

**APPENDIX A: NOTICE OF PREPARATION (NOP), INITIAL STUDY, & COMMENT LETTERS**

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## NOTICE OF PREPARATION

DATE: March 22, 2019  
TO: Reviewing Agencies, Organizations, and Interested Parties  
FROM: City of Norco  
SUBJECT: Notice of Preparation of an Environmental Impact Report for the Palomino Business Park Project

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**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 and interested members of the public 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 and the public 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 including 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](mailto: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](http://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.

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:

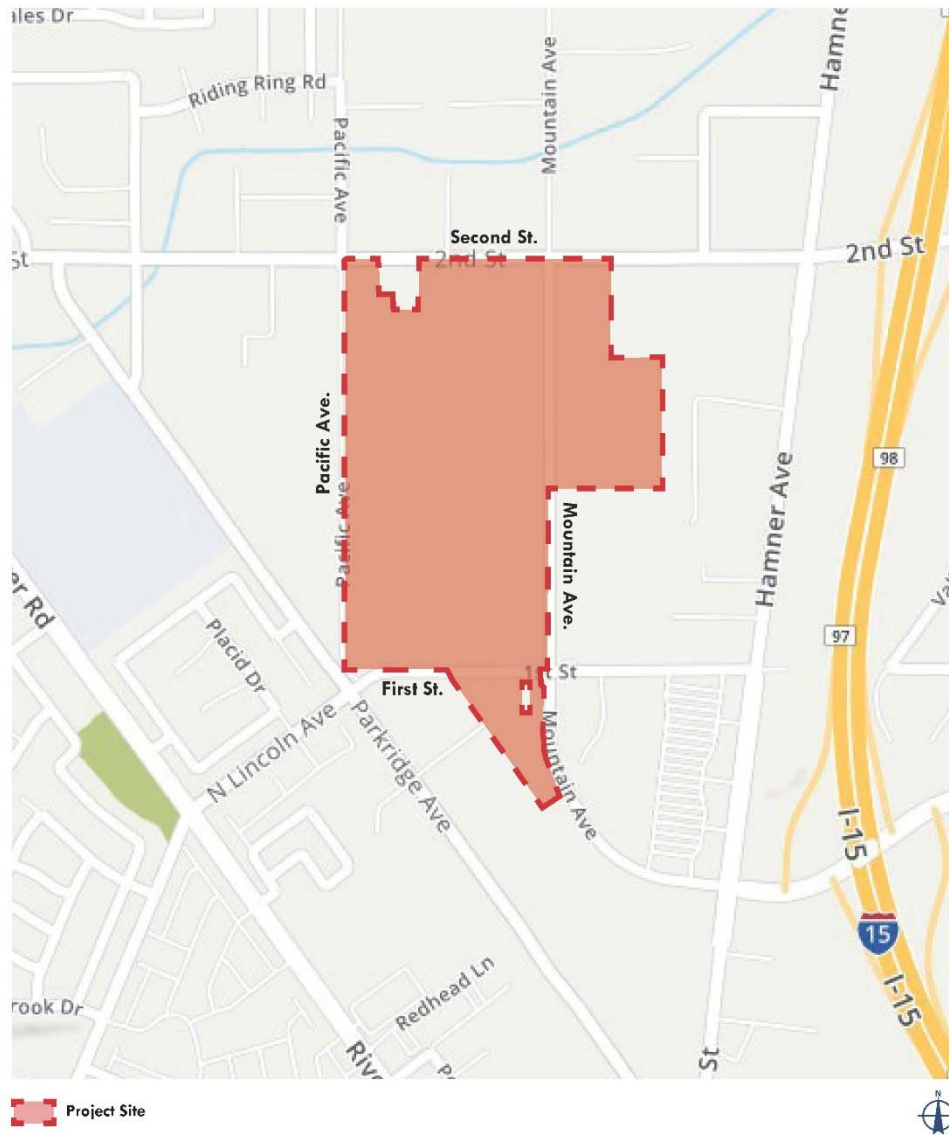
- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

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.

Figure 1

## Local Vicinity



STATE OF CALIFORNIA - THE RESOURCES AGENCY  
DEPARTMENT OF FISH AND GAME  
**ENVIRONMENTAL FILING FEE CASH RECEIPT**

Receipt #: 19-85605

State Clearinghouse # (if applicable): \_\_\_\_\_

Lead Agency: CITY OF NORCO Date: 03/27/2019

County/Agency of Filing: RIVERSIDE Document No: E-201900328

Project Title: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE PALOMINO

Project Applicant Name: CAPROCK ACQUISITIONS C/O CITY OF NORCO Phone Number: (949) 794-1188

Project Applicant Address: 2870 CLARK AVENUE, NORCO, CA 92860

Project Applicant: LOCAL PUBLIC AGENCY

CHECK APPLICABLE FEES:

☐ Environmental Impact Report

☐ Negative Declaration

☐ Application Fee Water Diversion (State Water Resources Control Board Only)

☐ Project Subject to Certified Regulatory Programs

☐ County Administration Fee

☐ Project that is exempt from fees (DFG No Effect Determination (Form Attached))

☐ Project that is exempt from fees (Notice of Exemption)

Total Received \$0.00

Signature and title of person receiving payment:

C. Sandral

Deputy

Notes:

# 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                                  |

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|                |                                                        |
|----------------|--------------------------------------------------------|
| O <sub>3</sub> | 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

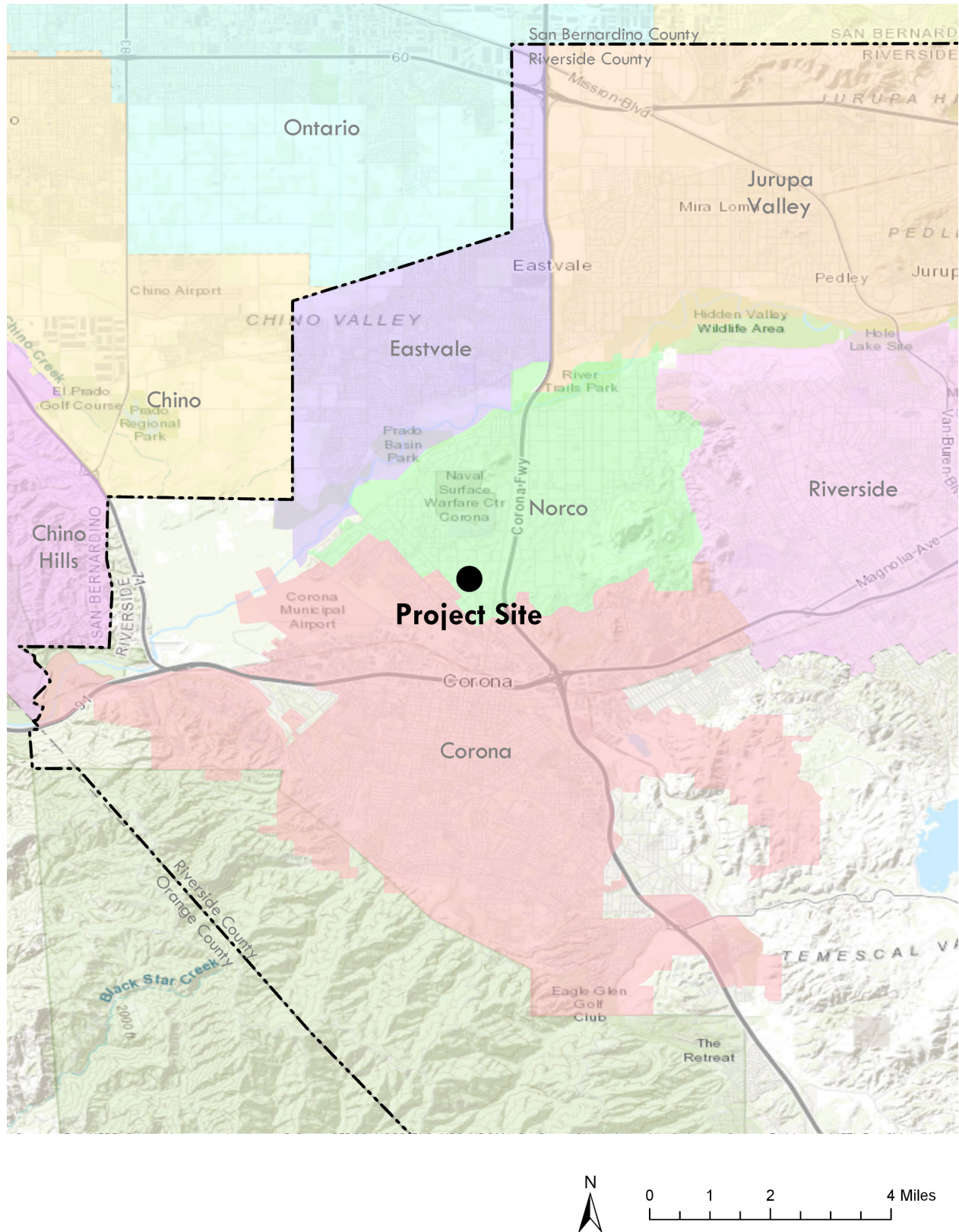
and has been amended 10 times since its adoption. The Specific Plan area encompasses 317 acres of uses zoned for Industrial, Residential, Commercial, and Office Park in an area that is generally bounded by Second Street to the north, Pacific Avenue on the west, Parkridge Avenue to the southwest, I-15 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.

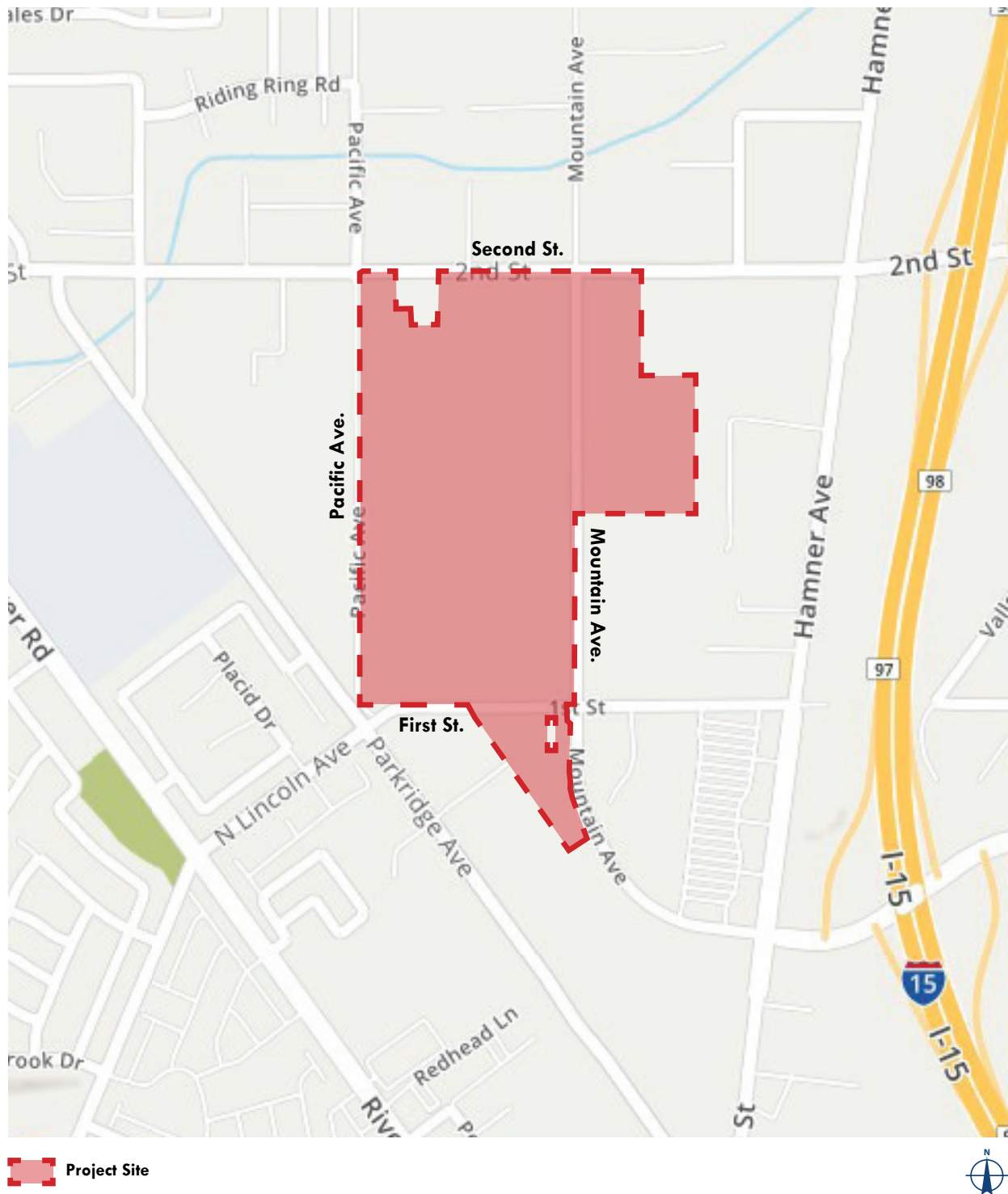
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# Regional Map



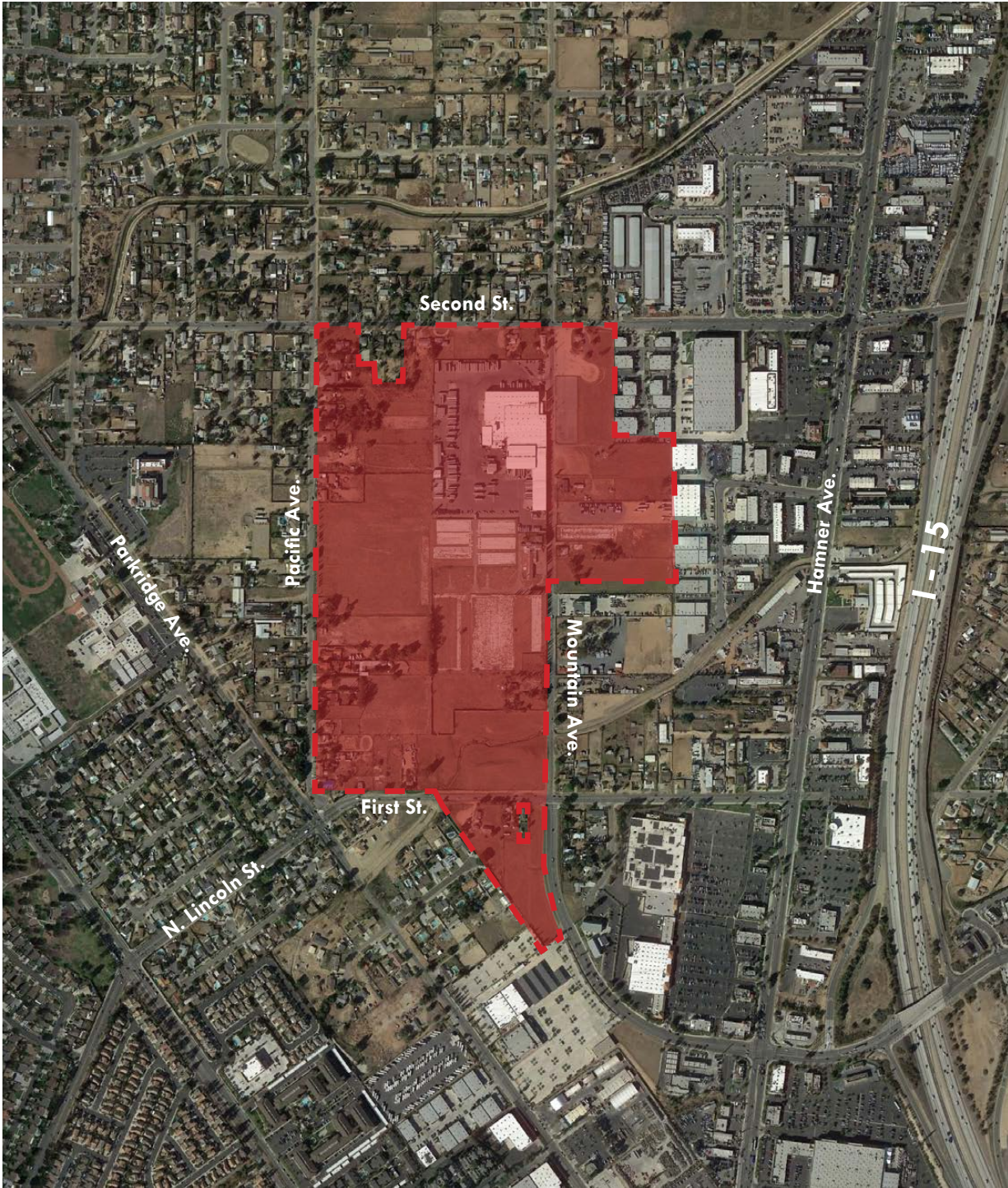
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## Local Vicinity



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Aerial Photograph

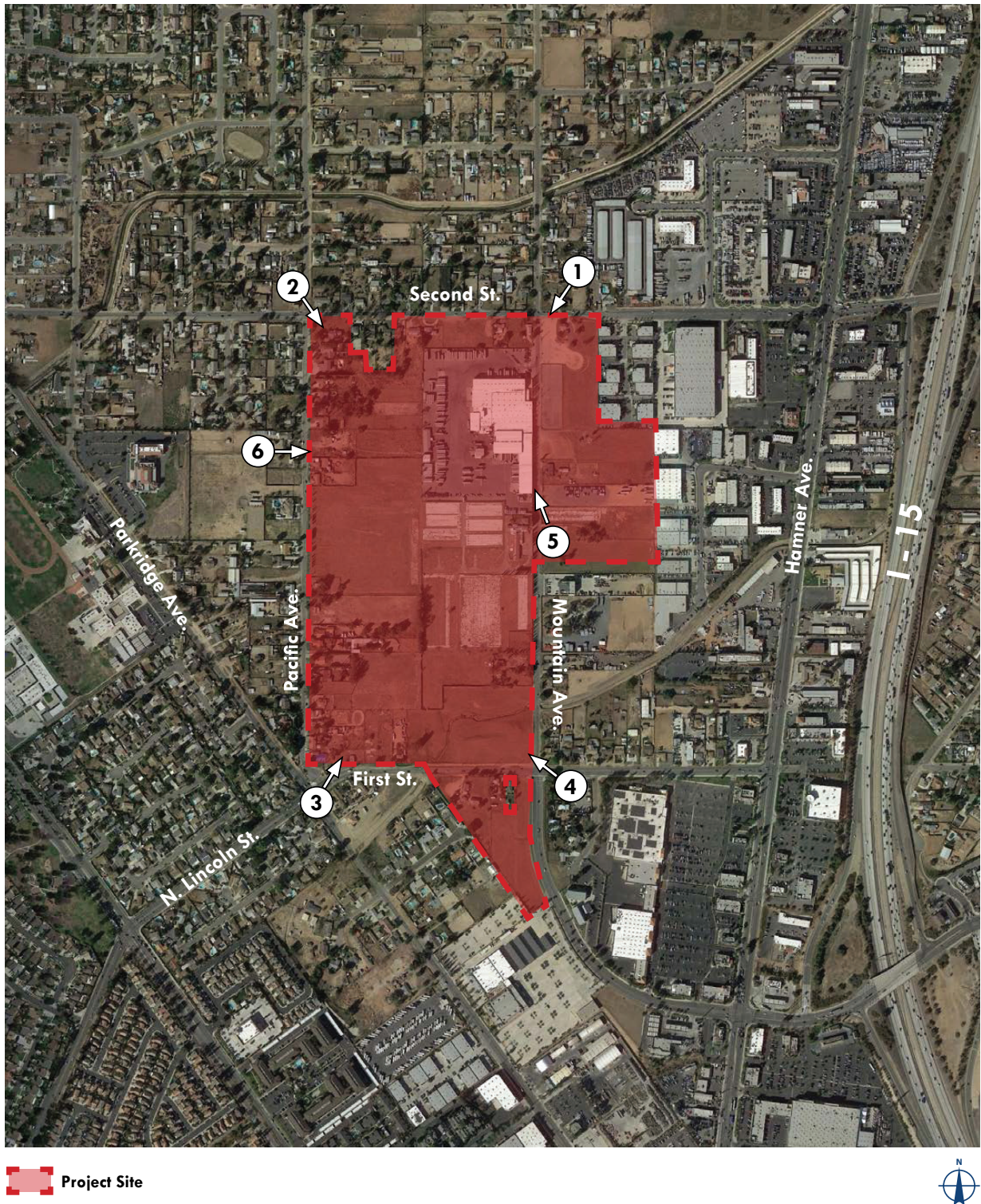


 Project Site



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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

3



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

4



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

5



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

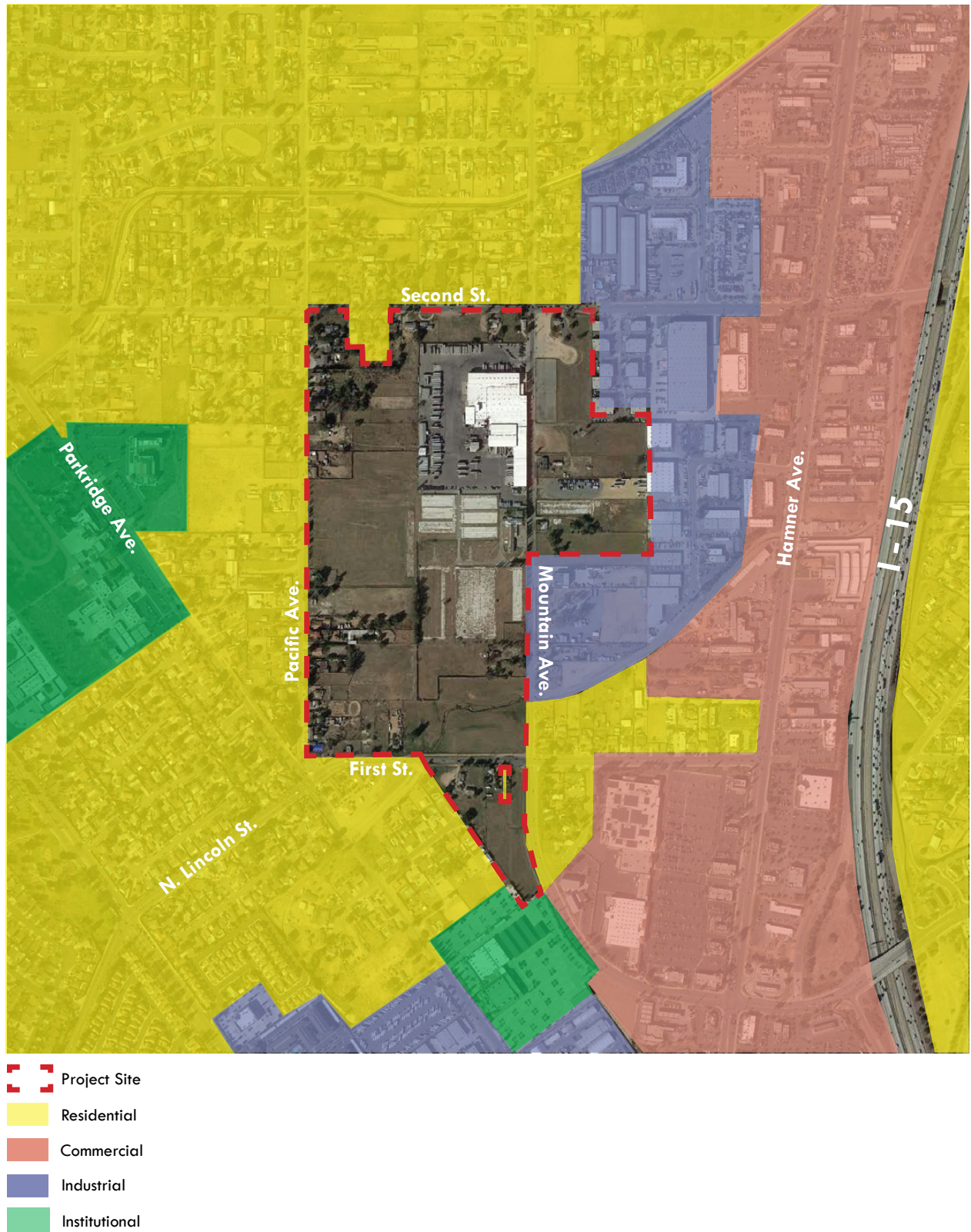
6



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

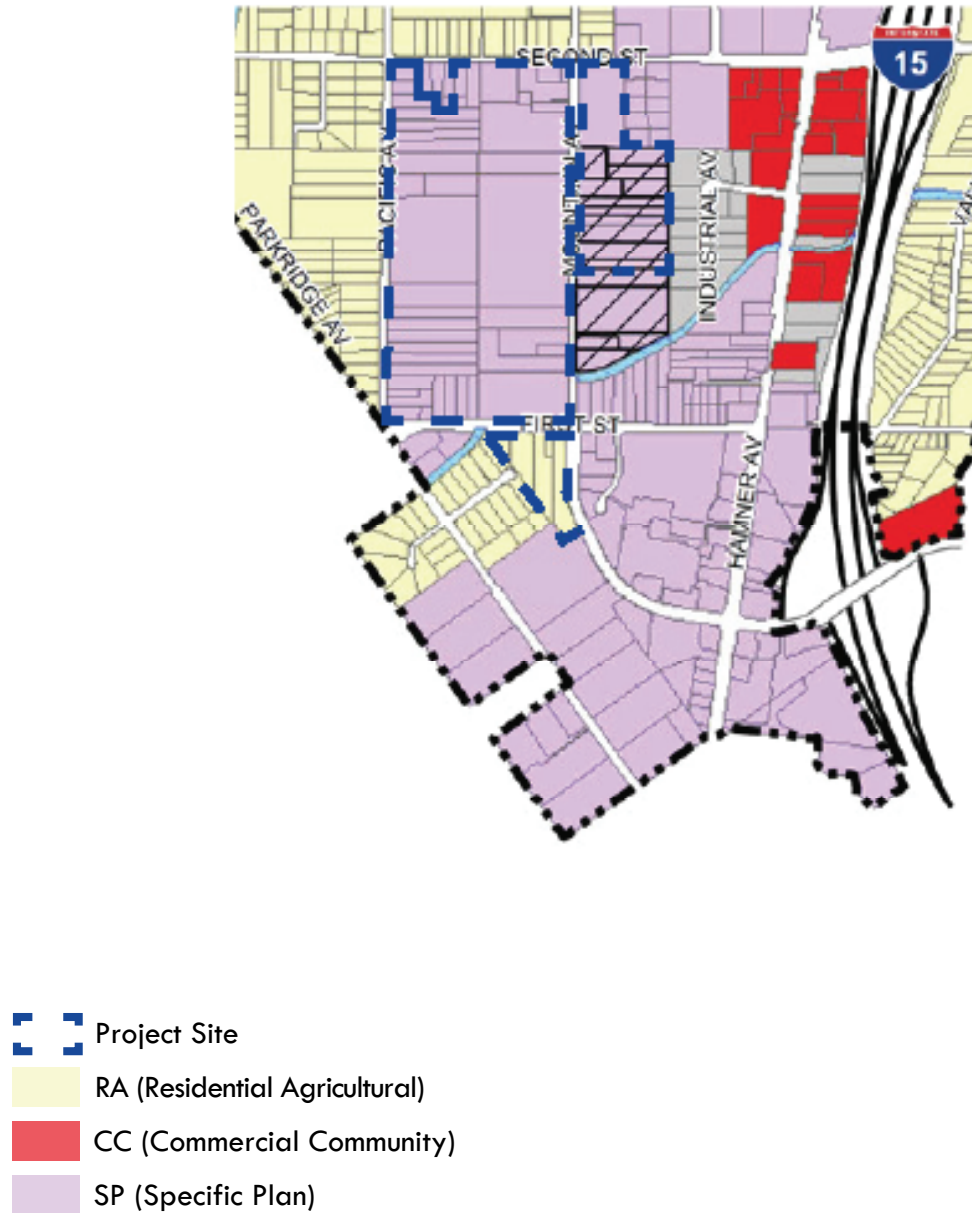
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# Surrounding Land Uses



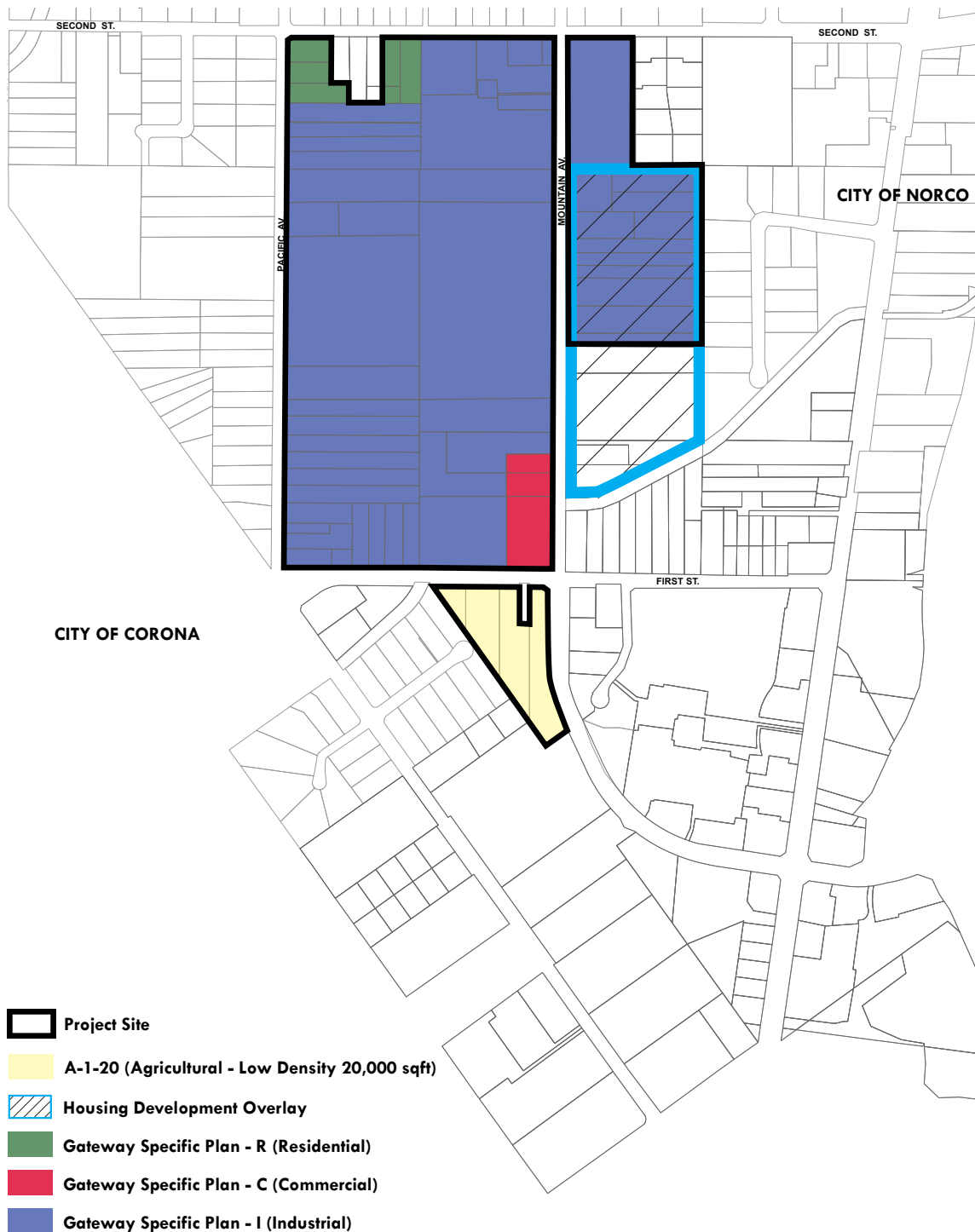
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## Existing General Plan Designations



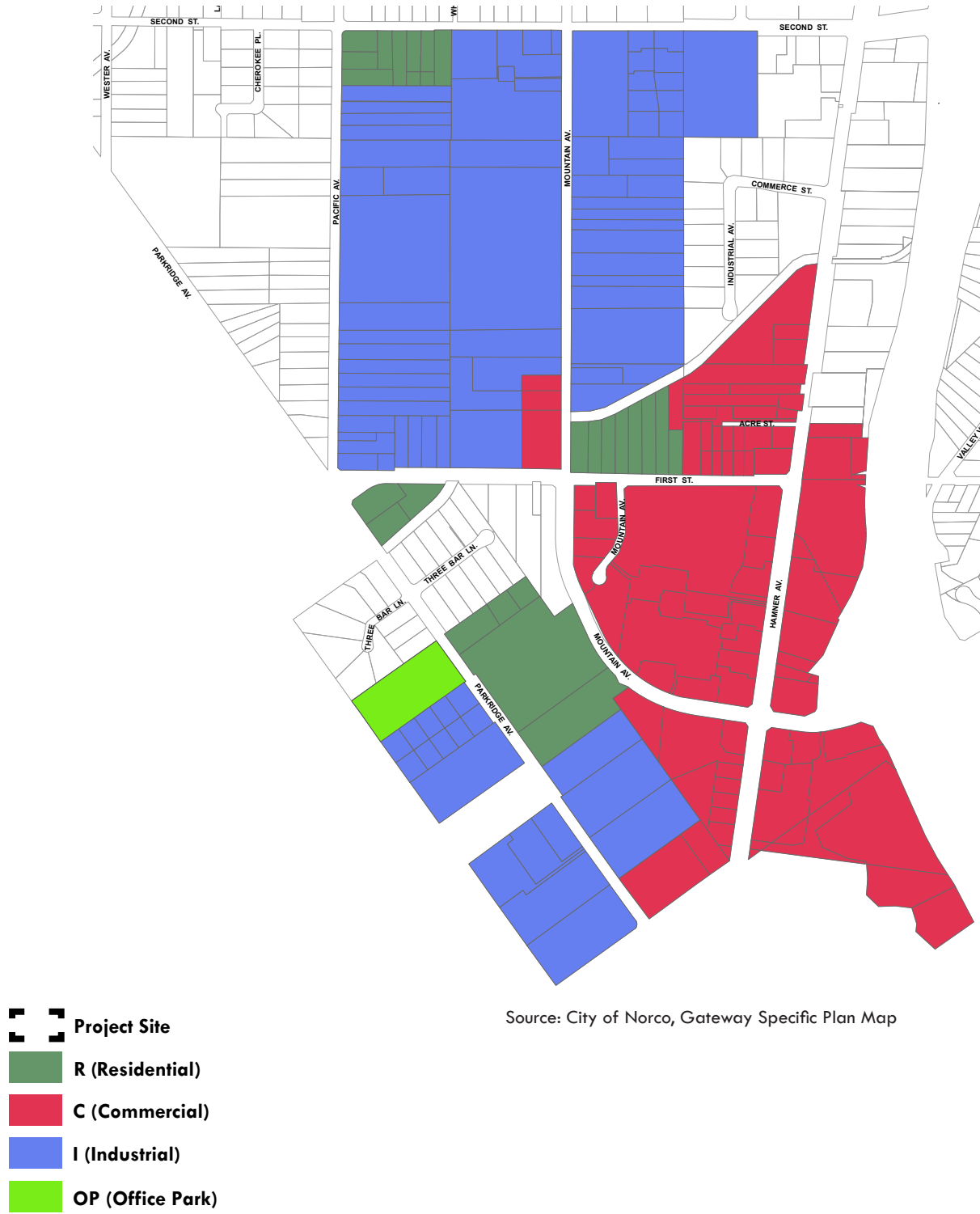
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# Existing Zoning Within Project Site



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# Gateway Specific Plan Land Use Map



Source: City of Norco, Gateway Specific Plan 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.

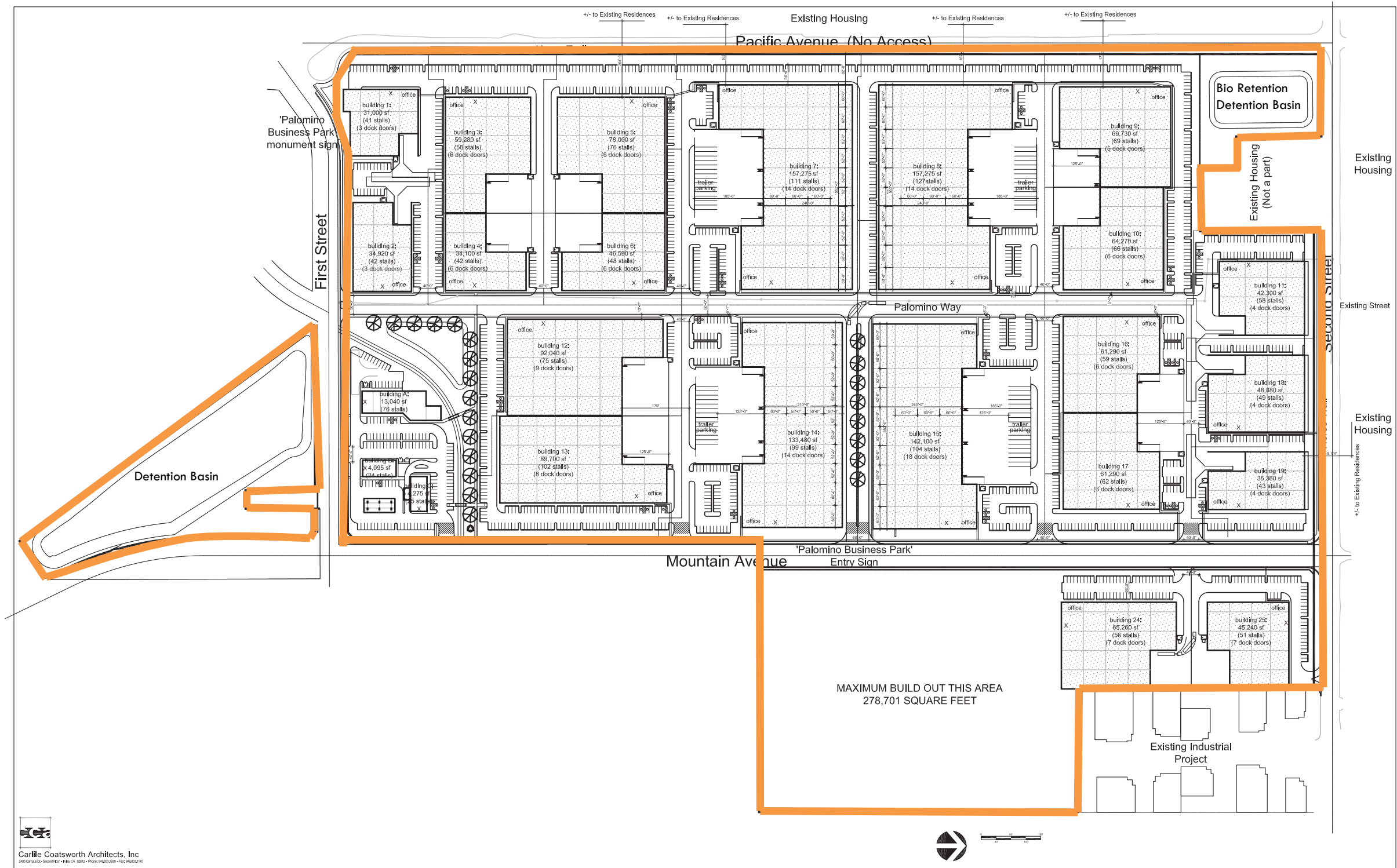
The Project includes installation of traffic signals at the intersections of First Street and Mountain Avenue, Second Street and Mountain Avenue, and at the main entrance on Mountain Avenue. In addition, the project would provide half-width improvements along the roadways surrounding the project site, 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

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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.

- **Site Plan Review.** The proposed site plan review would approve the site plan, overall site design, Project site layout, architectural quality and would ensure the Project is consistent with the Gateway Specific Plan.
- **Tentative Tract Map.** A tentative tract map is proposed to subdivide the Project site.

In addition, Project development will require a number of ministerial approvals, including the following:

- Issuance of demolition permit
- Issuance of grading permit
- Issuance of building permits
- Issuance of encroachment permits
- Lot Line Adjustment

The following approvals are anticipated from responsible agencies:

- South Coast Air Quality Management District
  - Issuance of Air Quality permits for demolition
  - Issuance of Air Quality permits for construction
- Santa Ana Regional Water Quality Control Board
  - Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit
  - Issuance of a Construction General Permit
- California Department of Fish and Wildlife
  - Approval of a Streambed Alteration Agreement
- County of Riverside Flood Control District
  - Approval of a triparty flood control cooperative agreement
- Federal Emergency Management Agency (FEMA)
  - Issuance of Conditional Letter of Map Revision and Letter of Map Revision to the Flood Insurance Rate Map

## 4 ENVIRONMENTAL CHECKLIST

### 4.1 BACKGROUND

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Project Title:</b><br>Palomino Business Park                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Lead Agency:</b><br>City of Norco<br>2870 Clark Avenue<br>Norco, CA 92860                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Lead Agency Contact:</b><br>Steve King, Planning Director<br>(951) 270-5661                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Project Location:</b><br>The Project site 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 and Figure 2, Local Vicinity, respectively.                                                                                                                                                                                                                                    |
| <b>Project Sponsor's Name and Address:</b><br>CapRock Acquisitions<br>1300 Dove Street, Suite 200<br>Newport Beach, CA 92660                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>General Plan and Zoning Designation:</b> The General Plan designates a 97.4-acre portion of the 103-acre Project site as Specific Plan (SP) within the Gateway Specific Plan; a small 4-parcel 5.6-acre area south of First Street has a General Plan designation of Residential Agricultural (RA) and a zoning designation of Agricultural – Low Density 20,000 square feet (A-1-20). The Gateway Specific Plan serves as the zoning for that portion of the Project site designated SP. The majority of the Project site is designated 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. |
| <b>Project Description:</b> The Palomino Business Park Project would redevelop approximately 103 acres of land within the City of Norco for new business park that would provide industrial, commercial, and office uses. The business park would provide approximately 26 industrial buildings and 3 commercial buildings that would include office uses. The Project would develop up to approximately 1,900,000 square feet of new development.                                                                                                                                                                                                                                                                                      |
| <b>Surrounding Land Uses and Setting:</b><br>North: Second Street followed by single-family residential uses.<br>West: Pacific Avenue and single-family residential uses.<br>South: First Street and single-family residential.<br>East: A portion of Mountain Avenue, single-family residential, and industrial development.                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Other Public Agencies Whose Approval is Required:</b><br>South Coast Air Quality Management District<br>Santa Ana Regional Water Quality Control Board                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

California Department of Fish and Wildlife  
Riverside County Flood Control District  
Federal Emergency Management Agency

#### 4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

|                                     |                             |                                     |                                |                                     |                                     |
|-------------------------------------|-----------------------------|-------------------------------------|--------------------------------|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | Aesthetics                  | <input type="checkbox"/>            | Agriculture & Forest Resources | <input checked="" type="checkbox"/> | Air Quality                         |
| <input checked="" type="checkbox"/> | Biological Resources        | <input checked="" type="checkbox"/> | Cultural Resources             | <input checked="" type="checkbox"/> | Energy                              |
| <input checked="" type="checkbox"/> | Geology /Soils              | <input checked="" type="checkbox"/> | Greenhouse Gas Emissions       | <input checked="" type="checkbox"/> | Hazards & Hazardous Materials       |
| <input checked="" type="checkbox"/> | Hydrology / Water Quality   | <input checked="" type="checkbox"/> | Land Use / Planning            | <input type="checkbox"/>            | Mineral Resources                   |
| <input checked="" type="checkbox"/> | Noise                       | <input type="checkbox"/>            | Population / Housing           | <input checked="" type="checkbox"/> | Public Services                     |
| <input type="checkbox"/>            | Recreation                  | <input checked="" type="checkbox"/> | Transportation                 | <input checked="" type="checkbox"/> | Tribal Cultural Resources           |
| <input checked="" type="checkbox"/> | Utilities / Service Systems | <input type="checkbox"/>            | Wildfire                       | <input checked="" type="checkbox"/> | Mandatory Findings of Significances |

#### 4.3 DETERMINATION:

On the basis of this initial evaluation

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- ☐ I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier analysis pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

STEVE KING, PLANNING DIR.

Name and Title

CITY OF NORCO

Lead Agency

#### 4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Guidelines Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
  - (a) Earlier Analysis Used. Identify and state where they are available for review.
  - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

## 5 ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

### 5.1 AESTHETICS

| Would the project:                                                                                                                                                                                                                                                                                                                                                         | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?                                                                                                                                                                                                                   | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |

#### a) Have a substantial adverse effect on a scenic vista?

**Potentially Significant Impact.** Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in 2 ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City’s General Plan does not designate any scenic vistas within the City. However, it does place an emphasis on encouraging land use development to be done in a manner that the City’s scenic vistas are protected.<sup>1</sup> The Santa Ana Mountains, located approximately 6 miles to the southwest and the San Gabriel Mountains are located approximately 18 miles to the north, are visible to motorists travelling on Pacific Avenue and Mountain Avenue. In addition, intermittent long-range views of the mountains can be seen across the Project site in between existing buildings, fencing, and trees from the surrounding roadways.

<sup>1</sup> General Plan Land Use Element Section 2.6.1.

The proposed business park would replace the existing industrial warehouse and residential uses and would develop buildings for industrial, warehouse distribution, office, and commercial uses on the approximately 103-acre site. Although portions of the site are currently developed with industrial buildings, the proposed Project would construct buildings with a maximum building height of 50 feet that would be greater in height, size and scale than the existing onsite structures. In addition, the large undeveloped open space area onsite that provides views of the mountains would not exist with development of the Project.

As described in the Project description, the proposed buildings would have a minimum setback of 15-foot along First Street, 25-foot setback along Second Street, 50-foot setback along Pacific Avenue, and a 10-foot setback along Mountain Avenue. These setbacks would allow for the continuation of the existing long-range public views of the Santa Ana and San Gabriel Mountains from the roadway corridors. However, development of the Project would replace background views of the mountains across the Project site with new buildings that would be greater in size and scale. This could result in blocking or diminishing the scenic quality of the views. As a result, impacts related to scenic vistas are potentially significant and will be evaluated in the EIR.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** There are no officially designated State scenic highways adjacent to the Project site. The closest Eligible State Scenic Highway according to the California Department of Transportation (Caltrans) is a portion of SR-91, located 1.5 miles south of the Project site, and the I-15 interchange with SR-91, located 1.75 miles southeast of the Project site. The Project site is not visible from either of these locations. Therefore, the Project would not result in any impacts to scenic resources within a state scenic highway and this topic will not be evaluated in the EIR.

**c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Potentially Significant Impact.** The Project site is located within an urban area and developed with 36 single-family residential structures, a warehouse and distribution facility, parking lots, remnants from previous uses, and undeveloped vacant land. The site is designated by the Gateway Specific Plan 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 site is bounded by single-family residential, vacant parcels, and some commercial and industrial uses. The proposed Project would change the appearance of the site from residential and industrial to a modern office/warehouse/commercial business park development. The EIR will evaluate whether the proposed Project would conflict with zoning or other regulations governing visual character and scenic quality.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Potentially Significant Impact.** Spill light occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Sensitive uses (e.g., residential uses) surrounding the Project site could be impacted by the light from development within the boundaries of the Project site if light spill occurs.

Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of off-site locations but results in a visible source of light viewable from a distance. Glare could also occur from building materials of the new structures, including glass and other reflective materials.

The Project site is currently developed with 36 single-family residences and a warehouse distribution facility and contains large areas of vacant undeveloped lands. Thus, the existing light and glare generated from the site is limited. The proposed Project would introduce new sources of light from new building security lighting, street lights within the Project area, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from the Project. Thus, the Project would increase lighting and could increase glare compared to the existing condition. The proposed Project would be subject to the City's Municipal Code and the Gateway Specific Plan Guidelines and Development Standards, and Project lighting would be required to be shielded, diffused or indirect to avoid glare to both on and offsite residents, pedestrians and motorists. Thus, significant impacts are not expected. However, the EIR will evaluate the proposed Project's potential to produce substantial amounts of light and/or glare during construction and operation and will evaluate its impact on the existing sensitive receptors (such as residences) surrounding the Project site.

## 5.2 AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

Potentially  
Significant  
Impact

Less Than  
Significant with  
Mitigation  
Incorporated

Less Than  
Significant  
Impact

No Impact

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐ ☐ ☐ ☒

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ ☐ ☒ ☐

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐ ☐ ☐ ☒

d) Result in the loss of forest land or conversion of forest land to non-forest use?

☐ ☐ ☐ ☒

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

☐ ☐ ☐ ☒

**a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The State of California Department of Conservation's Farmland Mapping and Monitoring Program is charged with producing maps for analyzing impacts on the state's agricultural resources.<sup>2</sup> California's agricultural lands are rated based on soil quality and irrigation status. For CEQA purposes, the following categories qualify as "agricultural land": Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land.<sup>3</sup>

<sup>2</sup> Farmland Mapping and Monitoring Program, <http://www.conservation.ca.gov/dlrp/fmmp>.

<sup>3</sup> Important Farmland Categories, [http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map\\_categories.aspx](http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx); California Public Resources Code Section 21060.1.

The site consists of warehouse distribution, residential uses, and undeveloped vacant land. Although some of the residential parcels contain chickens, horses, goats, ponies, and dog raising activities, there are no agricultural activities on or adjacent to the Project site. According the Department of Conservation's Data Viewer<sup>4</sup>, the Project site is categorized as Urban and Built-Up Land. Thus, implementation of the Project would not convert Prime Farmland, Unique Farmland, and/or Farmland of Statewide Importance land to a nonagricultural use. Therefore, no impact would occur, and this topic will not be evaluated in the EIR.

**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**Less than Significant Impact.** The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments.

The majority of the Project site is zoned Industrial, Commercial, and Residential by the Gateway Specific Plan. However, the southern portion of the site is zoned for A-1-20 or Agricultural Low Density 20,000 square feet. According to Chapter 18.13 of the Norco Zoning Code, A-1-20 is intended to provide and encourage the development of agriculturally oriented low-density living areas. Consistent with the General Plan designation of Residential Agricultural, this portion of the Project site includes three residences and vacant land. No agricultural uses or operations are present on the site. The Project would develop the A-1-20 parcel as a detention basin for stormwater. The use of the area as a detention basin would not conflict with the agricultural zoning of the area. Therefore, impacts would be less than significant, and this topic will not be evaluated in the EIR.

The Project site is not under an active Williamson Act contract. Therefore, development of the Project would not result in the cancellation of the contract, and impacts related to a Williamson Act contract would not occur and this topic will not be evaluated in the EIR.

**c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** "Forest land" is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."<sup>5</sup> "Timberland" is defined as "land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees."<sup>6</sup> "Timberland Production Zone" (TPZ) is defined as "an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h)."

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<sup>4</sup> Available at <https://maps.conservation.ca.gov/doggr/DataViewer/index.html>.

<sup>5</sup> California Public Resources Code Section 12220(g).

<sup>6</sup> California Public Resources Code Section 4526.

The Project site is designated industrial, residential, commercial, and agriculture and is not zoned for forest land, timberland, or TPZ. Therefore, the Project would not result in impacts to forests or timberlands. Therefore, this topic will not be evaluated in the EIR.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** The Project site is not zoned as forest land. There is no land in the City of Norco that qualifies as forest land as defined in Public Resources Code section 12220(g). Neither the General Plan, the Gateway Specific Plan, nor the City's Zoning Code provides designations for forest land. Consequently, the proposed Project would not result in the loss or conversion of forest land to non-forest use. Therefore, this topic will not be evaluated in the EIR.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

**No Impact.** The Project site is currently developed with 36 single-family residences, a distribution warehouse facility and vacant undeveloped land. Although some of the residential parcels contain chickens, horses, goats, ponies, and dog raising activities; there are no agricultural activities on or adjacent to the Project site. Additionally, neither the Project site nor its surroundings contain forest land. Thus, proposed Project would not convert existing farmland to nonagricultural uses nor forest land to non-forest uses. Therefore, no impact would occur and this topic will not be evaluated in the EIR.

### 5.3 AIR QUALITY

| Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?            | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?                                                                                             | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Potentially Significant Impact.** The City of Norco is located within the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB).

Standards for air quality within the Basin are documented in the SCAQMD's Air Quality Management Plan (AQMP).<sup>7</sup> The main purpose of an AQMP is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area in order to bring the area into compliance with federal and State air quality standards. SCAQMD's 2016 AQMP is based on regional growth forecasts for the Southern California Association of Governments region. Whether the Project would exceed the growth assumptions in the AQMP is, in part, based on projections from local general plans. The Norco General Plan designates the majority of site as Specific Plan (SP) within the Gateway Specific Plan; a small 4-parcel area south of First Street has a General Plan designation of Residential Agricultural (RA) and a zoning designation of Agricultural – Low Density 20,000 square feet (A-1-20). The site's land use designation was approved in 1991 along with the Gateway Specific Plan. The proposed Project would be consistent with the General Plan; therefore, the Project would be consistent with the AQMP regional growth forecasts for the Southern California Association of Governments region.

A project is consistent with the regional AQMP if it does not create new violations of clean air standards, exacerbate any existing violations, or delay a timely attainment of such standards. Construction of the proposed Project would generate exhaust from construction equipment and vehicle trips, fugitive dust from demolition and ground-disturbing activities, and off-gas emissions from architectural coatings and paving. The proposed Project would also result in the emission of pollutants into the Basin during Project operation from vehicle and truck trips, and stationary sources. The emission of pollutants resulting from construction (short-term) and operation (long-term) of the proposed Project have the potential to affect implementation of the AQMP. Therefore, the EIR will evaluate any impacts the proposed Project may have on the attainment of regional air quality objectives. Mitigation measures will be recommended as needed.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

**Potentially Significant Impact.** The Basin is designated under the California and National Ambient Air Quality Standards (NAAQS) as nonattainment for ozone (O<sub>3</sub>), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>) (California standard only), and lead (Los Angeles County only).

Air quality impacts are divided into short-term construction and long-term operational impacts. Short-term impacts are the result of demolition, grading, and/or construction operations. Long-term impacts are associated with the long-term operations of the proposed Project. Implementation of the proposed Project may increase existing levels of criteria pollutants and contribute to their nonattainment status in the Basin during both construction and operational activities. Thus, an air quality analysis will be prepared to determine if the proposed Project would result in a cumulatively considerable net increase in any criteria air pollutant. This topic will be addressed in the EIR, and mitigation measures will be recommended, as appropriate.

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<sup>7</sup> South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan (March 2017), available at <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** An impact is potentially significant if emission levels exceed the state or federal ambient air quality standards, thereby exposing sensitive receptors to substantial pollutant concentrations. Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). There are residential communities surrounding all sides of the Project site. The EIR will evaluate the potential for construction and operation activities of the proposed Project to exceed SCAQMD's localized significance thresholds in accordance with SCAQMD's guidance methodology. Mitigation measures will be recommended as needed.

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less Than Significant Impact.** The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by 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.*

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Odors generated by the operation of the proposed Project are not expected to be significant or highly objectionable and would be required to be in compliance with SCAQMD Rule 402, which would prevent nuisances to sensitive land uses.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any residences, they would be diluted to well below any level of odor concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials.

During operations, trucks and vehicles operating at the loading docks may emit odor. A southern California study (Zhu, 2002) showed measured concentrations of vehicle-related pollutants, including diesel exhaust, decreased dramatically (more than 90%) within approximately 300 feet.<sup>8</sup> There are no sensitive receptors (single-family residences) adjacent to the Project site or

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<sup>8</sup> Zhu, Y et al. "Study of Ultra-Fine Particles Near A Major Highway With Heavy Duty Diesel Traffic." Atmospheric Environment. 2002; 36:4323-4335

within 300 feet of proposed loading dock facilities. Therefore, by the time any diesel exhaust emissions reach the nearest residences, they would be diluted and not generate an objectionable odor. In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with operation- and construction-generated odors would be less than significant, and no further analysis is required in the EIR.

#### 5.4 BIOLOGICAL RESOURCES

| Would the project:                                                                                                                                                                                                                                                                                               | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?                                                                                                                                                                              | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/>            |

**a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** The Project site is developed with an industrial warehouse and 36 single-family residences. However, a large portion of the site contains undeveloped vacant land. In addition, the site includes ornamental landscaping, such as trees which could provide nesting areas for bird species. As a result, a biological assessment will be prepared to evaluate whether the Project has the potential to result in a substantial adverse effect on candidate, sensitive, or

special status species. This topic will be analyzed in the EIR and mitigation measures will be recommended, as necessary.

**b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** A drainage channel crosses the southeastern portion of the site between Mountain Avenue and First Street and conveys stormwater through the site to the Riverside County Flood Control Channel to the east of Mountain Avenue. A biological assessment will be conducted by a professional biologist to determine if the site has the potential to contain a riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. This topic will be addressed in the forthcoming EIR, and mitigation measures will be recommended, as appropriate.

**c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**Potentially Significant Impact.** As described in the previous response, the Project site is bisected by a drainage channel in the southeastern portion of the site. No known federally or state protected wetlands are present on the project site. A biological assessment will be conducted to determine if any protected wetlands are present in the drainage channel or elsewhere on the project site that would be potentially impacted by project implementation. This topic will be addressed in the forthcoming EIR, and mitigation measures will be recommended, as appropriate.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Potentially Significant Impact.** The Project site contains a drainage channel in the southeastern portion of the site. A biological assessment will be conducted by a professional biologist to determine whether a migratory wildlife corridor exists in the drainage channel and if the Project has the potential to impact the corridor.

In addition, the Project site includes vacant undeveloped land and trees, that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515. Therefore, the Project's potential impact to migratory birds during construction and operation will be evaluated in the EIR.

**e) Conflict with any local policies or ordinances protecting biological resources?**

**No Impact.** The City of Norco Municipal Code Section 12.12 regulates street trees and states that purpose of the regulation is to assure that a single tree species on any given street will be planted, maintained, trimmed, and replaced if damaged, in a uniform manner to develop a consistent and formal streetscape, providing a canopy effect appropriate to the nature of development adjacent to the street. The section is intended to implement an effective urban forestry program to protect the health, safety, and welfare of the community. There are no

existing street trees along the roadways around the Project site. The proposed Project would install new street trees, as part of the roadway improvements and install landscaping along the roadway setbacks adjacent to the new buildings. New trees and landscaping would comply with Norco Municipal Code Section 12.12, as applicable. Therefore, there would be no impacts. This topic will not be evaluated in the EIR, and no mitigation measures are required.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

**Potentially Significant Impact.** The Project site is within the boundaries of the Western Riverside County Multi-Species Habitat Conservation Plan. The Project site is not located within a MSHCP Criteria Area or Cell (Cities of Riverside and Norco Area Plan-Independent Cell Group). However, it is located within areas requiring habitat assessments for the burrowing owl (Section 6.3.2-Additional Survey Needs and Procedures) and selected Group 7 Narrow Endemic Plant Species (Section 6.1.3- Narrow Endemic Plants). Therefore, a biological assessment pursuant to the requirements of the MSHCP will be prepared and the potential impacts of the Project related to the MSHCP will be evaluated in the EIR.

## 5.5 CULTURAL RESOURCES

| Would the project:                                                                                            | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                          | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**

**Potentially Significant Impact.** Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project site currently contains industrial warehouse and single-family residential buildings, and remnants of previous uses. Several of the existing buildings are of historic age (in excess of 50 years), one of which was the former home, garage, and original egg plant of the founders of the Norco Egg Ranch who were Jewish immigrants and Holocaust survivors. Thus, it is possible that existing structures within the Project site are considered historic resources pursuant to CEQA Guidelines Section 15064.5. Therefore, a historic resources study will be prepared and the EIR will evaluate the proposed Project's potential to cause a substantial adverse change in the significance of a historical resource.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

**Potentially Significant Impact.** Although the Project site soils have been previously disturbed by agricultural, residential, and warehouse distribution development and activities, ground-disturbing activities of the Project have the potential to uncover previously undiscovered archaeological resources. Two historic period archaeological resources were identified onsite (33-019896 and 33-019897) in 2011. Therefore, it is possible that additional unidentified archaeological resources are located within the Project site. Thus, an archaeological resources assessment will be prepared as part of the EIR and will include a literature review and records search. Results of the archaeological resources assessment will be included in the EIR, and mitigation measures will be recommended, as necessary.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Less Than Significant Impact.** The Project site has been previous disturbed, as described above, and has not been previously used as a cemetery. Thus, impacts related to human remains are less than significant. However, California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the Project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Although soil-disturbing activities associated with the proposed Project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur. This topic will not be evaluated in the EIR, and no mitigation measures are required.

## 5.6 ENERGY

| Would the project:                                                                                                                                                                | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |

**a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Potentially Significant Impact.** During construction of the proposed Project, energy would be consumed in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project sites, construction worker travel to and from the project sites, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and;
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Once operational, the business park uses would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed.

The EIR will quantify the amount of energy that would be used by both construction and operation of the proposed Project to identify if wasteful, inefficient, or unnecessary consumption of energy resources would occur from implementation of the Project. Mitigation measures will be included, as necessary.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Potentially Significant Impact.** The State of California has established a comprehensive framework for the use of efficient energy. This occurs through the implementation of the Clean Energy and Pollution Reduction Act of 2015 (SB 350), Assembly Bill (AB) 1007 (Pavley 2007), Title 24 Energy Efficiency Standards, and the California Green Building Standards. The proposed project would result in an increase in energy use. Therefore, the EIR will further evaluate the energy use by the proposed project and evaluate its consistency with the applicable plans and policies.

## 5.7 GEOLOGY AND SOILS

| Would the project:                                                                                                                                                                                                                                                                     | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:                                                                                                                                                         |                                     |                                                    |                                     |                                     |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iv) Landslides?                                                                                                                                                                                                                                                                        | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?                                                                                                   | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?                                                                                                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |

**a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

**No Impact.** In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate "Earthquake Fault Zones" along with faults that are "sufficiently active" and "well-defined." The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-

Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

According to the City's Safety Element of the Norco General Plan there are no active or potentially active faults known on the site in the Norco area. Therefore, development of the Project would not expose people or structures to potential substantial adverse effects, including the risk or loss, injury, or death. In addition, all development is required to comply with the Uniform Building Code seismic design standards as implemented by the City through the development permitting process to reduce geologic hazard susceptibility. Therefore, any impacts related to rupture of a known fault lines would not occur and will not be further evaluated in the EIR.

**ii. Strong seismic ground shaking?**

**Less Than Significant Impact.** According to the City's Safety Element of the Norco General Plan there are no active or potentially active faults known on the site in the Norco area. However, ground shaking could still occur as a result from faults in the Chino/Elsinore zone. The closest fault zone, the Chino Fault, is located more than 3 miles from the Project site. The proximity of the site to the active faults will result in ground shaking during moderate to severe seismic events. However, structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) that provides provisions for earthquake safety based on factors including building occupancy type, the types of soils onsite, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it would withstand the effects of strong ground shaking.

All Project construction would also be developed in compliance with the Norco Municipal Code, the recommendations of a geotechnical investigation and all other ordinances adopted by the City related to construction and safety. The Norco Building and Safety Division would review the building plans through building plan checks, issuance of a building permit, and inspection of the building during construction, which would ensure that all required CBC seismic safety measures are incorporated into the building. Compliance with the CBC as verified by the City's review process, would reduce impacts related to strong seismic ground shaking to a less than significant level, and impacts related to groundshaking will not be further evaluated in the EIR.

**iii. Seismic-related ground failure, including liquefaction?**

**Potentially Significant Impact.** Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

A geotechnical investigation will be prepared for the Project site and potential impacts will further be discussed in the EIR. Mitigation measures will be recommended, if appropriate.

**iv. Landslides?**

**No Impact.** Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits. As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur and will not be further evaluated in the EIR.

**b) Result in soil erosion or the loss of topsoil?**

**Potentially Significant Impact.** The proposed Project would involve excavation, grading, stockpiling, and import and export of soil to and from the Project site. Grading increases the potential for erosion by removing the protective vegetation, changing the natural drainage patterns, and constructing slopes. As a result, the EIR will evaluate the potential of soil erosion or the loss of topsoil to occur during implementation of the Project.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?**

**Potentially Significant Impact.** As stated above, the Project site is located in an area that does not contain or is adjacent to large slopes, and impacts related to landslides would not occur. However, liquefaction has the potential to occur and result in lateral spreading or collapse. A geotechnical investigation will be prepared to further analyze the potential of geologic impacts related to implementation of the Project, and this topic will further be analyzed in the EIR.

**d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Potentially Significant Impact.** Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture. As described above, the Project site soils contain varying amounts of clay; and therefore, could be expansive. A geotechnical investigation will be prepared to analyze the potential of impacts related to expansive soils, and this topic will further be analyzed in the EIR.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

**No Impact.** The proposed Project would be served by the City sewer utilities and would not include the use of septic tanks or alternative wastewater disposal systems. There is no impact related to these systems and this topic will not be analyzed in the EIR.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Potentially Significant Impact.** The site vicinity is underlain by Pleistocene alluvial deposits that have the potential to contain paleontological resources. Therefore, as part of preparation of the EIR a paleontological resources assessment will be prepared to evaluate the potential of the site to contain fossils or other resources. The site-specific investigation will include detailed geologic conditions, the potential for paleontological resources to exist, and mitigation measures, if necessary, will be recommended.

## 5.8 GREENHOUSE GAS EMISSIONS

| Would the project:                                                                                                               | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Potentially Significant Impact.** Global climate change is not confined to a particular project area. A typical project does not generate enough greenhouse gas (GHG) emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Implementation of the proposed project would generate GHG emissions during both construction and operation of the development. During construction, sources of GHG emissions include construction equipment and workers' commutes to and from the site. During operations, the project would generate GHG emissions from vehicular trips; water, natural gas, and electricity consumption; and solid waste generation. The project has the potential to generate a substantial increase in GHG emissions. Therefore, this issue will be further analyzed in the EIR.

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Potentially Significant Impact.** The State of California, through its Governors and Legislature, has established a comprehensive framework for the substantial reduction of GHG emissions over the next 40-plus years. This will occur primarily through the implementation of Assembly Bill (AB) 32 (2006), Senate Bill (SB) 375 (2008), Executive Order S-3-05 (2005), Executive Order B-30-15 (2015), and SB 32 (2016), which address GHG emissions on a statewide, cumulative basis. The proposed project would result in an increase in GHG emissions. Therefore, the EIR will further evaluate the level of GHG emissions produced by the proposed project and evaluate its consistency with the applicable plans and policies.

## 5.9 HAZARDS AND HAZARDOUS MATERIALS

| Would the project:                                                                                                                                                                                                                                                                  | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/>            |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?                                                                                                                                             | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Potentially Significant Impact.** A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or

potential hazard to human health and safety or to the environment if released into the workplace or environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or the local implementing agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The proposed construction activities would involve transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking during construction activities. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. Additionally, asbestos-containing materials and lead based paint may exist in the existing structures onsite due to the date of construction. The EIR will describe the various regulations related to potential hazardous material releases related to construction and provide mitigation measures, as necessary to reduce impacts related to construction.

The proposed Project would operate new industrial, commercial, and office uses on the Project site. The future building occupants within the Specific Plan area site are not yet identified, and based on the planned industrial land uses, it is possible that acute hazardous materials could be used during the course of a future building user's daily operations. Therefore, the EIR will evaluate the potential of the Project to result in hazards to the public or the environment from the routine use, transport, or storage of hazardous materials.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Potentially Significant Impact.** The Project site was historically used for agricultural uses, which may indicate that herbicides and pesticides were previously stored and used on the site, and contains aged structures that may contain hazardous materials such as lead based paint, asbestos, and contaminated soils. In addition, Project grading and excavation could unearth contaminants that may be present in soils from previous uses on the site. A Phase I Environmental Site Assessment will be prepared to analyze the potential for previously used chemicals, and other hazardous or potentially hazardous materials, being on the site. Given historic uses and the potential presence of hazardous materials, this topic will be further evaluated in the forthcoming EIR.

**c) Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Potentially Significant Impact.** The Project site is located 0.14 mile east of three schools: George Washington Elementary, Victress Bower Elementary and Auburndale Intermediate School are all located across Parkridge Avenue, west of the Project site. Although the schools are separated from the Project site by existing residential land uses, the EIR will analyze the Project's potential to emit hazardous emissions or handle hazardous materials that could impact the schools.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Potentially Significant Impact.** A site-specific Phase I Environmental Site Assessment for the Project site will be prepared which will include an up-to-date governmental database search. Potential impacts would be analyzed based on the findings of the Phase I ESA. Thus, this topic would be further discussed in the EIR.

- e) For a project within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**Less Than Significant Impact.** The Project site is located 1.50 mile east of the Corona Municipal Airport. According to the Riverside County General Plan the Project site's southwest corner is within the Corona Municipal Airport Influence Area Boundary and identified as an area of potential hazard to objects over 100 feet tall. As the Project would result in a maximum of 50-foot high structures, it would not result in a safety hazard or excessive noise, and impacts would be less than significant. Therefore, this topic will not be analyzed in the EIR.

- f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?**

**Potentially Significant Impact.** The City's Safety Element, as contained within the City of Norco General Plan, includes policies and procedures to be administered in the event of a disaster.<sup>9</sup> The Safety Plan seeks interdepartmental and inter-jurisdictional coordination and collaboration to be prepared for, respond to and recover from every day and disaster emergencies. The City has adopted a Local Hazard Mitigation Plan (LHMP) prepared by the Norco Fire Department as recently as March 2017.<sup>10</sup> The Project site is identified as a special flood hazard area subject to inundation by the 1% annual change flood in the LHMP. The EIR will examine the proposed Project's consistency with the LHMP, as well as any adopted emergency response or evacuation plans. The Project's site plan and circulation system (internal and ingress/egress) will be evaluated as part of this analysis. This topic will be included in the EIR and mitigation measures will be recommended, as necessary.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** According to the CalFire Fire Hazard Severity Zone Map for Western Riverside County<sup>11</sup> and the Fire Hazards Map in the City's Safety Element<sup>12</sup>, the Project site is not within a Very High Fire Hazard Severity Zone. Adjacent areas to the Project site are urbanized and the site is not adjacent to or in the vicinity of wildlands. Therefore, impacts related to exposure of people or structures to wildland fire hazards would not occur, and this topic will not be analyzed in the EIR.

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<sup>9</sup> General Plan Safety Element Section 2.

<sup>10</sup> Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=24754>.

<sup>11</sup> Available at [http://www.fire.ca.gov/fire\\_prevention/fhsz\\_maps\\_riversidewest](http://www.fire.ca.gov/fire_prevention/fhsz_maps_riversidewest).

<sup>12</sup> General Plan Safety Element Section 2.1.2 and Fire Hazards Map at page 9.

## 5.10 HYDROLOGY AND WATER QUALITY

| Would the project:                                                                                                                                                                                                     | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: |                                     |                                                    |                                     |                          |
| i) result in a substantial erosion or siltation on- or off-site;                                                                                                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| iv) impede or redirect flood flows?                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?                                                                                                                    | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |

### a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Potentially Significant Impact.** The proposed Project would convert the partially vacant residential and industrial warehousing site into new business park uses. Development of the Project would include construction activities such as demolition, clearing, grading, paving, and building construction. These activities could result in the generation of water quality pollutants that could violate water quality or waste discharge standards. Required permits pursuant to National Pollutant Discharge Elimination System (NPDES) regulations, contain water pollution control requirements applicable to the Project. The General Construction Permit issued by the State Water Resources Control Board requires the Project applicant to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would specify Best Management Practices (BMPs) to be used during construction of the Project to minimize or avoid water pollution.

The Project would also result in development of new impervious surfaces such as parking lots, sidewalks, and buildings that could increase the levels of polluted runoff as water infiltration rates

would be reduced. A Water Quality Management Plan (WQMP) is also required by NPDES regulations. The WQMP would specify BMPs to be used in Project design and Project operation. However, due to the amount of construction disturbance and change in onsite uses potential impacts to water quality will be evaluated in the EIR, and mitigation measures will be identified as necessary.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Potentially Significant Impact.** The Project site is currently used for residential and industrial warehouse uses, and includes large areas of pervious surfaces. Upon development, the site would be largely impervious, which could change the infiltration into the groundwater basin under the Project site. Thus, hydrology assessment will be prepared to further analyze the Project's potential impacts and this topic will be evaluated in the EIR. Mitigation measures will be identified as necessary.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**i) result in a substantial erosion or siltation on- or off-site?**

**Potentially Significant Impact.** Project implementation has the potential to alter the drainage pattern onsite. As previously described, the proposed Project would require significant grading onsite and development of new drainage infrastructure. These changes could generate erosion or siltation during construction activities. In addition, a drainage channel exists in the southeast corner of the site, which could be affected during project construction and result in erosion or siltation. Therefore, hydrology and drainage studies will be prepared for the Project, and potential impacts related to erosion and siltation will be analyzed in the EIR. The EIR will describe the requirements of the SWPPP that would specify BMPs to be used during construction of the Project to minimize erosion or siltation. Mitigation measures will also be incorporated, as necessary to reduce potential impacts to erosion or siltation.

**ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**

**Potentially Significant Impact.** As described in the previous responses, the Project has the potential to alter the existing drainage pattern of the site. The Project would also result in development of new impervious surfaces such as parking lots, sidewalks, and buildings that could increase the levels of runoff, as water infiltration rates would be reduced. Thus, hydrology and drainage studies will be prepared to analyze pre- and post-development changes to the rate and amount of surface runoff onsite. The EIR will include analysis of potential impacts related to drainage, and mitigation measures will be provided as necessary.

**iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Potentially Significant Impact.** As previously mentioned, the proposed Project would involve grading and change to the onsite drainage and has the potential to result in additional runoff, as water infiltration rates would be reduced. Thus, Project impacts on existing and planned storm drainage systems will be analyzed in the EIR, and mitigation measures will be provided as necessary.

**iv) impede or redirect flood flows?**

**Potentially Significant Impact.** According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06065C0689G)<sup>13</sup>, the Project site is primarily located in Zone X, which is an area located outside of the 100-year and 500-year flood plains. However; the area near the drainage channel in the southeastern portion of the site is located within Zone AE, which is identified as an area subject to inundation by the 1 percent annual chance flood event. Therefore, a hydrology study will be prepared and the EIR will evaluate this topic. Mitigation measures will be included, as necessary.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less than Significant Impact.** According to the California Department of Water Resources Inundation Maps<sup>14</sup> and the City's Safety Element<sup>15</sup>, the City of Norco is not subject to inundation from failure of nearby dams and/or reservoirs. The City's Safety Element states that, "even though the upper reaches of the Prado Basin would extend up the Santa Ana River channel adjacent to Norco during capacity flood conditions, the water would stay within the established river channel".<sup>16</sup> Thus, the project would not risk release of pollutants as a result of inundation from failure of nearby dams and/or reservoirs.

A tsunami is a great sea wave produced by undersea disturbances such as tectonic displacement or large earthquakes. The Project site is located 30 miles to the northeast of the Pacific Ocean and separated by the Santa Ana Mountains. Therefore, the Project site would not have the potential to expose people or structures to a tsunami, and impacts related to risk release of pollutants due to a tsunami will not be further evaluated in the EIR.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin such as a reservoir, harbor, lake, or storage tank. The Project site is located approximately 0.85-mile south of Lake Norconian, which is a 55-acre artificial lake that is fed by well water that is piped to the lake. The depth of the water in the lake is generally maintained at 3 feet; however, the lake has a maximum depth of 14-feet, which provides capacity for stormwater runoff<sup>17</sup>. To ensure that the lake does not result in flooding of surrounding areas, spillovers exist at both the west and south

<sup>13</sup> Available at <https://msc.fema.gov/portal/home>.

<sup>14</sup> Available at <https://water.ca.gov/Programs/All-Programs/Division-of-Safety-of-Dams/Inundation-Maps>.

<sup>15</sup> General Plan Safety Element Section 2.1.3.

<sup>16</sup> *Id.*

<sup>17</sup> Integrated Natural Resources Management Plan Naval Weapons Station Seal Beach Detachment Norco, Norco, California, 2013. Accessed: [https://www.cnrc.navy.mil/content/dam/cnrc/cnrcsw/NAVFACSW%20Environmental%20Core/Norco\\_INRMP\\_signed.pdf](https://www.cnrc.navy.mil/content/dam/cnrc/cnrcsw/NAVFACSW%20Environmental%20Core/Norco_INRMP_signed.pdf)

portions of the lake<sup>18</sup>. Therefore, the lake contains a limited volume of water that could overflow, and any overflow would be accommodated by the spillways that are designed to accommodate the lake. Thus, the Project site that is located 0.85 mile from the lake would not risk release of pollutants as a result of a seiche from the lake. Overall, the proposed Project would result in less than significant impacts related to inundation related to a seiche, and impacts related to seiche would not be further evaluated in the EIR.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Potentially Significant Impact.** As described in the previous responses, the proposed Project would convert the partially vacant residential and industrial warehousing site into new business park uses that would generate pollutants, impervious surfaces, and utilize water supplies. Although existing regulations would require implementation of a SWPPP during construction and a WQMP during operation, whether the project would conflict with implementation of a water quality control plan or sustainable groundwater management plan will be evaluated in the EIR, and mitigation measures will be identified as necessary.

### 5.11 LAND USE AND PLANNING

| Would the project:                                                                                                                                                                     | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Physically divide an established community?                                                                                                                                         | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |

**a) Physically divide an established community?**

**Less Than Significant Impact.** The physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development was built which was inconsistent with the land uses in the community such that it divided the community. The environmental effects caused by such a facility or land use could include lack of, or disruption of, access to services, schools, or shopping areas.

The proposed Project would remove the existing single-family residential and industrial warehouse uses and develop a business park providing commercial, office, and industrial uses. The new uses would be consistent with the planned land uses identified by the Gateway Specific Plan and would be developed within the existing roadway system. The Project would improve the existing roadways and equestrian trails adjacent to and within the site, and the Project would not result in lack of access to services, schools, or shopping areas.

Although the Project would remove existing single-family residences from the site, and several residences would remain along the northern portion of the site on Second Street, these residences

<sup>18</sup> *ibid*

would continue to be across Second Street and Pacific Street from other existing single-family residences, and the project would not physically divide the residential community. Therefore, the Project would not physically divide an established community, and this topic will not be evaluated in the EIR.

**b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Potentially Significant Impact.** The proposed Project includes an amendment to the Gateway Specific Plan for warehouse parking standards and a CUP to increase building heights. In addition, the southwest corner of the Project site is within the Corona Municipal Airport Influence Area. Thus, the Project may have the potential to interfere with an applicable plan, policy, or regulation related to avoidance or mitigation of an environmental effect. Therefore, the Project's consistency with General Plan, Gateway Specific Plan, and other environmentally mitigating policies, and/or regulations will be analyzed in the EIR.

## 5.12 MINERAL RESOURCES

| Would the project:                                                                                                                                                    | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

**a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** There are no known mineral resources either on the Project site or in the immediate vicinity of the Project site that would be impacted by the Project. The General Plan Conservation Element Exhibit 3.7, *Mineral Resources*, shows that the Project site is not within an area of known mineral resources. Therefore, impacts related to known mineral resources would not occur from implementation of the Project, and this topic will not be evaluated in the EIR.

**b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on the general plan, specific plan or other land use plan?**

**No Impact.** As stated above, the Project sit does not include a mineral resource recovery site delineated on the General Plan. Therefore, impacts related to known mineral resources that are delineated on a land use plan would not occur from implementation of the Project, and this topic will not be evaluated in the EIR.

## 5.13 NOISE

| Would the project:                                                                                                                                                                                                                                                                                        | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                                                                                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Impact.** The proposed Project would redevelop the project site for business park uses. Project-related short-term construction activities, as well as long-term operational activities may expose persons in the vicinity to noise levels in excess of standards established by City's General Plan.

A Project-specific noise impacts analysis will be prepared to determine the potential short-term construction and long-term operational noise impacts associated with exposure of persons to or generation of noise levels in excess of standards established local standards. This topic will be evaluated the EIR, and mitigation will be identified, as needed.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Groundborne vibration or noise would be associated with construction activities at the Project site, including demolition, grading, and building construction, and with associated hardscape and landscape improvements. These temporary increased levels of vibration could impact vibration-sensitive land uses (single-family homes) surrounding the Project site. The operation of the Project would include heavy trucks transiting on site to and from the loading dock areas. The noise impacts analysis will include a vibration assessment to analyze the impact of vibration from trucking operations on nearby streets and roadways, as well the impact of construction vibration levels on nearby residential homes. This topic will be evaluated in the EIR, and mitigation measures will be recommended, as needed.

**c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**Less Than Significant Impact.** The proposed Project site is located approximately 1.5 miles east

of the runway at the Corona Municipal Airport and is within its Airport Influence Area boundary. However, as shown in the Riverside County Airport Land Use Compatibility Plan (Map CO-3)<sup>19</sup>, the Project site is outside the 55 CNEL noise compatibility contour of the Corona Municipal Airport. Due to the distance of the airport from the Project site, people residing or working in the project area would not be exposed to excessive noise levels related to airports. Furthermore, standard building construction consistent with the State of California Green Building Standards Code typically provides up to 25 dBA CNEL of exterior to interior noise attenuation. Therefore, implementation of the proposed Project would not expose people residing or working in the project area to excessive noise levels, and impacts would be less than significant.

#### 5.1.4 POPULATION AND HOUSING

| Would the project:                                                                                                                                                                                                  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

##### a) Induce substantial unplanned population growth in an area, either directly or indirectly?

**Less Than Significant Impact.** The proposed Project would remove the existing residential and employment uses on the project site and develop a new business park that would be consistent with the Gateway Specific Plan, which was approved by the City in 1991. The project would provide an increase of employment on the Project site that could lead to a potential population increase in the surrounding area. However, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in land use plans, a project that is consistent with the land use designated in a General or Specific Plan would also be consistent with the SCAG's growth projections. The proposed business park uses would result in an increased number of employees; and as shown in the SCAG 2016 growth forecast<sup>20</sup> the number of employees in the City of Norco is anticipated to increase by 51.4 percent between 2012 and 2040. Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would be within the forecasted and planned growth of the City. Therefore, the Project would result in a less than significant impact related to inducement of substantial unplanned population growth, and this topic will not be evaluated in the EIR.

##### b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**Less Than Significant Impact.** The Project would demolish approximately existing 36 single-family residential structures on the Project site to develop the proposed business park. Several of

<sup>19</sup> Available at: <http://www.rcaluc.org/Portals/0/PDFGeneral/plan/newplan/11-%20Vol%201%20Corona%20Municipal.pdf>

<sup>20</sup> SCAG 2016 RTP/SCS Appendix. Accessed: [http://scagrtppscs.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtppscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf)

the single-family homes are vacant and boarded up, and the remainder are occupied. However, the Census Factfinder describes that 4.2 percent of the housing units within the City (approximately 291 units) are vacant.<sup>21</sup> Thus, the Project would not displace a substantial number of people or housing units that would require construction of replacement housing, and this topic will not be evaluated in the EIR.

### 5.1.5 PUBLIC SERVICES

| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| Fire protection?                                                                                                                                                                                                                                                                                                                                                                                                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| Police protection?                                                                                                                                                                                                                                                                                                                                                                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| Schools?                                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Parks?                                                                                                                                                                                                                                                                                                                                                                                                                      | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities?                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:**

#### *i. Fire Protection and Emergency Services*

**Potentially Significant Impact.** The City of Norco contracts with the Riverside County Fire Department/Cal Fire (RCFD) for all fire and emergency services. The closest fire station to the Project site is Station 14, located approximately 0.40 miles northeast of the Project site, at 1511 Hamner Avenue, Norco, CA 92860. RCFD staffing needs are determined by the number of calls and requests for fire, paramedic, and emergency response services. Construction and operation of the proposed business park would increase the number of structures and employees in the Project area. Although development of the Project will comply with RCFD requirements and payment of applicable fire mitigation fees, the proposed Project may impact local fire response times. The Fire Department will be consulted to determine the adequacy of existing resources and potential Project impacts on fire services. This will be further analyzed in the EIR.

#### *ii. Police Protection*

**Potentially Significant Impact.** The City contracts with the Riverside County Sheriff's Department which serves the site. The closest station to the Project site is the Norco Sheriff's Station located at

<sup>21</sup> Available at [https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC\\_10\\_SF1\\_QTH1&prodType=table](https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_SF1_QTH1&prodType=table).

2870 Clark Avenue, Norco, CA 92860, an approximately 1.5 mile drive to the northeast. The proposed Project would replace 36-single family homes and industrial uses with a new business park that would provide industrial, commercial, and office uses. Project construction and operation would increase the number of structures and employees in the Project area, resulting in additional calls for police protection service. The Norco Sherriff's station will be consulted to determine existing police resources in the City and potential Project-generated impacts to services. This topic will be discussed in the EIR

*iii. School Services*

**Less Than Significant Impact.** The proposed Project would be developed with new business park that would provide industrial, commercial, and office uses. The business park uses would not be expected to generate impacts requiring the construction of new school facilities; nevertheless, pursuant to State law, commercial/industrial development is required to pay school impact mitigation fees in the form of development fees, as adopted by the affected school district. These fees are used to finance school facilities and accommodate student growth. By law, these fees constitute full mitigation of potential impacts upon the affected school district, the Corona-Norco Unified School District. Therefore, impacts are considered less than significant and the EIR will not address potential impacts to schools.

*iv. Parks*

**Less Than Significant Impact.** The site is served by the City of Norco Parks, Recreation, and Community Services Department. Typically, residential development increases the need for new parks and increases the use of existing citywide park facilities. The proposed Project involves development of a business park and would not directly provide new housing opportunities and new residents to the area. Although new employees may occasionally use local parks, such increase in use would be limited and would not result in deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. Therefore, any increased demand on the public parks within the city would be considered a less than significant impact. This issue will not be addressed in the forthcoming EIR.

*v. Other Public Facilities*

**Less Than Significant Impact.** The proposed Project involves new business park that would provide industrial, commercial, and office uses and would not provide new housing opportunities to the area. The proposed Project is not likely to create a significant increase in the use of other public facilities such as libraries, community centers, post offices or animal shelters. Therefore, impacts are considered less than significant and the forthcoming EIR will not address potential impacts to other public facilities.

### 5.16 RECREATION

| Would the project:                                                                                                                                                                                             | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?**

**Less Than Significant Impact.** The proposed Project would construct a new business park that would provide industrial, commercial, and office uses. Implementation of the proposed Project would not directly increase housing or population, which typically cause an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. Although new employees may occasionally increase the use of existing local parks, neighborhood and regionals parks, employees' limited use would not result in deterioration to facilities such that the construction or expansion of recreational facilities would be necessary. Any impacts related to the physical deterioration of existing recreation parks or facilities would be less than significant. This issue will not be addressed in the forthcoming EIR.

**b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** The proposed Project would construct a new business park that would provide industrial, commercial, and office uses. As described above, the indirect increase in population as a result of new employment opportunities would not result in use of recreational facilities sufficient to cause deterioration such that the construction or expansion of recreational facilities would be necessary. Furthermore, the Project would improve the existing roadways and equestrian trails adjacent to and within the site. These trails are existing and would be improved based on the City of Norco specifications. Therefore, there would be less than significant impacts associated with recreational facilities and this topic will not be discussed in the EIR.

### 5.17 TRANSPORTATION

| Would the project:                                                                                                                                        | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|--------------------------|
| a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |

|                                                                                                                                                                  |                                     |                          |                                     |                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?                                                                                  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) Result in inadequate emergency access?                                                                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |

**a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**Potentially Significant Impact.** Development of the Project would result in an increase in vehicle trips, which may conflict with local plans, policies, or ordinances. Project construction would also temporarily increase vehicle trips on nearby roadways and may also increase use of transit. A traffic impact analysis will be prepared to assess existing traffic conditions, forecast Project-generated traffic volumes and distribution, and forecast traffic conditions in the Project buildout year with and without the Project. A description of the existing and planned transit in the local and regional area will be provided. In addition, the existing bicycle and proposed pedestrian (sidewalks) facilities will be detailed. Impacts related to compliance with plans and policies that address the circulation system could occur with implementation of the Project, and these issues will be evaluated in the EIR.

**b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

**Less Than Significant Impact.** The CEQA Guidelines § 15064.3(b) provides criteria for analyzing transportation impacts. For land use projects, such as the proposed Project, CEQA Guidelines § 15064.3(b) states that vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. In addition, it states that the analysis includes evaluation of factors such as the availability of transit, proximity to other destinations, etc. This section also provides guidance on setting thresholds for VMT and methodology for evaluating VMT. According to CEQA Guidelines Section 15064.3(C), the provisions of Section 15064.3 shall apply statewide beginning on July 1, 2020. Prior to July 1, 2020, lead agencies may elect to utilize VMT as a CEQA threshold, but are not required to analyze VMT. Because the City has not yet adopted a VMT threshold for determining the significance of transportation impacts, VMT will not be evaluated for the Project. Rather, the Project will be evaluated against existing City-adopted transportation thresholds. Under threshold 5.16a above.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Potentially Significant Impact.** The Project does not propose changes to the City's circulation system, such as the redesign or closure of streets. However, temporary impacts may occur during construction. Design features of the Project circulation plan, including access lanes, driveway entrances and exits, and internal roadways, will be discussed in the EIR regarding potential hazards such as sharp curves or dangerous intersections. Mitigation measures will be recommended as needed.

**d) Result in inadequate emergency access?**

**Less than Significant Impact.** Operation of the proposed project would not result in inadequate emergency access. Direct access to the project site would be provided from Mountain Avenue, and First Street, which are adjacent to the project site. The project would also be required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with the City Municipal Code. The Fire Department would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in the Uniform Fire Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the proposed project would not result in inadequate emergency access, and impacts would be less than significant.

## 5.18 TRIBAL CULTURAL RESOURCES

| a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:                           | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|------------------------------|--------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?                                                                                                                                                                                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input type="checkbox"/> |

**a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

**Potentially Significant Impact:** In addition to consultation with Native American tribes that have provided notification to the City pursuant to Assembly Bill 52, a cultural resources assessment will be prepared with a literature review and records search related to potential site-specific tribal cultural resources. Additionally, a Sacred Lands search request will be obtained from the Native American Heritage Commission (NAHC) as part of the tribal consultation process. Results of the updated cultural resources assessment and tribal consultation will be included in the EIR. If required, mitigation measures will be recommended.

- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**Potentially Significant Impact.** Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (Public Resources Code § 21074). In order to determine whether any tribal cultural resources could be impacted by the proposed Project, California Native American tribes that are traditionally and culturally affiliated with the Project area will be contacted early in the CEQA process (Public Resources Code § 21080.3.1), and consultation undertaken with those Native American tribes that express an interest in engaging in consultation for this Project. The EIR will evaluate potential impacts of the proposed Project on tribal cultural resources, and mitigation measures will be provided as needed.

### 5.19 UTILITIES AND SERVICE SYSTEMS

| Would the project:                                                                                                                                                                                                                                                                | Potentially Significant Impact      | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact        | No Impact                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?                                                                                                                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input type="checkbox"/> |
| g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?                                                                                                                                                                | <input type="checkbox"/>            | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Potentially Significant Impact.** 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 Avenue contain 6-inch water lines. The Project would replace

the existing 6-inch water lines in Mountain Avenue and First Street with 12-inch water lines. The City's wastewater system flows north to south and a 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. Thus, the Project would construct new water and wastewater facilities and the impact will be further analyzed in the EIR. Mitigation measures will be provided, as needed.

Development of the site also includes installation of new drainage onsite and new drainage within offsite roadways. Construction of new storm drain facilities could have a potentially significant impact. Additionally, the project may require installation of electric power, natural gas, or telecommunications facilities. Thus, the EIR will evaluate the potential impacts of the construction of these facilities and recommend mitigation measures, as applicable.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Potentially Significant Impact.** The Project area is served with potable water by the Western Municipal Water District of Riverside County. Pursuant to CEQA Guidelines Section 15155, a water supply assessment will be prepared to determine if an adequate supply of water is available to serve the Project, as the Project proposes more than 650,000 square feet for industrial uses. The Project EIR will evaluate the availability of adequate water supplies to serve the Project and recommend mitigation measures, as applicable.

**c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Potentially Significant Impact.** The City of Norco would provide wastewater collection. The City is within the boundaries of the Western Municipal Water District of Riverside County. The City's wastewater is conveyed to the Western Riverside County Regional Wastewater Authority (WRCRWA) regional treatment plant in Eastvale, currently treating 8 million gallons per day (MGD) of wastewater and has a design capacity of 14 MGD. Although the treatment plant has capacity, the EIR will examine the amount of wastewater that would be produced by the Project and will determine if the proposed Project would cause the plant to exceed its capacity. This topic will be discussed in the forthcoming EIR.

**d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Potentially Significant Impact.** The City of Norco contracts with a waste disposal company, Waste Management, to transport trash to various local and regional disposal sites, including the El Sobrante Landfill, which is located approximately 12 miles south of the project site. The Project would increase in the amount of solid waste generated, thereby resulting in a contribution of waste that would add to the capacity at the El Sobrante Landfill and any other landfills designated to serve the Project. The EIR will further evaluate impacts related to disposal of solid waste and attainment of solid waste reduction goals.

**g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The Resource Conservation and Recovery Act of 1976 (United States Code Title 42, Section 6901 et seq.) governs the creation, storage, transport, and disposal of hazardous wastes and operators of hazardous waste disposal sites.

AB 939, the Integrated Waste Management Act of 1989 (California Public Resources Code Section 40000 et seq.) requires all local governments to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. Compliance with AB 939 is measured for each jurisdiction, in part, as actual disposal amounts compared to target disposal amounts. Actual disposal amounts at or below target amounts comply with AB 939. The City must comply with State law to reduce solid waste generation, promote reuse and require solid waste collection for recycling and composting. The City would require the Project to reduce solid waste generation and recycle materials as much as feasible to reduce solid waste. Because the Project would be required by the City to recycle, the Project would not have a significant impact to any federal, state or local statutes or regulations related to solid waste.

**5.20 WILDFIRE**

|                                                                                                                                                                                                                                                                    | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|------------------------------------|-------------------------------------|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:                                                                                                                                   |                                      |                                                                |                                    |                                     |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?                                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** According to the CalFire Fire Hazard Severity Zone Map for Western Riverside County<sup>22</sup> and the Fire Hazards Map in the City's Safety Element,<sup>23</sup> the Project site is not within a Very High Fire Hazard Severity Zone. Adjacent areas to the Project site are urbanized and the site is not adjacent to or in the vicinity of wildlands. Therefore, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan within or near a very high fire hazard severity zone. Wildfire risks will not be further evaluated in the EIR.

**b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact.** As described in the previous response, the Project site is not within a Very High Fire Hazard Severity Zone. Adjacent areas to the Project site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks. Thus, wildfire risks will not be further evaluated in the EIR.

**c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No Impact.** As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone, and the project does not include infrastructure that could exacerbate fire risks. The project is located within an urban setting and wildfire risks will not be further evaluated in the EIR.

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Furthermore, the project includes installation of onsite and off-site drainage facilities. Thus, the project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires. Thus, wildfire risks will not be further evaluated in the EIR.

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<sup>22</sup> Available at [http://www.fire.ca.gov/fire\\_prevention/fhsz\\_maps\\_riversidewest](http://www.fire.ca.gov/fire_prevention/fhsz_maps_riversidewest).

<sup>23</sup> General Plan Safety Element Section 2.1.2 and Fire Hazards Map at page 9.

## 5.21 MANDATORY FINDINGS OF SIGNIFICANCE

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Potentially<br>Significant<br>Impact | Less Than<br>Significant with<br>Mitigation<br>Incorporated | Less Than<br>Significant<br>Impact | No Impact                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------------------------|------------------------------------|--------------------------|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                    | <input type="checkbox"/>           | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?                                                                                                                                       | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                    | <input type="checkbox"/>           | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                                          | <input checked="" type="checkbox"/>  | <input type="checkbox"/>                                    | <input type="checkbox"/>           | <input type="checkbox"/> |

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Potentially Significant Impact.** Development of the proposed Project has the potential to impact habitat of a fish or wildlife species or rare, endangered species of plant or animal, or plant or animal communities. As previously stated, a site-specific biological resources study will be conducted to determine potential biological resources impacts. Additionally, Project ground-disturbing activities could damage previously undiscovered archaeological and/or paleontological resources. Thus, impacts to biological and cultural resources are potentially significant and will be analyzed in the EIR. Mitigation measures will be recommended as needed.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Potentially Significant Impact.** Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant,

developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- a. Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- b. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

As described above, the project would demolish historical structures, construct the business park and related improvements. The construction of a Project would have the potential to result in cumulative impacts to aesthetic, air quality, biological, cultural, geotechnical, greenhouse gas, hazardous material, hydrology, land use, noise, population and housing, public services, traffic, tribal cultural resources, and utility services. The extent and significance of potential cumulative impacts resulting from the combined effects of the proposed project plus other past, present, and reasonably foreseeable future project will be evaluated in the EIR.

**c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** Redevelopment of the site into development business park could directly or indirectly cause substantial adverse effects on human beings if not properly mitigated. The proposed Project could result in impacts to aesthetic, air quality, biological, cultural, geotechnical, greenhouse gas, hazardous material, hydrology, land use, noise, population and housing, public services, traffic, tribal cultural resources, and utility services that all could result in adverse effects on human beings. Therefore, these impacts will be addressed in the EIR, and mitigation measures will be recommended as needed.

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Alan & Suzanne Schuetz  
2193 First St  
Norco, Ca. 92860

When we bought our home in rural Norco our street was a dirt road. There was no gateway development project. Norco built seven custom homes on unpaved First street. We moved here to give our young children an agricultural lifestyle. After defending our rural home on numerous occasions we find our lives turned upside down again.

We are told by City Hall "we only have one police car" available. One police car cannot monitor the volume of traffic today. Let alone the increase of trucks and trailers back and forth, day & night coming from the proposed industrial business park.

We are unable to enter or exit our driveway because of the amount of daily cars, trucks, and delivery vehicles. Increasing traffic will create a health hazard and diminish air quality. The health of children & seniors will be at risk because of the change in our

quality. Asthma is an increased threat to children due to trucks exhaust. Approval has not been given but we have truck & trailer traffic now. Loud noise of trucks shifting, engine noise, plus air horn & jake brakes. Disturbing the peace in our home. Trucks do not follow proposed routes, but we cannot call the police for help.

The lights from the trucks comes thru the windows at night.

Demolition of 36 existing single family residences is unthinkable. (Noise)

This project includes 26 new industrial buildings & 3 commercial buildings that will include office uses.

Demolition is not quiet nor is building. Is this business park good for the 36 families it displaces. We have a lack of housing everywhere. The project claims there is no significant impact?

Our peaceful and rural lifestyle is threatened by this proposed business park.

## Steve King

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**From:** Connie Muckenthaler <icetimerunner@gmail.com>  
**Sent:** Monday, April 22, 2019 4:02 PM  
**To:** Steve King  
**Subject:** Palomino Business Park/Public Comments

Mr. King, I am writing to ask that the following concerns be addressed as the city reviews the proposal for the Palomino Business Park on Mountain Ave.

Let me first acknowledge that I understand the area is zoned for industrial and that this is in compliance with the Master Plan for the city, but the current plans for this development raise several issues that need to be addressed with steps to mitigate the impact before this plan goes forward.

The size of the project is immense. At 1,900,000 proposed square feet it seems that it would overwhelm the infrastructure of this area. Even if 2nd street is widened, that would be completely inadequate to deal with the traffic that would be generated by a facility of that size. As it is, there are a series of small blocks that cannot handle the semi traffic when it's there. I did not see where the size and the anticipated trucking traffic was addressed. This is a critical issue. One traffic signal at 2nd and Mountain is not going to handle that level of traffic.

The proposal states it would be a 24/7 operation. What happens to the residential areas that surround this facility. Our quality of life will be negatively impacted along with our property values. Not only should the traffic be addressed but also light and noise level increases.

What about air quality. While I know CEQA applies, the potential for increased air pollution must be seriously considered. What steps will be taken to mitigate the resulting increase in contaminants from truck and vehicle traffic.

While there have been concessions by the developer to put a horse trail around the perimeter, how will it be useable if there are 7 driveways just on Mountain between First and Second Streets. If there is truly a need for 7 driveways, that indicates the traffic is anticipated to be significant. Is there really a need for this size facility? Do we need more vacant business buildings in Norco?

Again I realize the this is zoned for industrial but the proposed size of this project is not in keeping with the location of the property and the impact to the residential areas surrounding it. It would be different if it was next to a freeway on ramp, but our local streets, particularly 2nd and Hamner are already so impacted by traffic generated from the college, this project could put us in permanent gridlock.

I look forward to hearing the Planning Commissions response to these issues.

Sent from my iPad

**Steve King**

---

**From:** Norco Danny Palmer <dannyjfpalmer@gmail.com>  
**Sent:** Tuesday, March 26, 2019 7:44 AM  
**To:** Steve King  
**Subject:** Palomino business park project

Hello my name is Daniel Palmer and I live at 1745 Pacific Ave, Norco California 92860 which is one of the homes that would be torn down for this project I'm curious to know when the project is estimated to start construction so I can relocate my family in a timely matter. Any information would be great thank you

## Steve King

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**From:** Steve King  
**Sent:** Tuesday, March 26, 2019 3:46 PM  
**To:** 'Norco Danny Palmer'  
**Cc:** Alma Robles  
**Subject:** RE: Palomino business park project

Hi Mr. Palmer,

Thank you for your email and interest regarding the Notice of Preparation (NOP) of an Environmental Impact Report for the Palomino Business Park Project that was mailed. We are collecting comments for response and will forward your request to the project proponent team as they will have a better idea of when construction could begin. The request being reviewed with this NOP is to change development regulations which has to go through public hearings with both the Planning Commission and the City Council, and meetings with the Streets, Trails, and Utilities Commission, the Historical Preservation Commission, and other commission(s) as needed. Ultimately everything needs to be approved by the City Council before the project proponent can submit plans towards receiving grading and building permits.

**From:** Norco Danny Palmer [mailto:dannyjfpalmer@gmail.com]  
**Sent:** Tuesday, March 26, 2019 7:44 AM  
**To:** Steve King <SKING@ci.norco.ca.us>  
**Subject:** Palomino business park project

Hello my name is Daniel Palmer and I live at 1745 Pacific Ave, Norco California 92860 which is one of the homes that would be torn down for this project I'm curious to know when the project is estimated to start construction so I can relocate my family in a timely matter. Any information would be great thank you

## Steve King

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**From:** Norco Danny Palmer <dannyjpalmer@gmail.com>  
**Sent:** Tuesday, March 26, 2019 3:57 PM  
**To:** Steve King  
**Cc:** Alma Robles  
**Subject:** Re: Palomino business park project

Thank you for your response.

On Tue, Mar 26, 2019 at 3:45 PM Steve King <[SKING@ci.norco.ca.us](mailto:SKING@ci.norco.ca.us)> wrote:

Hi Mr. Palmer,

Thank you for your email and interest regarding the Notice of Preparation (NOP) of an Environmental Impact Report for the Palomino Business Park Project that was mailed. We are collecting comments for response and will forward your request to the project proponent team as they will have a better idea of when construction could begin. The request being reviewed with this NOP is to change development regulations which has to go through public hearings with both the Planning Commission and the City Council, and meetings with the Streets, Trails, and Utilities Commission, the Historical Preservation Commission, and other commission(s) as needed. Ultimately everything needs to be approved by the City Council before the project proponent can submit plans towards receiving grading and building permits.

**From:** Norco Danny Palmer [mailto:[dannyjpalmer@gmail.com](mailto:dannyjpalmer@gmail.com)]  
**Sent:** Tuesday, March 26, 2019 7:44 AM  
**To:** Steve King <[SKING@ci.norco.ca.us](mailto:SKING@ci.norco.ca.us)>  
**Subject:** Palomino business park project

Hello my name is Daniel Palmer and I live at 1745 Pacific Ave, Norco California 92860 which is one of the homes that would be torn down for this project I'm curious to know when the project is estimated to start construction so I can relocate my family in a timely matter. Any information would be great thank you

To whom this may concern,

I am writing this letter in regards to the proposed Palomino Business Park in the city of Norco, CA. I am a 45-year resident of Norco, avid equestrian, homeowner, and mother. I understand that the property on Mountain Avenue (former egg ranch) will be developed, however, I am very concerned about the scope of this project. I do not believe that an industrial complex of this size is beneficial to our animal keeping community. Yes, I understand that there will be a few office buildings as well as a few commercial buildings, but the majority of this complex will be industrial. Based on the drawings and description of this project I think it is safe to assume that this will be mostly a truck depot with a lot of truck traffic. This means that there will be a substantial increase in truck traffic on our roads. We already have a horrible traffic problem on Second Street and Hamner Avenue due to high school and college traffic along with people cutting through Norco to avoid the traffic on I-15. I am well aware of this traffic because I drive in it every single day. I live on Mountain Avenue between Second and Third Street. How on earth do you propose to deal with the additional traffic from large trucks? The distance between the I-15 and Mountain is short and just a couple of trucks traveling at the same time will have a horrific negative effect on the flow of traffic and make it impossible to travel on Second Street. Traffic is not the only concern I have regarding this project. The hours of operation will be 24/7 so as a resident in this area I will be dealing with truck noise all day and night long. The quality of air that my family and I breathe will be worse than it already is. Trail riding will become more dangerous. The proposed height increase to 50 feet will be unsightly. Home values in the surrounding area will decrease, and just to reiterate, traffic will be horrific. I truly believe that this proposed business park will cause irreversible damage to our community and I strongly urge you to reconsider the scope and development of this industrial "business" park.

Sadly,

Erin Southerland

951-737-9181

## Steve King

---

**From:** Berwin Hanna  
**Sent:** Wednesday, March 27, 2019 2:39 PM  
**To:** Steve King; Andy Okoro  
**Subject:** Fwd: Unfair Zoning

Can you answer this?  
Get [Outlook for iOS](#)

----- Forwarded message -----

From: "**Berwin Hanna**" <[bhanna@ci.norco.ca.us](mailto:bhanna@ci.norco.ca.us)>  
Date: Wed, Mar 27, 2019 at 2:37 PM -0700  
Subject: Re: Unfair Zoning  
To: "Gregor Dellenbach" <[barbaradellenbach@icloud.com](mailto:barbaradellenbach@icloud.com)>

Thanks for the email. I will look into this a heck with the planning department.

Get [Outlook for iOS](#)

On Wed, Mar 27, 2019 at 2:10 PM -0700, "Gregor Dellenbach" <[barbaradellenbach@icloud.com](mailto:barbaradellenbach@icloud.com)> wrote:

Dear Mayor Pro Tem,

Will you help us understand why the City did not rezone three residential lots on Second Street between Mountain and Pacific for the EIR planning map we just received in the mail?

My wife graduated from Norco High in 1976 and wanted to live here, and so she has with our five children since 1994.

Our neighborhood was rural with only the Egg Ranch as our back door commercial neighbor all these years. Our home was built in 1977 on a quiet street, prior to even the freeway coming to town.

That all changed five years ago with the Allere Group's Gateway Specific Plan project. At that time we had already initiated a sale of our home with that project for our property to be a detention basin.

The project was rejected by the Planning Commission and Council vote.

So for five years, we have seen our neighborhood change from people to boarded up and dilapidated homes.

We are asking you to please represent our concern of being left out of the project maps zoning. Please ask the Planning Commission and City council to rezone three (3) lots along Second Street so that they will be included in the Caprock project.

Thank you,

Greg and Barbara Dellenbach  
2550 Second Street  
27 March 2019

Sent from my iPhone  
Greg Dellenbach

Notice of Preparation (NOP)  
Response  
April 22, 2019  
Gregor and Barbara  
Dellenbach  
2550 Second Street  
Norco, California  
92860-2812

Dear Steve King(City of  
Norco Planning Director),

We have reviewed and  
considered your City of  
Norco NOP letter dated  
March 22, 2019 regarding  
the Caprock Project that will  
Environmentally Impact (EI)  
our Property in its present  
condition. We have lived on  
site since 1994 and want to  
describe what now exists  
there:

1. The Norco Egg Ranch

and their auxiliary buildings and residential properties.

2. Plant and animal life.
3. A grassland ecosystem with fowls and predators.
4. The area may include habitat for an endangered or threatened species.
5. The site has slopes and the soil would be in danger of erosion during construction.
6. There is a presence drainage courses and wetland areas, especially after rain, in depressions allowing for plants, birds and animals to thrive.
7. Activities on lands next to the site that are

planned to being removed are equestrian lifestyles (stables, riding arenas and large .5 acre residential family homes with patios, pools and tennis courts for city living in rural atmosphere.)

8. There is night compliant dark skies for views of constellations, plants and moon in all her phases, due to no street lights.

We will now ask for "standing" with our response to the Notice of Preparation and our questions about the Caprock Project:

1. We would like to be

notified of anything this project proposes

2. The EI of our views looking south onto the Ortega Mountains?
3. The EI of shadows the tall buildings will cause onto our property and the sight of being boxed in instead of the openness-we enjoy now.
4. The EI of dust from building this project to our property? i.e. to the Windows, Cars etc
5. The EI noises of building this project?
6. The EI of the increased street traffic on First, Second, Pacific and Mountain Streets with road widening?
7. The EI of the cars on

Second Street being closer to our house and potentially driving onto our property?

8. The EI of the horse trail being narrowed from ten(10) ft to five feet, what it is now for horses and riders?
9. The EI of a taller than five foot chain link fence around our property?
10. The EI of Lights on the buildings taking from our dark compliant skies at night (since there are no street lights now) for the Stars and planets viewing?
11. The EI truck or other vehicular noises with traffic ingress to the property?

12. The EI of the shaking and vibrations to our house of the ground during demolition and building? What will that do and or dislocate our structure's columns and beams?
13. The EI of the 4-remaining residential values of our property for resale? (See zoning map)
14. The EI of how is the added air particulate pollution going to effect the quality of life?
15. The EI of how this project is going to enhance our residential property?
16. The EI of disturbing the soil to the rodents who live in the soil and the

raptors who prey on them?

17. The EI of soil erosion from the site being controlled during construction?
18. The EI of the top soil not being saved and put back on the site after the construction?
19. The EI of the project hardscape (roofs, driveways and parking) to future rain runoff and retention?
20. The EI of this site for important fossils or artifacts?
21. The EI for bikes and walking along Second Street?
22. The EI of how our rural neighborhood will benefit by it?

23. The EI to the zoned residential housing? Will an alternative proposal (ie different project design) be found that meets the needs of the people?
24. The EI of how the proposed project would permanently prevent other uses of the site for greater "point of sale" city of Norco sales tax?
25. The EI if vacant land is paved, for example, then that land could not be used for a community garden or a playground or for statuary "Palominos" horse Park?
26. The EI of tree removal and the less oxygen

into the atmosphere?

27. The EI of proper disposal of old air conditioners and old refrigerators and making sure the CFC's in them are disposed of properly?
28. What type of ecosystem is now found at the proposed site?
29. How will the roused project affect the living and non living parts of the ecosystem at the site?
30. What alternatives are there to locating the project at this site? Where else could it be done?
31. How will the proposed project benefit our equestrian lifestyle?

32. How will the site be permanently changed if the project goes ahead or not to all the boarded up structures?

33. We are asking the City Council to change the residential zoning after the four residential homes are sold and the current residents have moved out, to Caprock and Match the new zoning for the Gateway Specific Plan.

Based on our review of the proposed project, we think the project should not go ahead until the residential zoning is changed and the remaining residents relocated so their properties will be included into the Caprock project or it should

be stopped.

Thank you Steve for reading  
and considering our  
responses of the NOP,

Barbara and Gregor  
Dellenbach

## Steve King

---

**From:** Electron Electric <your\_electron@earthlink.net>  
**Sent:** Monday, March 25, 2019 10:58 PM  
**To:** Steve King  
**Subject:** Regarding the Palomino Business Park Project

Hi Mr King,

I am the owner of parcel 122-020-027 located on  
2300 1st street in Norco.

My parcel is designated for use as a single family residence, and even if at this time I don't have a home built there, I am very concerned about having an industrial park built right next to my property and about how it may affect the environment and quality of living once a home is built.

Could you please share any links or documents listing what options do I have as a property owner?

What are the chances of re-zoning my property as commercial or industrial since building a house would be unappealing once the park project takes place?

Regards.

Ismael Gonzalez

## Steve King

---

**From:** Steve King  
**Sent:** Tuesday, March 26, 2019 9:11 AM  
**To:** 'Electron Electric'  
**Cc:** Alma Robles  
**Subject:** RE: Regarding the Palomino Business Park Project  
**Attachments:** General Plan Amendment and Zone Change Application, exempt project, highlighted fees, march 2019.doc

Hi Mr. Gonzalez,

Thank you for your email and interest regarding the Notice of Preparation of an Environmental Impact Report for the Palomino Business Park Project that was mailed. We are collecting comments for response but the Zone Change you asked about is a decision of the City Council after a recommendation of the Planning Commission, both of which are public hearings once the City has received the appropriate application and fees. As such I am unable to comment on the chance or likelihood of having a Zone Change request approved on your property. Since your property is adjacent to the south across First Street, and adjacent to the west across the flood channel, from the project site, it is not out of the realm for consideration of a Zone Change, but again that is the ultimate decision of the City Council and there are existing adjacent residential uses that would be part of that consideration. And please be aware that submittal of an application is not a guarantee that the Zone Change request will be approved. Both the Planning Commission and City Council have full discretion to approve or deny a request. I've attached the Zone Change (and General Plan Amendment) application with the fees highlighted that would need to be submitted with the application. If you have any questions regarding the application process, please call or email me, or Alma Robles at (951) 270-5682, arobles@ci.norco.ca.us .

-----Original Message-----

From: Electron Electric [mailto:your\_electron@earthlink.net]  
Sent: Monday, March 25, 2019 10:58 PM  
To: Steve King <SKING@ci.norco.ca.us>  
Subject: Regarding the Palomino Business Park Project

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Regards.

Ismael Gonzalez



## Steve King

---

**From:** your\_electron <your\_electron@earthlink.net>  
**Sent:** Tuesday, March 26, 2019 10:08 AM  
**To:** Steve King  
**Cc:** Alma Robles  
**Subject:** RE: Regarding the Palomino Business Park Project

Thanks Mr King, really appreciate your quick response and the information provided.

Regards.

Ismael G.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

**From:** Steve King <SKING@ci.norco.ca.us>  
**Date:** 3/26/19 9:11 AM (GMT-08:00)  
**To:** 'Electron Electric' <your\_electron@earthlink.net>  
**Cc:** Alma Robles <AROBLES@ci.norco.ca.us>  
**Subject:** RE: Regarding the Palomino Business Park Project

Hi Mr. Gonzalez,

Thank you for your email and interest regarding the Notice of Preparation of an Environmental Impact Report for the Palomino Business Park Project that was mailed. We are collecting comments for response but the Zone Change you asked about is a decision of the City Council after a recommendation of the Planning Commission, both of which are public hearings once the City has received the appropriate application and fees. As such I am unable to comment on the chance or likelihood of having a Zone Change request approved on your property. Since your property is adjacent to the south across First Street, and adjacent to the west across the flood channel, from the project site, it is not out of the realm for consideration of a Zone Change, but again that is the ultimate decision of the City Council and there are existing adjacent residential uses that would be part of that consideration. And please be aware that submittal of an application is not a guarantee that the Zone Change request will be approved. Both the Planning Commission and City Council have full discretion to approve or deny a request. I've attached the Zone Change (and General Plan Amendment) application with the fees highlighted that would need to be submitted with the application. If you have any questions regarding the application process, please call or email me, or Alma Robles at (951) 270-5682, arobles@ci.norco.ca.us .

-----Original Message-----

**From:** Electron Electric [mailto:your\_electron@earthlink.net]  
**Sent:** Monday, March 25, 2019 10:58 PM  
**To:** Steve King <SKING@ci.norco.ca.us>  
**Subject:** Regarding the Palomino Business Park Project

Hi Mr King,

I am the owner of parcel 122-020-027 located on  
2300 1st street in Norco.

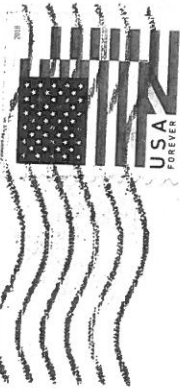
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What are the chances of re-zoning my property as commercial or industrial since building a house would be unappealing once the park project takes place?

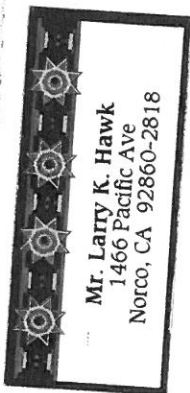
Regards.

Ismael Gonzalez



SANTA ANA CA 926

25 MAR 2015 PM 31



Steve King - Planner Director  
City of Norco planning Dept  
2870 Clark ave

Steve King

Dear Sir - I have lived on Pacific ave for 46 years and thanks to one dumb decision after another by the city, the whole area near the old Norco egg ranch has turned into a slum

The property value is cut in half on Pacific ave, and almost every summer the tumbleweeds bury the street.

The property is also a major fire hazard every summer.

It almost looks like a ghost town, please help us over here that have been overlooked for along time.

Larry Hawk  
Korean war Veteran

## Steve King

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**From:** Marilyn <marelin@earthlink.net>  
**Sent:** Monday, April 22, 2019 3:59 PM  
**To:** Steve King  
**Subject:** Palomino Business Park EIR

RE: Palomino Business Park EIR  
Emailed To: sking@ci.norco.ca.us

To: Steve King, City of Norco Planning Department

My first concern is that the documentation referred to in the Notice from the City of Norco dated March 22, 2019 was not available on-line at the time I received the notification. I spent the better part of two days looking for it, and it was not there.

Having now found it, I see that the documentation was not posted until March 27, 2019, five days later than the beginning of the period given for review. Therefore, it seems only logical that the 'REVIEW PERIOD' should be extended by that same amount of time, and anyone receiving the original notice should be informed of that.

I feel that the portion of land South of First Street should remain as previously zoned and not be included in the Palomino Business Park project. I would like more information as to exactly what this 'Retention Basin' would entail.

The problems with the rest of the development will include extensive traffic added to First Street which has already made my home inaccessible by vehicle. (Several attempts to discuss this with the City have Norco previously have been met with rudeness to the point that I felt the problem will be better addressed by an attorney.)

The extensive noise of trucks loading 24 hours a day is decidedly unfair to anyone living in the vicinity. I would have thought this wouldn't be a problem, but when the Target was first opened (and they were nightly violating their agreement not to be loading trucks all night long) the noise made by trucks backing up carried so at 2:00 am that it sounded constantly like a truck was backing through the bedroom. No one in the area got any sleep until the City of Norco forced Target into compliance. I can not imagine that all night noise with no recourse.

(to be continued)

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*Democratic Socialism explained in 3 words:*  
***We the People*** Since 1776.

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## Steve King

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**From:** Steve King  
**Sent:** Thursday, April 04, 2019 4:41 PM  
**To:** 'Nicholas Whipps'  
**Subject:** RE: Palomino Business Park - Please Add to Mailing List

Mr. Whipps,

Thank you for your interest, we will add you to the noticing lists.

---

**From:** Nicholas Whipps <nwhipps@wittwerparkin.com>  
**Sent:** Thursday, April 04, 2019 3:18 PM  
**To:** Steve King <SKING@ci.norco.ca.us>  
**Subject:** Palomino Business Park - Please Add to Mailing List

Dear Mr. King:

Can you please add myself and Ashley McCarroll ([amccarroll@wittwerparkin.com](mailto:amccarroll@wittwerparkin.com)) to the mailing list for the Palomino Business Park project? I would like to receive all future notices related to this project, including notices of upcoming hearings, as well as notices of availability of all future environmental review documents.

Thank you,

NICHOLAS WHIPPS

wittwer / parkin

WITTWER PARKIN LLP  
333 SPRECKELS DR., STE. H  
APTOS, CA 95003  
831.429.4011  
WWW.WITTWERPARKIN.COM

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## Steve King

---

**From:** Rull, Paul <PRull@RIVCO.ORG>  
**Sent:** Tuesday, March 26, 2019 11:18 AM  
**To:** Steve King  
**Subject:** Palomino Business Park EIR transmittal ALUC comments  
**Attachments:** Palomino Business Park Project transmittal ALUC comments.doc

Good Morning Steve,

Thank you for transmitting the above reference project to ALUC for review. Please find attached my comments. Please note that the project is located within Zone E of the Corona Municipal Airport Influence Area, and as such, state law requires (PUC section 21676) ALUC review of the project as the City's General Plan has not yet been found consistent with the Corona Municipal Airport Land Use Compatibility Plan.

Please note that ALUC review is required for any discretionary planning projects that occur within the Corona Municipal Airport Influence Area.

If you have any questions, please feel free to contact me.

**Paul Rull**

ALUC Principal Planner



**Riverside County Airport Land Use Commission**

4080 Lemon Street, 14<sup>th</sup> Floor

Riverside, Ca 92501

(951) 955-6893

(951) 955-5177 (fax)

[PRULL@RIVCO.ORG](mailto:PRULL@RIVCO.ORG)

[www.rcaluc.org](http://www.rcaluc.org)

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[County of Riverside California](#)

## Steve King

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**From:** Steve King  
**Sent:** Tuesday, March 26, 2019 3:56 PM  
**To:** 'Rull, Paul'  
**Subject:** RE: Palomino Business Park EIR transmittal ALUC comments

Thank you Paul,

We will submit your comments to the environmental consultant that is preparing the environmental documents. With regards to the City General Plan not being consistent with the Corona Municipal Airport Land Use Compatibility Plan, the Safety Element of the General Plan does address that and my recollection was that it was found consistent. What do we need to do to correct that? Thanks.

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**From:** Rull, Paul [mailto:PRull@RIVCO.ORG]  
**Sent:** Tuesday, March 26, 2019 11:18 AM  
**To:** Steve King <SKING@ci.norco.ca.us>  
**Subject:** Palomino Business Park EIR transmittal ALUC comments

Good Morning Steve,

Thank you for transmitting the above reference project to ALUC for review. Please find attached my comments. Please note that the project is located within Zone E of the Corona Municipal Airport Influence Area, and as such, state law requires (PUC section 21676) ALUC review of the project as the City's General Plan has not yet been found consistent with the Corona Municipal Airport Land Use Compatibility Plan.

Please note that ALUC review is required for any discretionary planning projects that occur within the Corona Municipal Airport Influence Area.

If you have any questions, please feel free to contact me.

**Paul Rull**  
ALUC Principal Planner



**Riverside County Airport Land Use Commission**  
4080 Lemon Street, 14<sup>th</sup> Floor  
Riverside, Ca 92501  
(951) 955-6893  
(951) 955-5177 (fax)  
[PRULL@RIVCO.ORG](mailto:PRULL@RIVCO.ORG)  
[www.rcaluc.org](http://www.rcaluc.org)

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[County of Riverside California](#)



# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

March 26, 2019

Mr. Steve King, Planning Director  
City of Norco Planning Department  
2870 Clark Avenue  
Norco CA 92860

**CHAIR**  
Steve Manos  
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Simon Housman

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Barbara Santos

County Administrative Center  
4080 Lemon St., 14th Floor.  
Riverside, CA 92501  
(951) 955-5132

[www.rcaluc.org](http://www.rcaluc.org)

**RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW REQUIRED**

Jurisdiction Project Case: Palomino Business Park Project

Dear Mr. King:

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the transmittal for the City of Norco case; a proposed Environmental Impact Report for the Palomino Business Park project.

ALUC staff has determined that the project is located within Compatibility Zone E of Corona Municipal Airport Influence Area which does not restrict non-residential intensity, and prohibits hazards to flights.

California Public Utilities Code section 21676 requires the local agency to refer any amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within an Airport Land Use Compatibility Plan (ALUCP) to the ALUC. Additionally, California Public Utilities Code Section 21676.5 allows the ALUC to review all projects within the Airport Influence Area when the local jurisdiction's General Plan is not consistent with the applicable ALUCP. Since the General Plan is not consistent with the ALUCP and/or because the project contemplates amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation, the ALUC requests that you submit the above-identified project(s) for its review. ALUC staff is also available to assist in bringing your jurisdiction's General Plan into consistency with the applicable ALUCP, if the local jurisdiction so desires.

If you have any questions, please contact Paul Rull, ALUC Principal Planner, at (951) 955-6893.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Paul Rull, ALUC Principal Planner



RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

225300

April 9, 2019

City of Norco  
Planning Department  
2870 Clark Avenue  
Norco, CA 92860

Attention: Steve King

Re: Palomino Business Park EIR

The District does not usually review land divisions/land use cases or provide State Division of Real Estate letters/flood hazard reports for projects that are located within incorporated cities. Exceptions are made for cases with items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees).

The District's review is based on the above-referenced project transmittal, received March 25, 2019. The District has not reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☒ This project involves District proposed Master Drainage Plan facilities, namely Norco MDP Lines N-10, S-4 and S-3, located along 2<sup>nd</sup> Street, Pacific Avenue and Mountain Avenue, respectively. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- ☐ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Norco Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- ☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, South Norco Channel. For further information, contact the District's encroachment permit section at 951.955.1266.
- ☐ The District's previous comments are still valid.

April 9, 2019

City of Norco  
Re: Palomino Business Park EIR

225300

**GENERAL INFORMATION**

This project may need to obtain an applicable National Pollutant Discharge Elimination System (NPDES) permit coverage from the State Water Resources Control Board or the California Regional Water Quality Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,



DEBORAH DE CHAMBEAU  
Engineering Project Manager

c: Riverside County Planning Department  
Attn: Jason Killebrew

HY:blm

SENT VIA USPS AND E-MAIL:

April 16, 2019

[sking@ci.norco.ca.us](mailto:sking@ci.norco.ca.us)

Steve King, Planner Director  
City of Norco, Planning Department  
2870 Clark Avenue  
Norco, CA 92860

**Notice of Preparation of an Environmental Impact Report for the Proposed  
Palomino Business Park**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### **Mitigation Measures**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook* South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits and South Coast AQMD Rules**

If the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or (909) 396-3308.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS  
RVC190402-02  
Control Number