and Second Street to provide a looped fire water system.

Sewer

The City's wastewater system flows north to south and an existing 24-inch transmission sewer main runs through the middle of the Project site. This sewer main would be protected in place and would not be used to serve the Project. The Project would connect to and be served by the existing 8-inch sewer lines that are located within Mountain Avenue, First Street, and Second Street. The three commercial buildings would connect to an existing 18-inch sewer line that is located northwest of the First Street and Mountain Avenue intersection.

Drainage

Existing offsite stormwater drainage infrastructure includes a 15-inch storm drain within Second Street; a 36-inch storm drain within Mountain Avenue; an 18-inch storm drain and 48-inch culvert pipes within First Street; and 24-inch and 42-inch storm drains within Pacific Avenue. The Project would install new offsite drainage facilities within these roadways, including: a 24-inch storm drain within Second Street, a 36-inch storm drain within the western portion of Second Street, a 36-inch storm drain within Mountain Avenue, and a 24-inch storm drain within First Street.

The Project also includes development of a series of onsite storm drains that would route storm water runoff to either the proposed detention basin south of First Street or the proposed detention basin at the northwest corner of the Project site adjacent to Second Street and Pacific Avenue. In addition, the Project would construct a soft bottom channel from the existing culverts in Mountain Avenue to the existing culverts in Second Street.

Construction Process and Schedule

Project construction would take approximately 24 months and includes the demolition of all existing structures onsite, grading in one phase, construction of backbone infrastructure, followed by building construction, pavement, and then architectural coatings. Construction is anticipated to start in 2020 and be completed by 2022.

Project grading is anticipated to include approximately 230,000 cubic yards of imported soils. Approximately 52,000 cubic yards of the import soil would come from the proposed detention basin to the south of First Street.

Operations

Although individual users have not been identified, the proposed business park is anticipated to operate up to 7 days a week. The industrial/warehousing uses could include multiple shifts with operational activities 24 hours per day. Operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, and the loading and unloading of trucks at designated loading bays.

Project Objectives

The Palomino Business Park site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the proposed Project and its associated environmental impacts. The project objectives are designed to ensure the Project develops a quality industrial and business park development. The Project

objectives have been refined throughout the planning and design process for the proposed Project, and are listed below:

1. To provide for the development of industrial and business facilities which utilize the site's prime location and other regional transportation facilities.
2. To create a high quality industrial and business development that attracts an array of businesses and provides employment opportunities to area residents.
3. To provide light industrial and commercial uses within the Project boundaries which are compatible with surrounding uses, and implement the land uses contemplated for the Project site under the City of Norco General Plan.
4. To develop a business park with structures flexible in design to meet the needs of an ever-changing business market, while assuring compliance with high development standards, including the Gateway Specific Plan.
5. To provide a plan for roadways, infrastructure, and utilities to support onsite land uses as the Project evolves.
6. To promote sustainability by providing opportunities for water efficiency in the Project architecture and Project landscaping to promote water conservation.

3.3 DISCRETIONARY ACTION REQUESTED

The City of Norco and the following responsible agencies are expected to use the information contained in this Initial Study 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.

As part of the proposed Project, the following discretionary actions are being requested by the project proponent:

- **Gateway Specific Plan Amendment.** The Gateway Specific Plan was adopted in 1991 and has been amended 10 times since then. The Project is seeking an amendment to update the Gateway Specific Plan's parking requirements to reduce the parking spaces required for warehouse uses to reflect the expected parking demands of a contemporary industrial business park.
- **Development Agreement.** The proposed Development Agreement would provide methods for financing, acquisition, and construction of infrastructure to implement the proposed Project, and providing vested rights to develop the project pursuant to the approved development entitlements.
- **Conditional Use Permit.** The Project is seeking approval of a Conditional Use Permit (CUP) pursuant to Section 18.45 of the Norco Municipal Code to increase the maximum allowable building height from 35 feet to 50 feet for approximately 50 percent of the site. The applicant is requesting a 15-foot height increase to allow for flexibility in final building design for the larger buildings in the interior of the site and to accommodate architectural treatments such as roof parapets.