

SEATON TECH CENTER

PLOT PLAN No. 180025

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

CEQA CASE No: CEQ180101

LEAD AGENCY:

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April 14, 2020

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B2	Biological Technical Report
B3	Determination of Biologically Equivalent or Superior Preservation
C	Phase I and Phase II Cultural Resources Assessment
D	Energy Analysis
E1	Geotechnical Investigation
E2	Supplemental Infiltration Testing
F	Greenhouse Gas Analysis
G	Phase I Environmental Site Assessment
H1	Preliminary Hydrology Calculations
H2	Project Specific Preliminary Water Quality Management Plan
I	Noise Impact Analysis
J1	Paleontological Resource and Mitigation Monitoring Assessment
J2	Paleontological Resource Impact Mitigation Program
K1	Traffic Impact Analysis
K2	Vehicle Miles Traveled (VMT) Assessment

LIST OF ACRONYMS AND ABBREVIATED TERMS

<u>Acronym</u>	<u>Definition</u>
A-1-1	Light Agriculture (zoning classification)
AB 341	Assembly Bill 341
AC	Asphalt Concrete
AC	Acre
ADOE	Archaeological Determinations of Eligibility
ADP	Area Drainage Plan
ADT	Average Daily Traffic
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
APE	Area of Potential Effect
APN	Assessor Parcel Number
AMSL	above mean sea level
ASTM	American Society for Testing and Materials
BLM	Bureau of Land Management
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFD	Community Facilities District
CFGF	California Fish and Game Code
cfy	cubic feet per year
cy	cubic yard
CIWMP	Countywide Integrated Waste Management Plan
CGC	California Government Code
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CRDR	County Regulations and Design Requirement
Corps	U.S. Army Corps of Engineers
CRMP	Cultural Resource Monitoring Program
CSA	Community Service Area
CWA	Clean Water Act
dBA	A-weighted decibels

LIST OF ACRONYMS AND ABBREVIATED TERMS

<u>Acronym</u>	<u>Definition</u>
DBESP	Determination of Biologically Equivalent or Superior Preservation
DEH	Department of Environmental Health
DIF	Development Impact Fee
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
E+P	Existing plus Project
EA	Existing plus Ambient Growth
EAC	Existing plus Ambient Growth plus Cumulative Conditions
EAP	Existing plus Ambient Growth plus Project Conditions
EAPC	Existing plus Ambient Growth plus Project plus Cumulative Conditions
EDR	Environmental Data Resources
e.g.	exempli gratia meaning “for example”
EIC	Eastern Information Center
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EMWD	Eastern Municipal Water District
FAR	floor-to-area ratio
FEMA	Federal Emergency Management Agency
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping & Monitoring Program
FTA	Federal Transit Administration
GCC	Global Climate Change
gpd	gallons per day
GLO	Government Land Office
HCP	Habitat Conservation Plan
HPD	Historic Properties Data File
HMBEP	Hazardous Materials Business Emergency Plan
i.e.	id est meaning “that is”
I-215	Interstate 215
I-P	Industrial Park (zoning classification)
IA	Implementing Agreement
in/sec	inch per second
IS	Initial Study

LIST OF ACRONYMS AND ABBREVIATED TERMS

<u>Acronym</u>	<u>Definition</u>
ITE	Institute of Engineers
JPA	Joint Powers Authority
kWh	kilowatts per hour
Leq	Equivalent continuous (average) sound level
LAFCO	Local Agency Formation Commission
LI	Light Industrial (General Plan land use designation)
LOS	Level of Service
M-SC	Manufacturing – Service Commercial (zoning classification)
MARB	March Air Reserve Base
MDP	Master Drainage Plan
mgpd	million gallons per day
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMTCO2e	Million Metric Ton of Carbon Dioxide Equivalent
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MRZ-3	Mineral Resources Zone 3
MSCHP	Multiple Species Habitat Conservation Plan
MS4	Municipal Separate Storm Sewer System
MVAP	Mead Valley Area Plan
MWD	Metropolitan Water District
NAHC	Native American Heritage Commission
ND	Negative Declaration
NIOSH	National Institute for Occupational Safety and Health
NOD	Notice of Determination
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OHP	Office of Historical Preservation
PCE	Passenger Car Equivalent
PM	Parcel Map
PP	Plot Plan
PPV	Peak Particle Velocity

LIST OF ACRONYMS AND ABBREVIATED TERMS

<u>Acronym</u>	<u>Definition</u>
PRC	Public Resources Code
R-R-1/2	Rural-Residential ½-Acre Lot Size (zoning classification)
RC-VLDR	Rural Community – Very Low Density Residential (General Plan land use designation)
RCALUC	Riverside County Airport Land Use Commission
RCIT	Riverside County Information Technology
RCFD	Riverside County Fire Department
RMS	root-mean-square
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SF	square foot/square feet
SCH	State Clearinghouse
SGMA	Sustainable Groundwater Management Act
SKR	Stephens' kangaroo rat
SOI	Sphere of Influence
STP	Shovel Test Pit
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
TIA	Traffic Impact Analysis
TLMA	Transportation and Land Management Agency
UCR	University of California, Riverside
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VVUSD	Val Verde Unified School District
WQMP	Water Quality Management Plan

1.0 Introduction

1.1 DOCUMENT PURPOSE

This document is a Mitigated Negative Declaration (MND) prepared in accordance with the California Environmental Quality Act (CEQA), including all criteria, standards, and procedures of CEQA (California Public Resource Code §§ 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000 *et seq.*). This MND is an informational document intended for use by the County of Riverside, Trustee and Responsible agencies, and members of the general public in evaluating the physical environmental effects resulting from planning, constructing, and operating the proposed Seaton Tech Center project (hereafter, referred to as the “Project” and described in detail in Section 3.0, *Project Description*, of this MND).

This MND was compiled by the County of Riverside, serving as the Lead Agency for the proposed Project pursuant to CEQA Section 21067 and CEQA Guidelines Article 4 and Section 15367. “Lead Agency” refers to the public agency that has the principal responsibility for carrying out or approving a project.

The construction and operation of the proposed Project is considered to be a “project” under CEQA and, as a result, the Project is subject to the County of Riverside’s environmental review process. The primary purpose of CEQA is to ensure that decision-makers and the public are aware of the environmental implications of a specific action or project and to determine whether the proposed project will have the potential to cause significant adverse impacts on the environment. As part of the proposed Project’s environmental review process, the County of Riverside prepared an Environmental Assessment (Initial Study), which is included herein in Sections 4.0 and 5.0.

Although the Initial Study was prepared with consultant support (T&B Planning, Inc.), the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgement and position of the County of Riverside in its capacity as Lead Agency. The County determined that the Initial Study and its supporting reference material provide substantial evidence that an MND is the appropriate environmental document for the proposed Project.

1.2 PROJECT SUMMARY

The proposed Project consists of an application for a Plot Plan (Plot Plan No. 180025) to develop an approximately 9.15-acre property located south of Perry Street, east of Seaton Avenue, west of Harvill Avenue, and north of Martin Street on Assessor Parcel Number (APN) 314-130-007 in the unincorporated community of Mead Valley in western Riverside County, California. The proposed Project involves the construction and operation of one (1) approximately 203,029 square foot (SF) industrial warehouse building with associated improvements.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

1.3.1 CEQA Objectives

CEQA, a statewide environmental law contained in Public Resources Code §§ 21000-21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies inform themselves of the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an Environmental Impact Report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations. If significant adverse impacts can be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

1.3.2 CEQA Requirements for a Mitigated Negative Declaration

An MND is a written statement by the Lead Agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines § 15371). The CEQA Guidelines require the preparation of an MND if the Initial Study prepared for a project identifies potentially significant effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the project applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the Lead Agency, that the project may have a significant effect on the environment. (CEQA Guidelines § 15070(b))

1.3.3 Format and Content of Mitigated Negative Declaration

The following components comprise this MND in its entirety:

- 1) This document, including all sections. Section 1.0 includes the *Introduction*. Section 2.0 includes the *Environmental Setting*. Section 3.0 includes the *Project Description*. Sections 4.0 and 5.0 comprise the completed *Environmental Assessment - Initial Study* and its associated analysis that document the reasons to support the findings and conclusions of the Initial Study. Section 6.0 includes the *References* used in preparation of this MND, and which are part of the Project's administrative record on file with the County of Riverside. A Mitigation Monitoring and Reporting Program (MMRP), which includes all mitigation measures imposed on the proposed Project by the County of Riverside to ensure that effects to the environment are reduced to less-than-significant levels, is attached to this MND. The MMRP also indicates the required timing for the implementation of each mitigation measure and identifies the parties responsible for implementing and monitoring each mitigation measure.

- 2) Eighteen (18) technical reports that evaluate the environmental effects of the proposed Project are attached to this MND as Technical Appendices A1-K2. Each of the appendices listed below are available for review at the Riverside County Planning Department, located at 4080 Lemon Street, 12th Floor, Riverside, California, 92502 and are hereby incorporated by reference pursuant to CEQA Guidelines § 15150.

- A1 Air Quality Impact Analysis, dated December 28, 2019 and prepared by Urban Crossroads Inc. (Urban Crossroads, Inc., 2019a)
- A2 Mobile Source Health Risk Assessment, dated December 28, 2019 and prepared by Urban Crossroads Inc. (Urban Crossroads, Inc., 2019b)
- B1 Jurisdictional Delineation, dated February 25, 2019 and prepared by Glenn Lukos Associates, Inc. (GLA, 2019a)
- B2 Biological Technical Report, dated October 10, 2019 and prepared by Glenn Lukos Associates, Inc. (GLA, 2019b)
- B3 Determination of Biologically Equivalent or Superior Preservation, dated November 8, 2019 and prepared by Glenn Lukos Associates, Inc. (GLA, 2019c)
- C Phase I and II Cultural Resources Assessment, dated February 5, 2019 and prepared by Brian F. Smith and Associates (BFSA, 2019a)
- D Energy Analysis, dated October 4, 2019 and prepared by Urban Crossroads, Inc. (Urban Crossroads, Inc., 2019c)
- E1 Geotechnical Investigation, dated July 2018 and prepared by NorCal Engineering (NorCal Engineering, 2018a)
- E2 Supplemental Infiltration Testing, dated September 4, 2018 and prepared by NorCal Engineering (NorCal Engineering, 2018b)
- F Greenhouse Gas Analysis, dated December 28, 2019 and prepared by Urban Crossroads, Inc. (Urban Crossroads, Inc., 2019a)
- G Phase I Environmental Site Assessment, dated August 23, 2018 and prepared by V3 Companies (V3 Companies, 2018)
- H1 Preliminary Hydrology Calculations, dated January 17, 2020 and prepared by Thienes Engineering, Inc. (Thienes Engineering, Inc., 2020b)
- H2 Project Specific Preliminary Water Quality Management Plan, dated September 5, 2019 and prepared by Thienes Engineering, Inc. (Thienes Engineering, Inc., 2019a)
- I Noise Impact Analysis, dated January 23, 2020 and prepared by Urban Crossroads, Inc. (Urban Crossroads, Inc., 2020a)

- J1 Paleontological Resource and Mitigation Monitoring Assessment, dated December 6, 2018 and prepared by Brian F. Smith and Associates, Inc. (BFSA, 2018)
 - J2 Paleontological Resource Impact Mitigation Program (PRIMP), dated January 29, 2019 and prepared by Brian F. Smith and Associates, Inc. (BFSA, 2019b)
 - K1 Traffic Impact Analysis, dated August 15, 2019 and prepared by Urban Crossroads, Inc. (Urban Crossroads, Inc., 2019e)
 - K2 Vehicle Miles Traveled (VMT) Assessment, dated October 14, 2019 and prepared by Urban Crossroads, Inc. (Urban Crossroads, Inc., 2019h)
- 3) All plans, policies, regulatory requirements, and other documentation that is incorporated by reference in this document pursuant to CEQA Guidelines § 15150. Refer to Section 6.0, *References*, of this MND.

1.3.4 Initial Study Conclusions

Section 4.0 of this document contains the Initial Study that was prepared for the proposed Project pursuant to CEQA and County of Riverside requirements. The Initial Study determined that implementation of the proposed Project would result in no impacts or less-than-significant environmental effects under the issue areas of: Aesthetics; Agriculture and Forest Resources; Energy; Geology/Soils; Hazards and Hazardous Material; Hydrology/Water Quality; Land Use/Planning; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; and Utilities/Service Systems. The Initial Study determined that the proposed Project would result in potentially significant effects to the issue areas of Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Paleontological Resources; Transportation; and Tribal Cultural Resources, but the Project Applicant has agreed to mitigation measures that would avoid or reduce the effects to a point where clearly no significant effects would occur. The Initial Study determined that, with the implementation of mitigation measures, there is no substantial evidence in light of the whole record before the Lead Agency (County of Riverside) that the Project may have a significant effect on the environment. Based on the Initial Study's conclusions, the County of Riverside determined that an MND is appropriate for the proposed Project pursuant to CEQA Guidelines § 15070(b).

1.3.5 Mitigated Negative Declaration Processing

The County of Riverside Planning Department directed and supervised the preparation of this MND. Although prepared with the assistance of the consulting firm T&B Planning, Inc., all of the content, analyses, determinations, and conclusions contained within this MND reflect the sole independent judgment of the County of Riverside, acting as Lead Agency under CEQA.

A Notice of Intent (NOI) to adopt the MND will be distributed to the following entities for a 30-day public review period: 1) organizations and individuals who have previously requested such notice in writing to the County of Riverside; 2) owners of contiguous property shown on the latest equalized assessment roll; 3) Responsible and Trustee agencies (public agencies that have a level of discretionary approval over some component of the proposed Project); 4) the Riverside County Clerk; and 5) the California Office of Planning

and Research, State Clearinghouse. The NOI identifies the location(s) where the MND, Initial Study, MMRP, and associated Technical Appendices are available for public review.

Following the public review period, the County of Riverside will review any comment letters received and determine whether any substantive comments were provided that may warrant revisions to the MND. If substantial revisions are not necessary (as defined by CEQA Guidelines § 15073.5(b)), then the MND will be finalized and forwarded to the County of Riverside decision-maker(s) for review as part of their deliberations concerning the proposed Project. In order to approve the proposed Project, the County of Riverside would need to approve this MND. Following approval, a Notice of Determination (NOD) for the MND will be filed with the Riverside County Clerk and the State Clearinghouse.

1.3.6 Lead Agency Contact Information

During the public review period for this MND, comments or questions concerning this MND can be submitted in writing by mail or e-mail to the County of Riverside as follows. No other methods of transmitting written comment (via social media, for example) will be accepted.

Deborah Bradford, Planner
County of Riverside Planning Department
4080 Lemon Street, 12th Floor
Riverside CA 92502-1409
Email: dbradford@rivco.com
(951) 955-6646

2.0 Environmental Setting

2.1 PROJECT LOCATION

As shown on Figure 2-1, *Regional Map*, and Figure 2-2, *Vicinity Map*, the 9.15 gross-acre Project site is located in the unincorporated community of Mead Valley in western Riverside County, California. Western Riverside County abuts San Bernardino County to the northeast, Orange County to the west, and San Diego County to the south. The Project site is located southwest of the City of Moreno Valley and west of the City of Perris. Interstate 215 (I-215) is located approximately 1,500 feet east of the Project site and the March Air Reserve Base/Inland Port Airport (MARB) is located approximately 1.2 miles northeast of the Project site.

The Project site is located south of Perry Street, east of Seaton Avenue, west of Harvill Avenue, and north of Martin Street. Specifically, the Project site is located near the southeast corner of Perry Street and Seaton Avenue. The northwest corner of the Project site is located ~96 feet south of the Perry Street/Seaton Avenue intersection in its existing condition.

2.2 CEQA REQUIREMENTS FOR THE ENVIRONMENTAL SETTING

CEQA Guidelines § 15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

§15125(a) (1) Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record.

In the case of the proposed Project, the Initial Study determined that an MND is the appropriate form of CEQA compliance document, which does not require publication of a Notice of Preparation (NOP) (refer to Subsection 1.3.4, *Initial Study Conclusions*). Therefore, the environmental setting for the proposed Project is the approximate date that the Project's environmental analysis commenced. The Project's applications were filed with the County of Riverside on October 18, 2018 and the environmental review commenced at that time. As such, the environmental baseline for the proposed Project is established as of approximately October 18, 2018.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

The land uses surrounding the Project site are described below and shown on Figure 2-3, *Surrounding Land Uses and Development*. Refer to Section 2.4, *Planning Context*, for information about the surrounding properties' land use designations and zoning classifications.

North: The Project site is bounded on the north by Perry Street, which is an unimproved dirt road in its existing condition. North of Perry Street is vacant land. Northwest of the site, on the northwest corner of Perry Street and Seaton Avenue is Torrance Aluminum, a manufacturer of aluminum windows and doors, at 22850 Perry Street. Torrance Aluminum comprises two large metal buildings, paved and unpaved surfaces, and outdoor storage surrounded by chain link fencing and barbed wire. (V3 Companies, 2018, p. 13) (Google Earth, 2018)

East: Abutting the Project site on the east is vacant land. East of that vacant land is Harvill Avenue and industrial warehouse development including a 600,000 s.f. warehouse (recently leased by Living Spaces) that is part of the approved Majestic Freeway Business Center Specific Plan area (Webb, 2005). East of the Majestic Freeway Business Center industrial warehouse complex is I-215. (V3 Companies, 2018, p. 13) (Google Earth, 2018)

South: South of the Project site is Green Bee Yard, a concrete foundation construction company, at 18890 Seaton Avenue and White House Sanitation, a porta potty rental and septic tank service company, at 18916 Seaton Avenue. Both of these businesses have small metal buildings and extensive outside storage surrounded by either a block wall or chain link fence with barbed wire. Martin Street is located south of these businesses. South of Martin Street is the approved Majestic Freeway Business Center Specific Plan, which is approved for industrial development. (V3 Companies, 2018, p. 13) (Google Earth, 2018) (Webb, 2005)

West: Abutting the Project site on the west is Seaton Avenue and east of Seaton Avenue is a mixture of rural residential uses and business enterprises. Golden State Paving, an asphalt paving company, is located at 22970 Cougar Street; this property is also assumed herein to have a component of residential occupancy. Concrete Equipment Storage Yard is located at 18795 Seaton Avenue. These uses are surrounded by a combination of block walls and chain link fence. A residential home with animal keeping pens comprised of metal and chain link fence is located at the southwest corner of Seaton Avenue and Perry Street (V3 Companies, 2018, p. 13) (Google Earth, 2018)

2.4 EXISTING SITE AND AREA CHARACTERISTICS

As discussed previously in Section 1.0, pursuant to the CEQA Guidelines § 15125, the environmental setting for the proposed Project is the approximate date that the Project's environmental analysis commenced. The Project's applications were filed with County of Riverside on October 18, 2018 and the environmental review commenced at that time. As such, the environmental baseline for the proposed Project is established as of approximately October 18, 2018. Therefore, pursuant to CEQA Guidelines §15125, the following subsections describe the Project site's physical environmental setting.

2.4.1 Site Access and Circulation

Access to the Project site is currently provided along the entirety of its two street frontages, Seaton Avenue and Perry Street, via edge of pavement or dirt. The segment of Seaton Avenue abutting the Project site to the west is paved. The segment of Perry Street to the north of the Project site is unpaved. There are no paved driveways or access points that enter the Project site from either of its street frontages. A gravel and dirt driveway is located along the south boundary of the site.

2.4.2 Land Use

Based on historical aerial photography, the Project site was used as agricultural cropland from approximately 1938 through 1978, and has been vacant since that time. According to Riverside County GIS, the Project site consists of “Developed/Disturbed Land;” and, although the site has not been farmed for approximately 40 years, is mapped as containing Agricultural Lands of Local Importance with a small sliver of land along the western boundary of the site mapped as “Urban Built-Up Land (RCIT, 2019)”.

As shown on Figure 2-4, *Aerial Photograph*, the Project site consists of vacant land with no structures. A gravel and dirt driveway is present along the south boundary of the site. The site is undeveloped and not directly connected to utilities, except water. (V3 Companies, 2018, pp. 11,13) Refer to Section 2.5, *Planning Context*, for information about the property’s land use designations and zoning classifications.

2.4.3 Aesthetics and Topographic Features

As shown on Figure 2-5, *USGS Topographical Map*, the Project site is relatively flat and situated at an elevation of approximately 1521-1539 feet above mean sea level (AMSL) (NorCal Engineering, 2019c, p. 2). The site slopes in a general easterly direction and is incised by an ephemeral drainage and tributary. A small rock outcropping is present in the southwest portion of the site, but due to its small size and lack of any visual prominence, is not considered to be a unique topographic feature. Regionally, the Project site lies within the larger Perris Valley, which is framed by the Gavilan Hills to the west, and the Lakeview Mountains across the valley to the east. (GLA, 2019a, p. 8) (BFSA, 2019a, p. 4.0-16)

The aesthetic character of the Project site is defined by disturbed, undeveloped, vacant land, located in an area of Mead Valley east of Seaton Avenue and west of I-215 that is transitioning to an employment-generating industrial corridor. Utility poles supporting overhead lines are located along the site’s frontage with Seaton Avenue. West of Seaton Avenue, the character transitions from business enterprises along Seaton Avenue to rural residential uses and smaller homebased business enterprises further west.

The Project site is routinely disked (soil turned over) for weed abatement purposes with tilling tracks visible throughout the site; a gravel and dirt driveway is visible along the southern boundary of the site. The existing aesthetic conditions of the Project site are shown on Figure 2-6, *Site Photo Key Map*, Figure 2-7, *Site Photos 1 and 2*, Figure 2-8, *Site Photos 3 and 4*, and Figure 2-9, *Site Photo 5*.

No sources of artificial light are located on the property, and no street lights are installed adjacent to the site along either Seaton Avenue or Perry Street. The Project site is located approximately 40 miles from

the Mt. Palomar Observatory, and according to Riverside County GIS, the Project site is located within Zone B (15-45 miles) of the Mt. Palomar Lighting Zone (RCIT, 2019) (Google Earth, 2018).

2.4.4 Air Quality and Climate

Other than airborne particulate matter (dust) and maintenance equipment exhaust that is emitted during periodic tilling of the site for weed abatement purposes, the Project site is not a current source of air pollutant emissions. The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's air quality impact analysis (*Technical Appendix A1* to this MND), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F maximum in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year.

Although air quality in the SCAB has improved over the past several decades, according to the SCAQMD, the SCAB currently does not meet State or federal criteria for ozone (8-hour standard) or particulate matter (PM) (<2.5 microns, or PM_{2.5}), and does not meet the State criteria for ozone (1-hour standard) or particulate matter (<10 microns, or PM₁₀) (SCAQMD, 2016). The SCAQMD conducts in-depth analysis of toxic air contaminants and their resulting health risks for all of Southern California. Also, air pollutants are known to adversely affect human health and the SCAQMD's MATES-IV study represents the baseline health risk by reporting calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-IV has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. MATES-IV modeling predicted an excess cancer risk of 517.59 in one million persons for the Project area, with diesel particulate matter (DPM) accounting for 68% of the total risk shown in MATES-IV. (Urban Crossroads, Inc., 2019a, p. 30)

2.4.5 Vegetation and Wildlife

The Project site is regularly tilled for weed abatement purposes and thus contains disturbed land, with no sensitive habitat communities present. Onsite vegetation includes minor brush and weeds. The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (herein, MSHCP) but is not located within a criteria area. However, the site is located within an area (Mead Valley Area Plan) requiring habitat assessments for burrowing owl. No burrowing owl observations or signs of burrowing owl were recorded on the site during a field survey conducted in 2018 and 2019. (GLA, 2019b, p. iii and Table 2-1) The site is also within a Stephens' Kangaroo Rat (SKR) Fee Area. (RCIT, 2019).

The Project site supports one (1) ephemeral drainage and its ephemeral tributary, described herein as Drainage A and Tributary A-1. Drainage A traverses the subject property from the southwestern property boundary to the northeastern boundary. Tributary A-1 originates at the western property and confluences with Drainage A near the center of the property. Drainage A continues eastward offsite, through the adjacent property, where flows are directed into the public storm drain located at the Harvill Avenue and Perry Street intersection. (GLA, 2019c, p. 2) Drainage A and Tributary A-1 are subject to the jurisdiction of the U.S. Army Corps of Engineers (Corps) jurisdiction, the Santa Ana Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW) jurisdiction (GLA, 2019a, p. 1)

2.4.6 Geology

The property is located in the Peninsular Ranges geomorphic province of California. The Peninsular Ranges province extends from the Los Angeles Basin southeast to Baja California and from the Pacific Ocean eastward to the Coachella Valley and the Colorado Desert. The province consists of numerous northwest to southeast-trending mountain ranges and valleys that are geologically controlled by several major active faults. The Project site is located in the central part of the Perris block, a generally stable area situated roughly midway between two of major faults- the Chino/Elsinore and San Jacinto fault zones.

The USGS Open File Report for the Steele Peak 7.5' Quadrangle assigns the soil materials underlying the site as early Pleistocene older alluvial fan deposits. These sediments are, in turn, underlain by Cretaceous granitic rocks of the Val Verde Pluton. The older alluvium is described in general as mostly well- dissected, well-indurated sand deposits. The underlying bedrock is described as relatively homogeneous, massive- to well-foliated, medium- to coarse-grained, biotite-hornblende tonalite. (NorCal Engineering, 2019c, p. 2)

According to Riverside County GIS, the approximate western portion of the site is mapped with a low potential paleontological sensitivity; whereas the approximate eastern portion of the site is mapped with a high sensitivity (High B) paleontological sensitivity (RCIT, 2019) (BFSA, 2018, pp. 1-2)

2.4.7 Soils

The Soil Conservation Service maps the following soil types as occurring in the general vicinity of the site (see Figure 2-10, *Soils Map*):

- Arlington Fine Sandy Loam, Deep, 2 to 8 Percent Slopes (AoC). The Arlington series consists of well-drained soils on alluvial fans and terraces. Slopes range from 0 to 35 percent but most slopes are less than 15 percent. These soils developed in alluvium from granitic rocks. Elevations range from 500 to 2,000 feet and vegetation typically consists of annual grasses, forbs, and chamise. This soil is used for irrigated citrus, truck crops, and grain, for dryland grain, pasture, and range, and for non-farming purposes. (GLA, 2019a, p. 3)
- Fallbrook Fine Sandy Loam, 2 to 8 Percent Slopes, Eroded (FfC2). The Fallbrook series consists of well-drained soils that lie on uplands and have slopes of 2 to 50 percent. These soils developed on granodiorite and tonalite. Vegetation typically associated with the Fallbrook soils includes

annual grasses, oaks, flat-top buckwheat, and chaparral. In a typical profile, the surface layer is brown sandy loam (10YR 3/3 when moist) about 14 inches thick. The subsoil is reddish-brown sandy clay loam (5YR 3/4 when moist) and at a depth of 24 inches is weathered tonalite. The Fallbrook soils are used for dryland pasture and grain, for irrigated citrus, alfalfa, and grain, and for homesites. (GLA, 2019a, p. 3)

- Hanford Coarse Sandy Loam, 2 to 8 Percent Slopes (HcC). The Hanford series consists of well-drained and somewhat excessively drained soils on alluvial fans. Slopes are 0 to 15 percent. These soils developed in alluvium made up of granitic materials. Vegetation typically associated with the Hanford soils includes annual grasses, forbs, and chamise. Typically, the upper 18 inches of the profile is grayish-brown coarse sandy loam 10YR 3/2 when moist). Underlying this is brown, stratified coarse sandy loam and loamy sand 10YR 3/3 when moist). The Hanford soils are used for dryland pasture and grain and for irrigated alfalfa, potatoes, citrus, grapes, and grain. They are also used for homesites. (GLA, 2019a, p. 3)

2.4.8 Hydrology

The Project site is located in the Santa Ana River watershed, which drains an approximately 2,650 square-mile area and is the principal surface flow water body within the region. The Santa Ana River starts in the San Bernardino Mountains, approximately 16.5 miles northeast of the Project site, and flows southwesterly for approximately 96 miles across San Bernardino, Riverside, Los Angeles, and Orange counties before spilling into the Pacific Ocean.

According to Thienes Engineering, a 66-inch reinforced concrete pipe (RCP) is constructed in Perry Street near Harvill Avenue. The 66-inch storm drain is constructed to approximately 285 feet west of Harvill Avenue. As depicted on Figure 2-11, *Existing Conditions Hydrology Map*, the Project site generally drains from west to east in an natural drainage course that traverses the site. Runoff continues easterly through the adjacent site, ultimately to the 66-inch public storm drain. The Project site currently accepts offsite drainage from areas west of Seaton Avenue. (Thienes Engineering, Inc., 2020b, p. n.p.)

Based upon information from the California Department of Water Resources, historic high groundwater in the vicinity of the Project site has been recorded deeper than 50 feet below grade. (NorCal Engineering, 2018a, p. 4) No water wells are located on the property (V3 Companies, 2018, p. 15). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate (FIRM) Panels 06065C1410G, the Project site is located in Flood Zone X, an area of minimal flood hazard (FEMA, 2008)

2.4.9 Utilities

The Project site is under the purview of the Eastern Municipal Water District (EMWD) for domestic water and sewer service. EMWD's water supply is obtained from four sources: 1) imported water from the Metropolitan Water District (MWD); 2) recycled water; 3) local groundwater production; and 4) desalted groundwater (EMWD, 2016a, pp. 3-1, 3-3). EMWD has an adopted Water Shortage Contingency Plan (EMWD Ordinance 117.2) that applies regulations and restrictions on the delivery of and consumption of water during water shortages.

There are no existing storm drain or sewer facilities in either street frontage to the Project site. There are existing water and dry utilities adjacent to the site. Power poles currently exist along Seaton Avenue that support overhead transmission lines (115k) and provide power to offsite uses.

2.5 PLANNING CONTEXT

2.5.1 Riverside County General Plan and Mead Valley Area Plan

The prevailing planning document for the Project site and its surrounding area is the Riverside County General Plan and the Mead Valley Area Plan (MVAP). As shown on Figure 2-12, *Existing General Plan Land Use Designations*, the Project site is designated Community Development - Light Industrial (LI) by the Riverside County General Plan. The Light Industrial (LI) land designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing, repair and other service facilities, warehousing, distribution centers, and supporting retail uses with a building intensity range of 0.25-0.60 floor-to-area ratio (FAR) (Riverside County, 2017a, Table LU-4).

The MVAP is a policy document that guides the physical development of property in the unincorporated community of Mead Valley. The MVAP is not a stand-alone document, but rather an extension of the County of Riverside General Plan. The County of Riverside General Plan establishes standards and policies for development within the entire unincorporated County territory. The MVAP, on the other hand, provides customized direction specifically for the Mead Valley area by establishing local Policy Areas. Policy Areas are specific geographic districts that contain unique characteristics that merit detailed attention and focused policies. The Project site is located within the March Joint Air Reserve Base Influence Area which provides for the orderly development of the March Joint Air Reserve Base and the surrounding areas in compliance with the Riverside County Airport Land Use Compatibility Plan (RCALUCP). (RCIT, 2019) (Riverside County, 2016a, p. 22)

2.5.2 Zoning Classifications

As shown on Figure 2-13, *Existing Zoning Classifications*, the Project site is split zoned Manufacturing - Service Commercial (M-SC) and Industrial Park (I-P). Specifically, the majority of the eastern portion of the Project site is zoned M-SC and a smaller portion of the property in the western portion of the site along Seaton Avenue is zoned I-P. Because the Project site is split-zoned, the proposed Project is required by the Riverside County Planning Department to be consistent with the development code regulations of both zoning classifications.

According to the Riverside County Land Development Ordinance (Ordinance No. 348), the primary purpose of the M-SC Zone is to promote and attract industrial and manufacturing activities which will provide jobs to local residents and strengthen the County's economic base. Typical uses in the I-P zone include industrial uses with special attention to circulation, parking, utility needs, aesthetics, and compatibility. Development is subject to area site improvement, landscaping, and performance standards specified in the Land Development Ordinance. (Riverside County, 2019b)

2.5.3 Surrounding Land Use and Zoning Classifications

The Project site is bounded by Perry Street on the north and Seaton Avenue on the west. The existing land uses of surrounding properties were previously described in Section 2.3, *Surrounding Land Uses and Development*.

The County's General Plan and MVAP designate surrounding properties to the north of Perry Street, and to south and east of the Project site as Light Industrial (LI). The zoning classifications of properties to the north, south, and east are I-P and M-SC (RCIT, 2019).

West of the Project site and west of Seaton Avenue is land designated by the General Plan and MVAP as Rural Community - Very Low Density Residential (RC-VLDR). RC-VLDR allows for single-family detached residences on parcels of 1-2 acres, and limited agriculture such as intensive equestrian and animal keeping uses. Lands to the west of Seaton Avenue are zoned Rural-Residential ½-Acre Lot Size (R-R-1/2) and lands west of Seaton Avenue and directly south of Perry Street are zoned Light Agriculture (A-1-1). (Riverside County, 2017a, Table LU-4) (RCIT, 2019)

2.5.4 City of Perris Sphere of Influence

According to Riverside County GIS, the Project site is located in the City of Perris Sphere of Influence (SOI) (RCIT, 2019). A SOI is a geographic area that could eventually be incorporated into a city by annexation, subject to approval of the Riverside County Local Agency Formation Commission (LAFCO).

2.5.5 Riverside County Airport Land Use Compatibility Plan

The March Air Reserve Base (MARB)/Inland Port Airport Land Use Compatibility Plan (ALUCP) identifies land use standards and design criteria for new development located in the proximity of the MARB to ensure compatibility between the airport and surrounding land uses and to maximize public safety. The Project site is located within "Compatibility Zone C2" of the MARB influence area and is therefore subject to the MARB ALUCP. Within Compatibility Zone C2, non-residential intensity is restricted to 200 people per average acre and 500 people per single acre, and hazards to flights are prohibited. (RCALUC, 2014, Table MA-2)

2.5.6 Western Riverside County Multiple Species Habitat Conservation Plan

The Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP (herein, MSHCP), a regional Habitat Conservation Plan (HCP), was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and participating entities. The intent of the Western Riverside County MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. The MSHCP identifies Criteria Areas, in which habitat conservation efforts are targeted. The Project site is not located within a Cell Group or Criteria Cell and is not targeted for conservation. However, the Project site is located in the western burrowing owl survey area and contains a non-wetland ephemeral drainage and tributary that are subject to MSHCP requirements.

2.5.7 Southern California Association of Governments Regional Transportation Plan

Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. As an MPO and public agency, SCAG develops transportation and housing plans that transcend jurisdictional boundaries that affect the quality of life for southern California as a whole.

SCAG's 2016-2040 *Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* includes an appendix titled "Goods Movement" that is applicable to the proposed Project because the Project entails the development of a warehouse building in the SCAG region that could support a variety of light industrial and warehousing users. In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason why the region is a critical mode in the global supply chain. (SCAG, 2018a, p. ES-1) The *RTP/SCS* is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods. The draft 2020-2045 *RTP/SCS* (also referred to as "Connect SoCal") has not yet been adopted at the time of preparing this MND; therefore, the 2016-2040 *RTP/SCS* would be the applicable adopted plan for the Project as evaluated herein.

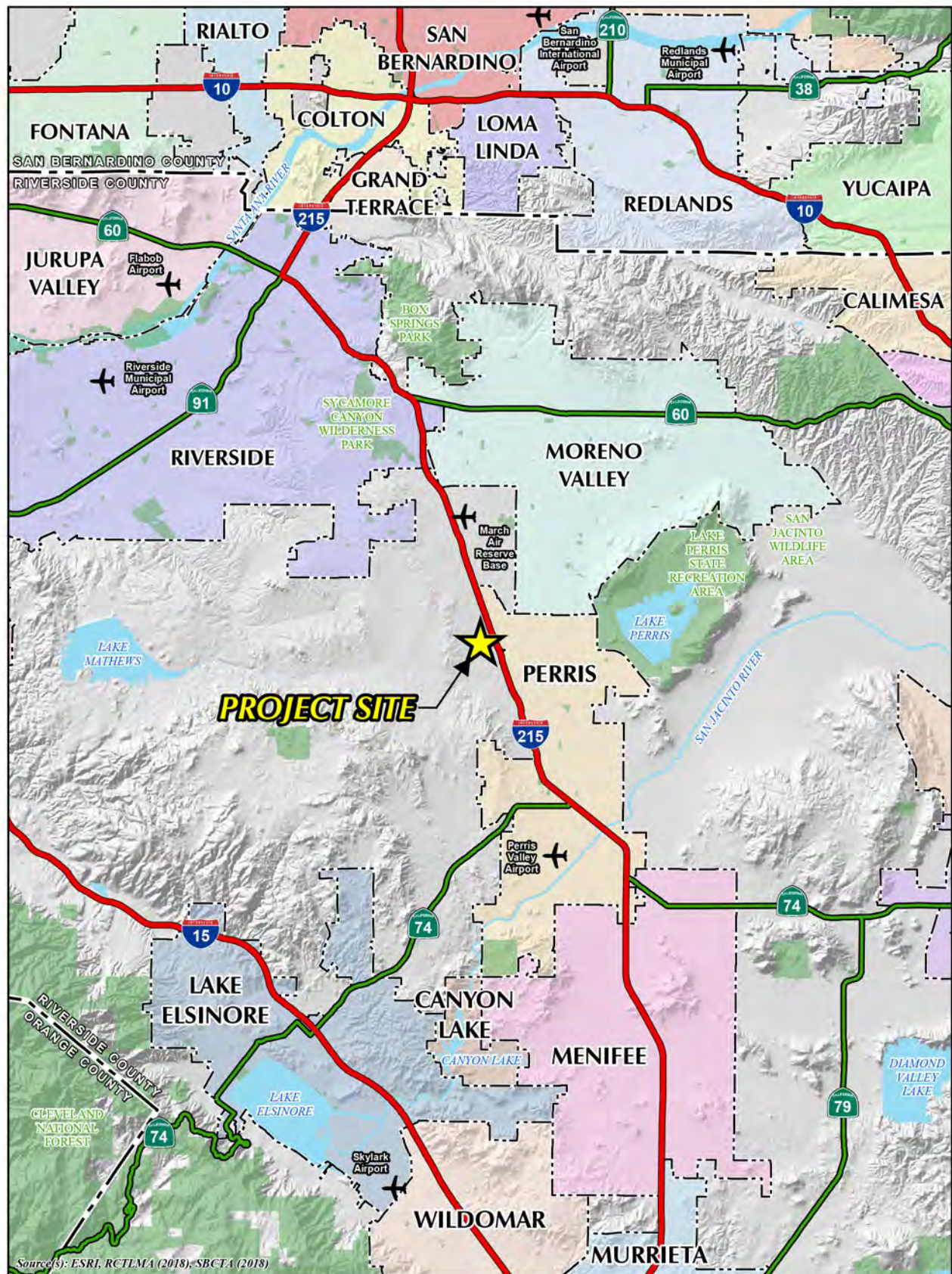


Figure 2-1

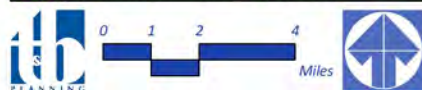
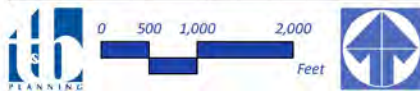




Figure 2-2



VICINITY MAP

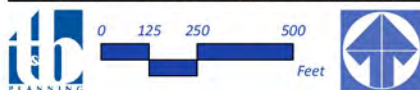


Figure 2-3

SURROUNDING LAND USES AND DEVELOPMENT

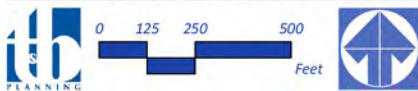


Figure 2-4

AERIAL PHOTOGRAPH

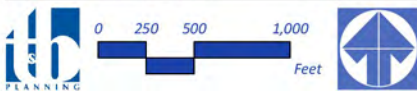
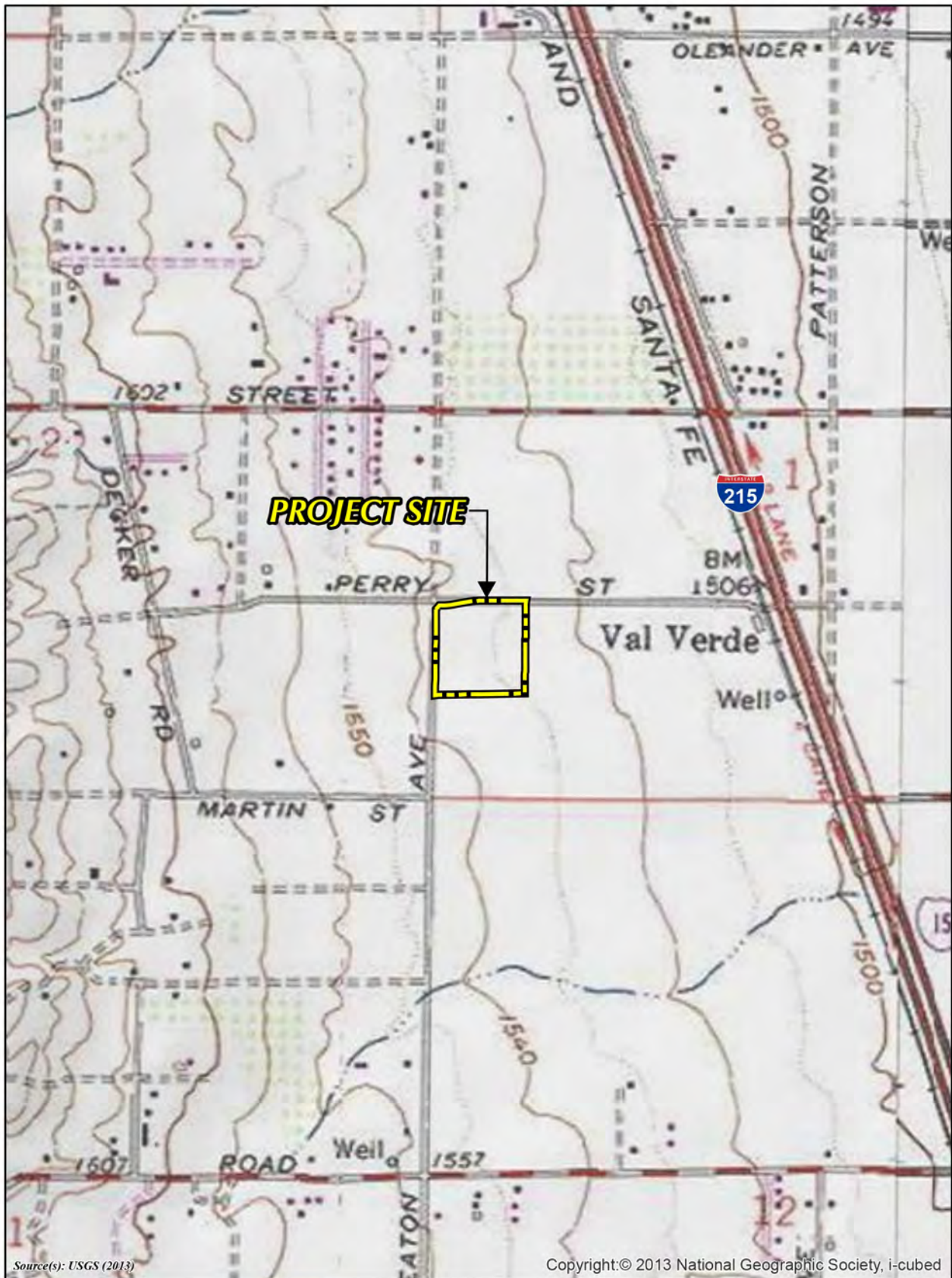


Figure 2-5

USGS TOPOGRAPHICAL MAP

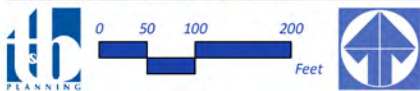


Figure 2-6

SITE PHOTO KEY MAP

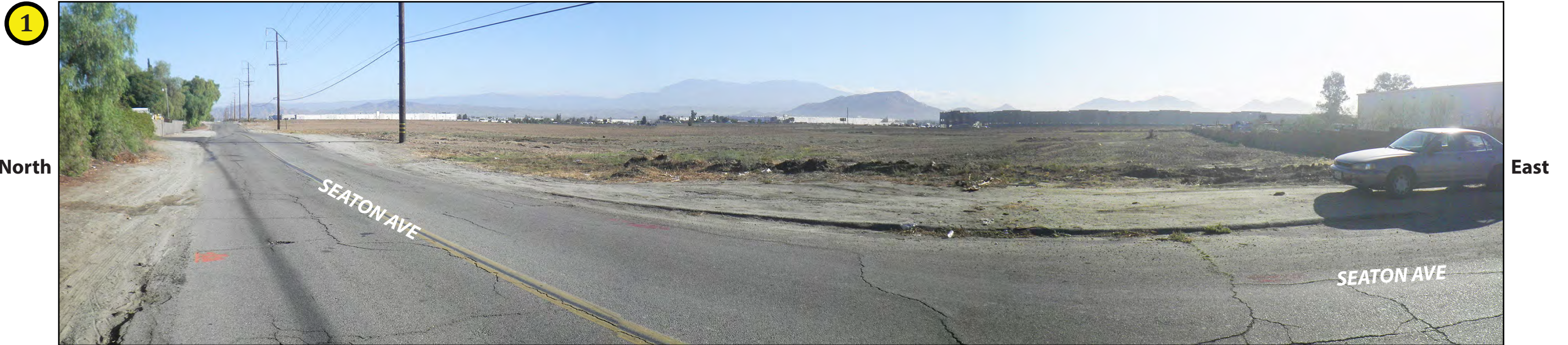


Photo 1: From the southwest corner of the Project site along Seaton Avenue, looking north to east.



Photo 2: From the western edge of the Project site along Seaton Avenue, looking north to south.



Photo 3: From the northwest corner of the Project site, at the intersection of Perry St & Seaton Ave, looking east to south.



Photo 4: From the northern edge of the Project site, along Perry St, looking east to west.



Photo 5: From the northeastern corner of the Project site, along Perry St, looking south to west.

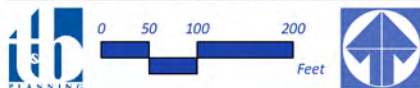
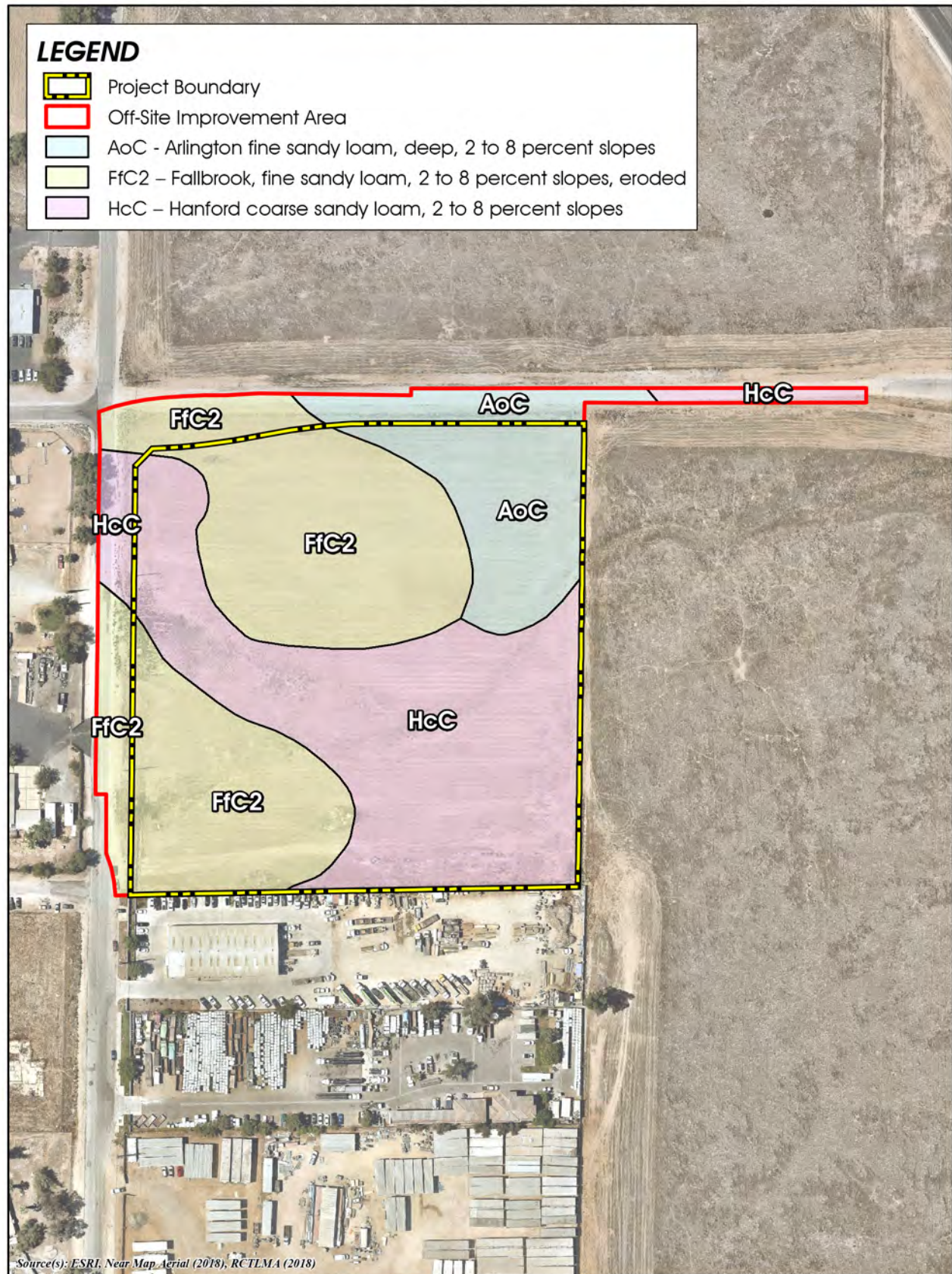


Figure 2-10

SOILS MAP

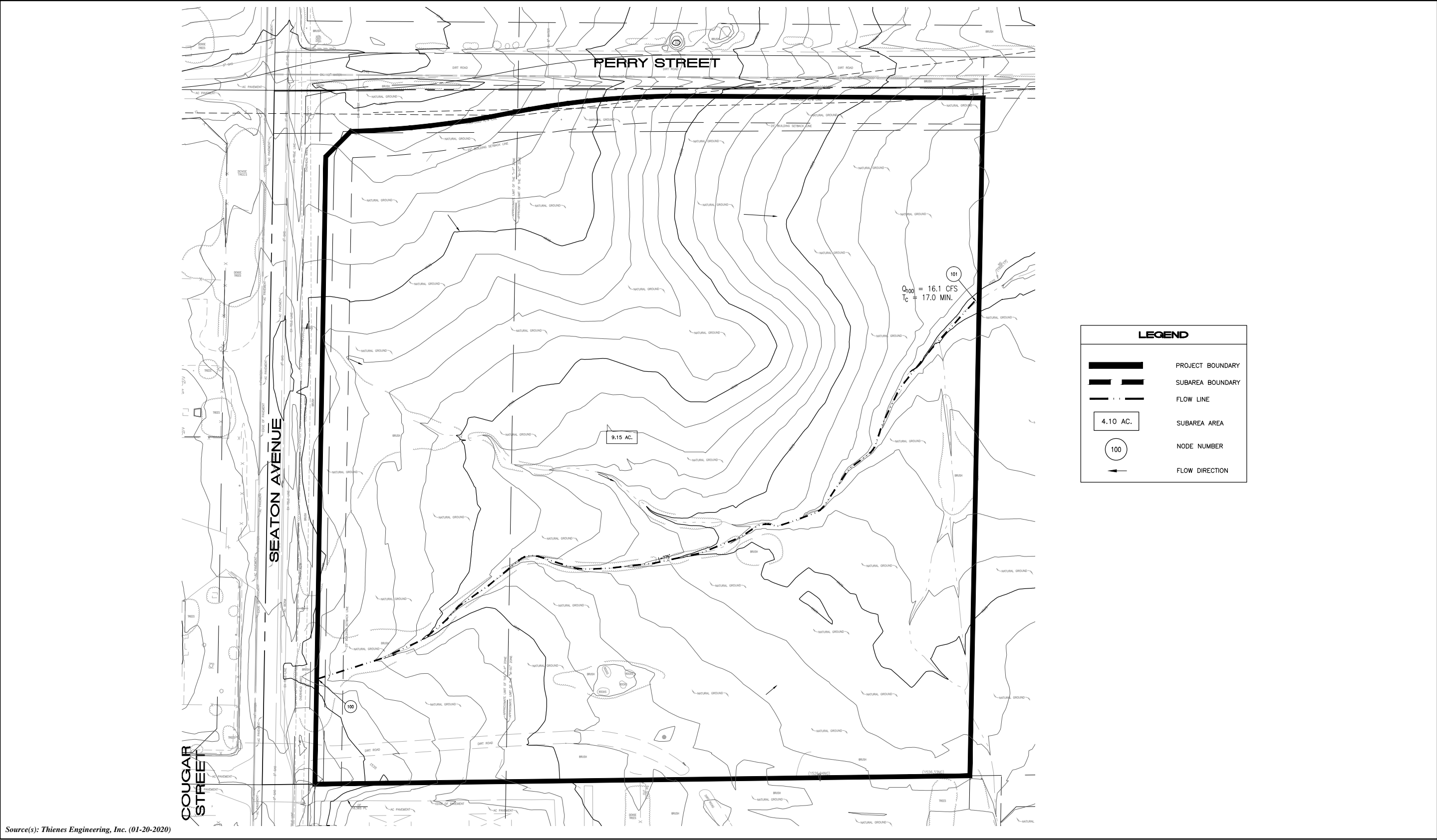


Figure 2-11

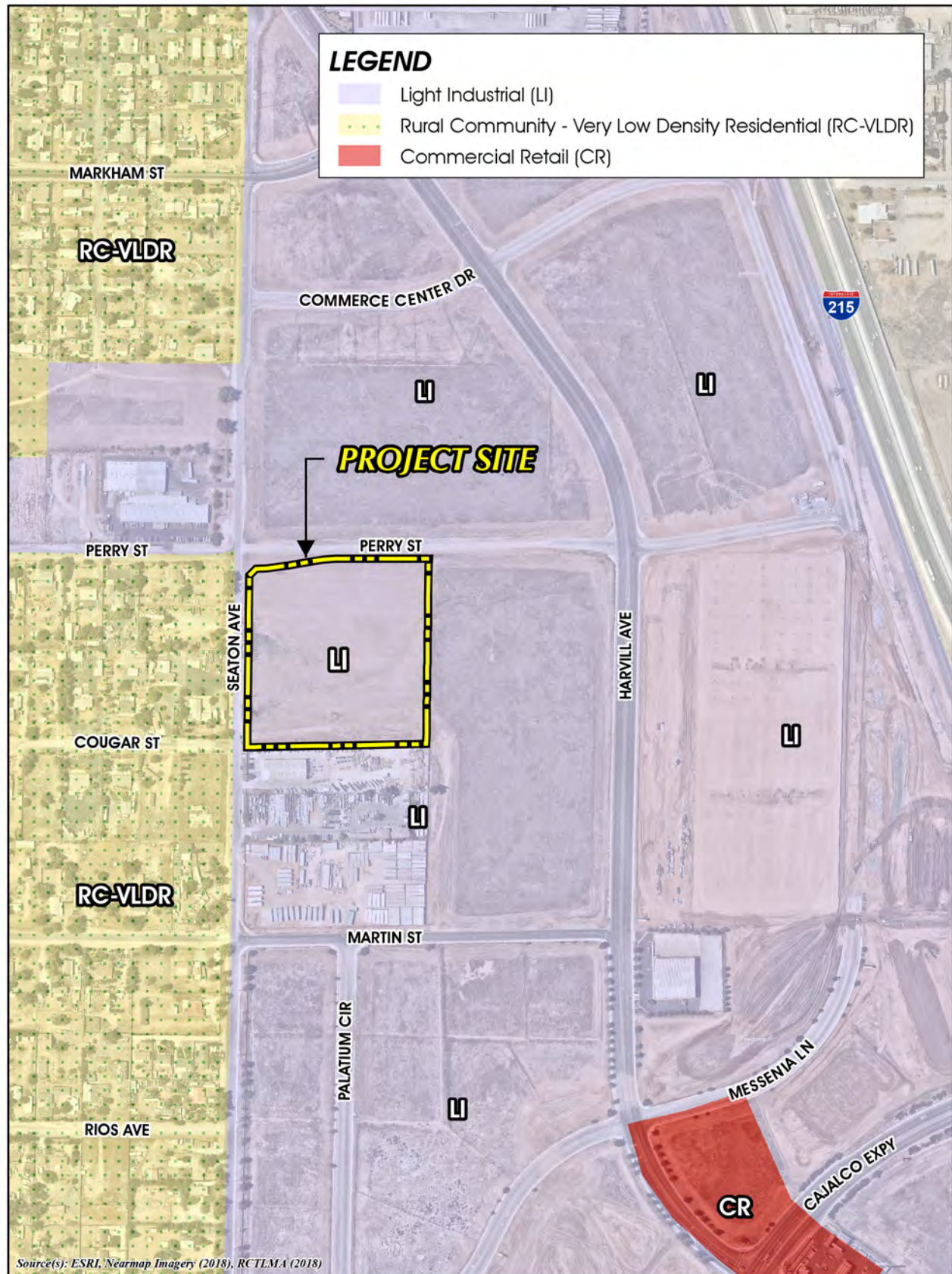
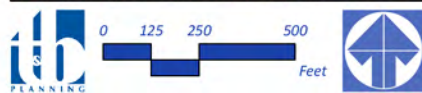


Figure 2-12



EXISTING GENERAL PLAN LAND USE DESIGNATIONS

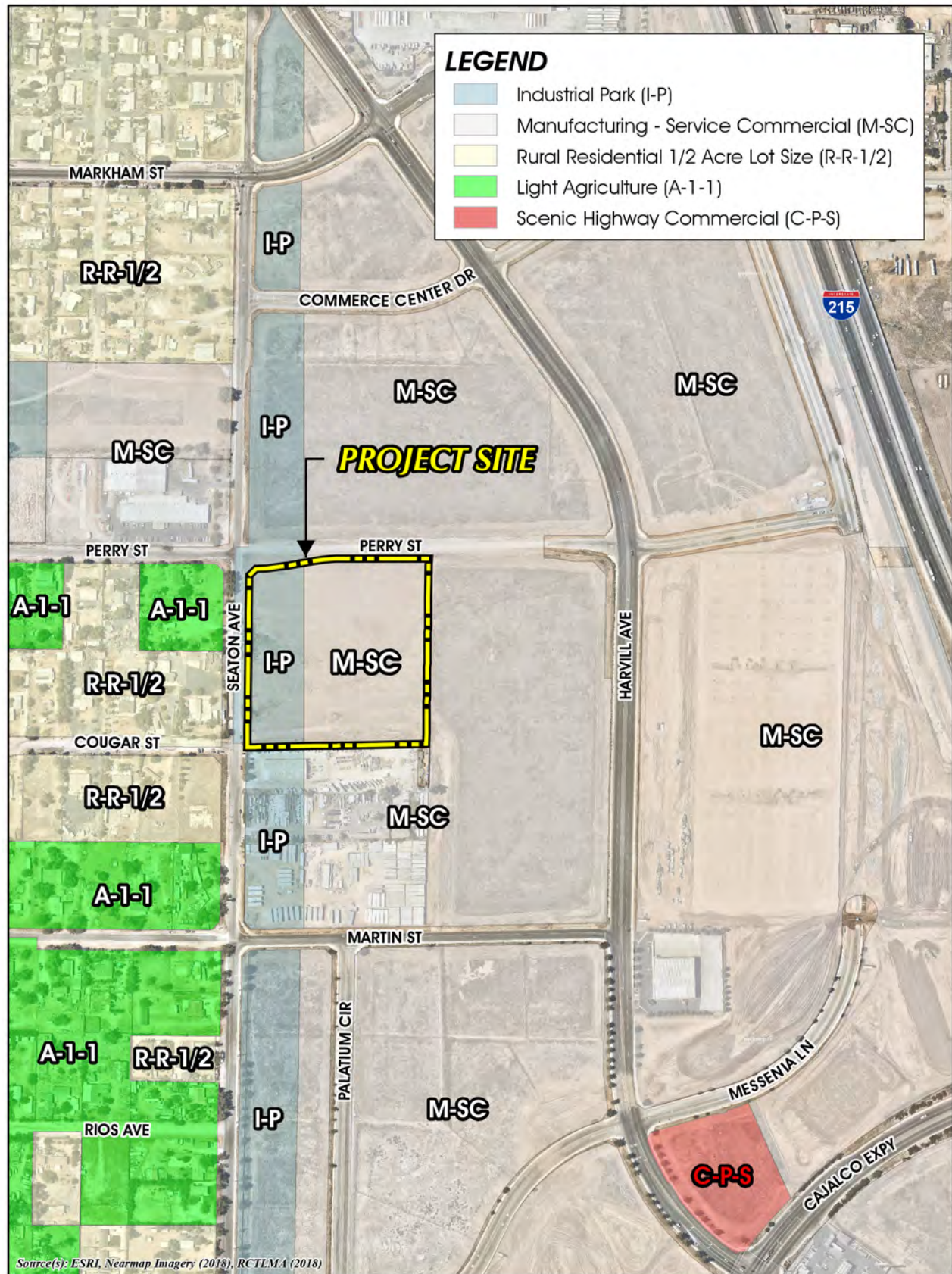
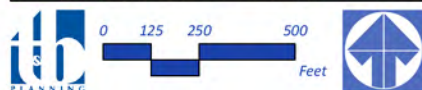


Figure 2-13



EXISTING ZONING CLASSIFICATIONS

3.0 Project Description

The Project evaluated by this MND is located in unincorporated Riverside County, California on Assessor Parcel Number (APN) 314-130-007. The proposed Project consists of an application for a Plot Plan. A copy of the entitlement application for the proposed Project is herein incorporated by reference pursuant to CEQA Guidelines § 15150 and is available for review at the Riverside County Planning Department, 4080 Lemon Street, 12th Floor, Riverside, California 92502. A detailed description of the proposed Project is provided in the following subsections. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 3-3, *Matrix of Project Approvals/Permits*.

3.1 PROPOSED DISCRETIONARY APPROVALS

3.1.1 Plot Plan No. 180025

A plot plan is required prior to the development of any permitted use pursuant to the requirements of the site's underlying zoning classifications of Manufacturing - Service Commercial (M-SC) and Industrial Park (I-P). Accordingly, Plot Plan No. 180025 is proposed to allow for development of the Project site with one industrial warehouse building. Major components of Plot Plan No. 180025 are described in the following subsections.

A. General Description

As shown on Figure 3-1, *Overall Site Plan*, the Project Applicant proposes to construct one (1) approximately 203,029 SF warehouse building comprised of 193,029 SF of warehouse space, 5,000 SF of ancillary ground floor office space and 5,000 SF of ancillary mezzanine office space. The office space is proposed at the northwest and/or southwest corners of the building, facing Seaton Avenue. The Project is designed to provide 19 loading docks on the east-facing side of the building and away from sensitive receptors that exist to the west of the Project site. The maximum building height would be approximately 42 feet from finished floor. The proposed building is planned to be constructed with concrete tilt-up panels supported by structural steel columns, and the office components of the building are designed to emulate a typical storefront with glazing (tempered glass).

Associated improvements to the site include auto and truck trailer parking, drive aisles, fire lanes, metal fencing and metal gates, outdoor employee amenity/patio area, landscaping, utility improvements, and roadway improvements to the frontage roadways of Seaton Avenue and Perry Street. Automobile parking would mainly be provided along the west side of the building adjacent to Seaton Avenue with limited automobile parking provided on the north side of the building and in the northeast and southeast corners of the Project site. Truck trailer dock doors for loading/unloading purposes would be provided exclusively on the east side of the building within a fenced and gated truck court. Two trash enclosures would be provided inside the gated truck court. A total of 19 dock doors would be positioned on the building's east-facing elevation secured by a fenced and gated truck court. Other than the driveway aprons, the western and northern boundaries of the Project site adjacent to Seaton Avenue and Perry Street would be landscaped, and the Seaton Avenue frontage also would provide for a segment of the County's multi-use trail system.

B. Circulation

Access to the site would be provided by two driveways connecting to Perry Street. Driveway 1, located near the northwest corner of the Project site along Perry Street would provide full access for passenger cars only. Driveway 2, located near the northeast corner of the site along Perry Street would provide full access for both trucks and passenger cars. (Urban Crossroads, Inc., 2019e, p. 1) The truck traffic would be directed by signage to only use Perry Street eastbound of the Project site to access Harvill Avenue. Refer to Exhibit 1-4 in the Project's Traffic Impact Analysis for a full description of the driveway access recommendations (*Technical Appendix K1* to this MND). Driveway 2 and the internal truck access and distribution drives are designed to accommodate the wide turning radii of heavy trucks. Refer to the Truck Access exhibit provided and discussed further under the topic of Transportation in MND Section 5.0. The security gate for the truck court is positioned approximately 211 feet inside the property line at Driveway 2, which provides ample space for truck stacking on the site inside the property boundary.

C. Parking

The future occupant(s) of the Project's building is unknown at this time. Pursuant to Riverside County Ordinance No. 348, if the number of workers cannot be determined, the number of required parking spaces shall be one (1) space per 2,000 SF of gross floor area for warehouses and one (1) space per 250 SF of office area for office uses (Riverside County, 2019b, Section 18.12). Therefore, pursuant to Ordinance No. 348, the Project would be required to provide 97 parking stalls for warehouse space ($193,029 \text{ SF} \div 2,000 \text{ SF} = 96.51$ stalls) and 40 parking stalls for the office space ($10,000 \text{ SF} \div 250 \text{ SF} = 40$) for a combined number of 137 parking spaces.

As shown on Figure 3-1 the site plan accommodates 137 standard auto parking stalls and 29 truck/trailer parking stalls, although the striping could be adjusted in the future as part of the building permit and occupancy permit processes to accommodate the parking needs of the building occupant(s). Some of the passenger car parking spaces would be required to be marked as handicapped, some as carpool, vanpool, and some equipped with electric vehicle (EV) parking/charging stations per the requirements of the California Green Building Standards Code (CALGreen). Bicycle parking also is required by CALGreen. The County does not have a requirement for providing a minimum number of truck/trailer parking spaces but requests that sufficient trailer parking spaces be provided to support the building size and use.

D. Architecture, Walls, and Fences

Figure 3-2, *Conceptual Architectural Elevations* and Figure 3-3, *Conceptual Architectural Elevations Details* depict the conceptual architectural elevations for the proposed building. The building would be constructed to a height of 42 feet from the finish floor to the top of the concrete parapet. The building would be constructed with painted concrete tilt-up panels and aluminum storefront framing with tempered glass at all doors. All exterior and interior glazing is proposed to be tempered with either insulated glass, single light vision glass or spandrel glass with concrete behind it. Elevation colors would consist of a color scheme of white, gray and blue with gray reflective glazing and clear anodized mullions.

As shown on Figure 3-4, *Wall and Fence Plan*, the north side of the truck court facing Perry Street would be enclosed and secured by a 14-foot high painted concrete screen wall with a sliding access gate

equipped with Knox-Box per Fire Department standards. The other sides of the truck court would be secured by an 8-foot high metal fence, and a swing-gate would be positioned on the southeast side of the truck court to provide a second means of emergency access to the truck court.

E. Conceptual Landscaping Plan

As noted on Figure 3-1, approximately 15.1% of the Project site would be landscaped. As shown on Figure 3-5, *Conceptual Landscaping Plan*, landscaping would be ornamental in nature and include trees, shrubs, and ground cover along the perimeter of the site adjoining the length of Seaton Avenue and Perry Street, and at the northeast boundary of the site to screen views of the Project's truck court from Perry Street east of the Project site. Landscaping also would occur adjacent to the building and surrounding the parking areas interior to the site. All landscaping and irrigation will comply with Riverside County Ordinance No. 859.3 and all auto parking areas, excluding drive aisles, will receive a minimum 50% shading utilizing an assortment of evergreen and deciduous trees in compliance with Riverside County Ordinance No. 348, Section 18.12.

3.2 PROJECT TECHNICAL CHARACTERISTICS

3.2.1 On-Site and Off-Site Utility Improvements

Infrastructure improvements that are required to be installed on the Project site and connected to the surrounding infrastructure system include new storm drains, stormwater/water quality treatment facilities, sewer lines, water lines, and dry utility systems. As part of the on-site drainage system, catch basins feeding underground infiltration chambers are proposed beneath a portion of the Project's passenger car parking lot and beneath a portion of the truck court to retain the runoff produced by the 85th percentile storm rainfall depth.

The Project's water lines would be connected to existing lines installed in Perry Street and Seaton Avenue. There are no sewer lines that currently exist directly adjacent to the Project site in either Seaton Avenue or Perry Street; therefore, the Project includes the installation of sewer line in Perry Street to extend off site approximately 396 feet east of the Project site to a point of connection that exists approximately 300' west of the intersection of Perry Street and Harvill Avenue. Similarly, for the storm drain system, the Project Applicant would be required to install a storm drain in Perry Street extending from the Project site east to connect with the upstream terminus of the Perris Valley Master Drainage Plan (MDP) Lateral E-10, located approximately 300 feet west of the intersection of Perry Street and Harvill Avenue.

An on-site storm drain system is proposed to be installed as part of the Project, consisting of a network of catch basins, underground storm drain pipes, and subsurface infiltration chambers that would collect, treat, and temporarily store stormwater runoff (as needed) before discharging treated flows from the property. "First flush" stormwater runoff flows (i.e., typically the first ¼-inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) for the site would be conveyed to proposed infiltration chambers located beneath the truck court and automobile parking lot. Stormwater runoff captured after the first flush would be discharged off-site via proposed connections to the existing public storm drain systems.

Also, as described below, the Project Applicant would improve Perry Street off-site from the easterly Project boundary to Harvill Avenue with a 32- foot wide section of asphalt concrete (AC) pavement.

Based on communication with Southern California Edison (SCE), the existing power poles along Seaton Avenue that support overhead transmission lines (115k) and provide power to offsite uses will remain in place.

3.2.2 Public Roadway Improvements

The Project Applicant would be required to construct asphalt concrete (AC) pavement, driveway, sidewalk, curb and gutter along the Project site's frontages with Perry Street and Seaton Avenue. Also, the Project is designed to include a segment of the County's multi-use trail system along the Project's frontage with Seaton Avenue.

- **Seaton Avenue** is a north-south oriented roadway located along the Project's western boundary. The Project is designed to construct Seaton Avenue at its ultimate half-section width as a Secondary Highway (100-foot right-of-way) between Perry Street and the Project's southern boundary, in compliance with applicable County of Riverside standards (Urban Crossroads, Inc., 2019e, p. 10).
- **Perry Street** is an east-west oriented roadway located along the Project's northern boundary. The Project is designed to construct Perry Street at its ultimate half-section width as an industrial collector (78- foot right-of-way) between Seaton Avenue and the Project's eastern boundary, in compliance with applicable County of Riverside standards. In addition, the Project Applicant is required to pave a 32' width of Perry Street from the Project site's eastern boundary to Harvill Avenue. (Urban Crossroads, Inc., 2019e, p. 10).
- On-site traffic signing and striping will be implemented in conjunction with detailed construction plans for the Project site (Urban Crossroads, Inc., 2019e, p. 10).

3.2.3 Earthwork and Grading

As shown on Figure 3-6, *Conceptual Grading Plan*, grading would occur over the entire Project site with no portion of the site left undisturbed. A landscaped manufactured slope is proposed along the western and northern perimeters of the site. Proposed earthwork activities would result in approximately 19,920 yards of cubic yards of cut and 19,920 cubic yards of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance on site and no import or export of soils would be required.

3.2.4 Construction Characteristics

Based on information supplied by the Project Applicant regarding the Project's expected construction schedule, as identified in Table 3-1, *Anticipated Construction Duration*, this MND anticipates that the proposed Project would be constructed in one phase over the course of approximately 12-13 months. When construction activities commence, site preparation would occur first. Then the property would be

mass-graded and underground infrastructure would be installed. Next, fine grading would occur, surface materials would be poured, and the proposed building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed.

Table 3-1 Anticipated Construction Duration

Phase Name	Days of Construction Activity
Site Preparation	10
Grading	20
Building Construction	230
Paving	20
Architectural Coating	20

(Urban Crossroads, Inc., 2019a, Table 3-2)

Construction equipment is expected to operate on the Project site eight (8) hours per day during the days and time periods allowed by County Ordinance. Although the County's Noise Ordinance (Riverside County Ordinance No. 847) allows construction equipment to operate for 12 hours a day between the hours of 6:00 AM to 6:00 PM during the months of June through September and 11 hours a day between 7:00 AM and 6:00 PM during the months of October through May, the typical working hours for most construction contractors are 7:00 AM to 4:00 PM, and construction is not in continual use; each piece of equipment is used only periodically during a typical construction work day. Thus, eight (8) hours of daily use per piece of equipment is a reasonable assumption, and likely overstates the actual amount of time that each piece of construction equipment will operate on a daily basis. Should construction activities need to occur outside of the hours permitted by Ordinance No. 847, the Project Applicant would be required to obtain authorization from the County of Riverside. Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. The types and numbers of off-road heavy equipment expected to be used on the Project site during construction activities are listed in Table 3-2, *Anticipated Construction Equipment*.

Table 3-2 Anticipated Construction Equipment

Activity	Equipment	Number	Operating Hours Per Day
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
Building Construction	Cranes	2	8
	Crawler Tractors	3	8
	Forklifts	3	8

Activity	Equipment	Number	Operating Hours Per Day
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coasting	Air Compressors	1	8

(Urban Crossroads, Inc., 2019a, Table 3-3)

3.2.5 Operational Characteristics

At the time this MND was prepared, the future user(s) of the proposed building was unknown; however, the Project Applicant expects the building to be occupied by a warehouse and light industrial user. The proposed building is not designed to accommodate an occupant that requires warehouse cold storage (i.e., refrigeration); therefore, the analysis in this MND assumes that the proposed building would not house a tenant that requires chilled, cold, or freezer warehouse space.

This MND assumes that the building would be operational 24 hours per day, seven (7) days per week, with exterior areas safety-lit at night. Lighting would be subject to compliance with Riverside County Ordinance Nos. 655 and 915, which were adopted to prevent significant skyglow or lighting levels affecting other properties. The proposed building is designed such that business operations would be conducted primarily within the enclosed building, with the exception of traffic movement, parking, and the loading and unloading of tractor trailers at the 19 loading docks positioned on the east side of the building. Based on the Project's traffic impact analysis (*Technical Appendix K1*), which assumed a slightly larger building than is currently proposed and thus slightly overstates expected traffic generation, during long-term operational conditions, the building is calculated to generate approximately 434 two-way trips per day (actual vehicles) and includes 118 two-way truck trips per day (Urban Crossroads, Inc., 2019e, Table 4-2)

Because the user(s) of the Project's building is not yet known, the number of jobs that the Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that Light Industrial (LI) businesses would employ one (1) worker for every 1,030 SF of building area $203,029 \text{ SF} \div 1,030 \text{ SF} = 197.11$ (Riverside County, 2017b, Table E-5). Based on this employment generation rate, the Project is expected to create approximately 197 new recurring jobs.

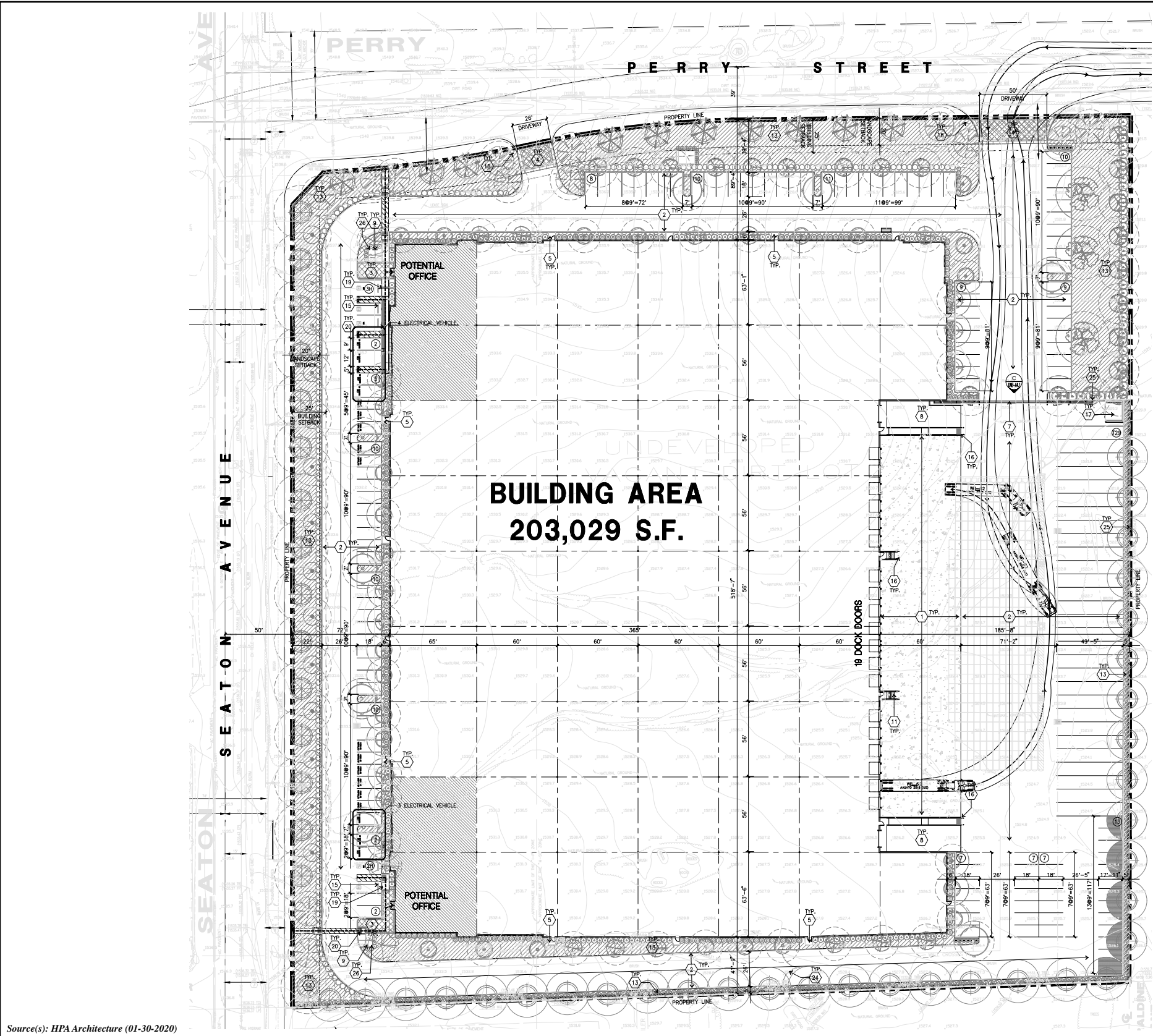
3.2.6 Related Environmental Review and Consultation Requirements

Riverside County has primary approval responsibility for the proposed Project. As such, the County is the Lead Agency for this MND pursuant to CEQA Guidelines § 15050. The County's decision-making body will consider the Project Applicant's requested Plot Plan application as part of a publicly-noticed hearing and will have the authority to approve, conditionally approve, or deny the proposed Project. Should the Plot Plan and this MND be approved, the County would conduct administrative reviews and grant ministerial

permits and approvals to implement the Project. State and federal approvals or permits are also required. Table 3-3, *Matrix of Project Approvals/Permits*, provides a summary of the agencies responsible for subsequent discretionary and ministerial approvals associated with the Project. This MND covers all federal, State, and local government approvals which may be needed to construct or implement the proposed Project, whether or not explicitly noted in Table 3-3.

Table 3-3 Matrix of Project Approvals/Permits

PUBLIC AGENCY	APPROVALS AND DECISIONS
RIVERSIDE COUNTY	
PROPOSED PROJECT – RIVERSIDE COUNTY DISCRETIONARY APPROVALS	
Riverside County Planning Director	<ul style="list-style-type: none"> • Approve, conditionally approve, or deny proposed Plot Plan No. 180025.
Subsequent Riverside County Discretionary and Ministerial Approvals	
Riverside County Building and Safety Department	<ul style="list-style-type: none"> • Grading Permit • Building Permits • Road Improvement Plan Approvals • Encroachment Permits • Certificates of Occupancy
Other Agencies – Subsequent Approvals and Permits	
U.S. Army Corps of Engineers (Corps)	<ul style="list-style-type: none"> • Section 404 Nationwide Permit
California Department of Fish and Wildlife (CDFW)	<ul style="list-style-type: none"> • Section 1602 Streambed Alteration Agreement
Santa Ana Regional Water Quality Control Board (RWQCB)	<ul style="list-style-type: none"> • Section 401 Water Quality Certification • Issuance of a Construction Activity General Construction Permit • Compliance with the National Pollutant Discharge Elimination System (NPDES)
Riverside County Flood Control & Water Conservation District (RCFCWCD)	<ul style="list-style-type: none"> • Approvals for construction of drainage infrastructure.
Eastern Municipal Water District (EMWD)	<ul style="list-style-type: none"> • Approvals for construction of water and sewer infrastructure.
Southern California Edison (SCE)	<ul style="list-style-type: none"> • Approvals for utility infrastructure, including but not limited to any power pole relocations or undergrounding of lines.



PROJECT INFORMATION

Owner / Applicant
LDC INDUSTRIAL REALTY, LLC
555 N. EL CAMINO REAL #4456
SAN CLEMENTE, CA 92672
TEL: (949) 228-4601
CONTACT: LARRY D. COCHRAN

Applicant Representative
HPA, INC.
18531 BARDEEN AVE. - SUITE 100
IRVINE, CA 92612
TEL: (949) 862-2138
FAX: (949) 863-0851
CONTACT: MATTHEW LEE

Project Address
SEATON AVE. & PERRY AVE
RIVERSIDE COUNTY, CA

Civil Engineer
THENES ENGINEERING
14544 FIRESTONE BLVD.
LA MIRADA, CA 90638
(714) 521-4811
CONTACT: NAVEEN GALI

Zoning

ZONING: INDUSTRIAL PARK (I-P)
MANUFACTURING - SERVICE COMMERCIAL (M-S-C)
GENERAL LAND USE DESIGNATION: U

Assessors Parcel Number

314-130-007-3

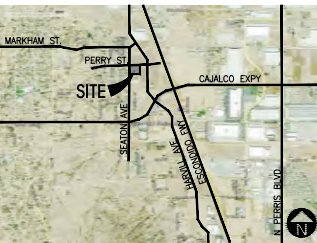
Construction Type

CONCRETE TILT-UP BUILDING
BUILDING OCCUPANCY: OFFICE & WAREHOUSE
CONSTRUCTION TYPE: S-1/B
II-B

Code Analysis

2016 CALIFORNIA BUILDING CODE
2016 CALIFORNIA PLUMBING CODE
2016 CALIFORNIA MECHANICAL CODE
2016 CALIFORNIA ELECTRICAL CODE
2016 CALIFORNIA FIRE CODE
2016 CALIFORNIA ENERGY CODE
2016 CALIFORNIA GREEN BUILDING STANDARDS

AERIAL MAP



SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH.
4. DRIVEWAY APRONS TO BE CONSTRUCTED.
5. 4" X 6" X 4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAIN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. APPROXIMATE LOCATION OF TRANSFORMER. CONTRACTOR TO VERIFY WITH S.C.E.
7. PROVIDE 8" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. CONCRETE RAMP W/ 42" HIGH CONCRETE WALL.
9. EXTERIOR BIKE RACK TYPICAL.
10. NOT USED.
11. EXTERIOR CONCRETE STAIR.
12. NOT USED.
13. LANDSCAPE: ALL LANDSCAPE AREAS INDICATED BY SHADING.
14. PATIO AREA.
15. PRE-CAST CONCRETE WHEEL STOP.
16. CONCRETE FILLED GUARD POST 7.6 DIA. U.N.O. 42" H.
17. TRASH ENCLOSURE PER CITY STANDARD.
18. ACCESSIBLE ENTRY SIGN.
19. ACCESSIBLE PARKING STALL SIGN.
20. TRUNCATED DOME.
21. APPROXIMATE LOCATION OF FIRE HYDRANT.
22. WALL MOUNTED LIGHTING FIXTURE.
23. SITE LIGHT POLE W/ CONCRETE BASE.
24. 8" HIGH METAL SWING GATE W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
25. 8" HIGH METAL FENCE. SEE A4.1 FOR DETAILS.
26. DESIGNATED SMOKING AREA.

SITE LEGEND

- CONCRETE PAVING:
SEE "C" DRAWGS. FOR THICKNESS
- STANDARD PARKING STALL
(9' X 18')
- LANDSCAPED AREA
- 24' WIDE FIRELANE
- HANDICAP PARKING STALL
(9' X 18') W/ 5' ACCESSIBLE AISLE
- HANDICAP PARKING STALL (VAN)
(12' X 18') W/ 5' ACCESSIBLE AISLE
- PATH OF TRAVEL

UTILITY INFO

WATER WESTERN MUNICIPAL WATER DISTRICT 14205 MERIDIAN PARKWAY RIVERSIDE, CA 92518 PHONE: (951) 571-7100	TELEPHONE SERVICE AT&T 32 AVENUE OF THE AMERICANS NEW YORK, NY 10013-2412 PHONE: (800) 348-8288	SEWER COUNTY OF RIVERSIDE 4080 LEMON ST. RIVERSIDE, CA 92501 PHONE: (951) 955-1000	SCHOOL DISTRICT VAL VERDE UNIFIED 975 W. MORGAN ST. PERRIS, CA 92571 PHONE: (951) 940-8100
GAS SOUTHERN CALIFORNIA GAS COMPANY 1981 LUGONIA AVENUE REDLANDS, CA 92373-0306 PHONE: (909) 428-8401	ELECTRIC SOUTHERN CALIFORNIA EDISON 1351 E. FRANCIS AVENUE ONTARIO, CA 91751 PHONE: (909) 357-6233	FIRE PROTECTION RIVERSIDE COUNTY FIRE DEPARTMENT 2300 MARKET ST., SUITE 150 RIVERSIDE, CA 92501 PHONE: (951) 955-4777	

TABULATION

SITE AREA	
in s.f.	398,827 s.f.
in acres	9.16 ac
BUILDING AREA	
Office	5,000 s.f.
Mezzanine	5,000 s.f.
Warehouse	193,029 s.f.
TOTAL	203,029 s.f.
COVERAGE	50.9%
AUTO PARKING REQUIRED	
Office: 1/250 s.f.	40 stalls
Warehouse: 1/2000 s.f.	97 stalls
TOTAL	137 stalls
AUTO PARKING PROVIDED	
Standard (9' x 18')	114 stalls
Accessible (9' x 18')	4 stalls
Accessible Van (12' x 18')	1 stall
Accessible EV (9'x18')	1 stall
Accessible EV (12'x18')	1 stall
Standard EV (9'x18')	5 stalls
Carpool/Vanpool (9'x18')	11 stalls
TOTAL	137 stalls
TRAILER PARKING PROVIDED	
Trailer (10' x 50')	20 stalls
ZONING ORDINANCE FOR COUNTY	
Zoning Designation: Industrial Park (I-P)	
Manufacturing - Service Commercial (M-S-C)	
Meat Valley Area Plan	
MAXIMUM BUILDING HEIGHT ALLOWED	
1-P zone - 20' for 35' high bldg, additional 2' setback required for each additional foot up to 50' max.	
2-M-S-C zone - 18' for 40' high bldg, additional 2' setback required for each additional foot up to 50' max.	
MAXIMUM FLOOR AREA RATIO	
FAR - 0.25-0.80	
LANDSCAPE REQUIREMENT	
Percentage - 10 % for I-P	
Percentage - 10 % for M-S-C	
LANDSCAPE PROVIDED	
In percentage -	16.1%
In s.f. -	80,245 s.f.
SETBACKS	
Building	Front: 25', 50' if abuts R zone 20'
Side/Rear - 0'	0

SITE PLAN GENERAL NOTES

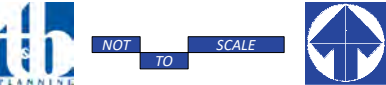
1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE CURBS, GUTTERS AND SWALES.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12" EX. WY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
15. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
16. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.

LEGAL DESCRIPTION

THE LAND REFERRED TO IN THIS COMMITMENT IS SITUATED IN THE UNINCORPORATED AREA OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 11, TOWNSHIP 4 SOUTH, RANGE 4 WEST, SAN BERNARDINO BASE AND MERIDIAN IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA.

Source(s): HPA Architecture (01-30-2020)



T&B Planning, Inc.

Figure 3-1

OVERALL SITE PLAN



Source(s): HPA Architecture (08-29-2019)

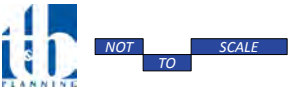
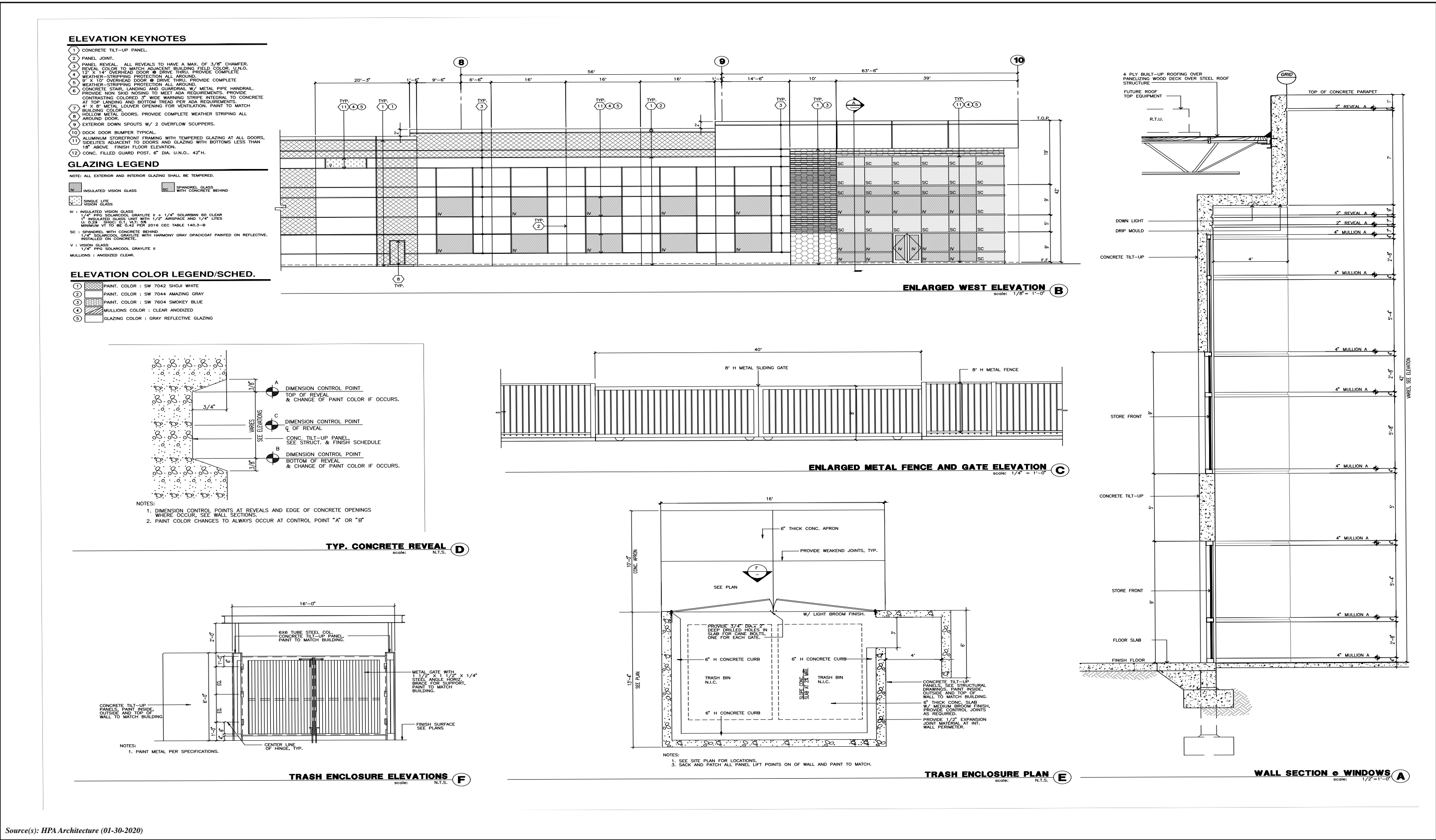


Figure 3-2

CONCEPTUAL ARCHITECTURAL ELEVATIONS



Source(s): HPA Architecture (01-30-2020)

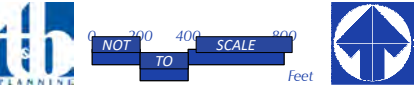
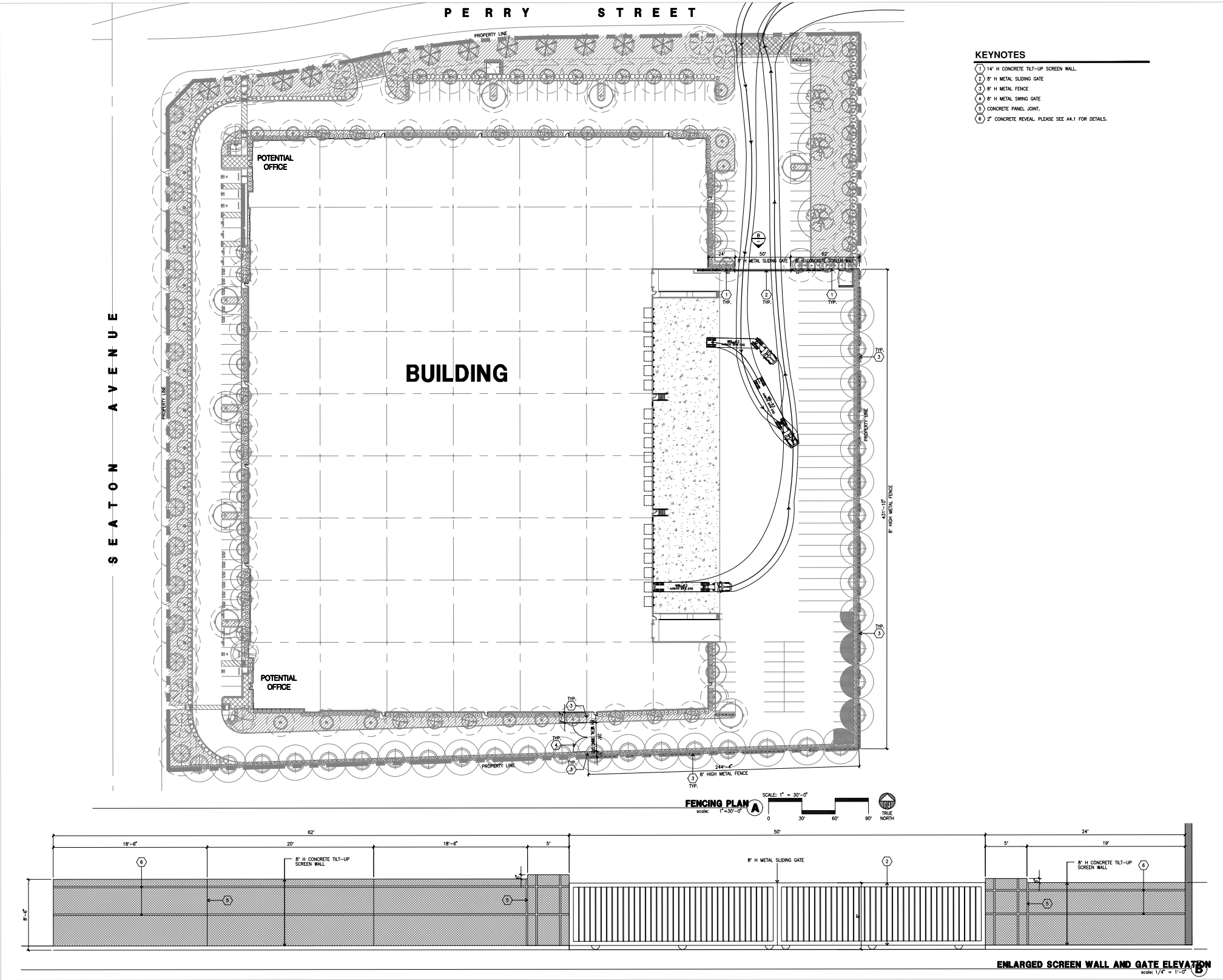


Figure 3-3

CONCEPTUAL ARCHITECTURAL ELEVATIONS DETAILS



Source(s): HPA Architecture (01-30-2020)

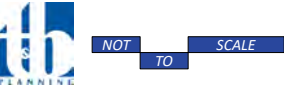
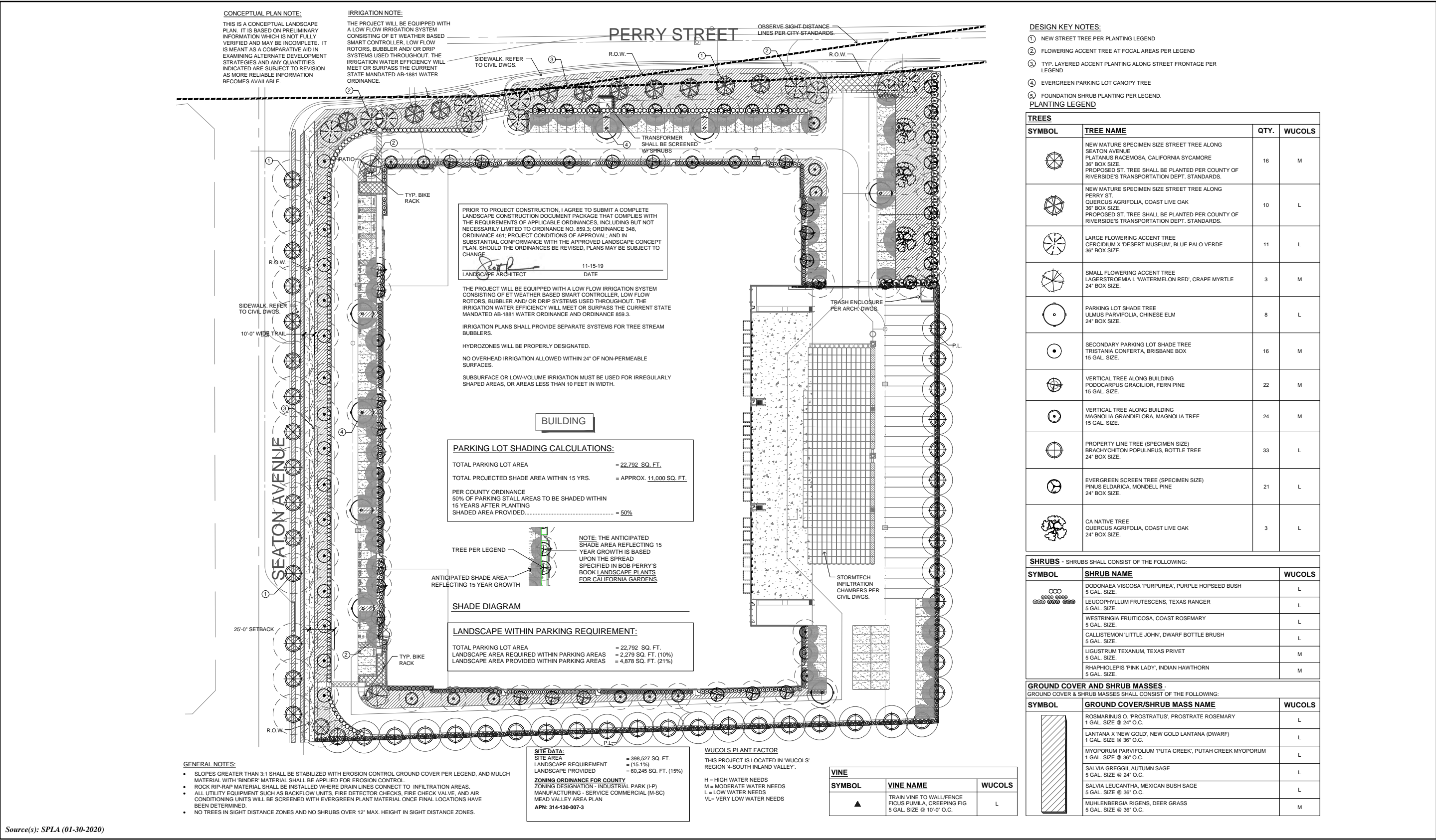


Figure 3-4

WALL AND FENCE PLAN



Source(s): SPLA (01-30-2020)

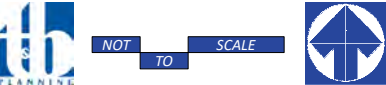


Figure 3-5



Figure 3-6

4.0 Environmental Assessment

Environmental Assessment (CEQ/EA) Number: CEQ180101

Project Case Type(s) and Number(s): Plot Plan No. 180025

Lead Agency Name: Riverside County Planning Department

Address: Riverside County Planning Department, 4080 Lemon Street, 12th Floor, P.O. Box 1409, Riverside, CA 92502

Contact Person: Deborah Bradford, Planner

Telephone Number: 951-955-6646

Applicant's Name: LDC Industrial Realty, LLC

Applicant's Address: 555 N. El Camino Real #A456, San Clemente, CA 92672

4.1 PROJECT INFORMATION

Project Description:

A. Type of Project: Site Specific ☒; Countywide ☐; Community ☐; Policy ☐

B. Total Project Area: 9.15 Gross Acres

Residential Acres: 0	Lots: 0	Units: 0	Projected No. of Residents: 0
Commercial Acres: 0	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 0
Industrial Acres: 9.15	Lots: 1	Sq. Ft. of Bldg. Area: 203,029	Est. No. of Employees: 197
acres		SF	
Other:	Lots: 0	Sq. Ft. of Bldg. Area: 0	Est. No. of Employees: 0

C. Assessor's Parcel No(s): 317-130-007

Street References: South of Perry Street, east of Seaton Avenue, west of Harvill Avenue, and north of Martin Street.

D. Section, Township & Range Description or reference/attach a Legal Description: T4SR4W Sec 1 SW, T4SR4W Sec. 2 SE

E. Brief description of the existing environmental setting of the project site and its surroundings:
Refer to Section 2.0, *Environmental Setting*.

4.2 APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

A. General Plan Elements/Policies:

- 1. Land Use:** The Project site is located within the Mead Valley Area Plan (MVAP) of the County of Riverside's General Plan. The General Plan and MVAP designate the site for Community Development - Light Industrial (LI) land uses. The Light Industrial (LI) land designation allows for a wide variety of industrial and related uses, including assembly and light manufacturing,

repair facilities, and supporting retail uses with a building intensity range of 0.25-0.60 floor-to-area ratio (FAR) ((Riverside County, 2016a, Table 1).

The Project site is split zoned Manufacturing - Service Commercial (M-SC) and Industrial Park (I-P). According to the Riverside County Land Development Ordinance, the primary purpose of the M-SC Zone is to promote and attract industrial and manufacturing activities which will provide jobs to local residents and strengthen the county's economic base. Typical uses within the I-P Zone include planned industrial area with special attention to circulation, parking, utility needs, aesthetics, and compatibility. Development is subject to area site improvement, landscaping, and performance standards. (Riverside County, 2019b) Because the Project site is split-zoned, the proposed Project is required by the Riverside County Planning Department to be consistent with the development code regulations of both zoning classifications.

2. **Circulation:** The proposed Project was reviewed for conformance with County Ordinance No. 461, "Road Improvement Standards and Specifications" by the Riverside County Transportation Department. Adequate circulation facilities exist and are proposed to serve the proposed Project. The proposed Project meets all applicable circulation policies of the General Plan. In addition, non-vehicular transportation and transportation by clean energy vehicles are encouraged through the Project's proposed construction of a segment of the County's community trail system along its frontage with Seaton Avenue, and by mandatory compliance with CALGreen, which requires that some of the on-site parking spaces be equipped with electric vehicle (EV) charging stations and that bicycle parking be provided on the site.
3. **Multipurpose Open Space:** No natural open space land is required to be preserved within the boundaries of this Project. The Project would be consistent with or otherwise would not conflict with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The proposed Project meets all other applicable Multipurpose Open Space Element Policies as demonstrated throughout this Initial Study/MND. No riparian or other sensitive vegetation is located on the site or in the ephemeral drainage and its tributary located on the site, and the site is not a wildlife corridor and is not located in a floodway or floodway fringe area. The site also does not contain agricultural resources, mineral resources, or any known significant cultural or paleontological resources, and is not located in a designated scenic corridor. The Project would not be a water-intensive use and the Project's landscaping plan complies with County Ordinance No. 859.3, "Water Efficient Landscape Requirements."
4. **Safety:** The proposed Project allows for sufficient provision of emergency response services to the existing and future users of the Project through the Project's design. The proposed Project meets all other applicable Safety Element policies. The Project site is not located in a seismic fault rupture area, area subject to landslides, seiches, or significant liquefaction. The site is also not located in a flood hazard area or wildfire hazard area. The Project has been reviewed by the Riverside County Airport Land Use Commission (ALUC) for air hazard safety and was found consistent with the March Air Reserve Base Airport Land Use Compatibility

Plan subject to conditions of approval issued by the ALUC which the County will impose as conditions of approval on Plot Plan No. 180025.

5. **Noise:** The proposed Project meets all applicable Noise Element policies and would not exceed Riverside County noise standards as concluded by the analysis contained herein. The Project is designed such that the truck loading docks are located on the east-facing side of the building and away from sensitive receptors that exist to the west of the Project site. The Project's construction and operational activities are required to comply with the Riverside County Noise Ordinance No. 847.
6. **Housing:** No housing is proposed by this Project. The Project would not displace any existing housing. There are no significant adverse impacts to housing as a direct result of this Project.
7. **Air Quality:** The proposed Project is conditioned by Riverside County to control any fugitive dust during Project construction activities in accordance with the SCAQMD Rule 403. As concluded by the analysis contained herein, the proposed Project: would not exceed the SCAQMD's regional emission significance threshold for any criteria pollutant during its operation; would not exceed the SCAQMD's significance thresholds for cancer and non-cancer health risks beyond thresholds of significance established by the SCAQMD; and would not create objectionable odors that affect sensitive receptors. The Project is designed such that the loading docks are located on the east-facing side of the building and away from sensitive receptors that exist to the west of the Project site. The proposed Project is consistent with or otherwise would not conflict with all applicable Air Quality Element policies.
8. **Healthy Communities:** A Project-specific Health Risk Assessment (HRA) (*Technical Appendix A2*) was prepared for the proposed Project which determined that the Project would not result in any significant localized air quality impacts affecting nearby sensitive receptors (i.e., residential uses). The Project accommodates sidewalk connections and will provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue, in conformance with the MVAP, which would encourage walking and physical activity. The Project is designed such that the loading docks are located on the east-facing side of the building and away from sensitive receptors that exist to the west of the Project site. The Project site is not subject to severe natural hazards. The Project also would provide for local jobs, which would assist the County in reducing the substantial out-of-county job commutes. The proposed Project is consistent with or otherwise would not conflict with all applicable policies of the Healthy Communities Element.

B. General Plan Area Plan(s): Mead Valley Area Plan (MVAP)

C. Foundation Component(s): Community Development

D. Land Use Designation(s): Light Industrial (LI)

E. **Overlay(s), if any:** None

F. **Policy Area(s), if any:** None

G. Adjacent and Surrounding:

1. **General Plan Area Plan(s):** Mead Valley Area Plan (MVAP)
2. **Foundation Component(s):** Community Development (to the north, south, and east) and Rural (to the west)
3. **Land Use Designation(s):** M-SC, I-P, A-1-1, R-R-1/2
4. **Overlay(s) if any:** None
5. **Policy Area(s), if any:** None

H. Adopted Specific Plan Information

1. **Name and Number of Specific Plan, if any:** None
2. **Specific Plan Planning Area, and Policies, if any:** None

I. **Existing Zoning:** Manufacturing – Service Commercial (M-SC) and Industrial Park (I-P).

J. **Proposed Zoning, if any:** N/A

K. **Adjacent and Surrounding Zoning:** M-SC and I-P to the north and south of the Project site; M-SC to the east of the site; roadway (Seaton Avenue) and R-R-1/2 adjacent to the southwest portion of the site; roadway (Seaton Avenue) and A-1-1 adjacent to the northwestern corner of the Project site; and roadway (Seaton Avenue and Perry Street) and M-SC directly adjacent to the northwest corner of the Project site.

4.3 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (x) would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

4.4 DETERMINATION

On the basis of this initial evaluation:

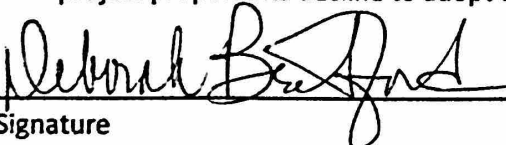
A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED:

- ☐ 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 (EIR)** is required.

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED

- ☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
- ☐ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
- ☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore, a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.
- ☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken

which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.


Signature

April 14, 2020

Date

Deborah Bradford
Printed Name

For: Charissa Leach, P.E.
Assistant TLMA Director

5.0 Environmental Analysis

5.1 ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21178.1), this Initial Study (IS) has been prepared to analyze the proposed Project to determine any potential significant impacts upon the environment that would result from construction and implementation of the Project. In accordance with California Code of Regulations § 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the County of Riverside, in consultation with other jurisdictional agencies, to determine whether a Negative Declaration, Mitigated Negative Declaration (MND), Environmental Impact Report (EIR), or Addendum to a previous EIR or MND is required for the proposed Project. The Initial Study sent out for public review reflects the independent judgment of the Lead Agency (County of Riverside).

5.1.1 Aesthetics

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
I. Scenic Resources				
a. Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized 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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: California Department of Transportation (Caltrans) Scenic Highways and Designated and Eligible Routes (Caltrans, 2017); Caltrans California Scenic Highway Mapping System (Caltrans, n.d.); Google Earth (Google Earth, 2018), and Riverside County General Plan Figure C-8 "Scenic Highways" (Riverside County,

2015a); Viewshed Analysis performed by T&B Planning, Inc. (T&B Planning, Inc., 2018); Mead Valley Area Plan (Riverside County, 2016a); Southern California Association of Governments (SCAG), U.S. Census Urbanized Areas -SCAG Region (SCAG, 2017); County of Riverside Ordinance No. 348: Providing for Land Use Planning and Zoning Regulations and Related Functions of the County of Riverside (Riverside County, 2019b)

a) Would the Project have a substantial effect upon a scenic highway corridor within which it is located?

According to the Riverside County General Plan Figure C-8, "Scenic Highways," the Project site is located approximately 0.4-mile northwest of the portion of the Ramona Expressway designated as a "County Eligible Scenic Highway." The Project site also is located approximately 5.1 miles northwest of the portion of I-215 that is designated as a "State Eligible Scenic Highway" and approximately 4.6 miles north of SR-74, which is designated as a "State Eligible Scenic Highway." (Riverside County, 2015a, Figure C-8; Google Earth, 2018; Caltrans, 2017) Due to distance and intervening development and topography, and based on an on-site viewshed analysis conducted by T&B Planning, Inc. and analysis using Google Earth Pro, the Project site is not visible from any of these designated scenic routes (T&B Planning, Inc., 2018)(Google Earth, 2018). Because the Project site is not located within or adjacent to a scenic highway corridor and is not visible from a designated or eligible corridor, the proposed Project would not have a substantial effect upon a scenic highway corridor.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project substantially damage scenic resources, including, but not limited to trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?

The existing conditions of the site are shown on Figure 2-7, *Site Photos 1 and 2*, Figure 2-8, *Site Photos 3 and 4*, and Figure 2-9, *Site Photo 5*). Under existing conditions, the Project site is vacant with no existing structures. Onsite vegetation includes minor brush and weeds. The majority of the site is disturbed by weed abatement activities (i.e., discing (turning over of soil)) with tilling tracks visible throughout the site. A low-profile rock outcropping exists in the southern portion of the Project site but it is not considered a scenic resource due to its low profile and low visibility and because it is not unique; rock outcroppings are common in the vicinity of the Project site.

Properties surrounding the site to the south, north, northwest, and east are either vacant or developed with industrial uses, some with visible outdoor storage. Northwest of the site, on the northwest corner of Perry Street and Seaton Avenue is Torrance Aluminum, a manufacturer of aluminum windows and doors, at 22850 Perry Street. Torrance Aluminum comprises two large metal buildings, paved and

unpaved surfaces, and outdoor storage surrounded by chain link fencing and barbed wire. Abutting the Project site on the east is vacant land, east of which is Harvill Avenue. South of the Project site is Green Bee Yard, a concrete foundation construction company, at 18890 Seaton Avenue and White House Sanitation, a porta potty rental and septic tank service company, at 18916 Seaton Avenue. Both of these businesses have small metal buildings and extensive outside storage surrounded by either a block wall or chain link fence with barbed wire. Abutting the Project site on the west is Seaton Avenue and east of Seaton Avenue is a mixture of rural residential uses and business enterprises. Golden State Paving, an asphalt paving company, is located at 22970 Cougar Street and Concrete Equipment Storage Yard is located at 18795 Seaton Avenue. These uses are surrounded by a combination of block walls and chain link fence. A residential home with animal keeping pens comprised of metal and chain link fence is located at the southwest corner of Seaton Avenue and Perry Street (V3 Companies, 2018, p. 13) (Google Earth, 2018)

The Project site and surrounding properties are located in the Mead Valley community. The Mead Valley planning area lies entirely within the Perris Valley which is framed by the Gavilan Hills to the west and the Lakeview Mountains across the valley to the east. The eastern flank of Mead Valley is generally flat, sloping gently upward toward the Gavilan Hills, which form a portion of the planning area's western boundary. Located in the southwest portion of the planning area in the Gavilan Hills is Steele Peak which is the tallest peak in the planning area at 2,529 feet. (Riverside County, 2016a, pp. 6,7)

As shown on Figure 2-7, Figure 2-8, and Figure 2-9, the only possible existing public viewpoints on or around the site offering views of prominent scenic vistas or views open to the public are along Seaton Avenue (paved road) and Perry Street (unpaved dirt road). However, due to the existing regional topography of the Perris Valley, existing ornamental landscaping in the surrounding area, including street trees, existing development along the I-215 corridor, as well as the Project site's low profile setting in the Perris Valley, scenic views beyond the Project site are minimal to the north, west, and south. The Gavilan Hills and Steele Peak are visible to the east. The Riverside County General Plan EIR determined that a "major visible aesthetic effect... would mean affecting open views of local foothills or mountains" (Riverside County, 2015b, p. 4.4-25). Therefore, the Project would result in aesthetic impacts if it were to substantially block open views of mountains or foothills from Seaton Avenue.

As shown in Figure 2-7, from Seaton Avenue, the Gavilan Hills are visible in the distance to the east. Because the Gavilan Hills, including Steele Peak are located over 3.5 miles to the southwest of the site, the distance and location of the Gavilan Hills in relation to the Project site do not result in a unique, prominent, distinct view of the Gavilan Hills from the site and abutting roadways under existing conditions.

As identified in Table 3-1, the Project would be constructed over a period of approximately 12 months. Heavy equipment would be used, which would be visible to the immediately surrounding properties during the temporary construction period. Construction activities are a common occurrence in the developing Inland Empire region of southern California and are not considered to result in the creation of an aesthetically offensive site open to public view. Furthermore, many of the properties immediately surrounding the site are either vacant or developed with industrial uses having outdoor storage, including

a window and door manufacturing company, concrete foundation construction company, and porta potty and septic tank rental company. On the west side of Seaton Avenue directly across the street from the Project site are an asphalt paving company, concrete equipment storage yard, and one residential home with outdoor animal keeping pens. Except for the short-term use of cranes during building construction and lifts during the architectural coating phase, the construction equipment that would be used on the Project site is expected to be low in height and not substantially visible to the surrounding area. All construction activities would be temporary in nature and all construction equipment would be removed from the Project site following completion of construction activities. For these reasons, temporary aesthetic effects during the Project's construction period would be less than significant.

Because the Project site would be developed from a vacant undeveloped site to a warehouse building, the aesthetic changes to the Project site would be noticeable and obvious upon Project completion. Landscaping would be installed around the perimeter of the Project site, including along the frontages with Seaton Avenue and Perry Street and the building's dock doors would be positioned on the east-facing side of the building facing a vacant property designated Light Industrial development by the County's General Plan. Because Mead Valley's scenic vistas, notably, the Gavilan Hills, including Steele Peak, are located over 3.5 miles southwest of the Project site with intervening development and topography between the site and the Gavilan Hills, views of the distant landforms would remain visible to the public and thus the Project would not obstruct the view or create an aesthetically offensive site open to public view as seen from a scenic vista.

The Project will incorporate a number of features intended to soften the visual prominence of the building and east-facing loading docks from public viewing areas, including enhanced architectural treatments and landscaping. The building also would incorporate a solid screen wall with metal gate at the Perry Street driveway to obscure loading and docking bays from public views along Perry Street. The visual prominence of this metal gate would be reduced through the installation of landscaping (trees, shrubs, and groundcover) east of the gate and driveway at the northeast corner of the property. Therefore, because development of the Project would not substantially damage scenic resources, obstruct any prominent scenic vista or view open to the public, or result in the creation of an aesthetically offensive site open to public view, impacts would be less than significant.

- c) **In non-urbanized areas, would the project 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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

According to mapping information provided from the Southern California Association of Governments (SCAG), which is based on U.S. Census data for urbanized areas, the Project site is located within an urbanized area (SCAG, 2017).

As shown previously on Figure 2-13, *Existing Zoning Classifications*, the Project site is split zoned Manufacturing - Service Commercial (M-SC) and Industrial Park (I-P) and the proposed Project is consistent with the zoning classifications. According to the Riverside County Land Development Ordinance, the

primary purpose of the M-SC Zone is to promote and attract industrial and manufacturing activities which will provide jobs to local residents and strengthen the County's economic base. The I-P Zone typical uses include planned industrial area with special attention to circulation, parking, utility needs, aesthetics, and compatibility. Development is subject to area site improvement, landscaping, and performance standards applicable to the M-SC and I-P zones (Riverside County, 2019b)

The proposed Project would be required to comply with the development standards of the stricter of the zoning classifications on the site; therefore, with compliance with the zoning development standards and regulations, the Project's potential to result in a conflict with applicable zoning and other regulations governing scenic quality would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
2. Mt. Palomar Observatory				
a. Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County Ordinance No. 655 (Regulating Light Pollution) (Riverside County, 1988); Riverside County General Plan Draft No. 512 Section 4.4 "Aesthetics and Visual Resources" (Riverside County, 2015b)

a) Would the Project interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

According to the Riverside County General Plan Draft EIR No. 512, the Project site is located within Zone B of the Mt. Palomar Nighttime Lighting Policy Area (Riverside County, 2015b, Figure 4.4.1). All developments within Zone B of the Mt. Palomar Nighttime Lighting Policy Area, including the Project, are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the observatory. The Project's Conditions of Approval imposed by Riverside County require compliance with all such mandatory requirements and the County of Riverside would be obligated to review subsequent building permits to ensure compliance. Therefore, because the Project

would be required to comply with Ordinance No. 655, the Project's potential to interfere with the nighttime use of the Mt. Palomar observatory would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Applicable Regulatory Requirements: The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp sources and shielding of light emissions for outdoor fixtures to reduce "skyglow" or light pollution that affects day or nighttime views from Mt. Palomar Observatory (located approximately 40 miles southeast of the Project site in northern San Diego County).

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
3. Other Lighting Issues				
a. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County Airport Land Use Commission (RCALUC, 2019a); County of Riverside Ordinance No. 655 (Riverside County, 1988); County of Riverside Ordinance No. 915 (Riverside County, 2012); Viewshed Analysis performed by T&B Planning, Inc. (T&B Planning, Inc., 2018).

- a) **Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**
- b) **Would the Project expose residential property to unacceptable light levels?**

Under existing conditions, the Project site is vacant and undeveloped and generates no day or nighttime light or glare. The site is surrounded by vacant land, industrial uses, one residential property located at the southwest corner of Seaton Avenue and Perry Street and residential uses mixed with business enterprises further to the west. The proposed Project would include exterior lighting; however, the installation of exterior lighting would be ancillary to the proposed building. The proposed Project would be required to adhere to the lighting requirements as set forth in Riverside County Ordinance Nos. 655 and 915, which provide minimum requirements for outdoor lighting in order to reduce light trespass and to protect the health, property, and well-being of residents. Plans submitted to Riverside County for future implementing permits and approvals (i.e., building permits) would be required to demonstrate compliance with these standards. Accordingly, mandatory compliance with County Ordinances No. 655 and 915 would ensure that the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views or expose residential properties to unacceptable light levels.

The Project would involve the construction of one (1) warehouse building with exterior building surfaces that consist of concrete tilt-up panels and gray reflective glazing. Loading docks would be east-facing and the architecture of the west-facing side of the building and southwest and northwest corners of the building are designed to emulate an office aesthetic with windows. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of any surrounding properties, including motorists on adjacent roadways, because the glass used by the Project would be low-reflective. Areas proposed for window glazing would be limited, as shown on the Project's application materials (HPA, 2020). The roof of the proposed warehouse building would be constructed to accommodate the installation of solar panels. Because solar panels absorb light – and do not reflect it – they are not expected to result in substantial adverse glare effects. In addition, any solar panels installed on the site would need to be designed to minimize glare in accordance with Riverside County ALUC requirements as identified under the Hazards and Hazardous Materials threshold (see Threshold 21). Therefore, because the proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or expose residential property to unacceptable light levels, impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.

Monitoring: No monitoring is required.

5.1.2 Agriculture and Forest Resources

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
4. Agriculture				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure OS-2 "Agricultural Resources" (Riverside County, 2015a); Riverside County GIS Database (RCIT, 2019); California Department of Conservation California Important Farmland Finder (CDC, 2016a); Ordinance No. 625: An Ordinance of the County of Riverside Amending Ordinance No. 625 Providing A Nuisance Defense for Certain Agricultural Activities, Operations, And Facilities And Providing Public Notification Thereof (Riverside County, 1994); California Department of Conservation Land

Evaluation & Site Assessment Model (LESA) (DOC, 1997); V3 Companies, Phase I Environmental Site Assessment (V3 Companies, 2018)

a) Would the Project 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?

According to the Farmland Mapping & Monitoring Program (FMMP) California Important Farmland Finder and as reported by Riverside County GIS, the Project site contains lands defined by the FMMP as Farmland of Local Importance (CDC, 2016a). There are no portions of the Project site that contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland ("Farmland"). Also, there are no areas surrounding the Project site that contain designated Farmland.

According to Riverside County GIS, the Project site is mapped with "Agricultural Lands of Local Importance" with a small sliver of land along the western boundary of the site mapped as Urban Built-Up Land. Farmland of Local Importance is assigned to land that is either currently producing agricultural crops, or has the capability of production, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. According to the California Department of Conservation (CDC) classifications, lands designated as "Farmland of Local Importance" likely carry the designation because the soils in this area are capable of agricultural production, but the property has never been used for agriculture and/or lacks available irrigation water for use in agricultural crop production and no active farming is occurring in the general area.

Because the Project site does not contain land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), the Project has no potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?

According to historical aerial photography, the Project site was agricultural cropland from 1938 to 1978 and has not been farmed since that time (approximately 40 years) (V3 Companies, 2018, p. 1). The site is currently vacant undeveloped land. The site is zoned M-SC and I-P and is not zoned for agricultural use. As shown on Riverside County GIS, the Project site is surrounded on the south and west by "Urban-Built-Up Land" and on the north and east by "Farmland of Local Importance". The Project site is not a part of an agricultural preserve and there are no lands identified as agricultural preserves on any lands surrounding the Project site (RCIT, 2019). Therefore, because the Project would not conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a

Riverside County Agricultural Preserve, no impact would occur as a result of development of the proposed Project.

The agricultural value of the Project site was evaluated using the California Department of Conservation's (DOC) Land Evaluation and Site Assessment (LESA) Model. The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources. The LESA Model is made up of two (2) sets of factors: Land Evaluation (LE) and Site Assessment (SA), which are scored and weighed separately to yield a total LE subscore and SA subscore. The Final LESA Score is the sum of the LE and SA subscores and has a maximum possible score of 100 points. Based on the Final LESA Score, a threshold system is used to determine the significance of a project's impacts on agricultural resources (refer to Table 9 of the LESA Instruction Model). (DOC, 1997, p. 31).

The Land Evaluation (LE) subscore consists of two (2) factors, including the Land Capability Classification (LCC) rating and the Storie Index rating, which were devised to measure the inherent soil-based qualities of land as they relate to agricultural production. The LCC Rating and Storie Index rating scores are based upon the soil map unit(s) identified on a property and the acreage of each soil mapping unit relative to the property's total acreage. Data for the soil map unit(s), LCC, and Storie Index for the Project site were obtained from soil survey data provided by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). (DOC, 1997, pp. 7-9)

The Site Assessment (SA) subscore consists of four factors that measure social, economic, and geographic features that contribute to the overall value of agricultural land. The SA factors include Project Size Rating, Water Resource Availability Rating, Surrounding Agricultural Land Rating, and Protected Resource Land Rating. (DOC, 1997, p. 13)

As summarized Table 5-1, *LESA Summary Score*, the Project site's LESA Model score is 48.74. According to the LESA Model scoring thresholds, a project site that receives a score between 40 and 59 is considered significant only if the Land Evaluation (LE) and the Site Assessment (SA) subscores are each greater than or equal to 20 points (DOC, 1997, Table 9). Because the proposed Project's SA subscore is less than 20, the Project site is not considered to be an important agricultural resource pursuant to the LESA Model.

Table 5-1 LESA Summary Score

	Factor Scores	Factor Weight	Weighted Factor Scores
Land Evaluation (LE) Factors			
Land Capability Classifications (LCC) ¹	70.01	0.25	17.50
Storie Index ²	61.86	0.25	15.47
<i>LE Subtotal</i>		<i>0.50</i>	<i>32.97</i>
Project Size	0	0.15	0
Water Resource Availability ³	100	0.15	15
Surrounding Agricultural Land ⁴	0	0.15	0
Protected Resource Land ⁵	0	0.05	0

SA Subtotal		0.50	15.00
Final LESA Score			47.97

Notes:

¹The entire Project site has an LCC classification of IIIe, which corresponds to a LESA LCC rating of 70 points. The weighted LCC score for the site is 70.01.

²Approximately 1.24 acres of the Project site has a Storie Index rating of 48.2; approximately 3.96 acres of the Project site has a Storie Index rating of 45.7; and approximately 3.95 acres of the Project site has a Storie Index rating of 82.3. The weighted Storie Index rating for the site is 61.86.

³The soils on the Project site do not meet the minimum area requirement (in acres) to be awarded a score under the LESA Model.

⁴The Project site is not irrigated; however, the Project area receives sufficient average annual rainfall to support dryland farming in non-drought years, in theory. Additionally, water utilities are available to the Project site from the abutting roadways (Seaton Avenue and Perry Street). The irrigation conditions at the Project site correspond to a score of 100 under the LESA Model.

⁵There are no agricultural lands or protected resource lands within the Project's zone of influence. The zone of influence is defined pursuant to the LESA Model.

-Factor weights are defined by the LESA Model.

Source: (DOC, 1997) (USDA, 1971) (UC Davis California Soil Resources Lab, 2019)

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?

Surrounding zoning classifications consists of M-SC and I-P to the north and south of the Project site, M-SC to the east of the site, roadway (Seaton Avenue) and R-R-1/2 adjacent to the southwest portion of the site, roadway (Seaton Avenue) and A-1-1 adjacent to the northwestern corner of the Project site, and roadway (Seaton Avenue and Perry Street) and M-SC directly adjacent to the northwest corner of the Project site. Although the R-R-1/2 zone allows for limited and small-scale agricultural uses, agriculture is not a permitted primary use. As discussed in Section 2.0, a residential home with ancillary animal keeping pens which appear to house a few horses and goats enclosed by metal and chain link fence, is located at the southwest corner of Seaton Avenue and Perry Street. Although land northwest of the Project site is zoned A-1-1, the land is occupied by Torrance Aluminum a window and door manufacturing company. In addition, the Project site and the lands zoned as R-R-1/2 and A-1-1 are separated by Seaton Avenue and Perry Street.

Pursuant to Ordinance No. 625 (Right-to-Farm Ordinance), the phrase "agricultural activity, operation, or facility, or appurtenances thereof" shall include, but not be limited to, the cultivation and tillage of the soil, dairying, the production, cultivation, growing, and harvesting of any agricultural commodity, including timber, viticulture (grape cultivation), apiculture (bee keeping), or horticulture (garden cultivation and management), the raising of livestock, fur bearing animals, fish, poultry, and any practices

performed by a farmer or on a farm as an incident to or in conjunction with such farming operations, including preparation for market, delivery to storage or to market, or to carriers for transportation for market.” (Riverside County, 1994)

A residential home with ancillary animal keeping pens for horses and goats is located at the southwest corner of Seaton Avenue and Perry Street. According to Ordinance No. 625, as summarized above, these uses do not meet the definition of agricultural activity. However, in the unlikely event that agricultural activity commences on the properties to the northwest of the Project site that are zoned A-1-1, and continues for at least three years before the Project site is developed, the proposed Project would be required to comply with Riverside County Ordinance No. 625 (Riverside County Right-to-Farm Ordinance). Ordinance No. 625 (Right-to Farm Ordinance) specifies that if any agricultural operation has been in place for at least three years and is not considered a nuisance operation at the time the operation began, no change in surrounding land uses may cause said operation to become a nuisance. (Riverside County, 1994). Mandatory compliance with Ordinance 625, would ensure that any potential conflicts between the proposed Project and existing agriculturally zoned property within 300 feet of the Project site do not occur, thereby resulting in a less-than-significant impact to existing agriculturally zoned properties located in the Project site’s vicinity.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA’s definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with Riverside County Ordinance No. 625, which requires that when non-residential uses are developed adjacent to properties zoned primarily for agricultural purposes (that support agricultural operations that have been in place for at least three years and not considered a nuisance operation at the time the operation began), future property owners must be notified of any agricultural operations that are on-going in the area, and acknowledge that such agricultural uses shall not be the subject of nuisance complaints.

d) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

“Farmland” is defined in Section II.a of Appendix G to the State CEQA Guidelines to mean Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As described under Threshold a), above, there are no areas of Farmland within the Project vicinity.

As described previously in Section 2.0, and above under Threshold 4.(c), lands to the west of the Project site and west of Seaton Avenue are zoned R-R-1/2 and A-1-1 and are not designated Farmland by the

FMMP. In addition, the Project site is located in a portion of Riverside County around the I-215 corridor that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light industrial land uses. Seaton Avenue, which abuts the Project site to the west, separates the planned employment area from a rural residential area that has some ancillary animal keeping uses but no Farmland.

As such, because there are no components of the proposed Project that would result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use, no impact would occur as a result of development of the proposed Project.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
5. Forest				
a. 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 Govt. Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure OS-3a "Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas (Riverside County, 2015a); Riverside County GIS (RCIT, 2019)

- a) Would the Project 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 Govt. Code section 51104(g))?
- b) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?
- c) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

The Project site is not zoned as forest land and there are no lands within the Project site's vicinity that are zoned for forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or Timberland Production (as defined by Govt. Code § 51104(g)). Due to the lack of forest land in the Project area, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. Additionally, because there are no forest lands in the Project vicinity, the Project would not have the potential to involve other changes to the existing environment which, due to their location or nature, could indirectly result in the conversion of forest land to non-forest use. (RCIT, 2019) (Riverside County, 2015a, Figure OS-3a:) (Google Earth, 2018) Therefore, because implementation of the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and because the Project would not result in the loss of forest land or conversion of forest land to non-forest use, no impact would occur as a result of development of the proposed Project.

Findings of Fact: There would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
6. Air Quality Impacts				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" 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"/>

Source: Urban Crossroads, Air Quality Impact Report (Urban Crossroads, Inc., 2019a); Urban Crossroads,, Mobile Health Risk Assessment (Urban Crossroads, Inc., 2019b); Urban Crossroads

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Project site is located within the South Coast Air Basin (SCAB or “Basin”) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards (Urban Crossroads, Inc., 2019a, p. 8)

Currently, State and federal air quality standards are exceeded in most parts of the Basin. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP, the 2016 AQMP, was adopted by SCAQMD in March 2017. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD’s *CEQA Air Quality Handbook (1993)* (Urban Crossroads, Inc., 2019a, p. 57). The Project’s consistency with these criteria is discussed below.

***Consistency Criterion No. 1:** The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) or regional significance thresholds were exceeded. The Project would not exceed the applicable regional thresholds and LST thresholds for operational activity. However, as evaluated under Threshold 6(c), below, the Project would exceed localized significance thresholds for particulate matter 2.5 microns in diameter or less (PM_{2.5}) emissions during construction. Therefore, the Project has the potential to conflict with the AQMP according to this criterion and a significant impact

would occur associated with consistency with the AQMP, requiring mitigation. (Urban Crossroads, Inc., 2019a, p. 58).

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The growth forecasts used in the AQMP to calculate future emissions levels are based in part on land use planning data provided by lead agencies via their general plan documentation. Projects that increase the intensity of use on a subject property may result in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the AQMP. The Project site is designated for “Light Industrial (LI)” land use by the County of Riverside General Plan and the Mead Valley Area Plan (MVAP). The land use proposed by the Project is consistent with the LI General Plan and MVAP Land Use Designation and the Project does not propose to change the General Plan or MVAP Land Use Designations for the Project site. Accordingly, the Project would not exceed the growth projections in the County of Riverside General Plan and MVAP and the Project is considered to be consistent with the growth assumptions used in the AQMP and is therefore consistent with Criterion No. 2.

In summary, because the Project would exceed the localized significance thresholds for PM_{2.5} during construction, the Project has the potential to conflict with or obstruct implementation of the AQMP under Consistency Criterion No. 1. Therefore, impacts are determined to be significant and mitigation is required. To mitigate the Project’s potentially significant impact to the AQMP, the Applicant is required to use construction equipment that complies with EPA/CARB Tier 3 emissions standards to decrease localized construction PM_{2.5} emissions to a less-than-significant level.

Findings of Fact: Impacts would be less than significant with mitigation incorporated.

Mitigation: The following mitigation measure (MM) addresses the Project’s direct impact to localized PM_{2.5} emissions during construction. With the implementation of Air Quality MM-1, the localized PM_{2.5} emissions during construction would be reduced to less than significant and the Project would not conflict with or obstruct implementation of the applicable air quality plan.

Air Quality MM-1: Prior to grading permit issuance, the County of Riverside shall verify that the following note is included on the grading plan. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The note shall also be specified in bid documents issued to prospective construction contractors.

- When using construction equipment greater than 150 horsepower (>150 HP), the construction contractor(s) shall ensure that off-road diesel construction equipment complies with the EPA/CARB Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer’s specifications.

Monitoring: Monitoring is required throughout the construction phase. The Project construction manager would be responsible for keeping records demonstrating that all equipment greater than 150 HP complies with the EPA/CARB Tier 3 emissions standards. These records shall be made available for inspection by the Riverside County Building & Safety Department upon request.

b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The proposed Project has the potential to generate air pollutant concentrations during construction activities and operational activities. This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including: SCAQMD Rule 403, "Fugitive Dust;" SCAQMD Rule 431.2, "Sulfur Content of Liquid Fuels;" SCAQMD Rule 1113, "Architectural Coatings;" SCAQMD Rule 1186, "PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations;" SCAQMD Rule 1186.1, "Less-Polluting Street Sweepers," and Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations "Airborne Toxic Control Measure."

Impact Analysis for Construction Emissions

For purposes of analytical analysis, construction of the Project was assumed to begin in 2019 and last through 2020. Although construction will occur later, the results of the analytical analysis reported herein and in *Technical Appendix A1* would be considered "worst case" and overstated compared to what would actually occur due to the retirement of older equipment and replacement of such equipment with newer, less-polluting equipment. The California Emissions Estimator Model (CalEEMod) accounts for the implementation and enforcement of California's progressively more restrictive regulatory requirements for construction equipment and the ongoing replacement of older construction fleet equipment with newer, less-polluting equipment. Thus, according to the CalEEMod, construction activities that occur in the near future are expected to generate more air pollutant emissions than the same activities that may occur farther into the future. The Project's construction characteristics and construction equipment fleet assumptions used in the analysis are described in Section 3.0, *Project Description* and in *Technical Appendix A1*. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The duration of construction activity was based on CalEEMod defaults and a 2020 opening year. (Urban Crossroads, Inc., 2019a, p. 39)

The County Noise Regulation Ordinance (Ordinance No. 847) requires that any private construction activity located within one-quarter of a mile from an inhabited dwelling be restricted to the hours of 6:00 a.m. to 6:00 p.m., during the months of June through September, and 7:00 a.m. to 6:00 p.m., during the months of October through May. As such, construction activities are permitted to occur up to twelve (12) hours per day pursuant to the County's Noise Regulation Ordinance. However, for analytical purposes herein, it is assumed that each piece of construction equipment operating on the Project site and listed in Table 3-2, *Anticipated Construction Equipment*, would operate for a total of eight (8) hours per day. Eight (8) hours per day is consistent with industry standards and typical construction practices and CalEEMod defaults. In actuality, most pieces of equipment would likely operate for fewer than eight (8) hours per

day. (Urban Crossroads, Inc., 2020a, p. 40) For further substantiation that eight (8) hours of construction equipment use per day is a reasonable assumption, the CalEEMod that was developed by several air districts in California, including the SCAQMD, which is the authority responsible for bringing the South Coast Air Basin's air quality into attainment with federal and State standards, includes a default assumption of eight (8) hours of construction activity. The eight (8) hours of construction equipment activity assumed in CalEEMod is based on a construction survey conducted by the SCAQMD, referenced in Appendix E1 of CalEEMod's Appendix E: "Technical Source Documentation" (CAPCOA, 2017). As such, eight (8) hours per day for equipment use is reasonable, consistent with industry-standard practice, and supports uniform CEQA review for all development projects based on the CalEEMod default value.

The calculated maximum daily emissions associated with Project construction are presented in Table 5-2, *Overall Construction-Related Emissions (without Mitigation)*. As shown in Table 5-2 the Project's daily construction emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_x) carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM₁₀ and PM_{2.5}) would not exceed SCAQMD regional criteria thresholds (Urban Crossroads, Inc., 2019a, p. 41). Accordingly, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or cumulatively-considerable basis. Impacts associated with construction-related emissions of VOCs, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} would be less than significant and mitigation is not required.

Although mitigation is not required to reduce estimated daily construction regional emissions, because mitigation is required to decrease localized emissions (see Threshold 6(c) below), implementation of the localized emissions measures would further reduce the already less-than-significant regional emissions as indicated in Table 5-3. (Urban Crossroads, Inc., 2019a, p. 41).

Table 5-2 Overall Construction-Related Emissions (without Mitigation)

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2019	5.94	68.26	30.24	0.09	11.05	6.75
2020	52.69	49.26	28.70	0.08	4.19	2.40
Winter						
2019	5.94	68.26	29.06	0.08	11.05	6.75
2020	52.68	49.24	27.62	0.08	4.19	2.40
Maximum Daily Emissions	52.69	68.26	30.24	0.09	11.05	6.75
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of *Technical Appendix A1*.

Source: (Urban Crossroads, Inc., 2019a, Table 3-4)

Table 5-3 Overall Construction Emissions Summary (with Mitigation)

Year	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2019	4.78	48.53	32.16	0.09	9.81	5.66
2020	52.69	44.80	30.72	0.08	4.02	2.26
Winter						
2019	4.77	48.53	30.98	0.08	9.81	5.66
2020	52.68	44.78	29.64	0.08	4.03	2.26
Maximum Daily Emissions	52.69	48.53	32.16	0.09	9.81	5.66
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

CalEEMod construction-source (mitigated) emissions are presented in Appendix 3.2 of *Technical Appendix A1*.

Source: (Urban Crossroads, Inc., 2019a, Table 3-5)

Impact Analysis for Operational Emissions

Operational activities associated with the Project are expected to generate air pollutant emissions from the operation of motor vehicles (including cars and trucks), landscape maintenance activities, application of architectural coatings, and the use of electricity and natural gas. Long term operational emissions associated with the Project are presented in Table 5-4, *Summary of Peak Operational Emissions*.

As summarized in Table 5-4, Project-related operational emissions of VOCs, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation. The Project's long-term emissions of VOCs, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} would be less than significant and no mitigation is required. (Urban Crossroads, Inc., 2019c, pp. 46-47).

Table 5-4 Summary of Peak Operational Emissions

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	4.68	4.40e-04	0.05	0.00	1.70e-04	1.70e-04
Energy Source	0.05	0.45	0.38	2.69e-03	0.03	0.03
Mobile Source (Passenger Cars)	0.95	0.71	11.47	0.03	3.02	0.81
Mobile Source (Trucks)	0.96	29.34	6.24	0.10	4.11	1.51
On-Site Equipment Source	0.15	1.79	0.78	3.17e-03	0.06	0.05
Total Maximum Daily Emissions	6.80	32.29	18.92	0.13	7.22	2.41
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	4.68	4.40e-04	0.05	0.00	1.70e-04	1.70e-04
Energy Source	0.05	0.45	0.38	2.69e-03	0.03	0.03
Mobile Source (Passenger Cars)	0.85	0.74	9.41	0.03	3.02	0.81
Mobile Source (Trucks)	0.95	30.64	6.09	0.10	4.11	1.51
On-Site Equipment Source	0.15	1.79	0.78	3.17e-03	0.06	0.05
Total Maximum Daily Emissions	6.68	33.62	16.71	0.13	7.22	2.41
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: (Urban Crossroads, Inc., 2019a, Table 3-6)

SCAQMD considers air pollutant emissions that exceed the SCAQMD's project-level thresholds to also be cumulatively-considerable. Conversely, if a project does not exceed the SCAQMD project-level thresholds, then SCAQMD considers that project's air pollutant emissions to be less than cumulatively-considerable. The evaluation of Project-specific air pollutant emissions presented above demonstrates that the Project would not exceed any applicable thresholds that are designed to assist the region in attaining the applicable national air quality standards. Therefore, the Project's air pollutant emissions would be less than cumulatively-considerable and would not contribute to the non-attainment of applicable State and federal standards.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the provisions of the SCAQMD Rule 403 “Fugitive Dust.” Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project’s grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:
 - In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.
 - The construction contractor(s) shall ensure that all distributed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
 - The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.
- The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1113 “Table of Standards” pertaining to VOC emissions by Low-Volatile Organic Compounds paints (no more than 50 gram/liter of VOC). Prior to building permit final inspection, the County of Riverside shall verify a note requiring Rule 1113 compliance is specified on all building plans. Project contractors would be required to comply with the note and maintain written records of such compliance that can be inspected by the County of Riverside or its designee upon request.
- The Project’s construction activities are required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 1186 “PM₁₀ Emissions from Paved and Unpaved Roads and Livestock Operations,” which requires the use of a street sweeper certified by the Air Quality Management District (AQMD), and the use of non-toxic chemical stabilizers for dust control.
- Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site.
- The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting,

water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce air pollutant emissions.

- Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project's truck courts specifying the idling restriction requirement.

c) Would the Project expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?

For a detailed description of the health effects of air pollutants refer to Section 2.6 of the Project's Air Quality Impact Analysis (*Technical Appendix A1*). In general, air pollutants have adverse effects to human health including, but not limited to, respiratory illness and carcinogenic effects. The following analysis is based on the applicable significance thresholds established by the SCAQMD (which are based on federal and State air quality standards).

As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (*Sierra Club v. County of Fresno (Friant Ranch L.P. (2018) 6 Cal.5th 502)* (SCAQMD Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. The SCAQMD discusses in the Brief that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors outlined in the SCAQMD Brief. The Brief specifically states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)) and even where a health risk assessment can be prepared, the resulting maximum health risk value is only a calculation of risk--it does not necessarily mean anyone will contract cancer or other health concern as a result of the project. For extremely large regional projects (unlike the proposed Project), the SCAQMD Brief states that it is possible to correlate potential health outcomes for very large emissions sources; as part of the SCAQMD's rulemaking activity, specifically 6,620 pounds per day of NO_x and 89,190 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone (Brief, at page 12). The proposed Project does not generate anywhere near 6,620 pounds per day of NO_x or 89,190 pounds per day of VOC emissions. In comparison, the Project would generate only 48.53 pounds per day of NO_x during construction and only 33.62 pounds per day of NO_x during operations (0.73 percent and 0.51 percent of 6,620 pounds per day, respectively). The Project would generate only 52.69 pounds per day of VOC emissions during construction and only 6.68 pounds per day of VOC emissions during operations (0.06 percent and 0.01 percent of 89,190 pounds per day, respectively). Therefore, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a Basin-wide level. (Urban Crossroads, Inc., 2019a, pp. 59-60)

Provided below are analyses of the Project's localized significance thresholds (LST) evaluation and mobile source diesel particulate matter (DPM) evaluation, based on quantifiable methodologies accepted by the

SCAQMD. The following provides an analysis of the Project's potential to expose sensitive receptors in the immediate vicinity of the Project site to substantial pollutant concentrations during Project construction and long-term operation based on the applicable significance thresholds established by the SCAQMD.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual and cumulatively significant impact. Sensitive receptors are people who are especially sensitive to air pollution. Sensitive receptors could include children, the elderly, persons with preexisting respiratory or cardiovascular illness, and those who engage in frequent exercise. The nearest sensitive receptor to the Project site where an individual can stay for a 24-hour period is labeled R3 in *Technical Appendix A1*, which is an existing residential property located on the northwest corner of Cougar Street and Seaton Avenue, and approximately 90 feet/27 meters) west of the Project site (Urban Crossroads, Inc., 2019a, p. 50). The measurement is based on the distance from the property line of the Project site to the property line of the residential property.

For evaluation of localized NO₂ and CO impacts, the nearest receptor where an individual can be located for an 8-hour period is a manufacturing facility located less than 50 feet from the southern boundary of the Project site. Consistent with SCAQMD's LST Methodology, Urban Crossroads used a 25-meter receptor distance for NO₂ and CO which provides for a conservative i.e., "health protective" standard of care. Because the total acreage that would be actively disturbed on the Project site is less than 5 acres per day for site preparation and grading activities, Urban Crossroads used SCAQMD's screening look-up tables to determine the potential for impacts. (Urban Crossroads, Inc., 2019a, p. 52)

Impact Analysis for Construction Localized Emissions

As stated above, the nearest receptor where an individual can stay for a 24-hour period is represented by location R3, an existing residential use located west of Seaton Avenue at approximately 90 feet (27 meters) west of the Project site's boundary. For evaluation of localized NO₂ and CO impacts, the nearest receptor where an individual can remain for an 8-hour period is a manufacturing facility located adjacent (less than 50 feet) to the Project site. (Urban Crossroads, Inc., 2019a, p. 50)

As shown in Table 5-5, *Localized Significance Summary of Construction Emissions (without Mitigation)*, the Project would not exceed the SCAQMD's localized significance threshold for NO_x, CO, or PM₁₀ emissions during construction. Accordingly, Project construction would not expose sensitive receptors or a substantial number of people to substantial pollutant emissions and impacts associated with construction-related emissions of NO_x, CO, and PM₁₀ would be less than significant and mitigation is not required. Notwithstanding the conclusions above, the Project's construction-related emissions of PM_{2.5} would exceed the applicable SCAQMD localized threshold during the site-preparation phase of Project construction. According to Table 3-1, *Anticipated Construction Duration*, site preparation activity is expected to occur for approximately 10 days. Accordingly, the Project's daily localized PM_{2.5} emissions during the site preparation phase of Project-related construction activities has the potential to expose sensitive receptors, which are located within one (1) mile of the Project site, to substantial pollutant concentrations for a period of approximately 10 days. Therefore, impacts associated with daily localized

construction PM_{2.5} emissions would be a significant direct impact and cumulatively considerable and require the implementation of mitigation to reduce the PM_{2.5} emissions. (Urban Crossroads, Inc., 2019a, p. 52)

Table 5-5 Localized Significance Summary of Construction Emissions (without Mitigation)

On-Site Site Preparation Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	68.20	23.17	10.85	6.70
SCAQMD Localized Threshold	220	1,230	12	6
Threshold Exceeded?	NO	NO	NO	YES
On-Site Grading Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	45.32	17.12	5.01	3.07
SCAQMD Localized Threshold	187	999	9	5
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, Inc., 2019a, Table 3-9)

Impact Analysis for Operational Localized Emissions

As shown in Table 5-6, *Localized Significance Summary of Operations (Without Mitigation)*, the Project's calculated long-term operational emissions would not exceed the localized thresholds established by the SCAQMD, for the nearest receptor, R3. Receptors located further from the Project site would be exposed to a lesser concentration of Project-related operational emissions. Accordingly, long-term operation of the Project would not result in the exposure of sensitive receptors, which are located within one-mile of the Project site, to substantial pollutant concentrations. Therefore, impacts associated with operational localized emissions would be less than significant. (Urban Crossroads, Inc., 2019a, p. 54)

Table 5-6 Localized Significance Summary of Operations (Without Mitigation)

Operational Activity	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	3.74	2.09	0.45	0.20
SCAQMD Localized Threshold	270	1,577	5	2
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, Inc., 2019a, Table 3-11)

Impact Analysis for CO "Hot Spots"

Localized areas where ambient CO concentrations exceed the CAAQS and/or NAAQS are termed CO "hot spots." Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Consequently, the highest

CO concentrations are generally found within close proximity to congested intersection locations. For purposes of providing a conservative, worst-case impact analysis, the Project's potential to cause or contribute to CO hotspots was evaluated by comparing the study area intersections that would receive Project traffic (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. In the 2003 AQMP, the SCAQMD evaluated CO concentrations at four (4) busy intersections in the City of Los Angeles that were determined to be the most congested intersections in the SCAB. Each of the evaluated intersections were primary thoroughfares, some of which were located near major freeway on/off ramps, and experienced traffic volumes of approximately 100,000 vehicles per day. The SCAQMD's analysis at these busy intersections did not identify any CO hotspots. Based on an analysis of the intersections in the Project's study area, Urban Crossroads determined that none of the intersections in the Project's study area would be subject to the extreme traffic volumes and vehicle congestion of the intersections modeled by the SCAQMD in the 2003 AQMP. (Urban Crossroads, Inc., 2019a, pp. 55-56) Therefore, Project-related vehicular emissions would not create a CO hot spot and would not substantially contribute to an existing or projected CO hot spot. Impacts would be less than significant.

Impact Analysis for Diesel Particulate Emissions

Diesel-fueled trucks would travel to/from the Project site during operation of the Project. Diesel trucks produce diesel particulate matter (DPM), which is known to be associated with health hazards, including cancer. To evaluate the Project's potential to expose sensitive receptors within ¼-mile of the Project site and the Project's primary travel routes to substantial amounts of DPM during long-term operation, a Mobile Source Health Risk Assessment was prepared for the proposed Project (*Technical Appendix A2*). The modeled truck travel routes included in the HRA are based on the truck trip distributions (inbound and outbound) available from the Project's Traffic Impact Analysis (TIA) (*Technical Appendix K1*). The Project is designed such that trucks would use proposed Driveway 2 at Perry Street and enter and exit the driveway traveling east of the Project site to/from Harvill Avenue. The modeled truck route is consistent with the trip distribution patterns identified in the Project's TIA and was modeled to determine the potential impacts to sensitive receptors along the primary truck routes. The modeling domain is limited to the Project's primary truck route and includes off-site sources in the study area for approximately 1.0 mile. This modeling domain is more inclusive and conservative than using only a ¼ mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential health risks occur within a ¼ mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling, travel, and on-site equipment). Project-related DPM health risks were evaluated under the residential and worker receptor scenarios, which are summarized below. (Urban Crossroads, Inc., 2019b, p. 9). Detailed air dispersion model outputs and risk calculations are presented in Appendices 2.1 and 2.2, respectively, of *Technical Appendix A2*.

The residential land use with the greatest potential exposure to Project DPM source emissions is an existing residential home located west of the Project site on Seaton Avenue. The distance between the Project site boundary and the residential property line is approximately 90 feet. The existing residential use is a residential receptor where an individual could remain for 24 hours per day. At this maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to the Project's DPM emissions is calculated to be 1.67 in one million. The cancer risk attributable to the Project at the

MEIR (i.e., 1.67 in one million) would not exceed the SCAQMD cancer risk threshold of 10 in one million. At this same receptor location, the non-cancer health risk index attributable to the Project would be 0.0006, which would not exceed the SCAQMD non-cancer health risk index of 1.0. Because all other modeled residential receptors are located at a greater distance than the scenario analyzed, and DPM dissipates with distance from the source, all other residential receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein at 90 feet west of the Project site boundary. As such, the Project would not cause a significant human health or cancer risk to adjacent residences. The nearest modeled receptors for operational activity are illustrated on Exhibit 2-C of *Technical Appendix A2*. Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of residential receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact. (Urban Crossroads, Inc., 2019b, p. 1)

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is an existing manufacturing facility located less than 50 feet from the Project site's southern boundary. At the maximally exposed individual worker receptor (MEIW), the maximum incremental cancer risk impact at this location is 0.70 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.002, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the scenario analyzed and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. The nearest modeled receptors for operational activity are illustrated on Exhibit 2-C. of *Technical Appendix A2*. Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of worker receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact. (Urban Crossroads, Inc., 2019b, p. 1)

The school site land use with the greatest potential exposure to Project DPM source emissions is at the Val Verde High School located at 972 Morgan Street in the City of Perris, approximately 0.8-mile (approximately 4,224 feet) southeast of the Project site and east of I-215. The greatest potential for exposure to DPM emissions occurs within 1,000 feet from a Project's primary source of DPM emissions (in the case of the Project, the primary source of emissions is the on-site idling and travel) and a health risk evaluation is typically conducted for school receptors located within a one-quarter mile radius or 1,320 feet geographic scope. There are no schools located within a ¼ mile of the Project site, and the nearest school is located on the opposite side of the I-215 Freeway where Project-related truck trips are not expected to travel in mass. Therefore, less-than-significant impacts would occur to schools in the vicinity of the Project. (Urban Crossroads, Inc., 2019a, pp. 1-2)

As shown on Table 5-7, *Summary of Localized Construction Emissions (with Mitigation)*, with the implementation of Air Quality MM-1 and Air Quality MM-2, PM_{2.5} construction-related emissions would be reduced during the site preparation phase of Project construction and the SCAQMD localized threshold would not be exceeded. Therefore, with mitigation, impacts would be reduced to less than significant.

Findings of Fact: Impacts will be less than significant with mitigation incorporated for construction-related localized PM_{2.5} emissions to sensitive receptors and less than significant for operational-related localized emissions, CO Hot Spots, and diesel particulate emissions to sensitive receptors.

Mitigation: To reduce impacts to less than significant, Air Quality MM-1 is required to address the Project's construction-related localized PM_{2.5} emissions to sensitive receptors.

Monitoring: Monitoring is required as specified above for Air Quality MM-1.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:
 - In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.
 - The construction contractor(s) shall ensure that all distributed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
 - The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less
- The Project is required to comply with the provisions of the SCAQMD Rule 1113 "Table of Standards" pertaining to VOC emissions by using Low-Volatile Organic Compounds paints (no more than 50 gram/liter of VOC) and/or High-Pressure Low Volume (HPLV) applications. Prior to building permit final inspection, the County of Riverside shall verify a note requiring Rule 1113 compliance is specified on all building plans. Project contractors would be required to comply with the note and maintain written records of such compliance that can be inspected by the County of Riverside or its designee upon request.
- The Project's construction activities are required to comply with the provisions of the SCAQMD Rule 1186 "PM10 Emissions from Paved and Unpaved Roads and Livestock

Operations,” which requires the use of a street sweeper certified by the SCAQMD, and the use of non-toxic chemical stabilizers for dust control.

- Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site.
- The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce air pollutant emissions.
- Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project’s truck courts specifying the idling restriction requirement.

As shown on Table 5-7, after implementation of Air Quality MM-1, Project construction emissions would not exceed the applicable SCAQMD localized thresholds for any criteria pollutant. Therefore, after the implementation of mitigation, impacts would be less than significant.

Table 5-7 Summary of Localized Construction Emissions (with Mitigation)

On-Site Site Preparation Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	43.61	26.29	9.61	5.61
SCAQMD Localized Threshold	220	1,230	12	6
Threshold Exceeded?	NO	NO	NO	NO

(Urban Crossroads, Inc., 2019a, Table 3-10)

d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance (Urban Crossroads, Inc.,

2019a, pp. 61-62). Many of the properties immediately surrounding the site are either vacant or developed with industrial uses having outdoor storage, including a window and door manufacturing company, concrete foundation construction company, and porta potty and septic tank rental company. On the west side of Seaton Avenue directly across the street from the Project site are an asphalt paving company, concrete equipment storage yard, and one residential home with outdoor animal keeping pens. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

During long-term operation, the Project would include a warehouse land use, which is not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project's long-term operational use in the gated truck court on the east side of the Project site could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding any significant odor impact. Furthermore, there are no sensitive odor receptors in this area (the adjacent property to the east is vacant and designated by the County's General Plan for future development with industrial uses), and the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation (Urban Crossroads, Inc., 2019a, pp. 61-62). As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the provisions of the South Coast Air Quality Management District (SCAQMD) Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.

5.1.4 Biological Resources

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
7. Wildlife & Vegetation				
a. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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 Wildlife or U.S. Wildlife Service?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Have a substantial adverse effect on State or federally protected wetlands (including, but	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
g. 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"/>

Source: Riverside County GIS Database (RCIT, 2019); Western Riverside County Multiple Species Habitat Conservation Plan (TLMA-EPD, 2003); Riverside County Ordinance No. 663 (as Amended through 663.10. An Ordinance of the County of Riverside Amending Ordinance No, 663 Establishing the Riverside County Stephens' Kangaroo Rat Habitat Conservation Plan Fee Assessment Area and Setting Mitigation Fees (Riverside County, 1996); Riverside County Ordinance No. 810.2, An Ordinance of the County of Riverside Amending Ordinance No. 810 to Establish the Western Riverside County Multiple Species Habitat Conservation Plan Mitigation Fee (Riverside County, 2003); Glenn Lukos Associates Inc., Jurisdictional Delineation (GLA, 2019a); Glenn Lukos Associates, Inc. Biological Technical Report (GLA, 2019b); Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis (GLA, 2019c)

a) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?

Two adopted Habitat Conservation Plans (HCPs) apply to the Project site. The Project site is located within the Stephens' Kangaroo Rat (SKR) HCP and the Western Riverside County MSHCP.

The Riverside County Ordinance No. 663 contains provisions for the protection of the SKR pursuant to the SKR HCP (Riverside County, 1996). The Project site is not located within an identified reserve area for the SKR and the species has a low potential for occurrence due to existing disturbed site conditions. Although the Study Area (defined as the Project site, the Project's off-site impact areas along Perry Street, and a survey buffer) is disturbed and no burrows or evidence of occupation was observed, Glenn Lukos Associates (GLA) calculated that the Study Area contains an estimated 9.75 acres of potential habitat for the SKR within disturbed/ruderal habitat; and therefore, the SKR may be present. (GLA, 2019b, Table 4-3, pp. 35-36). Because the Project site is located within the HCP boundary, the Project Applicant is required to pay a mandatory per-acre mitigation fee pursuant to Riverside County Ordinance No. 663, which requires a per-acre mitigation fee payment to assist the County in implementing the SKR HCP. With mandatory compliance with standard regulatory requirements (i.e., payment of the development mitigation fee), the proposed Project would not conflict with any County policies or ordinances related to the SKR HCP.

The Project site also is subject to the Western Riverside County MSHCP. According to Riverside County GIS, the Project site is not located within any MSHCP Criteria Cells; thus, the subject property is not targeted for conservation under the MSHCP. The nearest area subject to a MSHCP Criteria Cell is located approximately 0.52 mile south of the Project site and south of Cajalco Road (Cell No. 2334) (RCIT, 2019). However, because the Project site is located in the MSHCP area, the Project Applicant is required to pay a local development impact and mitigation fee pursuant to Riverside County Ordinance No. 810, which

requires a per-acre local development mitigation fee payment to assist the County in implementing the MSHCP.

The Project's study area is located within the MVAP of the MSHCP and is located within the MSHCP Survey Area for Burrowing Owl. The study area is not located within the MSHCP Criteria Area; Narrow Endemic Plant Species Survey Area (NEPSSA); Criteria Area Plant Species Survey Area (CASSA); Mammal or Amphibian Survey Areas; or MSHCP Core and Linkage areas. Within the designated Survey Areas, the MSHCP requires habitat assessments, and focused surveys within areas of suitable habitat. (GLA, 2019b, p. 3)

MSHCP Consistency Analysis

In order to identify biological resources in accordance with the requirements of CEQA and the MSHCP, GLA assembled biological data consisting of following main components into the Project's Biological Technical Report (*Technical Appendix B2*) (GLA, 2019b, p. 4):

- Delineation of aquatic resources (including wetlands and riparian habitat subject to the jurisdiction of the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and the Western Riverside County MSHCP riparian/riverine areas and vernal pools policy;
- Performance of general biological surveys and vegetation mapping for the Study Area;
- Performance of habitat assessments, and site-specific biological surveys, to evaluate the presence/absence of special-status species; and
- Performance of a focused survey for burrowing owl.

The analysis below evaluates the proposed Project with respect to consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures).

Project Relationship to Reserve Assembly

The Project site is located within the MVAP of the MSHCP; but is not located within the MSHCP Criteria Areas. The Project site is also not located within the MSHCP Core and Linkage areas. As such, the proposed Project has not been identified by the MSHCP for reserve assembly and is not subject to the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process, or the Joint Project Review (JPR) process. (GLA, 2019b, p. 47)

Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools

As shown on Figure 5-1, *MSHCP Riverine Map*, the Project site contains 0.31 acre of MSHCP riverine areas (1,202 linear feet), associated with Drainage A and Tributary A-1, neither of which support riparian habitat. Drainage A and Tributary A-1 are ephemeral drainage features with marginal bed and/or bank; and both features exhibit evidence of a drainage pattern including debris wracking and deposits from recent storms.

Drainage A ranges in widths from 8 to 25 feet, traversing the property from the southwestern property boundary continuing to the northeastern boundary. Tributary A-1 ranges in widths from 10 to 28 feet, originating at the western boundary. Tributary A-1 confluences with Drainage A near the center of the property. (GLA, 2019c, pp. 3-4)

As noted above, the site does not contain riparian habitat, and therefore does not contain suitable habitat for the least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, or other riparian birds. In addition, the site does not contain any vernal or seasonal pools, or other artificial features with the potential to support fairy shrimp. No ponding was observed at the site during biological surveys, including those that occurred following periods of substantial rainfall. The site lacks the suitable topography (including localized depressions) to support prolonged inundation or ponding. The site slopes slightly from west to east, with the central portion of the site containing drainage features that convey flows from west to east. As a result of the sloping topography and drainage, there is no opportunity for water to pond at the site. Furthermore, the site does not contain any artificial depressional features, including tire tracks and stock ponds that could support prolonged inundation. In addition, the site is mapped as containing sandy loam soils, which are generally not associated with vernal pools. Observations of the soils at the site showed a lack of clay soil components. Lastly, no plants were observed at the site that are associated with vernal pools and similar habitats that experience prolonged inundation. (GLA, 2019c, p. 4) No vernal or seasonal pools are present within the Project site and Study Area and no impact to vernal or seasonal pools would occur (GLA, 2019b, p. 48).

Pursuant to Volume I, Section 6.1.2 of the MSHCP, projects must consider alternatives to avoid impacts to riparian/riverine areas. If avoidance is infeasible, then the unavoidable impacts must be mitigated and a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required. (GLA, 2019c, p. 4) A DBESP has been prepared for the Project and is contained as *Technical Appendix B3*.

As noted above, MSHCP riverine areas within the Project site are limited to an onsite ephemeral drainage complex (A and A-1). The Project would result in unavoidable impacts to all MSHCP riverine areas at the site, totaling 0.31 acre. With the incorporation of mitigation, impacts to riparian/riverine species would be mitigated to a less than significant level, which would result in a biologically equivalent or superior mitigation as compared to avoidance of resources. This would result in consistency with the MSHCP (GLA, 2019c, pp. 1, 4, 5)

Protection of Narrow Endemic Plants

Volume I, Section 6.1.3 of the MSHCP requires that within identified NEPSSA, site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The proposed Project does not occur within the NEPSSA. As such, focused surveys are not required by the MSHCP for NEPSSA species, and the proposed Project is consistent with Volume I, Section 6.1.3 of the MSHCP. (GLA, 2019b, p. 48)

Guidelines Pertaining to the Urban/Wildland Interface

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. The proposed Project does not occur

adjacent to or near the MSHCP Conservation Area, and therefore the Urban/Wildland Interface Guidelines do not apply to the Project. (GLA, 2019b, p. 48)

Additional Survey Needs and Procedures

Volume I, Section 6.3.2 of the MSHCP identifies that additional surveys may be needed for certain plant and animal species in conjunction with MSHCP implementation in order to achieve full coverage for these species. Within areas of suitable habitat, focused surveys are required if a project site occurs within a designated CASSA, or special animal species survey area (i.e., burrowing owl, amphibians, and mammals). The Project site does not occur within the amphibian or mammal survey areas, or within the CASSA. (GLA, 2019b, p. 48)

The Project site occurs within the MSHCP survey area for burrowing owl; therefore, the MSHCP survey conservation requirements for burrowing owl apply to the Project's study area. GLA conducted focused surveys of the Project's study area during the 2018 and 2019 nesting season pursuant to the MSHCP. No burrowing owls were detected within the Project's study area during GLA's protocol burrowing owl surveys; however, GLA observed that the Project's study area contains potentially suitable habitat for burrowing owl, including a few California ground squirrel burrows located on the site, but none of this habitat exhibited any evidence of burrowing owl occupation. Based on the current lack of detection of burrowing owl on the Project site, the Project is not expected to have an impact on the burrowing owl species; however, because the Project site contains suitable habitat for the burrowing owl, development of the Project would result in a potentially significant direct and cumulatively considerable impact associated with compliance to the Western Riverside County MSHCP due to the potential to impact western burrowing owl individuals if the species is present on the site when construction activities commence. (GLA, 2019b, p. 33) Although GLA determined that no burrowing owl currently occur on the Project site, because the species is migratory and could use/occupy the property prior to ground-disturbing construction activities, mitigation is required to ensure that development of the Project does not result in a substantial adverse effect to the burrowing owl in the event the species occupies the Project site at the time of construction.

With the implementation of mitigation measures, the proposed Project would be consistent with MSHCP Volume I, Section 6.3.2. (GLA, 2019b, p. 48)

Conclusion of MSHCP Consistency Analysis

As outlined above, the proposed Project is found consistent with the biological requirements of the MSHCP; specifically pertaining to the Project's relationship to reserve assembly, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures). (GLA, 2019b, p. 49)

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required.

Biological Resources MM-1: Pre-Construction Surveys for Western Burrowing Owl

Pursuant to Objectives 5, 6, and 7 of the Species Account for the Burrowing Owl in the Western Riverside County MSHCP, within 30 days prior to the issuance of a grading permit, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist who holds a Memorandum of Understanding (MOU) with the County. The survey results shall be provided in writing to the Environmental Programs Department/County Biologist. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required. If it is determined that the Project site is occupied by the burrowing owl, take of "active" nests shall be avoided pursuant to the MSHCP and the MBTA. Burrowing Owl relocation shall only be allowed to take place outside of the burrowing owl nesting season (March 1 through August 31) and is required to be performed by a qualified biologist familiar with relocation methods. The County Biologist shall be consulted to determine appropriate type of relocation (active or passive) and potential translocation sites. Burrowing Owl Protection and Relocation Plans and Biological Monitoring Plans are required to be reviewed and approved by the California Department of Fish and Wildlife (CDFW).

If it is determined during the 30-day preconstruction survey that burrowing owls have colonized the Project site prior to initiation of construction, the Project Applicant will immediately inform the Riverside County Biologist, CDFW, and the Regional Conservation Authority (RCA), and would need to retain a biologist that holds a MOU with the County of Riverside to prepare a Burrowing Owl Protection and Relocation Plan for approval by the County of Riverside and Wildlife Agencies prior to initiating ground disturbance. The relocation plan will include the following:

- The locations of the nests and owls proposed for relocation.
- The locations of the proposed relocation sites.
- The numbers of adult owls and juveniles proposed for relocation.
- The time of year when relocation is proposed to take place,
- The name of the biologist proposed to supervise the relocation, and the details of his/her previous experience capturing, handling, and relocating burrowing owls, including the outcomes of the previous relocation efforts (survival/mortality rates and site-fidelity rates of the relocated owls), and relevant permits held.
- A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site.
- A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision).
- Description of the monitoring methods and monitoring duration to be employed to verify survival of the relocated owls and their long-term retention on the relocation site.

Monitoring: Monitoring is required. Prior to the issuance of any grading permits, the results of the pre-construction surveys shall be reviewed by the County Environmental Programs Department (EPD) and/or County Biologist. No grading permits shall be issued by the Riverside County Building & Safety Department until EPD and/or the County Biologist verifies that the pre-construction surveys were satisfactorily completed. If burrowing owls colonize the site prior to initiation of grading activities, the Project Biologist

shall be responsible for preparing and implementing a Burrowing Owl Protection and Relocation Plan, which shall be reviewed and approved by EPD and the Wildlife Agencies prior to initiating ground disturbance.

Biological Resources MM-2: Vegetation Clearing Outside of the Migratory Nesting Bird Season (the nesting season generally occurs between February 1 and August 31).

As a condition of a grading permit, a migratory nesting bird survey of all trees to be removed from the site shall be conducted by a qualified biologist within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree. A copy of the migratory nesting bird survey results report shall be provided to the Riverside County Environmental Programs Department (EPD). If the survey identifies the presence of active nests, then the qualified biologist shall provide the Riverside County EPD with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the Riverside County EPD and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County EPD verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.

Monitoring: Monitoring is required. A qualified biologist shall conduct a migratory nesting bird survey of all trees within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree. The results of the migratory nesting bird survey shall be reviewed and approved by EPD prior to initiating tree removal or ground disturbance within 500 feet of any tree. If nesting birds are identified, the qualified biologist shall establish buffer zones around the active nests and shall mark such buffers with construction fencing. Fencing shall be evaluated on a weekly basis by the qualified biologist, and shall be subject to field inspections by EPD staff during the nesting season, if warranted.

Biological Resources MM-3: In-Lieu Payment for Loss of MSHCP Riverine/Riparian Area

To mitigate for permanent impacts to 0.31 acres (1,202 linear feet) of ephemeral drainage feature on the Project site, the Project Applicant shall purchase compensatory mitigation credits at a 2:1 mitigation-to-impact ratio. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to the issuance of a grading permit. The Project Applicant shall be required to provide for the purchase of 0.62 acre of mitigation credits from the Riverpark Mitigation Bank.

Monitoring: Monitoring is required. Prior to issuance of a grading permit, the Riverside County Environmental Programs Department (EPD) shall ensure evidence of fee payment from the Project Applicant.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project Applicant shall comply with Riverside County Ordinance No. 810 (Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Fee Program Ordinance), which requires a per-acre local development impact and mitigation fee payment prior to the issuance of a building permit.
 - The Project Applicant shall comply with County of Riverside Ordinance No. 663 (Stephens' Kangaroo Rat Mitigation Fee Ordinance) which requires a per-acre local development and mitigation fee payment prior to the issuance of a grading permit.
 - The Project Applicant shall comply with the federal Migratory Bird Treaty Act (MBTA).
 - The Project Applicant is required to obtain a Section 404 Nationwide Permit from the U.S. Army Corps of Engineers (ACOE) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.
 - The Project Applicant is required to obtain a Section 1602 Streambed Alteration Permit from the California Department of Fish and Wildlife (CDFW) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.
 - The Project Applicant is required to obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.
- b) **Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?**
- c) **Would the Project 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 Wildlife or U.S. Wildlife Service?**

The list of plants designated by the Fish and Game Commission as endangered, threatened, or rare is contained in the California Code of Regulations, Title 14, Section 670.2. Threatened, Endangered, or Candidate Species includes all species listed by the California Fish and Game Commission (see Title 14 CCR § 670.5), and by the federal government under the Endangered Species Act (ESA). Title 50 Code of Federal Regulations Section 17.11 covers Endangered and Threatened Wildlife. Sections 17.11 and 17.12 of Title 50 Code of Federal Regulations covers federally Endangered and Threatened Plants.

As discussed in Threshold 7(a), based on habitat assessments conducted by GLA on the Project site, no native habitat types are present on the site and no listed species (currently protected by state or federal endangered species acts) are expected to occur due to absence of suitable habitat. Regardless, the potential presence of burrowing owl is considered a significant direct and cumulatively considerable impact because the species is migratory and could be present on the Project site at the time that the Project's construction activities commences. In addition, other migratory bird species protected by the MBTA could be impacted by the Project if active nests are present on the site at the time that nesting habitat (trees and shrubs) are removed. Mitigation is required.

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required. Biological Resources MM-1 and MM-2 are required to reduce impacts to less than significant.

Monitoring: Monitoring is required as specified above for Biological Resources MM-1 and MM-2.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project Applicant shall comply with Riverside County Ordinance No. 810 (Western Riverside County MSHCP Fee Program Ordinance), which requires a per-acre local development impact and mitigation fee payment prior to the issuance of a building permit.
- The Project Applicant shall comply with Riverside County Ordinance No. 663 (Stephens' Kangaroo Rat Mitigation Fee Ordinance) which requires a per-acre local development and mitigation fee payment prior to the issuance of a grading permit.
- The Project Applicant shall comply with the federal MBTA. (Refer to Biological Resources MM-2 for more detail.)

d) Would the Project 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?

The Project's study area lacks migratory wildlife corridors and wildlife nursery sites. The study area does not occur within MSHCP Cores or Linkages. The proposed Project would not interfere or impact the movement of native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, nor would the Project impede the use of native wildlife nursery sites. No impact would occur. (GLA, 2019b, p. 43).

Wildlife movement corridors in Western Riverside County are addressed by the conservation requirements specified in the Western Riverside County MSHCP, and the Project site is not identified for

conservation or designated as a wildlife movement corridor as part of the MSHCP. Accordingly, the Project site is not considered to be a wildlife movement corridor.

As discussed in Threshold 7(a), the Project has the potential to impact nesting birds if vegetation is removed during the nesting season (February 1 through August 31). Impacts to nesting birds are prohibited by the MBTA and CFGC. With the Project's mandatory compliance with the MBTA, CFGC, and Biological Resources MM-1 and MM-2, a less than significant impact would occur associated with the Project's impacts on migratory birds.

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required. Biological Resources MM-1 and MM-2 are required to reduce impacts to less than significant.

Monitoring: Monitoring is required as specified above for Biological Resources MM-1 and MM-2.

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

Source: Glenn Lukos Associates Inc., Jurisdictional Delineation (GLA, 2019a); Glenn Lukos Associates, Inc. Biological Technical Report (GLA, 2019b)

As discussed under Threshold 7(a), the Project site contains 0.31 acre of MSHCP riverine areas, associated with Drainage A and Tributary A-1, none of which support riparian habitat. Drainage A and Tributary A-1 are ephemeral drainage features with marginal bed and/or bank; and both features exhibit evidence of a drainage pattern including debris wracking and deposits from recent storms. Drainage A ranges in widths from 8 to 25 feet, traversing the property from the southwestern property boundary continuing to the northeastern boundary. Tributary A-1 ranges in widths 10 to 28 feet, originating at the western boundary. Tributary A-1 confluences with Drainage A near the center of the property. (GLA, 2019c, pp. 3-4)

As noted above, the site does not contain riparian habitat, and therefore does not contain suitable habitat for the least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, or other riparian birds. In addition, the site does not contain any vernal or seasonal pools, or other artificial features with the potential to support fairy shrimp. No ponding was observed at the site during biological surveys, including those that occurred following periods of substantial rainfall. The site lacks the suitable topography (including localized depressions) to support prolonged inundation necessary to support fairy shrimp. The site slopes slightly from west to east, with the central portion of the site containing drainage features that convey flows from west to east. As a result of the sloping topography and drainage, there is no opportunity for water to pond at the site. Furthermore, the site does not contain any artificial depressional features, including tire tracks and stock ponds that could support prolonged inundation. In addition, the site is mapped as containing sandy loam soils, which are generally not associated with vernal pools. Observations of the soils at the site showed a lack of clay soil components. Lastly, no plants were

observed at the site that are associated with vernal pools and similar habitats that experience prolonged inundation. (GLA, 2019c, p. 4)

Pursuant to Volume I, Section 6.1.2 of the MSHCP, projects must consider alternatives providing for 100% percent avoidance of riparian/riverine areas. If avoidance is infeasible, then the unavoidable impacts must be mitigated and a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required. (GLA, 2019c, p. 4)

As noted above, MSHCP riverine areas within the Project site are limited to an onsite ephemeral drainage complex (A and A-1) that traverses through the middle of the property. Due to its location in the center of the site, avoidance is not feasible. The Project would result in unavoidable impacts to all MSHCP riverine areas at the site, totaling 0.31 acre. With the incorporation of mitigation, impacts to riparian/riverine species would be mitigated to a less than significant level, which would result in a biologically equivalent or superior mitigation as compared to avoidance of resources. This would result in consistency with the MSHCP (GLA, 2019c, pp. 1, 4, 5)

Findings of Fact: Impacts will be less than significant with mitigation incorporated.

Mitigation: Mitigation is required. Biological Resources MM-1, MM-2, and MM-3 are required to reduce impacts to less than significant.

Monitoring: Monitoring is required as specified above for Biological Resources MM-1, MM-2, and MM-3.

f) Would the Project 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?

According to the Project's biological and jurisdictional delineation reports, there are no State or federally protected wetlands on the Project site (GLA, 2019a). Thus, no impact to State or federally protected wetlands would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

g) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

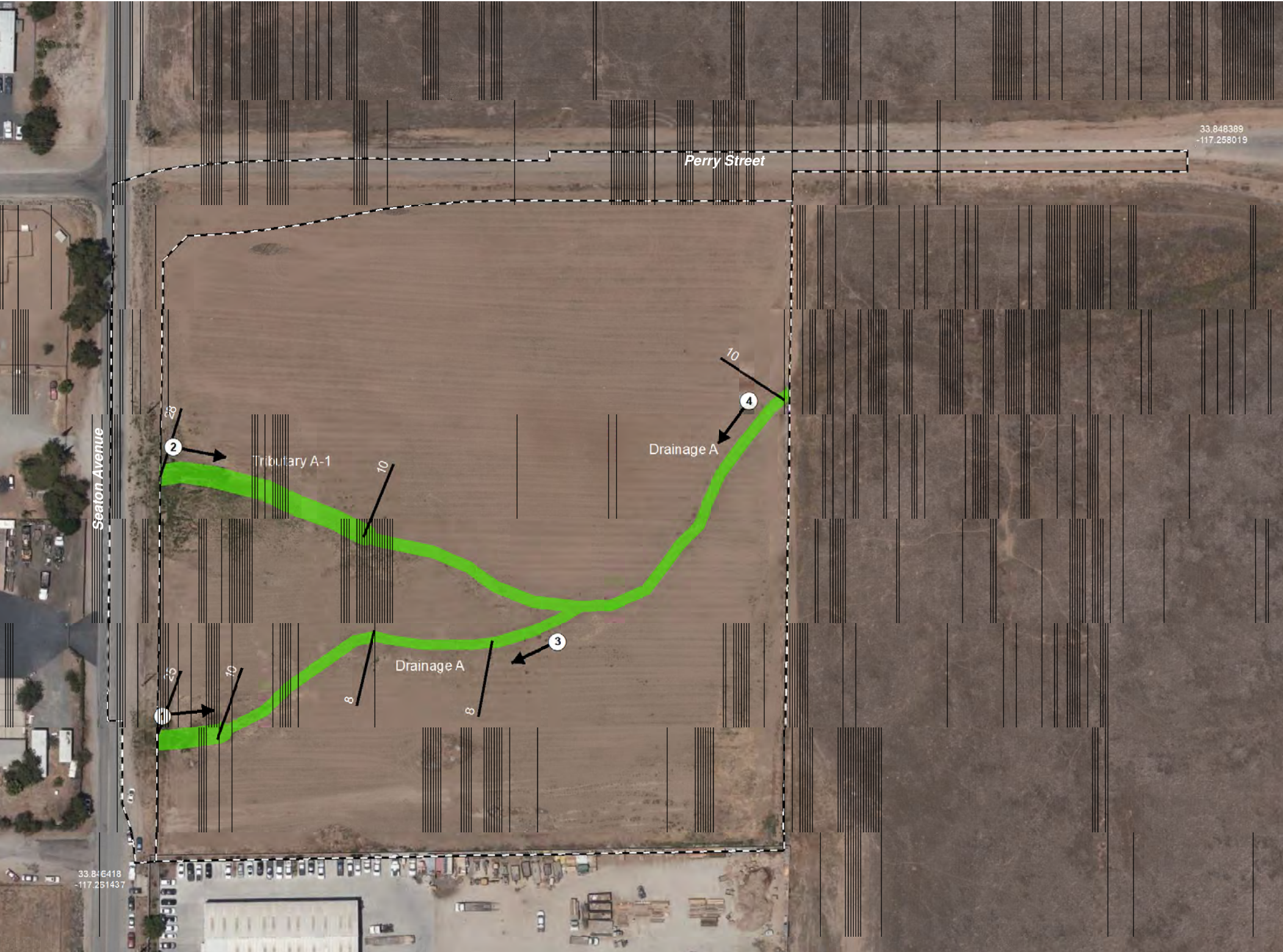
Other than the SKR HCP and the Western Riverside County MSHCP, which are addressed above, the only local policies or ordinances protecting biological resources within the Project area are County Ordinance No. 559 (Regulating the Removal of Trees) and the County's Oak Tree Management Guidelines. The Project site does not contain oak trees. Therefore, the Riverside County Oak Tree Management Guidelines

are not applicable to the Project. Ordinance No. 559 pertains to parcels or property located above 5,000 feet in elevation. Because the Project site does not reach an elevation of 5,000 feet, Ordinance No. 559 is also not applicable to the Project site. Thus, because the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, no impact would occur as a result of implementation of the Project as proposed on the Project site.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.



- Project Study Area
- MSHCP Riverine
- Width in Feet
- Photo Location

Source(s): Glenn Lukos Associates, Inc. (10-10-2019)

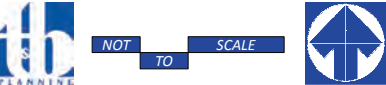


Figure 5-1

5.1.5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
8. Historic Resources				
a. Alter or destroy a historic site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Brian F. Smith and Associates, Phase I and Phase II Cultural Resources Assessment for the Seaton Commerce Center Project (BFSA, 2019a); County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standards Scopes of Work (Riverside County, 2009); California Code of Regulations, Title 14, Chapter 3, 15064.5 Determining the Significance of Impacts to Archaeological and Historical Resources (CCR 15064.5)

a) **Would the Project alter or destroy a historic site?**

b) **Would the Project cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?**

In order to determine the presence of any previously recorded historic site, Brian F. Smith and Associates (BFSA) conducted a records search at the Eastern Information Center (EIC) at the University of California, Riverside (UCR), for the Project site and an area of one-mile surrounding the Project site. The complete records search results are provided within Appendix C of the Project's Cultural Resources Assessment (*Technical Appendix C* to this MND). (BFSA, 2019a, pp. 3.0-1)

While at the EIC, BFSA reviewed the following historic sources:

- The National Register of Historic Places (NRHP) Index;
- The Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility (ADOE); and
- The Office of Historic Preservation (OHP), Directory of Properties in the Historic Property Data File (HPD)

In addition, the BFSA research library was consulted for any relevant historical information. BLM GLO records, historic aerial photographs dating between 1966 and 2016, the 1901 Elsinore, California 30-minute quadrangle map, the 1901 and 1942 Riverside, California 15-minute USGS quadrangle maps, and the 1953 Steele Peak, California 7.5-minute USGS quadrangle map also were consulted. The GLO records

indicate that the Project area was originally granted to the Southern Pacific Railroad in 1891 as part of a large 98,330-acre patent. The aerial photographs indicated that the Project site was historically utilized for agriculture. Based upon the historic maps and aerial photographs, no structures were ever located on the property. Therefore, based on the result of the records search, BFSa determined that no properties listed in the NRHP, the ADOE, or the HPD are located within the boundaries of the Project site. (BFSa, 2019a, pp. 3.0-1, 4.0-10) Therefore, because no historic sites exist on the Project site, and there is no reasonable likelihood that historic resources would be located beneath the surface of the site, implementation of the Project would not alter or destroy a historic site or cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
9. Archaeological Resources				
a. Alter or destroy an archeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" 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"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Brian F. Smith and Associates., Phase I and Phase II Cultural Resources Assessment for the Seaton Commerce Center Project (BFSa, 2019a); County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standards Scopes of Work (Riverside County, 2009); California Code of Regulations, Title 14, Chapter 3, 15064.5 Determining the Significance of Impacts to Archaeological and Historical Resources (CCR 15064.5); California Health and Safety Code Section 7050.5 (HSC, 1939)

Note that confidential information has been redacted from MND *Technical Appendix C, Phase I and Phase II Cultural Resources Assessment*, for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County of Riverside, and Brian F. Smith and Associates (BSFA) is considered confidential in respect to places that have tribal cultural significance (Gov. Code § 65352.4), and although relied

upon in part to inform the preparation of this MND, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. § 15120(d)).

- a) Would the Project alter or destroy an archaeological site?**
- b) Would the Project cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?**

BFSA conducted a cultural resources survey and testing program for the proposed Project to locate and record any cultural resources or archaeological sites identified within the Project's Area of Potential Effect (APE) in compliance with CEQA and following County of Riverside Cultural Resource Guidelines (Draft) (Riverside County, 2009). The Project's APE includes the Project's limits of grading which includes the Project site and off-site improvement areas. BFSA's assessment included an Archaeological Records Search, an intensive pedestrian reconnaissance, Phase II Testing and Evaluation, subsurface testing, and outreach to Native American tribes. (BFSA, 2019a, Section 3.0)

The archaeological records search for the Project site and the surrounding area within a one-mile radius and identified 47 cultural resources within one-mile of the Project site. The EIC records indicated that none of the sites are located within the Project's APE. The records search results also indicated that a total of 54 resource studies have been conducted within a one-mile radius of the Project site, none which covered the Project's APE. (BFSA, 2019b, Pages 4.0-1 through 4.0-9, Table 4.1-1, Table 4.1-2)

During BFSA's survey of the Project site, one (1) previously unrecorded cultural resource was discovered on the property. The site is similar to those previously identified within the records search and common to the Mead Valley area of Riverside County. No associated artifacts were located during the survey. Disturbances at the site include natural erosion, bioturbation (disturbance of sedimentary deposits by living organisms) in the form of small mammal burrows, impacts from previous agricultural activities, and modern trash strewn across the site. The exposed boulders throughout the site area have undergone various degrees of deterioration and exfoliation, which may affect the observable pattern of prehistoric use. (BFSA, 2019a, Page 1.0-1, 4.0-16)

Because the cultural resource would be impacted by the development of the property; as stipulated by CEQA and County of Riverside guidelines, in order to accurately evaluate the archaeological site and the Project's potential impacts on the resource, an archaeological testing program (ATP) was subsequently conducted by BFSA in January 2019 to augment the level of work completed as part of the Phase I survey of the Project site. (BFSA, 2019a, Page 4.0-13)

Pursuant to Assembly Bill 52 (AB 52), both the Pechanga Band of Luiseño Indians and the Soboba Band of Luiseño Indians requested to participate in the consultation process for the Project. Therefore, BFSA invited both groups to observe the archaeological testing, and one representative from the Pechanga Band of Luiseño Indians and one representative from the Soboba Band of Luiseño Indians were present during BFSA's testing of the site. (BFSA, 2019a, pp. 3.02, 3.0-3) BFSA conducted Phase II testing at the site in January 2019 to formally map and record the cultural resource feature, identify any surface or

subsurface artifact concentrations, and determine site boundaries. The subsurface investigation was accomplished by excavating a series of shovel test pits (STPs). The investigation revealed that the cultural resource feature was a minimally used site and identified features indicated that site activities focused primarily upon floral and/or faunal food processing. The integrity of the cultural resource feature appears to have been impacted by the past agricultural use of the property. Shovel test investigations did not identify any subsurface deposits at the site. (BFSa, 2019a, Page 4.0-23)

Due to the lack of any significant subsurface deposits, BFSa and the County of Riverside determined that the cultural resource is not significant under CEQA. The level of information already obtained from this site, including documentation of the features and site boundary, has exhausted the resource's research potential. Negative subsurface tests provide the foundation from which to state that the potential for buried cultural deposits at the site is limited and that no significantly different information likely would be gathered from further investigations. However, due to the presence of the cultural resource documenting prehistoric use of the subject property, the potential still exists that other unidentified cultural resources may be present within the APE that may be exposed during grading. Therefore, if resources are unearthed during earth-moving disturbances associated with the development of the Project that meet the definition of a significant resource under CEQA, impacts would be significant if the resource was not properly identified and appropriately treated. (BFSa, 2019a, Page 5.0-1)

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: The proposed Project would impact a cultural resource feature which the County of Riverside has determined is not CEQA-significant. However, because previously undiscovered significant resources may be uncovered by the Project's ground-disturbing construction activities, mitigation is required.

Cultural Resources MM-1: Native American Monitor.

Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.

Monitoring: Monitoring is required. Prior to Grading Permit issuance, the Project Applicant shall provide a copy of the agreement with the Native American Monitor to the County Archaeologist.

Cultural Resources MM-2: Project Archeologist.

Prior to issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A

CRMP shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with the Project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

Monitoring: Monitoring is required. Prior to issuance of grading permits, evidence that a qualified archaeologist (Project Archaeologist) has been retained shall be provided to the Riverside County Planning Department, along with a copy of the Monitoring Plan. Monitoring by the Project Archaeologist shall occur throughout the duration of grading activities. The Riverside County Planning Department shall ensure that the CRMP is implemented during grading activities, and may conduct site inspections upon request.

Cultural Resources MM-3: Artifact Disposition.

Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project's property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. All historic archaeological materials recovered during the archaeological investigations, shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

Prehistoric Resources - One of the following treatments shall be applied.

- a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.
- b. If reburial is not agreed upon by the Consulting Tribes then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including

title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.

Monitoring: Monitoring is required. Prior to Grading Final Inspection, the Project Archaeologist shall provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations have been appropriately treated as required by this mitigation measure.

Cultural Resources MM-4: Phase IV Cultural Monitoring Report

Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the Transportation and Land Management Agency (TLMA) website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.

Monitoring: Monitoring is required. Prior to Grading Permit Final Inspection, the Phase IV Cultural Resources Monitoring Report shall be submitted for review and approval to the Riverside County Planning Department.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project site does not contain any known human remains. The Project's mass grading and excavation (utility trenching) activities would disturb the entire site and the off-site improvement area as identified in Section 3.0. Therefore, there is a remote potential that human remains may be unearthed during the Project's ground-disturbing construction activities. This same potential for the discovery of human remains occurs on nearly every construction site that disturbs an undeveloped ground surface. If human remains are found on the site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- If human remains are found on the Project site, the developer/permit holder or any successor in interest shall comply with the following codes:
 - Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. The Coroner will have two working days to determine if the remains are subject to his or her authority as part of a crime.
 - If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted by the Coroner within the period specified by law (24 hours). The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, inspect the site of the discovery of the Native American human remains and may recommend means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - Upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, where the Native American human remains are located, is not damaged or disturbed. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. The descendants' preferences for treatment may include the following:
 - The nondestructive removal and analysis of human remains and items associated with Native American human remains.
 - Preservation of Native American human remains and associated items in place.
 - Relinquishment of Native American human remains and associated items to the descendants for treatment.
 - Other culturally appropriate treatment.

The parties may also mutually agree to extend discussions, taking into account the possibility that additional or multiple Native American human remains, as defined in this section, are located in the project area, providing a basis for additional treatment measures.

Human remains of a Native American may be an inhumation or cremation, and in any state of decomposition or skeletal completeness. Any items associated with the human remains that are placed or buried with the Native American human remains are to be treated in the same manner as the remains, but do not by themselves constitute human remains.

Whenever the commission is unable to identify a descendant, or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with

Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. To protect these sites, the landowner shall do one or more of the following:

- Record the site with the commission or the appropriate Information Center.
- Utilize an open space or conservation zoning designation or easement.
- Record a document with the county in which the property is located. The document shall be titled "Notice of Reinternment of Native American Remains" and shall include a legal description of the property, the name of the owner of the property, and the owner's acknowledged signature, in addition to any other information required by this section. The document shall be indexed as a notice under the name of the owner. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with the descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains.

Monitoring: Monitoring shall be required if human remains are encountered on the Project site shall be required pursuant to State Health and Safety Code Section 7050.5 if human remains are encountered during construction activities associated with the Project.

5.1.6 Energy

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
10. Energy Impacts				
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Urban Crossroads, Inc., Energy Analysis (Urban Crossroads, Inc., 2019c)

- a) **Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Project implementation would result in the conversion of the subject site from its existing condition to a warehouse building. This change in the site's land use would increase the site's demand for energy.

Construction Energy Demands

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Urban Crossroads calculated that in order to accomplish construction of the Project, the total estimated electricity usage would be approximately 71,602 kWh and the total estimated diesel fuel consumption for on-site equipment would be approximately 63,955 gallons. Construction equipment use of electricity and fuel would be typical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. (Urban Crossroads, Inc., 2019c, p. 35)

CCR Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. (Urban Crossroads, Inc., 2019c, p. 35)

Construction worker trips (traveling to and from the Project site) for full construction of the proposed Project would result in the estimated fuel consumption of 19,044 gallons of fuel. Additionally, fuel consumption from construction vendor trips (medium and heavy-duty trucks) is calculated to total approximately 12,956 gallons. Refer to the Project's Energy Analysis (*Technical Appendix D*) for additional information. The 2016 Integrated Energy Policy Report (IEPR) released by the California Energy Commission shows that fuel efficiencies are improving within on and off-road vehicle engines due to more stringent government requirements. (Urban Crossroads, Inc., 2019c, pp. 35-36)

The equipment used for Project construction would be required by law to conform to CARB regulations and California emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, Inc., 2019c, pp. 35-36)

Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities). Each are discussed below.

Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. Vehicular trips and related VMT generated by the operation of the Project would result in an estimated annual fuel demand

of 259,478 gallons of fuel assuming each trip to/from the Project site is a new trip that is not already on the regional roadway network. Computations for each type of vehicle are contained in Section 4.4 of the Project's Energy Analysis (*Technical Appendix D*) (Urban Crossroads, Inc., 2019c, p. 36).

Fuel would be provided by commercial fuel vendors. Trip generation and VMT generated by the Project would be typical of industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Ed., 2017); and CalEEMod. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. (Urban Crossroads, Inc., 2019c, p. 36)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) over time (as is the current trend) would likely decrease future gasoline fuel demands per VMT. The location of the Project site proximate to regional and local roadway systems, including the State Highway System, tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project site is located near the I-215 Freeway and the distance from the Project's driveway to the I-215 Freeway on/off ramps at Cajalco Expressway is approximately 1.0 miles. (Urban Crossroads, Inc., 2019c, p. 36)

The Project would include the provision of a segment of the Riverside County trail system along its Seaton Avenue frontage, and install a sidewalk along its Perry Street frontage, encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code, the Project would promote the use of bicycles as an alternative means of transportation by providing on-site bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, Inc., 2019c, p. 36)

Facility Energy Demands

Long-term operation of the Project is calculated to consume an estimated 1,671,144 kilo-British thermal units (kBtu) a year of natural gas, and 852,703 kilowatts (kWh) a year of electricity. Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied by SCE. The Project proposes conventional warehouse uses reflecting contemporary energy efficient/energy conserving designs and operational programs consistent with the California Building Standards Code, Title 24, which would ensure that the Project's energy demands would not be considered inefficient, wasteful, or otherwise unnecessary. The Project site has been planned for industrial development by the County's General Plan and the Mead Valley Area Plan (MVAP) for at least 20 years and the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. (Urban Crossroads, Inc., 2019c, p. 36)

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use.
- Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside will verify that signs are posted in the Project's truck courts specifying the idling restriction requirement.

b) Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The Project would implement energy-saving features and operational programs, consistent with the reduction measures set forth in the County's Climate Action Plan (CAP). Notably, the Project would comply with the CALGreen, as implemented by the County of Riverside. (Urban Crossroads, Inc., 2019c, p. 33) In addition, as part of CAP compliance, the Project is required to offset at least 20% of its energy use by renewables.

As previously discussed, the Project would provide for, and promote, energy efficiencies beyond those required under other applicable federal and State of California standards and regulations, and in so doing would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other industrial uses of similar scale and intensity that are constructed and operating in California due to the increasing stringency of CALGreen requirements. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the Project would not cause or result in the need for additional energy producing facilities or energy delivery system. (Urban Crossroads, Inc., 2019c, p. 39)

Findings of Fact: No mitigation is required.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the CALGreen, including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use.

5.1.7 Geology / Soils

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project directly or indirectly:</i>				
II. Alquist-Priolo Earthquake Fault Zone or County Fault Hazards Zones				
a. Be subject to 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-2 "Earthquake Fault Study Zones (Riverside County, 2015a);" Riverside County GIS Database (RCIT, 2019); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a); NorCal Engineering Response to County Comments Letter (NorCal Engineering, 2019c)

- a) **Would the Project be subject to 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?**

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone or within an area of a known fault (Riverside County, 2015a, Figure S-2), (RCIT, 2019), (NorCal Engineering, 2018a, p. 2) (NorCal Engineering, 2019c, p. 1). NorCal reviewed several stereo pair aerial photographs to evaluate for any lineaments or fault-related geomorphic features within, adjacent to, or trending towards the Project site and no indications of natural lineaments or other fault-related features indicative of Holocene or older faulting were noted. Also, no indications of faulting were noted by NorCal during their reconnaissance at the Project site and in the vicinity of the site. (NorCal Engineering, 2019c, p. 1). Therefore, the potential for fault rupture of a known earthquake fault is less than significant. (NorCal Engineering, 2018a, p. 2). (NorCal Engineering, 2019c, p. 1)

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
12. Liquefaction Potential Zone				
a. Be subject to seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-3 "Generalized Liquefaction" (Riverside County, 2015a); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a)

a) Would the Project be subject to seismic-related ground failure, including liquefaction?

Due to groundwater levels recorded in excess of 50 feet below the ground surface in the vicinity of the Project site and near surface very dense granitic bedrock, the liquefaction potential at the Project site is deemed low. The design of the proposed Project in conformance with the latest California Building Standards Code provisions for earthquake design is expected to provide adequate attenuation of any ground-shaking hazards, including, liquefaction hazards that are typical to southern California. (NorCal Engineering, 2018a, p. 6) (CBSC, 2017)

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code which addresses construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project

site by NorCal Engineering and dated January 11, 2019, which is included herein as *Technical Appendix E1*. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
13. Ground-shaking Zone				
a. Be subject to strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-4 “Earthquake-Induced Slope Instability Map,” and Figures S-13 through S-21 (showing General Ground Shaking Risk) (Riverside County, 2015a); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a); NorCal Engineering Response to County Comments Letter (NorCal Engineering, 2019c); County of Riverside Building & Safety Department, “Building Codes” (Riverside County, 2019c)

a) Would the Project be subject to strong seismic ground shaking?

The San Jacinto (San Jacinto Valley) Fault zone is located approximately 15 kilometers (9.32 miles) east of the Project site and is capable of producing a Magnitude 6.9 earthquake. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. (NorCal Engineering, 2018a, p. 3)

The Project site is located in a seismically active area of southern California that is expected to experience moderate to severe ground shaking during future seismic events. This risk is not substantially different than the risk experienced by other properties in the southern California area.

State law requires that all cities and counties in California enforce the building codes as mandated by the California Building Standards Commission. As a mandatory condition of Project approval, the Project’s building would be required to be constructed in accordance with currently adopted California Building Standards Code, Riverside County Ordinances, and California Title 24 regulations in effect at the time of building plan submittal. Furthermore, the Project would be required to comply with the site-specific grading and construction recommendations contained within the Project’s geotechnical report (*Technical Appendix E1*), which the County would impose as conditions of Project approval, to further reduce the risk of adverse effects related to strong seismic ground shaking. With the Project’s mandatory compliance with these standard and site-specific design and construction measures, potential impacts related to seismic ground shaking would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code, which address construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as *Technical Appendix E1*. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
I4. Landslide Risk a. 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 off-site landslide, lateral spreading, collapse, or rockfall hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope" (Riverside County, 2015a); Riverside County General Plan - Mead Valley Area Plan, Figure 14, "Mead Valley Area Plan Steep Slope", Mead Valley Area Plan Figure 15, "Slope Instability" (Riverside County, 2016a); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a); NorCal Engineering Response to County Comments Letter (NorCal Engineering, 2019c)

a) **Would the Project 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 off-site landslide, lateral spreading, collapse, or rockfall hazards?**

Riverside County does not identify the Project site within an area at risk to landslide or landslide hazard (Riverside County, 2016a, Figure 15) (Riverside County, 2016a, Figure 14, Figure 15). The topography of the Project site is generally level and does not contain substantial natural or man-made slopes nor does it contain any substantial cliffs that could cause landslides or rockfall hazards. In addition, the areas surrounding the Project site are relatively flat, and have no hillsides that may have the potential for landslide or rockfall hazards.

Lateral spreading is primarily associated with liquefaction hazards. As noted under Threshold 12(a), the potential for liquefaction on the Project site is considered low. The Project would construct a 2:1 slope on the north and west sides of the Project site. The 2:1 slopes would be engineered for long-term stability and would be required to be constructed in accordance with the site-specific recommendations of the Project's geotechnical investigation (*Technical Appendix E1*).

The geotechnical evaluation prepared for the Project site also evaluated the potential for collapse and lateral spreading hazards on site, and identifies site-specific recommendations to preclude collapse or lateral spreading hazards. The Project would be conditioned to comply with the site-specific recommendations of the geotechnical evaluation, which would reduce potential impacts to less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code, which address construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as *Technical Appendix E1*. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
15. Ground Subsidence a. 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 ground subsidence?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-7 “Documented Subsidence Areas Map,” (Riverside County, 2015a); Riverside County GIS Database (RCIT, 2019); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a)

a) Would the Project 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 ground subsidence?

With the exception of the southwest portion of the Project site, Riverside County GIS shows that approximately 75 percent of the site is susceptible to subsidence (RCIT, 2019). NorCal Engineering researched the Riverside County Hazards report, which showed that subsidence in Riverside County has been linked to substantial fluctuations in groundwater levels within deep alluvial basins, and generally, the subsidence occurs throughout the valley region. Three areas have been identified with documented subsidence; the Elsinore Trough, the San Jacinto Valley, and the southern Coachella Valley. The subject property is situated on shallow alluvium with no groundwater, with historic groundwater levels in the vicinity at depths of greater than 50 feet. Additionally, the property is not situated within any of the three areas of Riverside County associated with documented subsidence. Therefore, the potential for subsidence to impact the site is considered low. (NorCal Engineering, 2019c, p. 2)

Based on the conditions encountered at subsurface testing locations on the Project site, soil shrinkage is expected to be on the order of 5%-8% due to excavation and re-compaction (NorCal Engineering, 2018a, p. 9). Computations utilizing pressure curves and the recommended allowable soil bearing capacities revealed that the foundation of the building would experience normal (static) settlements on the order of ¾ inch and differential settlements of ¼ inch. In addition, the upper on-site soils were determined to be low in expansion (Expansion Index=21-50). (NorCal Engineering, 2018a, pp. 12, 14) Furthermore, the Project site’s geotechnical report (*Technical Appendix E1*) indicates that the site’s settlement potential would be attenuated through the proposed removal of near surface soils down to competent materials and replacement with properly compacted fill (NorCal Engineering, 2018a, p. 7). Through standard conditions of approval, the proposed Project would be required by the County to incorporate the recommendations contained within the Project site’s geotechnical report (*Technical Appendix E1*) into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with ground subsidence.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code and the County of Riverside Building Code, which address construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as *Technical Appendix E1*. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
16. Other Geologic Hazards				
a. Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure S-5 "Regions Underlain by Steep Slope", Figure S-9, Special Flood Hazard Areas", Figure S-10," Dam Failure Inundation Zone (Riverside County, 2015a); Riverside County General Plan - Mead Valley Area Plan. Figure 14, "Mead Valley Area Plan Steep Slope," Mead Valley Area Plan Figure 15, "Slope Instability", Mead Valley Area Plan Figure 11, "Mead Valley Area Plan Flood Hazards (Riverside County, 2016a); Riverside County GIS (RCIT, 2019); (Google Earth, 2018).

a) Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

No steep hillsides subject to mudflow and no volcanoes are located on or near the Project site (Riverside County, 2015a, Figure S-5) (Riverside County, 2016a, Figures 14 and 15). With respect to seiches, the nearest body of water to the Project site is the Perris Reservoir located approximately 3.7 miles east of

the Project site. However, according to Riverside County General Plan, the dam inundation areas are located east of I-215 and east and south of the Project site (Riverside County, 2016a, Figure 11). Therefore, there is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
17. Slopes				
a. Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a);

a) Would the Project change topography or ground surface relief features?

b) Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

The Project site is relatively flat and situated at an elevation of approximately 1521-1539 AMSL (NorCal Engineering, 2019c, p. 2). Grading would occur over the entire Project site. After grading, the highest point of the property would be near the northwest corner (approximately 1,540 AMSL) and the lowest point of the property would be near the northeast corner (approximately 1,521 AMSL). The Project is designed to have a slope with a maximum incline of 2:1 (vertical: horizontal) along the northern and western portions of the property. The proposed grading plan and the creation of manufactured slopes on the Project site would result in less-than-significant impacts to geology and soils because the slopes would be stable and not lead to any geologic or soil hazard. As a standard condition of Project approval, the Project would be required to comply with the site-specific recommendations contained in the geotechnical investigation for the Project site, including recommendations related to site preparation, soil compaction, and manufactured slope design that would minimize potential hazards associated with

manufactured slope failure. (NorCal Engineering, 2018a, pp.7-15) As such, the Project would not create a substantial adverse effect associated with changes in topography nor create cut or fill slopes greater than 2:1 or higher than 10 feet. Impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required by law to comply with the California Building Standards Code and the County of Riverside Building Code, which address construction standards including those related to geologic and soil conditions.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as *Technical Appendix E1*. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

c) Would the Project result in grading that affects or negates subsurface sewage disposal systems?

The Project site does not contain any subsurface sewage disposal systems under existing conditions. The Project site does not serve as a leach field for any off-site properties and has no potential to affect or negate subsurface sewage disposal systems. No impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
18. Soils				
a. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have soils incapable of adequately supporting 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"/>

Source: NorCal Engineering, Geotechnical Investigation (NorCal Engineering, 2018a); Thienes Engineering, WQMP (Thienes Engineering, Inc., 2019a); Riverside County Ordinance No. 857.1. Business Stormwater Compliance Program (Riverside County, 2019a); Riverside County Ordinance No. 460, Article XV, "Soil Erosion Due to Wind" (Riverside County, 2014); Riverside County Ordinance. No. 484 (as amended through 484.2) for the Control of Blowing Sand (Riverside County, 2000); South Coast Air Quality Management District Rule 403 (SCAQMD, 2005)

a) Would the Project result in substantial soil erosion or the loss of topsoil?

Impact Analysis for Temporary Construction-Related Activities

Construction of the Project would involve grading, paving, utility installation, building construction, and landscape installation that has the potential to temporarily expose on-site soils that would be subject to erosion during rainfall events or high winds. Pursuant to State Water Resources Control Board requirements, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area.

It is the intent of the County to comply with directives of the Clean Water Act (CWA) and the requirements of the National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer [system] permits (MS4 permit) for the Santa Ana, Santa Margarita, and Whitewater watersheds so as to protect water quality in the County in order to protect the public health, safety, and welfare of the people of the County (Riverside County, 2017e). The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare a Project-specific Storm Water Pollution Prevention Plan

(SWPPP) and submit it to the County of Riverside for approval. During site construction, construction activities shall be designed and constructed to minimize runoff of sediment and all other pollutants onto public properties, other private properties, and into waters of the United States as required by Riverside County Ordinance No. 754.

Erosion and sediment control measures utilized by the permittee shall not conflict with the requirements of Riverside County Ordinance Nos. 695 and 787. All dischargers who are required to file a Notice of Intent (NOI), under the provisions of the NPDES General Permit No. CAS000002, State Water Resources Control Board Order Number 92-08-DWQ, shall develop and implement a SWPPP, a monitoring program, and a reporting plan as required by the Federal Water Pollution Control Act (Clean Water Act) and implementing regulations promulgated by the U.S. Environmental Protection Agency (EPA). The SWPPP is required to identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges during construction.

In addition, the Project's construction contractors would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion (SCAQMD, 2005). With mandatory compliance to the requirements identified in the Project's SWPPP, as well as applicable regulatory requirements, the potential for water and/or wind erosion impacts during Project construction would be less than significant.

Long-Term Operational Activities

Following construction, wind and water erosion on the Project site would be less than existing conditions because the Project site would be landscaped (approximately 15%) and covered with impervious surfaces (approximately 85%) and surface runoff would be captured and treated by an on-site storm drain system. Therefore, implementation of the Project would result in less long-term erosion and loss of topsoil than under the site's existing conditions.

The County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Water Quality Management Plan (WQMP) (Riverside County, 2017e). The Project-Specific Preliminary WQMP identifies an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The Preliminary WQMP for the Project, prepared by Thienes Engineering (attached hereto as *Technical Appendix H2*), incorporates catch basin/inlet filters and underground infiltration chambers. The catch basin/inlet filters and underground infiltration chambers would remove waterborne pollutants from storm water flows, including silt and sediment. The underground infiltration chambers would facilitate percolation to maximize on-site infiltration and minimize the amount of stormwater – which could, potentially, carry sediment – discharged from the site. These design features would be effective at removing silt and sediment from storm water runoff, and the WQMP requires post-construction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the WQMP would be required as a condition of Project approval and long-

term maintenance of on-site water quality features is required. Therefore, the proposed Project would not result in substantial erosion or loss of topsoil during long-term operation.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant is required to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board.
- Prior to issuance of a grading permit, the Project Applicant is required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with Riverside County Municipal Code Chapter 15.12.020, to be implemented during Project construction.
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final Water Quality Management Plan (WQMP), which is required to be implemented over the lifetime of the Project's operations. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.

b) Would the Project be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property?

As determined by NorCal Engineering, the near surface on-site soils possess a very low expansion potential (Expansion Index ranging from 0-20) (NorCal Engineering, 2018a, p. 13, Appendix C, Table II). The minimal expansive characteristics of on-site soils would be further attenuated by implementation of the foundation and floor slab design recommendations included in the Project's geotechnical report (NorCal Engineering, 2018a, pp. 7-13). Therefore, implementation of the Project would result in less-than-significant impacts associated with expansive soils and would not create substantial risks to life or property.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

- c) **Would the Project have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
19. Wind Erosion and Blowsand from project either on or off site.				
a. Be impacted by or result in an increase in wind erosion and blowsand, either on or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure S-8 “Wind Erosion Susceptibility Map (Riverside County, 2015a); County of Riverside Ordinance No. 460, Article XV, “Soil Erosion Due to Wind” (Riverside County, 2014); County of Riverside Ordinance. No. 484 (as amended through 484.2) for the Control of Blowing Sand (Riverside County, 2000); SCAQMD Rule 403, Fugitive Dust (SCAQMD, 2005)

- a) **Would the Project be impacted by or result in an increase in wind erosion and blowsand, either on or off-site?**

According to the Riverside County General Plan, the Project site is located in an area with a “Moderate” susceptibility to wind erosion (Riverside County, 2015a, Figure S-8). During construction, existing vegetative cover would be removed from a majority of the subject property, soils would be exposed, and the potential for wind-induced erosion and blowsand would increase as compared to existing conditions. The Project would be required to comply with SCAQMD Rule 403 that requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth-moving, grading, and construction equipment travel on unpaved roads. Following development of the Project, soils on the Project site would be covered with impervious surfaces and landscaping and no longer be as exposed to wind as it is under existing conditions; therefore, wind erosion and loss of topsoil under long-term conditions would be substantially reduced as compared to existing conditions. With mandatory compliance to applicable regulatory requirements, the potential for the Project to result in an increase in

wind erosion and blowsand, either on- or off-site, would be less than significant and mitigation is not required.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:
 - In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines.
 - The construction contractor(s) shall ensure that all distributed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
 - The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less.
- As a standard condition of Project approval, the Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as Technical Appendix E. The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.

5.1.8 Greenhouse Gas Emissions

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
20. Greenhouse Gas Emissions				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: County of Riverside Climate Action Plan (Riverside County, 2018b); County of Riverside Ordinance No. 859, The Water Efficient Landscape Requirements (Riverside County, 2015c); Urban Crossroads, Inc., Greenhouse Gas Analysis (Urban Crossroads, Inc., 2019d)

While estimated Project-related GHG emissions can be calculated, the direct impacts of such emissions on global climate change (GCC) and global warming cannot be determined on the basis of available science because GCC is a global phenomenon and not limited to a specific locale such as the Project site and its immediate vicinity. Furthermore, there is no evidence that would indicate that the emissions from a project the size of the proposed Project could directly or indirectly affect the global climate. Because global climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global climate change; rather, Project-related impacts to global climate change only could be potentially significant on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to global climate change in a cumulatively-considerable way.

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Pursuant to CEQA Guidelines Section 15604.4, a lead agency may rely on a qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. The County of Riverside adopted a Climate Action Plan (CAP) in December 8, 2015 and subsequently updated the CAP in November 2019. The purpose of the Updated CAP is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County. To address the State's requirement to reduce GHG emissions, the County of Riverside plans to reduce GHG emissions to 3,576,597 by the year 2030. (Urban Crossroads, Inc., 2019d, p. 40)

The CAP identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO₂e per year screening threshold are required to quantify and disclose the anticipated GHG emissions that either 1) demonstrate GHG emissions at project buildout year levels of efficiency and includes project design features and/or mitigation measures to reduce GHG emissions or 2) garner 100 points through the Screening Tables. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that generate fewer than 3,000 MTCO₂e per year or achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions. (Urban Crossroads, Inc., 2019d, p. 51)

The Project's annual GHG emissions are summarized in Table 5-8, *Total Annual Project Greenhouse Gas Emissions*. The methodology used to calculate the Project's GHG emissions would tend to overstate the amount of GHG that would actually be emitted by the Project, and is described in detail in *Technical Appendix F*. The Project would result in approximately 811.89 (31.93 + 0.01 + 362.37 + 51.24 + 103.47 + 262.87 = 811.89) MTCO₂e per year from construction, area, energy, waste, and water usage. In addition, the Project has the potential to result in an additional 2,148.14 (459.38 + 1,688.68 = 2,148.14) MTCO₂e per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project site are "new" trips resulting from the development of the proposed Project, and vehicles would idle for 15 minutes as compared to 5 minutes as regulated by California's anti-idling regulations. As shown in Table 5-8, the Project would result in approximately 2,960.03 MTCO₂e per year; therefore, the proposed Project would not exceed the County's screening threshold of 3,000 MTCO₂e per year and the Project would not generate an amount of GHG emissions that have the potential to directly or indirectly have an adverse effect on the environment. (Urban Crossroads, Inc., 2019d, p. 51)

Table 5-8 Total Annual Project Greenhouse Gas Emissions

Emission Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Annual construction-related emissions amortized over 30 years	31.77	0.01	0.00	31.93
Area Source	0.01	3.00e-05	0.00	0.01
Energy Source	360.87	0.01	3.96e-03	362.37
Mobile Source (Passenger Car)	459.04	0.01	0.00	459.38
Mobile Source (Truck)	1,688.27	0.02	0.00	1,688.76
On-Site Equipment	50.83	0.02	0.00	51.24
Waste	41.77	2.47	0.00	103.47
Water Usage	212.49	1.56	0.04	262.87
Total CO₂E (All Sources)	2,960.03			

CalEEMod operational emissions are presented in Appendices 3.2 and 3.3 of *Technical Appendix A1*.

TotalCO₂e are rounded up to the hundredths.

Source: (Urban Crossroads, Inc., 2019d, Table 3-4)

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

The Project's consistency with AB 32, SB 32, and the County of Riverside's CAP are discussed below. (Urban Crossroads, Inc., 2019d, p. 51)

CARB's Scoping Plan identifies strategies to reduce California's GHG emissions in support of AB32, which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation and the Project supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping. The Scoping Plan Consistency Summary is contained in the Project's Energy Report (*Technical Appendix F*). (Urban Crossroads, Inc., 2019c, pp. 51-59)

SB 32

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05 is to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed above, is consistent with AB 32 via compliance with the County's CAP by virtue of emitting an annual amount of GHGs that fall below the CAP's screening threshold. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2017 Scoping Plan Update reflects the 2030 reduction target, set by Executive Order B-30-15 and codified by SB 32. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. (Urban Crossroads, Inc., 2019d, pp. 55-59)

The 2050 reduction target of Executive Order S-3-05 has not been codified, unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively. Accordingly, the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030. (Urban Crossroads, Inc., 2019d, pp. 55-59)

The CAP identifies a two-step approach in evaluating GHG emissions. First, a screening threshold of 3,000 MTCO₂e per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO₂e per year will be required to evaluate consistency with the CAP through compliance with the

applicable Screening Tables. The CAP contains a menu of measures potentially applicable to discretionary development that include energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual sub-measures are assigned a point value within the overall screening table of GHG implementation measures. The point values are adjusted according to the intensity of action items with modest adoption/installation (those that reduce GHG emissions by modest amounts) worth the least number of points and greatly enhanced adoption/installation worth the most. (Urban Crossroads, Inc., 2019d, p. 60)

As shown on Table 5-8, the Project would result in approximately 2,960.03 MTCO₂e per year; therefore, the proposed Project would not exceed the County's screening threshold of 3,000 MTCO₂e per year. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change and would not require additional analysis. (Urban Crossroads, Inc., 2019d, p. 60)

Finding: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

Applicable Regulatory Requirements: The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes. The Project would comply with a number of regulations that would further reduce GHG emissions, including regulations that are particularly applicable to the Project and that would assist in the reduction of GHG emissions. See the Project's GHG Impact Analysis attached to this MND as *Technical Appendix F*.

- The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce greenhouse gas emissions.
- In compliance with the County's Climate Action Plan, prior to issuance of a building permit, the Project Applicant shall provide documentation to the County of Riverside Building Department demonstrating implementation of Climate Action Plan measure R2-CE1, which requires on-site renewable energy production to offset 20% of the building's energy demand.

5.1.9 Hazards and Hazardous Materials

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
21. Hazards and Hazardous Materials				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); V3 Companies, Phase I Environmental Site Assessment (V3 Companies, 2018); Department of Toxic Substances Control (DTSC, 2018); (Google Earth, 2018); Riverside County Ordinance No. 651 as Amended through 651.4, Requiring Disclosure of Hazardous Materials and the Formulation of Business Emergency Plans (Riverside County, 2009a)

- a) **Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b) **Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

The Project has the potential to create hazards to the public or the environment from the handling of materials present on the Project site under existing conditions, and/or from introducing potential hazardous materials onto the site during the Project's short-term construction or long-term operation. Each of these conditions is addressed below.

Existing Conditions of the Project Site

A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by V3 Companies and is included as *Technical Appendix G*. Based on reviewed historical information related to the Project site, V3 Companies determined that the site was used as agricultural cropland from 1938 through 1978 and it is likely that herbicides/pesticides associated with agricultural use were applied to the property during that time frame. As a result of the past use, some residual chemicals may be present in the near surface soils. No evidence of chemical mixing, bulk storage or misuse was evident during the course of the Phase I ESA investigation. As such, the past use of the site for crop cultivation and the possible use of herbicides/pesticides do not present evidence of a Recognized Environmental Condition (REC). The site was used by squatters in approximately 2017 to 2018 and dumping of general refuse and drums containing asphalt were reported on the site. The drums have been removed and the site is no longer occupied; therefore, under existing conditions, there is no evidence of a REC associated with these past activities. (V3 Companies, 2018, p. 11) For these reasons, handling of on-site soils during Project construction would not expose people or the environment to a significant hazard, and impacts are determined to be less than significant.

The adjoining properties to the north, south, and west were primarily vacant, undeveloped land until development occurred in the later 1970s to early 1980s. The southern adjoining property is listed in the regulatory database report; however, based on the historical records reviewed, historical use and operations at adjoining sites do not represent evidence of a REC in connection with the Project site. (V3 Companies, 2018, p. 12) For these reasons, proximity of the Project site to these off-site uses would not expose people or the environment to a significant hazard, and impacts are determined to be less than significant.

Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during the construction phases of the Project. The heavy equipment would likely be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental

releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), SCAQMD, and Santa Ana RWQCB. With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase, and impacts would be less than significant.

Long-Term Operational Activities

The future occupant(s) of the Project's proposed building is unknown at the time of this assessment; however, the building would be developed with a 203,029 SF warehouse building comprised of 193,029 SF of warehouse space, 5,000 SF of ancillary ground floor office space and 5,000 SF of ancillary mezzanine office space. Allowable land uses would be governed by the site's zoning classifications of M-SC and I-P. Although unlikely, it is possible that hazardous materials could be used during the course of a future occupant's daily operations. State and federal Community-Right-to-Know laws allow the public to access information about the amounts and types of chemicals in use at local businesses. Regulations also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies the building on the Project site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require permits from the Riverside County Department of Environmental Health (DEH) in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the Riverside County Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Thus, impacts would be less than significant and mitigation is not required.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. Under long-term operational conditions, the proposed Project would be required to maintain adequate emergency access for emergency vehicles on-site as required by the County. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any existing public road that would impair or interfere with the implementation of evacuation procedures. The Project would be required to improve Seaton Avenue along the site frontage and pave Perry Street between the Project site and Harvill Avenue, which would improve emergency access. Because the Project would not interfere with an adopted emergency response or evacuation plan, no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

d) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school?

There are no existing or planned schools within one-quarter mile of the Project site. The nearest school to the Project site is Val Verde High School located approximately 0.8 mile southeast of the Project site and east of I-215 at the physical address of 972 Morgan Street, Perris, CA. Accordingly, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter (1/4) mile of an existing or proposed school and no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

e) Would the Project 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?

The Project site is not listed on the Hazardous Waste and Substances Sites List produced by the Department of Toxic Substances Control (DTSC), which is referred to as "Envirostor" (DTSC, 2018). To

determine whether the Project site is identified as a hazardous materials site pursuant to Government Code Section 65962.5, an American Society for Testing and Materials (ASTM) radius search was performed by Environmental Data Resources (EDR) regulatory database record search, which obtains updated environmental database information from *Standard Federal, State, and Tribal Environmental Record Sources*. The EDR regulatory database record search determined that the Project site is not listed on any hazardous materials databases. (V3 Companies, 2018 Section 4.2)

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
22. Airports				
a. Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Riverside County General Plan Figure S-20 "Airport Locations" (Riverside County, 2015a); Riverside County GIS Database (RCIT, 2019); Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (RCALUC, 2014); County of Riverside Airport Land Use Commission Staff Report dated January 10, 2019, Case Number ZAP1339MA18 (RCALUC, 2019a); Aeronautical Study No. 2018-AWP-17869-OE, Issue Date 02/07/19 (FAA, 2019a)

- a) **Would the Project result in an inconsistency with an Airport Master Plan?**
- b) **Would the Project require review by the Airport Land Use Commission?**
- c) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

At a distance of approximately 6,340 feet southwesterly of the southerly end of Runway 14-32 at MARB the Project site is located within "Compatibility Zone C2" of the March Air Reserve Base/Inland Port Airport Influence area and is therefore subject to the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP). Within Compatibility Zone C2, non-residential intensity is restricted to 200 people per average acre and 500 people per single acre, and hazards to flights are prohibited. (RCALUC, 2014, Table MA-2) (RCALUC, 2019a)

The Project (with a slightly different design at the time) was subject to review by the Riverside County Airport Land Use Commission (ALUC) on January 10, 2019. The ALUC Staff report concluded that the Project is conditionally consistent with the March Air Reserve Base/Inland Port Land Use Compatibility Plan. The ALUC's conditions are listed below as regulatory requirements applicable to the Project. (RCALUC, 2019a) Although the currently-proposed Project has a slightly different design (slightly smaller building with modified driveway configurations), the design changes were not substantive enough to require another review by the ALUC. The population density of the currently-proposed building and the building height in elevation above mean sea level is the same or less than reviewed and approved by the ALUC. With compliance to the ALUC conditions of approval, the Project is consistent with the ALUCP and would not create a hazard.

The elevation of March Air Reserve Base/Inland Port Airport Runway 14-32 at its southerly terminus is 1,488 feet AMSL. At a distance of approximately 6,340 feet from the runway to the site, Federal Aviation Administration (FAA) review is required for any structures with top of roof elevation exceeding 1,551.4 feet AMSL. (RCALUC, 2019a) For the proposed Project, the ALUC analyzed a maximum top-of-roof elevation for the Project's building at 1,578 feet AMSL. In addition, the FAA conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable, Title 14 of the Code of Federal Regulations, Part 77, for the proposed Project and issued a "Determination of No Hazard to Air Navigation" on February 7, 2019. The aeronautical study concluded that the Project's structure does not exceed obstruction standards and would not be a hazard to air navigation provided conditions are met (see Conditions below). The FAA's determination does include temporary construction equipment such as cranes. Thus, the Project Applicant would be required to apply for and obtain FAA approval for the use of a crane or other construction equipment that would rise above elevation 1,551.4. (FAA, 2019a)

Findings of Fact: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required

Applicable Regulatory Requirements. The following are applicable regulations and design requirements imposed by the Riverside County Airport Land Use Commission (ALUC) and the Federal Aviation Administration (FAA) on the proposed Project. Although these requirements technically do not meet CEQA's definition for mitigation, they are listed below to ensure Project compliance with the ALUC and FAA regulations and design requirements.

Airport Land Use Commission (ALUC) Conditions:

- Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- The following uses/activities are not included in the proposed project and shall be prohibited at this site, in accordance with Note A on Table 4 of the Mead Valley Area Plan.
 - Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
 - Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
 - Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
 - Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- The following uses/activities are specifically prohibited at this location: trash transfer stations that are open on one or more sides; recycling centers containing putrescible wastes; construction and demolition debris facilities; wastewater management facilities; incinerators; noise-sensitive outdoor non-residential uses; and hazards to flight. Children's schools are discouraged.
- The following uses/activities are not included in the proposed project, but, if they were to be proposed through a subsequent use permit or plot plan, they would require subsequent Airport Land Use Commission review: Restaurants and other eating establishments; day care centers; health and exercise centers; churches, temples, or other uses primarily for religious worship; theaters.
- The "Notice of Airport in Vicinity" included in the January 10, 2019 County of Riverside Staff Report shall be given to all prospective purchasers of the property and tenants of the building, and shall be recorded as a deed notice.

- Any aboveground detention basins on the site (including water quality management basins) shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.
- March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.
- Noise attenuation measures shall be incorporated into the design of the office areas of the structure, to the extent such measures are necessary to ensure that interior noise levels from aircraft operations are at or below 45 Community Noise Level Equivalent (CNEL).
- The proposed Project has been evaluated for 200,392 square feet of manufacturing area, 5,000 square feet of first floor office area, and 2,500 square feet of second floor mezzanine office area. Any increase in building area or change in use other than for office, manufacturing, and/or warehousing uses will require an amended review by the Airport Land Use Commission.
- For the installation of solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.

Federal Aviation Commission (FAA) Conditions:

- It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or within 5 days after the construction of the Project's building reaches its greatest height (7460-2, Part 2).
- FAA approval is required for cranes or other construction equipment that would rise above an elevation 1,551.4 feet AMSL.

d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?

There are no private airport facilities or heliports within the vicinity of the Project site. As such, the Project would not result in a safety hazard for people residing or working in the project area associated with private airports or heliports, and no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.10 Hydrology/Water Quality

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
23. Water Quality Impacts				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
i. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure S-9, "Special Flood Hazard Areas", Figure S-10, "Dam Failure Inundation Zone" (Riverside County, 2015a); Riverside County General Plan - Mead Valley Area Plan. Figure 14, "Mead Valley Area Plan Steep Slope," Mead Valley Area Plan Figure 15, "Slope Instability", Mead Valley Area Plan Figure 11, "Mead Valley Area Plan Flood Hazards" (Riverside County, 2016a); Riverside County Ordinance 754, Establishing Stormwater/Urban Runoff Management and Discharge Controls (Riverside County, 2006); Regional Water Quality Control Board Santa Ana Region Basin Plan (RWQCB, 2016); Riverside County GIS (RCIT, 2019); (Google Earth, 2018); Riverside County Planning Department PAR Comments (Riverside County Planning Department, 2018a); SCAQMD, Rule 403, Fugitive Dust (SCAQMD, 2005); Thienes Engineering, Project Specific Preliminary Water Quality Management Plan (Thienes Engineering, Inc., 2019a); California Department of Water Resources, Sustainable Groundwater Management Act (DWR, 2016); California Department of Water Resources, Statewide Map of 2018 SGMA Basin Prioritization Results (DWR, 2018); California Department of Water Resources "Groundwater Sustainability Plans" (DWR, 2019); Eastern Municipal Water District, West San Jacinto Groundwater Management Plan 2017 Annual Report (EMWD, 2018)

- a) **Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Construction-Related Water Quality Impacts

Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation; all of these activities would have the potential to generate water-borne pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to affect water quality. As such, short-term water quality impacts have the potential to occur during the Project's construction in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and Riverside County Ordinance No. 754, prior to the commencement of construction activities, the Project would be required to obtain coverage under the State of California NPDES Construction Storm Water General Permit. The NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance

with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities, including grading. The SWPPP will specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern, including silt/sediment, are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that could be used during Project construction include, but are not restricted to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip-rap, and soil stabilizers/hydroseeding.

Mandatory compliance with the SWPPP will ensure that the Project does not violate any water quality standards or waste discharge requirements during short-term construction activities. Therefore, water quality impacts associated with short-term construction activities would be less than significant and no mitigation would be required.

Post-Development Water Quality Impacts

The 2010 Santa Ana MS4 Permit requires that Low Impact Development (LID) Retention BMPs be used unless it can be shown that those BMPs are infeasible. As shown in Figure 5-2, *WQMP Site Map - Sheet 1*, and Figure 5-3, *WQMP Site Map - Sheet 2*, in order to capture and infiltrate storm water runoff, Low Impact Development (LID) Principals and LID BMPs are incorporated into the site design to fully address all management areas. Stormwater BMPs are located in areas to promote infiltration to the maximum extent feasible. Underground infiltration chambers are proposed within the truck yard and westerly vehicle parking lot and the entire Design Capture Volume (DCV) will be handled by the proposed underground infiltration chambers. Street runoff will be handled via oversizing the onsite BMPs, even though street runoff does not physically drain to that area. (Thienes Engineering, Inc., 2019a, pp. 9, 10, 19)

Pursuant to the County's NPDES permit and in accordance with Ordinance No. 754, the Project would be required to prepare and implement a site-specific Preliminary Water Quality Management Plan (WQMP). The WQMP is a site-specific, post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via BMPs. Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. Prior to issuance of grading permits and/or building permits for the Project site, the County of Riverside requires that a site-specific WQMP be prepared for projects. Because compliance with an applicable WQMP is a required condition of approval for all development proposals and long-term maintenance of on-site water quality features would be required by the County to ensure their long-term effectiveness, compliance with the site-specific WQMP would ensure that water quality impacts associated with post-development at the Project site and long-term operation of the Project would be less than significant. Therefore, long-term use of the Project site as a warehouse facility would not violate any water quality standards or waste discharge requirements and impacts would be less than significant.

The Project Applicant also would be required to demonstrate compliance with the NPDES program, which requires certain land uses (e.g., industrial uses) to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted an updated new NPDES permit for storm water discharge associated with industrial activities (referred to as the “Industrial General Permit”). The new Industrial General Permit, which is more stringent than the prior Industrial General Permit, became effective on July 1, 2015. The new NPDES Industrial General Permit requires the preparation of a SWPPP for operational activities and the implementation of a long-term water quality sampling and monitoring program unless an exemption is granted. Mandatory compliance with the NPDES Industrial General Permit would further reduce water quality impacts during long-term operation of the Project to below significant levels.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA’s definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.
- Prior to issuance of a grading permit, the Project Applicant shall prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.

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

The Project would not install any water wells; therefore, the Project would not directly extract groundwater from the Perris North Groundwater Basin. Notwithstanding, the Project would install

impervious surfaces on the site and the increase in impervious surface cover to approximately 84.9% of the site could reduce the amount of water percolating down into the groundwater basin that underlies the Project area. However, the LID Principals and Low Impact Development (LID) BMPs that are incorporated into the site design to fully address all management areas would minimize potential adverse effects related to groundwater recharge.

As discussed under Threshold 23(a), the 2010 Santa Ana MS4 Permit requires that LID Retention BMPs be used unless it can be shown that those BMPs are infeasible. As shown in Figure 5-2, *WQMP Site Map - Sheet 1*, and Figure 5-3, *WQMP Site Map – Sheet 2*, in order to capture and infiltrate storm water runoff, LID Principals and LID BMPs are incorporated into the site design to fully address all management areas. Stormwater BMPs are located in areas to promote infiltration to the maximum extent feasible. Underground infiltration chambers are proposed within the truck yard and westerly vehicle parking lot and the entire Design Capture Volume (DCV) will be handled by the proposed underground infiltration chambers. Street runoff will be handled via oversizing the onsite BMPs, even though street runoff does not physically drain to that area. (Thienes Engineering, Inc., 2019a, pp. 9, 10, 19) Therefore, with buildout of the Project, the local groundwater levels would not be adversely affected and impacts to groundwater supplies and recharge would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project 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?

As depicted on Figure 2-11, *Existing Conditions Hydrology Map*, the Project site generally drains from west to east in existing natural drainage course that traverses the site. The Project site currently accepts offsite drainage from areas west of Seaton Avenue. (Thienes Engineering, Inc., 2020b, p. n.p.)

A 66-inch reinforced concrete pipe (RCP) is constructed in Perry Street near Harvill Avenue. The 66-inch storm drain is constructed to approximately 285 feet west of Harvill Avenue. The peak flow rate shown on the profile is consistent with the Master Plan hydrology for this area. The Project site is tabled to this drain. (Thienes Engineering, Inc., 2020b, p. n.p.)

As part of the proposed Project, the storm drain would be extended to the intersection of Perry Street and Seaton Avenue. An additional public storm drain would be installed in Seaton Avenue to convey the runoff from the two existing low spots fronting the Project site. (Thienes Engineering, Inc., 2020b, p. n.p.)

The Master Plan of Drainage for the Perris Valley Area depicts several subareas west of the Project site that are ultimately tributary to the proposed Master Plan storm drain system. However, Thienes determined that all areas shown on the Master Plan of Drainage do not directly enter the Project site.

Areas A-1 through A-5 drain to Perry Street. Area A-6 is the subarea that drains through the Project site via the existing low points in Seaton Avenue. The overall drainage area would be similar to that of the existing Master Plan of Drainage calculations (Thienes Engineering, Inc., 2020b, p. n.p.)

As indicated in Figure 5-4, *Preliminary Hydrology Map*, implementation of the Project would alter the existing ground contours of the Project site and result in the installation of impervious surfaces, which would result in changes to the site's existing, internal drainage patterns. Runoff from the easterly portion of the proposed building and the easterly truck yard area will be collected in grate inlets located in the truck yard area. Flow from the westerly portion of the building, the westerly parking area and the northerly parking lot will be intercepted in catch basin in the parking areas. A storm drain will convey this flow around the building to the truck yard area and confluence with runoff from the easterly portion of the Project site. A proposed storm drain will convey runoff northerly to the proposed extension of the Master Plan storm drain in Perry Street. (Thienes Engineering, Inc., 2020b, p. n.p.)

While the Project site drains to an existing Master Plan storm drain system, detention basin and outlet sizing will ensure that none of the 1-hour, 3-hour, 6-hour, and 24-hour duration events for the 2-year, 5-year, and 10-year events will have a higher peak discharge in the post-development condition than in the pre-development conditions. (Thienes Engineering, Inc., 2020b, p. n.p.)

The Project's Plot Plan application materials, which include a Conceptual Grading Plan and that are on file with the County of Riverside Planning Department at 4080 Lemon Street, 12th Floor, Riverside, California, 92502 are hereby incorporated by reference pursuant to CEQA Guidelines § 15150; these plans show the details of the Project's storm water and water quality infrastructure system (Thienes Engineering, Inc., 2020a).

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The site is located within the bounds of the Perris Valley ADP for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.

d) Would the Project result in substantial erosion or siltation on-site or off-site?

Implementation of the Project has the potential to result in soil erosion and/or siltation on- or off-site. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and/or long-term operation of the Project.

Impact Analysis for Temporary Construction-Related Activities

Grading and construction activities on the Project site would expose underlying soils and disturb surficial soils on the Project site. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a NPDES permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific SWPPP. The SWPPP will identify a combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges during construction. In addition, proposed construction activities would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. Rule 403 requires that certain construction practices be followed that limit dust and dirt from leaving the construction site. For example, no dust is allowed to be visible in the air beyond the property line of the construction site, and no dirt is allowed to be tracked out of the site by more than 25 feet. With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

Impact Analysis for Long-Term Operational Activities

Following construction, wind and water erosion on the Project site would be minimal because the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system.

Furthermore, the County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a WQMP (WQMP, Ordinance 754). The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The WQMP for the Project is required to incorporate BMPs, which are effective at removing silt and sediment from storm water runoff. WQMPs also require post-construction maintenance and operational measures to ensure on-going erosion protection. Compliance with the Project-Specific WQMP for the Project would be required as a condition of Project approval as would the long-term maintenance of water quality features. With compliance of the Project-specific WQMP, implementation of the proposed Project would not result in substantial erosion or siltation on-site or off-site.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.
- Prior to issuance of a grading permit, the Project Applicant shall prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.

e) Would the Project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?

See the analyses in Thresholds 23(a), (c), and (d) above that describe the Project's proposed storm drain system. All runoff would be directed to the storm drain infrastructure. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site. Therefore, impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The site is located within the bounds of the Perris Valley ADP for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.

f) Would the Project 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?

See the analyses in Thresholds 23 (a), (c) and (d) above that describe the Project's proposed storm drain system. All runoff would be directed to the storm drain infrastructure. The Perris Valley ADP is a master-planned storm drain system adequately sized to convey all expected flows. As such, the Project would not 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. Therefore, impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.
- Prior to issuance of a grading permit, the Project Applicant shall prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.

- The site is located within the bounds of the Perris Valley ADP for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.

g) Would the Project impede or redirect flood flows?

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate (FIRM) Panels 06065C1410G, the Project site is located in Flood Zone X, an area of minimal flood hazard (FEMA, 2008). Thus, the Project site is not in the path of flood flows. Also, see the analysis under Thresholds 23 (a) (c) and (d), that describe that all of the Project's water runoff would be directed to the storm drain infrastructure that is part of the Perris Valley ADP. The Perris Valley ADP is a master-planned storm drain system adequately sized to convey all expected flows. As such, the Project would not impede or redirect flood flows.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- The site is located within the bounds of the Perris Valley ADP for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.

h) Would the Project result in flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?

The nearest large body of surface water to the Project site is the Perris Reservoir, located approximately 3.7 miles east of the Project site. According to MVAP Figure 11, *Special Flood Hazards Areas*, the Project site is not located within any dam inundation areas or special flood hazard areas. The Project site is located over 37 miles from the Pacific Ocean and is therefore not subject to a tsunami. The Project would include the installation of an integrated, on-site system of underground storm drain pipes, catch basins, underground infiltration basins to convey the runoff across the site, and treat the runoff to minimize the amount of water-borne pollutants carried from the Project site. The Project's Plot Plan application materials, which include a Conceptual Grading Plan and that are on file with the County of Riverside Planning Department at 4080 Lemon Street, 12th Floor, Riverside, California, 92502 are hereby

incorporated by reference pursuant to CEQA Guidelines § 15150; these plans show the details of the Project's storm water and water quality infrastructure system (Thienes Engineering, Inc., 2020a). Upon development of the Project, all stormwater from the Project site would be filtered by on-site BMPs in accordance with the Project's WQMP (see *Technical Appendix H2*) and then discharged to existing storm drains beneath Perry Street. There is no potential for flooding to occur on the Project site such that pollutants could be released in flood waters.

Findings of Fact: No impact will occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.

i) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The California Porter-Cologne Water Quality Control Act (California Water Code §§ 13000) and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Region Basin Plan (as most recently updated in February 2016). This document is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3348. (RWQCB, 2016)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana Watershed. Receiving waters for the property's drainage are the Perris Valley Storm Drain, San Jacinto River Reach 3, Canyon Lake (aka San Jacinto River, Reach 2), San Jacinto River Reach 1, and Lake Elsinore. Receiving Water's 303(d) listed impairment consist of the following: Canyon Lake is impaired by nutrients and pathogens and Lake Elsinore is impaired by nutrients, organic enrichment/low dissolved oxygen, polychlorinated biphenyls (PCBs), sediment toxicity, and unknown toxicity. The Perris Valley Storm Drain, San Jacinto River Reach 3, and the San Jacinto River, Reach 1 are not listed as receiving waters listed impairments. (Thienes Engineering, Inc., 2019a, Table A.1)

A specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a SWPPP and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Long-Term Operational Water Quality Impacts

Receiving waters and impaired waters are noted above. The Project's pollutants of concern include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease (Thienes Engineering, Inc., 2019a, Table E-1). The County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Water Quality Management Plan (WQMP) (Riverside County, 2019a, Chapter 5.72). The Project-Specific Preliminary WQMP identifies an effective combination of water quality control measures (i.e., Best Management Practices (BPMs) to reduce or eliminate water pollutants before they reach the groundwater table. The Preliminary WQMP for the Project, prepared by Thienes Engineering (attached hereto as *Technical Appendix H2*), incorporates catch basin/inlet filters and underground infiltration chambers. The catch basin/inlet filters and underground infiltration chambers would remove waterborne pollutants from storm water flows. The underground infiltration chambers would facilitate percolation to maximize on-site infiltration. The WQMP requires post-construction maintenance and operational measures to ensure ongoing effectiveness. Compliance with the WQMP would be required as a condition of Project approval. Therefore, the proposed Project's operation would not obstruct implementation of the Santa Ana Region Basin Plan. The Project Applicant, successors in interest, and construction contractors would be required to comply with the Project-specific WQMP as a condition of approval.

Groundwater Management Plan

The Project site is located within the West San Jacinto Groundwater Management Area, and is therefore subject to the EMWD's "Groundwater Management Plan – West San Jacinto Groundwater Basin". The Groundwater Management Plan (GMP) is intended to manage the San Jacinto Groundwater Basin in a manner that would supplement EMWD's water supplies, thereby increasing the amount of locally-available water and reducing the amount of water that needs to be imported through MWD. The GMP covers approximately 256-square miles (over 164,200 acres) and is divided into six (6) groundwater management zones. The Project site is located in the Perris North Groundwater Basin Management Zone.

The California Department of Water Resources' (DWR's) Sustainable Groundwater Management Act (SGMA) was signed into law on September 16, 2014. The purpose of the SGMA is to achieve the sustainable management of groundwater in a manner that does not cause undesirable results. The SGMA grants additional groundwater management authorities to Groundwater Sustainability Agencies (GSA). Eastern Municipal Water District (EMWD) became the GSA for the West San Jacinto Groundwater Basin in 2017. Existing groundwater basin boundaries are defined in the DWR's Bulletin 118. The West San Jacinto Groundwater Basin, previously known as the San Jacinto Groundwater Basin, is defined in Bulletin 118 (Basin No. 8-005), is a "high priority" basin. Groundwater basins that are prioritized as medium or high priority are required to be managed by a Groundwater Sustainability Plan (GSP). The West San

Jacinto Groundwater Basin is identified as a high priority basin, but it is not considered “critically over-drafted,” so the deadline for completion of a GSP is January 30, 2022. As such, the GSP for the West San Jacinto Groundwater Basin is under development and not yet published. (EMWD, 2018)

The Project would not directly extract groundwater; however, with addition of the proposed Project, an increase in impervious surface cover would occur over approximately 85% of the site, which would reduce the amount of water directly percolating into the groundwater table on the Project site. The LID Principals and Low Impact Development (LID) BMPs that are incorporated into the site design would minimize potential adverse effects related to groundwater recharge. Underground infiltration chambers are proposed to be installed on the site, which would facilitate percolation to maximize on-site infiltration. After implementation of the Project, the Project’s proposed stormwater drainage system would convey water runoff into the public storm drain system which flows to downstream water bodies where percolation into the groundwater table occurs. Therefore, the proposed Project would not conflict or obstruct implementation of a groundwater management plan. Therefore, impacts would be less than significant.

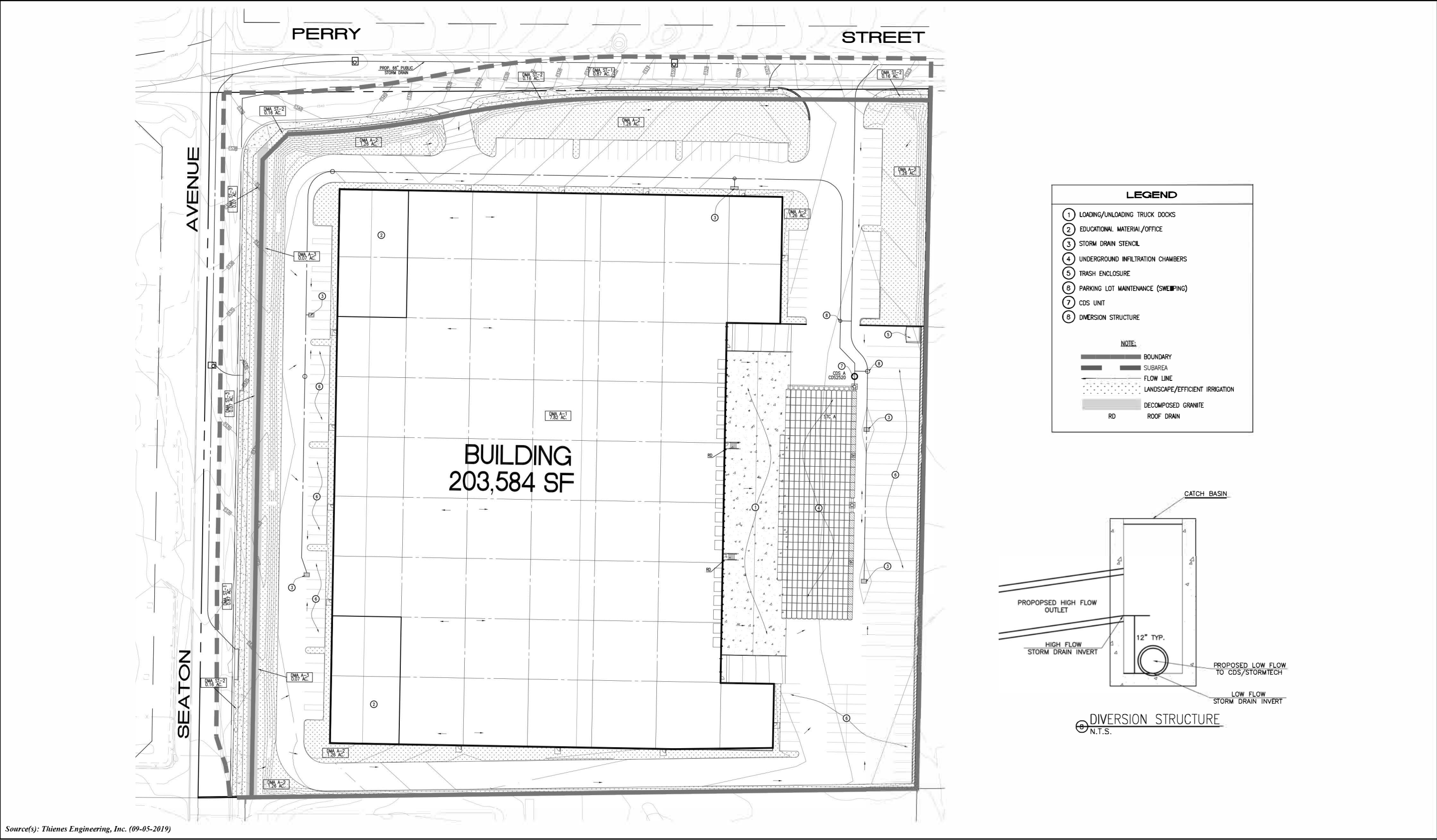
Findings of Fact: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA’s definition for mitigation, they are listed below for information purposes.

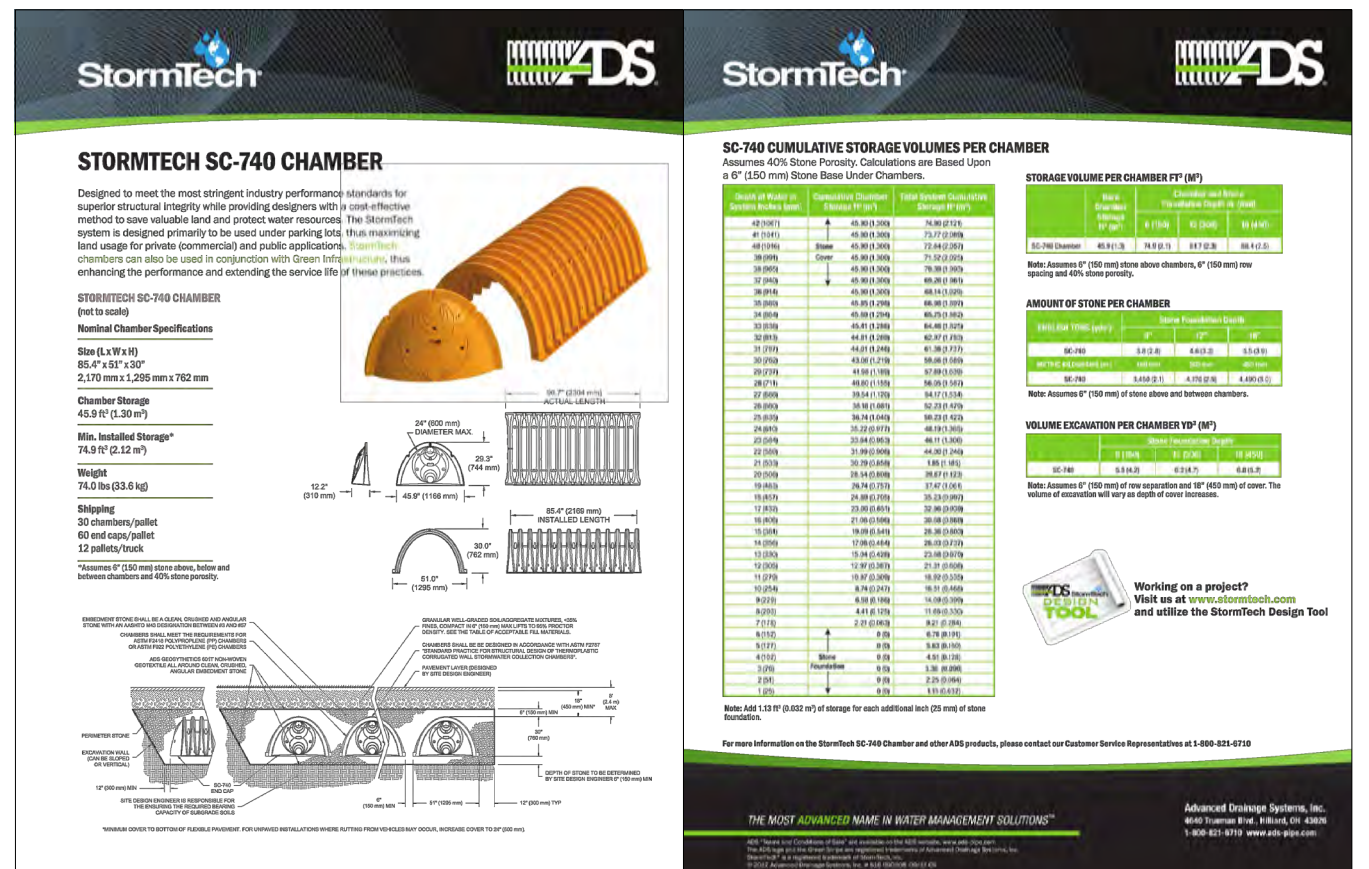
- Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.



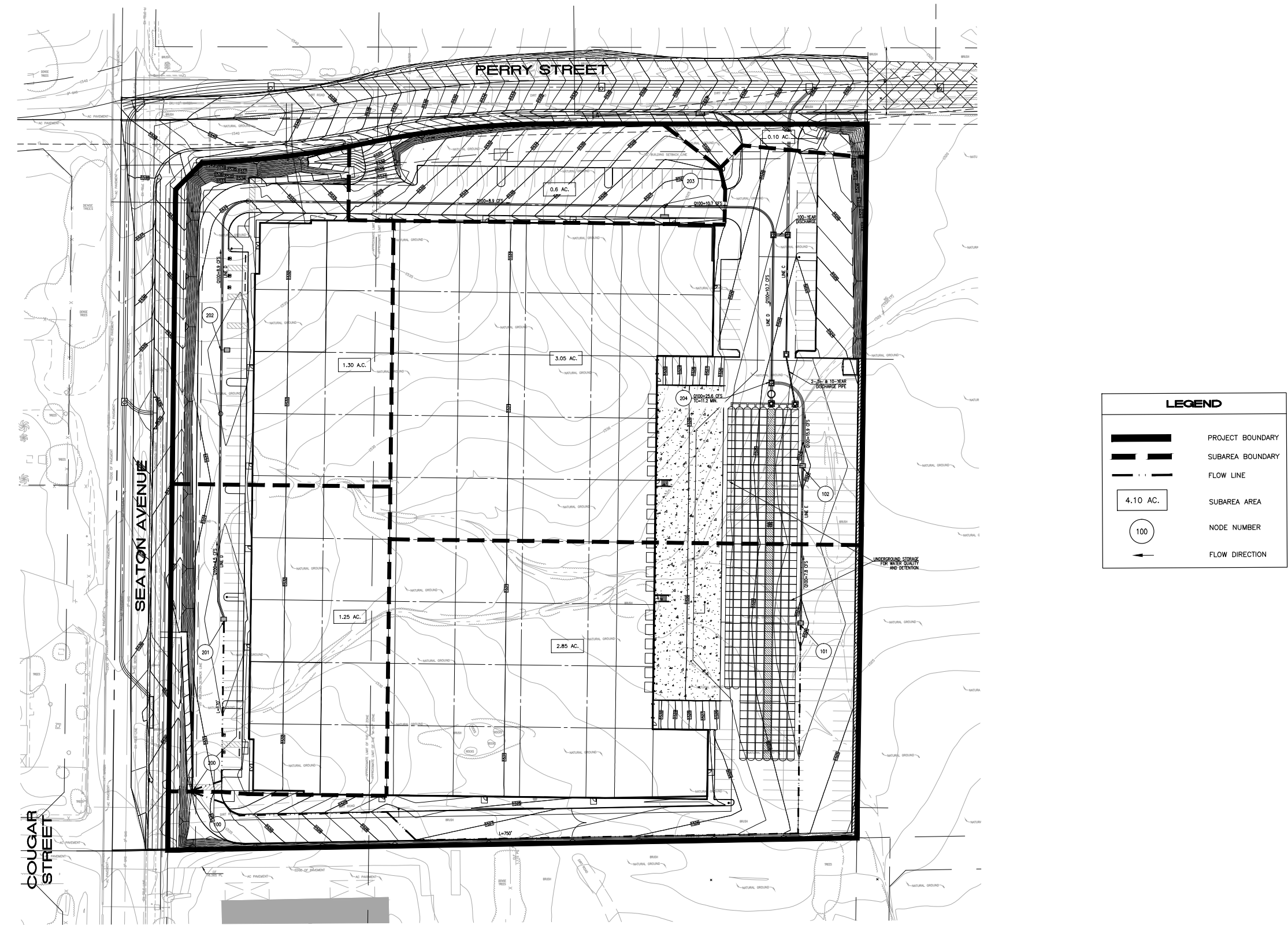
Source(s): Thienes Engineering, Inc. (09-05-2019)



Figure 5-2



NOT TO SCALE



Source(s): Thienes Engineering, Inc. (01-20-2020)

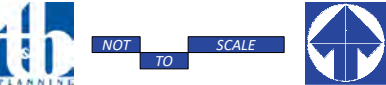


Figure 5-4

5.1.11 Land Use/Planning

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
24. Land Use				
a. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan (Riverside County, 2015a); Riverside County GIS (RCIT, 2019)

a) Would the Project 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?

The environmental effects associated with developing the Project site in accordance with the property's existing General Plan "Industrial" land use designation and Industrial Park (I-P) and Manufacturing -Service Commercial (M-SC) zoning classifications are analyzed throughout this MND. The Project site is split zoned I-P and M-SC and the proposed Project is consistent with those zoning classifications. The proposed use is allowed in the I-P and M-SC zones, subject to the approval of a Plot Plan (Riverside County Planning Department, 2018a). As such, there is no conflict with the property's zoning designations.

The Project site is located within the MVAP portion of the Riverside County General Plan and designated "Industrial." As part of its review of the proposed Project, Riverside County staff evaluated the Project for consistency with applicable General Plan and MVAP policies and concluded that the Project would be consistent with or otherwise would not conflict with the applicable policies of the General Plan or MVAP.

There are no other land use plans, land use policies, or land use regulations applicable to the Project site.

Refer to Threshold 6(a), *Air Quality*, for a discussion of the Project's consistency with the SCAQMD's 2016 AQMP. Refer to Threshold 7(a), *Biological Resources*, for a discussion of the Project's compliance with the Western Riverside County MSHCP. Refer to Threshold 20, *Greenhouse Gas Emissions*, for a discussion of the Project's consistency with Riverside County's Climate Action Plan (CAP).

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Implementation of the Project will not disrupt or divide the physical arrangement of an established community. As discussed in Section 2.0, land uses surrounding the Project site consists of vacant land, warehouses, manufacturing operations, storage yards, the industrial warehouse development including a 600,000 SF warehouse (recently leased by Living Spaces) that is part of the approved Majestic Freeway Business Center Specific Plan to the north, south, and east, and rural business enterprises and residents to the west.

The Project site is bounded on the north by Perry Street, which is an unimproved dirt road in its existing condition. North of Perry Street is vacant land. As such, the Project has no potential to disrupt or divide land uses located to the north. Similarly, abutting the Project site on the east is vacant land, and east of that vacant land is Harvill Avenue and the industrial warehouse development including a 600,000 SF warehouse (recently leased by Living Spaces) that is part of the approved Majestic Freeway Business Center Specific Plan area, which is approved for industrial development. East of the approved Majestic Freeway Business Center is I-215. As such, the Project has no potential to disrupt or divide land uses located to the east.

South of the Project site is Green Bee Yard, a concrete foundation construction company, at 18890 Seaton Avenue and White House Sanitation, a porta potty rental and septic tank service company, at 18916 Seaton Avenue. Both of these businesses have small metal buildings and extensive outside storage surrounded by either a block wall or chain link fence with barbed wire. Martin Street is located south of these businesses. As such, the Project has no potential to disrupt or divide land uses located to the south.

Abutting the Project site on the west is Seaton Avenue and east of Seaton Avenue is a mixture of rural residential uses and business enterprises. This area has an established rural character, particularly as distance from Seaton Avenue increases. Along Seaton Avenue directly across from the Project site are primarily business enterprises. Golden State Paving, an asphalt paving company (also with residential occupancy), is located at 22970 Cougar Street and Concrete Equipment Storage Yard is located at 18795 Seaton Avenue. These uses are surrounded by a combination of block walls and chain link fence. A residential home with animal keeping pens comprised of metal and chain link fence is located at the southwest corner of Seaton Avenue and Perry Street. North of the residential home on the northwest corner of Perry Street and Seaton Avenue is Torrance Aluminum, which comprises two large metal buildings, paved and unpaved surfaces, and outdoor storage surrounded by chain link fencing and barbed wire. Given the predominately business enterprise character of the land uses immediately abutting Seaton Avenue west of the Project site, the Project has no potential to disrupt or divide land uses located to the west. The Project's design faces the building's truck court and loading bays to the east, which would

not be visible to Seaton Avenue. In addition, the Project's design includes a sidewalk, landscaping, and multi-use trail segment along the Project site's frontage with Seaton Avenue, which are physical characteristics that enhance compatibility with the established land uses on the west side of Seaton Avenue. Further, as demonstrated in the analyses contained in this MND, the Project would not result in any significant and unavoidable impacts to sensitive receptors in the surrounding area. All air quality, health risk, and noise impacts would be less than significant or mitigated to less than significant. As such, a less-than-significant impact associated with disruption to an established community would occur. No significant disruption would occur.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.12 Mineral Resources

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
25. Mineral Resources				
a. Result in the loss of availability of a known mineral resource that would be of value to the region or 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"/>
c. Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure OS-6 "Mineral Resources Area" (Riverside County, 2015a)

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?

Riverside County General Plan Figure OS-6 shows that the Project site and surrounding area is located within Mineral Resource Zone 3 (MRZ-3), meaning the significance of mineral deposits is undetermined

and the site is not located within an area designated by the State Mining and Geology Board as being of regional or statewide significance (Riverside County, 2015a, Figure OS-6). Because the site is not located within an area known for mineral resources that are of value to the region and the residents of the State, no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project 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?

The Project site is designated by the Riverside County General Plan as Light Industrial and the property is zoned I-P and M-SC and is not designated for mining. As discussed above in Threshold 25(a), the Project site is not located within an area designated by the State Mining and Geology Board as being of regional or statewide significance (Riverside County, 2015a, Figure OS-6). Therefore, there is no potential for the Project to 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.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project potentially expose people or property to hazards from proposed, existing or abandoned quarries or mines?

As discussed above in Thresholds 25(a) and (b), the site is not located in a State designated sector of valuable resources and there are no known quarries or mines in the immediate vicinity of the Project site. Therefore, no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.13 Noise

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project result in:</i>				
26. Airport Noise				
a. For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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"/>
b. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Google Earth (Google Earth, 2018); Riverside County Airport Land Use Commission (RCALUC, 2014); Riverside County General Plan, Figure N-1, "Land Use Compatibility for Community Noise Exposure" (Riverside County, 2015a); Urban Crossroads, Inc., Noise Impact Analysis (Urban Crossroads, Inc., 2020a); County of Riverside ALUC Staff Report (RCALUC, 2019a); (Urban Crossroads, Inc., 2020b); Riverside County Ordinance No. 847 (as Amended Through 847.1). An Ordinance of the County of Riverside Amending Ordinance No. 847 Regulating Noise (Riverside County, 2007)

b) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) 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?

The Project site is located approximately 6,340 feet southwesterly of the southerly end of Runway 14-32 at the MARB (RCALUC, 2019a). The MARB Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP) includes the policies for determining the land use compatibility of the Project. The MARB/IPA, Map MA-1, indicates that the Project site is located within Compatibility Zone C2, which Table MA-1 Compatibility Zone Factors indicates is considered to have a moderate noise impact. Further, the Project site is located outside the 65 dBA CNEL noise level contour boundary. Moreover, the Basic Compatibility Criteria, listed in Table MA-2 of the MARB/IPA LUCP identifies no prohibited uses other than highly noise-sensitive outdoor non-residential uses (e.g., sports stadiums, concert halls). The MARB/IPA LUCP does not identify industrial-use specific noise compatibility standards, and therefore, the County of Riverside Land Use Compatibility for Community Noise Exposure matrix was used by Urban Crossroads to assess potential aircraft-related noise levels at the Project site. The County of Riverside guidelines indicate that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 75 dBA CNEL. The noise contour boundaries of the MARB/IPA show that the Project is considered a normally

acceptable land use since it is located outside of the 65 dBA CNEL contour. Further, Table MA-2 indicates that no uses are prohibited in this area except for highly noise-sensitive outdoor nonresidential uses (e.g., sports stadiums, concert halls) (Urban Crossroads, Inc., 2020a, p. 22). As such, the Project would not expose people visiting or working on the Project site to excessive noise levels. Impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

There are no private airfields or airstrips in the vicinity of the Project site (Google Earth, 2018). Therefore, the Project would not expose people to excessive noise levels associated with operations at a private airstrip. No impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project result in:</i>				
27. Noise Effect on or by the Project				
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, noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan, Figure N-1, "Land Use Compatibility for Community Noise Exposure" (Riverside County, 2015a); Urban Crossroads, Inc., Noise Impact Analysis (Urban Crossroads, Inc., 2020a)

a) Would the Project 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, noise ordinance, or applicable standards of other agencies?

The background ambient noise levels in the Project area studied by Urban Crossroads are dominated by the transportation-related noise associated with I-215 and the MARB, in addition to background industrial land use activities. This includes auto and heavy truck activities in the study area on roadway segments near the noise level measurement locations. (Urban Crossroads, Inc., 2020a, p. 33)

Under CEQA, consideration must be given to the magnitude of the noise level increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. In order to determine a person's subjective reaction to a new noise is the comparison of the new noise to the existing environment to which one has adapted—the so-called ambient environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. (Urban Crossroads, Inc., 2020a, pp. 25-26)

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of increases in noise levels that take into account the ambient noise environment. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative exposure metrics, such as the average-daily noise level (i.e., CNEL). The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. For example, if the ambient noise environment is quiet (< 60 dBA) and a new noise source greatly increases the noise levels, a perceived impact may occur even if the noise does not reach a level that is considered incompatible with the land use by the County's General Plan Noise Element or Noise Ordinance. Therefore, for the purpose of this analysis, a readily perceptible 5 dBA or greater Project-related noise level increase is considered a significant impact for noise-sensitive uses regardless of the existing noise level. In locations where the without-Project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase will be considered significant for noise-sensitive uses, and in locations where the without-Project noise levels already exceed 65 dBA, an increase in noise greater than 1.5 dBA will be considered a significant impact for noise-sensitive uses. (Urban Crossroads, Inc., 2020a, p. 26)

The County of Riverside General Plan Noise Element, Table N-1, *Land Use Compatibility for Community Noise Exposure*, was used to establish the satisfactory noise levels of significance for non-noise-sensitive land uses in the Project study area. The normally acceptable exterior noise levels for non-noise-sensitive land uses is 70 dBA CNEL. Noise levels greater than 70 dBA CNEL are considered conditionally acceptable per Noise Element Table N-1. Therefore, to determine if Project-related traffic noise level increases are significant at off-site non-noise-sensitive land uses, a readily perceptible 5 dBA and barely perceptible 3 dBA criteria were used. When the without-Project noise levels at the non-noise-sensitive land uses are below the normally acceptable 70 dBA CNEL compatibility criteria, a readily perceptible 5 dBA or greater noise level increase is considered a significant impact. When the without-Project noise levels are greater than the normally acceptable 70 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already

exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the County of Riverside General Plan Noise Element Table N-1's normally acceptable 70 dBA CNEL exterior noise level criteria. (Urban Crossroads, Inc., 2020a, p. 27)

In summary, noise impacts would be considered significant if as a direct result of the proposed Project, any of the significance criteria summarized in Table 5-9, *Significance Criteria Summary* is exceeded.

Table 5-9 Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive ¹	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive ^{1,2}	If ambient is < 70 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	Exterior Noise Level Standards ³	65 dBA Leq	45 dBA Leq
		If ambient is < 60 dBA Leq1	≥ 5 dBA Leq Project increase	
		If ambient is 60 - 65 dBA Leq1	≥ 3 dBA Leq Project increase	
		If ambient is > 65 dBA Leq1	≥ 1.5 dBA Leq Project increase	
		Vibration Level Threshold ⁴	0.01 in/sec RMS	
Construction	Noise-Sensitive	Noise Level Threshold ⁵	85 dBA Leq	
		Vibration Level Threshold ⁴	0.01 in/sec RMS	

¹ Source: FICON, 1992.

² Source: County of Riverside General Plan Noise Element, Table N-1.

³ Source: County of Riverside General Plan Noise Element, Table N-2.

⁴ Source: County of Riverside General Plan Noise Element, Policy N 16.3.

⁵ Acceptable threshold for construction noise based on the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, Inc., 2020a, Table 4-2)

Impact Analysis for Construction Phase

The Project would only have the potential to cause a substantial temporary or periodic increase in ambient noise levels during its construction phase. Construction activities on the Project site, especially those activities involving the use of heavy equipment, would create intermittent, temporary increases in ambient noise levels in the vicinity of the Project site. Noise generated by heavy construction equipment, including trucks, graders, bulldozers, concrete mixers, and portable generators, can reach high levels. However, construction-related noise increases: 1) would be transitory (i.e., varying from day-to-day and throughout the day), 2) would completely cease upon completion of Project construction, and 3) would not represent a recurring, periodic source of noise (although periodic and temporary construction noise has the potential to be substantial compared to existing ambient noise levels).

To evaluate whether the Project would generate potentially significant short-term noise levels at off-site sensitive receiver locations, a construction-related noise level threshold was adopted by the National Institute for Occupational Safety and Health (NIOSH). NIOSH identifies a noise level threshold of 85 equivalent-level decibels (dBA Leq) as an acceptable threshold for construction noise at sensitive receiver locations (Urban Crossroads, Inc., 2020a, p. 71).

The construction noise analysis provided in the Project's noise impact analysis was prepared using reference noise level measurements taken by Urban Crossroads to describe the typical construction activity noise levels for each stage of Project construction. Refer to the Project's Noise Impact Analysis in *Technical Appendix I* for information on the reference measurements. (Urban Crossroads, Inc., 2020a, p. 63)

Using the reference construction equipment noise levels, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were conducted by Urban Crossroads. Tables 10-2 to 10-6 of the Project's Noise Impact Analysis (*Technical Appendix I*) present the short-term construction noise levels for each stage of construction. Table 5-10, *Unmitigated Construction Equipment Noise Level Summary (DBA Leq)* provides a summary of the construction noise levels by stage at the nearby noise-sensitive receiver locations. To assess the worst-case construction noise levels, this analysis shows the highest noise impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity to each receiver location. This is the site preparation phase of Project construction, which is expected to last approximately 10 days in duration as shown on Table 3-1, *Anticipated Construction Duration*.

Table 5-10 Unmitigated Construction Equipment Noise Level Summary (DBA Leq)

Receiver Location ¹	Construction Noise Level (dBA Leq)					
	Site Preparation	Grading	Building Construction	Architectural Coating	Paving	Highest Activity Noise Levels ²
R1	56.1	50.0	44.7	44.0	48.1	56.1
R2	72.8	66.7	61.4	60.7	64.8	72.8
R3	74.5	68.4	63.1	62.4	66.5	74.5
R4	63.2	57.1	51.8	51.1	55.2	63.2
R5	62.5	56.4	51.1	50.4	54.5	62.5
R6	56.4	50.3	45.0	44.3	48.4	56.4

¹ Noise receiver locations are shown on Figure 5-5.

² Estimated construction noise levels during peak operating conditions.

Source: (Urban Crossroads, Inc., 2020a, Table 10-8)

To evaluate whether the Project would generate potentially significant short-term noise levels at off-site sensitive receiver locations, a construction-related NIOSH noise level threshold of 85 dBA Leq is used as acceptable thresholds for construction noise at the nearby sensitive receiver locations. As shown on Table 5-11, *Construction Equipment Noise Level Compliance (dBA Leq)*, Project-related construction activities

are calculated to reach maximum noise levels between 56.1 and 74.5 dBA Leq when measured at the property line of nearby receivers, which would fall well below the NIOSH 85 dBA Leq significance threshold during temporary Project construction activities. Therefore, the Project would not cause a substantial construction-related temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, and impacts would be less than significant. (Urban Crossroads, Inc., 2020a, p. 71)

Table 5-11 Construction Equipment Noise Level Compliance (dBA Leq)

Receiver Location ¹	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	56.1	85	No
R2	72.8	85	No
R3	74.5	85	No
R4	63.2	85	No
R5	62.5	85	No
R6	56.4	85	No

¹ Noise receiver locations are shown on Figure 5-5.

² Estimated construction noise levels during peak operating conditions, as shown on Table 5-10.

³ Construction noise thresholds as shown on Table 5-9.

⁴ Do the estimated Project construction noise levels satisfy the construction noise level threshold?

(Urban Crossroads, Inc., 2020a, Table 10-8)

In addition, to control noise impacts associated with the construction of the proposed Project, as with any other construction project in the County, the Project's construction contractors would be required to comply with the County's Noise Ordinance No. 847. Ordinance No. 847 requires that noise from any private construction activity located within one-quarter of a mile from an inhabited dwelling be restricted to between the hours of 6:00 a.m. and 6:00 p.m., during the months of June through September and 7:00 a.m. and 6:00 p.m., during the months of October through May. (Urban Crossroads, Inc., 2020a, p. 22)

Impact Analysis for Operational Noise

As summarized in Table 5-12, *Project Daytime Noise Level Contributions* and Table 5-13, *Project Nighttime Noise Level Contributions* the Project would not generate a daytime operational noise level increase at nearby sensitive receiver locations, but would generate a nighttime operational noise level increase up to 0.2 dBA Leq at the nearby noise receiver locations identified on Figure 5-5. Because the Project-related operational noise increases do not result in an exceedance of the significance threshold, the Project would not contribute to a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project and impacts would be less than significant. (Urban Crossroads, Inc., 2020a, p. 60)

Table 5-12 Project Daytime Noise Level Contributions

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Threshold ⁷	Threshold Exceeded? ⁷
R1	29.6	L7	56.8	56.8	0.0	5.0	No
R2	41.1	L6	61.1	61.1	0.0	3.0	No
R3	41.9	L8	62.0	62.0	0.0	3.0	No
R4	34.8	L8	62.0	62.0	0.0	3.0	No
R5	34.5	L5	59.4	59.4	0.0	5.0	No
R6	29.8	L5	59.4	59.4	0.0	5.0	No

¹ Noise receiver locations are shown on Figure 5-5.

² Total Project operational noise levels as shown on Table 9-3, *Unmitigated Operational Noise Level Compliance*, of *Technical Appendix I*.

³ Reference noise level measurement locations as shown on Exhibit 5-A, *Noise Measurement Locations*, of *Technical Appendix I*.

⁴ Observed nighttime ambient noise levels as shown on Table 5-1, *24-Hour Noise Level Measurements*, of *Technical Appendix I*.

⁵ Represents the combined ambient conditions plus the Project activities.

⁶ The noise level increase expected with the addition of the proposed Project activities.

⁷ Significance Criteria as defined in Section 4 of *Technical Appendix I*.

(Urban Crossroads, Inc., 2020a, Table 9-4)

Table 5-13 Project Nighttime Noise Level Contributions

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Threshold ⁷	Threshold Exceeded? ⁷
R1	29.6	L7	54.0	54.0	0.0	5.0	No
R2	41.1	L6	58.6	58.7	0.1	5.0	No
R3	41.9	L8	55.5	55.7	0.2	5.0	No
R4	34.8	L8	55.5	55.5	0.0	5.0	No
R5	34.5	L5	58.0	58.0	0.0	5.0	No
R6	29.8	L5	58.0	58.0	0.0	5.0	No

¹ See Figure 5-5 for the receiver locations.

² Total Project operational noise levels as shown on Table 9-3, *Unmitigated Operational Noise Level Compliance*, of *Technical Appendix I*.

³ Reference noise level measurement locations as shown on Exhibit 5-A, *Noise Measurement Locations*, of *Technical Appendix I*.

⁴ Observed nighttime ambient noise levels as shown on Table 5-1, *24-Hour Noise Level Measurements*, of *Technical Appendix I*.

⁵ Represents the combined ambient conditions plus the Project activities.

⁶ The noise level increase expected with the addition of the proposed Project activities.

⁷ Significance Criteria as defined in Section 4 of *Technical Appendix I*.

(Urban Crossroads, Inc., 2020a, Table 9-5)

Impact Analysis for Traffic-Related Noise

To evaluate permanent, off-site noise increases that could result from Project-related traffic, noise levels were modeled for the following traffic scenarios:

- Existing (2018): This scenario refers to the existing present-day traffic noise conditions without and with the proposed Project. This analysis is included in the Project's Noise Impact Analysis (*Technical Appendix I*) for informational purposes; the existing traffic noise levels plus traffic noise generated by the proposed Project will not actually occur because the Project would not be fully constructed and operational until future year cumulative conditions. (Urban Crossroads, Inc., 2020a, p. 43)
- Existing plus Ambient Growth (EA) (2020): This scenario refers to the background noise conditions in year 2020 without and with the Project plus ambient growth. (Urban Crossroads, Inc., 2020a, p. 43)
- EA plus Cumulative (EAC) (2020): This scenario refers to the background noise conditions in year 2020 without and with the Project plus ambient growth, and includes all reasonably foreseeable cumulative development projects identified in the Project's Traffic Impact Analysis (*Technical Appendix K1*). (Urban Crossroads, Inc., 2020a, p. 43)

Traffic noise contours and noise levels were established based on existing and projected future traffic conditions on off-site roadway segments within the Project's study area, and do not take into account the consider the effect of any existing noise barriers or topography that may affect attenuate ambient noise levels. Refer to *Technical Appendix I* for a detailed description of the methodology used to evaluate the Project's traffic-related noise effects. (Urban Crossroads, Inc., 2020a, p. 43)

Table 5-14, *Unmitigated EA (2020) with Project Traffic Noise Level Increases*, presents the existing plus ambient growth (EA) 2020 noise conditions that would result with the addition of Project-related traffic, without accounting for any noise attenuation features such as noise barriers or topography. Table 5-15, *Unmitigated EAC (2020) with Project Traffic Noise Level Increases*, presents a comparison of the EAC 2020 with Project conditions, without accounting for any noise attenuation features such as noise barriers or topography, plus ambient growth and reasonably foreseeable cumulative development projects. In both scenarios, noise levels along the roadway segments within the Project study area would increase between 0.0 and 8.8 dBA CNEL with development of the Project, with the loudest increase in traffic noise occurring at Perry Street, east of Driveway 2. An 8.8 dBA CNEL noise level increase along the segment of Perry Street between the Project's Driveway 2 and Harvill Avenue exceeds the threshold of significance (Table 5-9, *Significance Criteria Summary*) under both traffic scenarios and the noise increase is considered potentially significant. All other roadway segments are shown to experience less-than-significant noise level impacts. (Urban Crossroads, Inc., 2020a, p. 48)

Because all the Project truck traffic is proposed to use Perry Street east of Driveway 2, it is reasonable to expect that this roadway segment would experience potentially significant Project-related noise level

increases. However, these potential impacts are largely a function of the low existing traffic volumes related to the unimproved nature of the existing dirt road and the Project's paving of a 32-foot width of the road and the addition of Project truck traffic. The property located adjacent to Perry Street east of Driveway 2 is currently vacant and without receivers of any kind (noise sensitive or non-noise sensitive). Therefore, with no receivers experiencing a traffic noise level increase on the roadway segment of Perry Street, east of Driveway 2, the off-site traffic-related noise level increases would be less than significant. (Urban Crossroads, Inc., 2020a, p. 48)

Table 5-14 Unmitigated EA (2020) with Project Traffic Noise Level Increases

ID	Road	Segment	Adjacent Planned (Existing) Land Use ¹	CNEL at Adjacent Land Use (dBA) ¹			Noise-Sensitive Land Use?	Threshold Exceeded? ²
				No Project	With Project	Project Addition		
1	Seaton Av.	n/o Perry St.	Light Industrial/Residential	67.6	67.6	0.0	Yes	No
2	Seaton Av.	s/o Perry St.	Light Industrial/Residential	67.3	67.4	0.0	Yes	No
3	Markham St.	w/o Seaton Av.	Residential	77.2	77.2	0.0	Yes	No
4	Markham St.	e/o Seaton Av.	Light Industrial	77.4	77.4	0.0	No	No
5	Perry St.	w/o Dwy. 1	Light Industrial	56.1	56.4	0.3	No	No
6	Perry St.	e/o Dwy. 1	Light Industrial	56.1	56.3	0.2	No	No
7	Perry St.	e/o Dwy. 2	Light Industrial	56.1	64.9	8.8	No	Yes

¹The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use. Values rounded to the nearest one-tenth.

²Significance Criteria (See Section 4 of *Technical Appendix I*).

Source: (Urban Crossroads, Inc., 2020a, Table 7-8)

Table 5-15 Unmitigated EAC (2020) with Project Traffic Noise Level Increases

ID	Road	Segment	Adjacent Planned (Existing) Land Use ¹	CNEL at Adjacent Land Use (dBA) ¹			Noise-Sensitive Land Use?	Threshold Exceeded? ²
				No Project	With Project	Project Addition		
1	Seaton Av.	n/o Perry St.	Light Industrial/Residential	67.6	67.6	0.0	Yes	No
2	Seaton Av.	s/o Perry St.	Light Industrial/Residential	67.3	67.4	0.0	Yes	No
3	Markham St.	w/o Seaton Av.	Residential	77.2	77.2	0.0	Yes	No
4	Markham St.	e/o Seaton Av.	Light Industrial	77.4	77.4	0.0	No	No
5	Perry St.	w/o Dwy. 1	Light Industrial	56.1	56.4	0.3	No	No
6	Perry St.	e/o Dwy. 1	Light Industrial	56.1	56.3	0.2	No	No
7	Perry St.	e/o Dwy. 2	Light Industrial	56.1	64.9	8.8	No	Yes

¹The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use. Values rounded to the nearest one-tenth.

²Significance Criteria (See Section 4 of *Technical Appendix I*).

Source: (Urban Crossroads, Inc., 2020a, Table 7-9)

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- All construction activities shall comply with Riverside County Noise Ordinance (Ordinance No. 847). This requirement shall be noted on all grading and building plans and in bid documents issued to construction contractors.

b) Would the Project generate excessive ground-borne vibration or ground-borne noise levels?

Impact Analysis for Near-Term Construction Vibration

Construction activities on the Project site would utilize heavy equipment that has the potential to generate low levels of intermittent, localized ground-borne vibration. Refer to *Technical Appendix I* for a detailed description of the methodology used to calculate construction vibration levels.

Vibration levels from Project-related construction activities were calculated to the property lines of six (6) receiver locations near the Project site. (See Figure 5-5 for the locations of the modeled receptors and refer to *Technical Appendix I* for a detailed description of the receptors). The results of the vibration analysis for Project-related construction activities are summarized in Table 5-16, *Project Construction Vibration Levels*.

As shown in Table 5-16, Project construction activities would generate a maximum vibration level of 0.009 root-mean-square (RMS), which is less than the significance threshold of 0.1 in/sec RMS (Urban Crossroads, Inc., 2020a, p. 72). Furthermore, the Project-related construction vibration levels do not represent levels capable of causing building damages to nearby residential homes. The Federal Transit Administration (FTA) identifies construction vibration levels capable of building damage ranging from 0.12 to 0.5 in/sec PPV. As shown in Table 5-16, peak Project construction vibration levels approach 0.013 in/sec PPV, which is below the FTA vibration levels for building damage at the residential homes near the Project site. Based on the foregoing, the Project's construction activities would not expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. The Project would result in less-than-significant impacts associated with construction vibration and ground-borne noise. (Urban Crossroads, Inc., 2020a, p. 72)

Table 5-16 Project Construction Vibration Levels

Receiver ¹	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV ²					Velocity Levels (in/sec) RMS ³	Threshold (in/sec) RMS ⁴	Threshold Exceeded? ⁵
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
R1	745'	0.000	0.000	0.000	0.001	0.001	0.000	0.01	No
R2	109'	0.000	0.004	0.008	0.010	0.010	0.007	0.01	No
R3	90'	0.000	0.005	0.011	0.013	0.013	0.009	0.01	No
R4	332'	0.000	0.001	0.002	0.002	0.002	0.001	0.01	No
R5	360'	0.000	0.001	0.001	0.002	0.002	0.001	0.01	No
R6	726'	0.000	0.000	0.000	0.001	0.001	0.000	0.01	No

¹Receiver locations are shown on Figure 5-5.

²Based on the Vibration Source Levels of Construction Equipment included on Table 6-8 in *Technical Appendix I*.

³Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.

⁴Does the vibration level exceed the maximum acceptable vibration threshold?

Source: (Urban Crossroads, Inc., 2020a, Table 10-9)

Impact Analysis for Long-Term Operational Vibration

Under long-term conditions, the proposed Project would not include nor require equipment, facilities, or activities that would result in substantial or perceptible ground-borne vibration. The operation of the Project site would include heavy trucks moving on site to and from the loading docks areas located on the east-facing side of the building. According to the Federal Transit Administration (FTA), trucks rarely create vibration levels that exceeds 70 VdB or 0.003 in/sec unless there are bumps due to frequent potholes in the road. Trucks transiting the Project site will be traveling at very low speeds; therefore, it is expected that truck vibration impacts at nearby homes closest to the Project site and located west of Seaton Avenue facing the side of the building having offices and no dock doors or truck court movements would satisfy the County of Riverside's 0.1 in/sec RMS vibration threshold. Therefore, because the Project-related vibration velocity levels would remain below the County of Riverside threshold of 0.01 in/sec RMS at all receiver location, the Project's operational activities would not expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. Accordingly, long-term operational vibration impacts would be less than significant and no mitigation is required. (Urban Crossroads, Inc., 2020a, p. 2).

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- All construction activities shall comply with the County of Riverside Noise Ordinance (Ordinance No. 847). This requirement shall be noted on all grading and building plans and in bid documents issued to construction contractors.



LEGEND:

- Receiver Locations
- Distance from receiver to Project site boundary (in feet)

Source(s): Urban Crossroads (01-23-2020)



NOT TO SCALE



Figure 5-5

SENSITIVE RECEIVER LOCATIONS

5.1.14 Paleontological Resources

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<i>Would the project:</i>				
28. Paleontological Resources				
a. Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Figure OS-8 “Paleontological Sensitivity”; Brian F. Smith and Associates, Inc., Paleontological Resource and Mitigation Assessment (BFSA, 2018); Brian F. Smith and Associates, Inc., Paleontological Resource Impact Mitigation Program (PRIMP) (BFSA, 2019b)

a) Would the Project directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?

Brian F. Smith and Associates, Inc. (BFSA) completed a Paleontological Resource and Mitigation Monitoring Assessment for the Project attached to this MND as *Technical Appendix J1*. A geologic map of the Steele Peak 7.5’ quadrangle, shows that the Project site is underlain by lower Pleistocene (approximately 1.8 million to perhaps 200,000 to 300,000-year old) very old alluvial fan deposits that lap onto granitic exposures of the Cretaceous Val Verde tonalite along the west side of the Project site. Geomorphically, there is a very gentle slope to the east toward Perris Valley. (BFSA, 2018, p. 1)

A paleontological sensitivity map generated by the Riverside County Land Information System (RCLIS) ranks most of the project area as having a High Potential/Sensitivity (High B), which is “based on [the presence of] geologic formations or mappable rock units that contain fossilized body elements, and trace fossils such as tracks, nests and eggs. These fossils occur on or below the surface.” The category “High B” indicates that fossils are likely to be encountered at or below a depth of four feet, and may be impacted by excavation work during construction-related activities. The eastern portion of the Project site, which is composed of very old alluvial fan sediments are ranked with a High Potential/Sensitivity (High B) to yield nonrenewable paleontological resources (i.e., fossils). The western portion of the Project site, which is composed of Cretaceous granitic rocks, is ranked as having a Low Paleontological Potential/Sensitivity because fossils are never found in granitic rocks, which are formed by cooling magma miles below the Earth’s surface, and therefore do not have any paleontological resource potential or sensitivity. (BFSA, 2018, pp. 1-2) Based on Google Earth imagery accessed by BFSA in January 2019, all of the areas of Quaternary sediments were recently graded or tilled and it is unlikely that any paleontological resources would be present at the surface of these areas and the areas with exposures of granitic and metamorphic rocks would not have any fossils (BFSA, 2019b, p. 2).

However, grading and excavation activities that occur deeper than 4.0 feet in depth in the eastern portion of the Project site in areas composed of very old alluvial fan sediments ranked with a High Potential/Sensitivity (High B), have the potential to unearth paleontological resources that may exist below the ground surface. If significant paleontological resources are unearthed there is a potential for a significant impact if the resources are not properly identified and treated. Therefore, the Project's potential to directly or indirectly destroy unique paleontological resources that may be present beneath the ground surface in the eastern portion of the site in areas mapped with a High Potential/Sensitivity (High B), is a potentially significant impact and mitigation is required.

Because of the High Paleontological Sensitivity (High B) assigned to the older alluvial fan deposits across much of the Project site, full-time paleontological monitoring of mass grading and excavation (utility trenching, etc.) activities in areas mapped as Quaternary older alluvial fan deposits is required in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (i.e., fossils). Paleontological monitoring is not required where the Cretaceous granitic rocks are exposed at the surface or in the shallow subsurface (less than four feet below ground level) on the west side of the project. (BFSA, 2018, p. 2)

Findings of Fact: Less than significant with mitigation incorporated.

Mitigation: Mitigation is required.

Implementation of Paleontological Resources MM-1 would ensure the proper identification and subsequent treatment of any significant paleontological resource, site, or unique geologic feature that may be encountered during ground-disturbing activities associated with Project excavation activities in the area of the Project site mapped as older Quaternary sediments. With implementation of Paleontological Resources MM-1, the Project's potential to impact paleontological resources on the Project site would be reduced to less than significant.

Paleontological Resources MM-1. The County of Riverside shall require implementation of the Project's Paleontological Resource Impact Mitigation Program (PRIMP) by a qualified paleontologist as a condition of the Project's grading permit, for any mass grading and excavation-related activities, including utility trenching, that will exceed 4.0 feet in depth in exposed Quaternary older alluvial fan sediments (Qvofa) located in the northeast portion of the property. The PRIMP shall be followed in the event that fossils are discovered in order to ensure that significant resources are properly identified and treated and that no significant paleontological resource, site, or unique geologic feature is destroyed. The protocols documented in the PRIMP are required to be followed. [Refer to *Technical Appendix J2* for a copy of the preliminary PRIMP.]

Monitoring: Monitoring is required. Prior to the issuance of grading permits that involve grading at depths that exceed 4.0 feet in depth and that encompass areas of exposed Quaternary older alluvial fan sediments (Qvofa) on site, the PRIMP will be prepared and approved by the County Geologist. The PRIMP shall be implemented by the Project paleontologist during all grading activities that exceed 4.0 feet in depth and occur in areas containing exposed Quaternary older alluvial fan sediments (Qvofa).

5.1.15 Population and Housing

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
29. Housing				
a. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County Riverside County GIS Database (RCIT, 2019); Riverside County General Plan, Chapter 8 - Housing Element 2017-2021 (Riverside County, 2017c); United States Department of Labor Bureau of Labor Statistics (USBLS, 2018)

a) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Under existing conditions, the Project site is comprised of vacant undeveloped land with no structures. Therefore, development of the Project would not displace any housing or displace any people, and thus would not necessitate the construction of replacement housing elsewhere.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

The Project entails the proposed development of one warehouse building. For purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that Light Industrial (LI) businesses would employ one (1) worker for every 1,030 SF of building area $203,029 \text{ SF} \div 1,030 \text{ SF} = 197.11$). Based on this employment generation rate, the Project is expected to create approximately 197 new recurring jobs.

It is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in July 2018, the Riverside-San Bernardino-Ontario region's civilian labor force was 2,042,492 persons with 1,948,971 persons employed and 93,521 persons unemployed for an unemployment rate of 4.6 percent (USBLS, 2018). The anticipated jobs generated as part of the Project could be filled from the local area, as the surrounding area contains an ample supply of potential employees. Therefore, it is not anticipated that the labor demand caused by the proposed Project would result in the addition of residents within Riverside County or surrounding jurisdictions, or trigger the need for affordable housing. Therefore, the Project is not expected to be a catalyst for any population growth and no impact associated with population projections or affordable housing needs would occur.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project 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)?

As discussed above in Threshold 29(b), the Project entails the proposed development of one warehouse building. For purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that Light Industrial (LI) businesses would employ one (1) worker for every 1,030 SF of building area $203,029 \text{ SF} \div 1,030 \text{ SF} = 197.11$). Based on this employment generation rate, the Project is expected to create approximately 197 new recurring jobs.

The Project site would not directly generate a residential population. It is anticipated that the employment base for both the construction and operational phases of the proposed Project would come from the existing population in Riverside County. According to the Bureau of Labor Statistics, in July 2018, the Riverside-San Bernardino-Ontario region's civilian labor force was 2,042,492 persons with 1,948,971 persons employed and 93,521 persons unemployed for an unemployment rate of 4.6 percent (USBLS, 2018). It is anticipated that the Project's job openings could be filled from the local area. The surrounding area contains an ample supply of potential employees. Therefore, it is not anticipated that the labor

demand caused by the proposed Project would result in the addition of residents within Riverside County or surrounding jurisdictions. Therefore, the Project is not expected to be a catalyst for any population growth and no impact associated with population projections would occur.

The on-site employment generation would not induce substantial growth in the area because it is anticipated that the Project's future employees would already be living in the Riverside County area. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area. Indirect population growth has the potential to occur when infrastructure improvements are proposed. Increased road access and availability of utility connections are a byproduct of the proposed Project. However, the proposed improvements are specific to the Project and access would not extend beyond Perry Street to the east, with the exception of proposed utility connections. The Project would not construct any roadways beyond what was already planned by the County of Riverside. Surrounding properties that would have access to or benefit from such improvements are designated by the County of Riverside General Plan for Light Industrial (L-I) and Rural Community – Very Low Density Residential (RC-VLDR). The Light Industrial (L-I) land uses are not considered to be population increasing land uses, as they would have similar characteristics to the proposed Project (the employees for such developments would most likely come from within the County for the same reasons as those discussed for this Project). The RC-VLDR land uses are anticipated to be built out with low density housing, as planned by the County's General Plan. Project-related utility improvements would service the Project site and would not induce growth on other parcels. Accordingly, the proposed Project would have a less-than-significant impact related to directly or indirectly inducing substantial population growth in the area.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.16 Public Services

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
30. Fire Services Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
service ratios, response times or other performance objectives for <u>fire protection</u> services?				

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Safety Element (Riverside County, 2016c); Riverside County Fire Department, "Station Locator" (RCFD, n.d.); Riverside County Ordinance No. 787, Fire Code (Riverside County, 2017d); County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d); Riverside County General Plan Draft Environmental Impact Report (EIR) No. 521, Section 4.17, Public Facilities (Riverside County, 2015b) ; (Google Earth, 2018)

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 fire protection services?**

The Project site receives fire protection services from the Riverside County Fire Department (RCFD). Development of the Project site with a warehouse building has the potential to increase the frequency of fire protection calls to the site. RCFD Station 59 is the closest fire station to the Project site located approximately 1.7 miles to the southwest of the site at 21510 Pinewood Avenue, Perris, CA 92570. RCFD Station 90 is located at 333 Placentia Avenue, Perris, CA, 92571, approximately 2.8 miles southeast of the Project site (RCFD, n.d.) (Google Earth, 2018).

To ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspection and review structures for compliance with the California Code, including PRC Sections 4290-4299 and California Government Code (CGC) 51178 that address fire safety and Riverside County Ordinance No. 787 (Fire Code Standards) (Riverside County, 2017d, P. 4.17-23) (Riverside County, 2015b).

Although the Project's increased demand on fire services could be impactful to the RCFD's response times should there be a call to service to the Project site, the impact under CEQA is determined to be less than significant because the Project would be served from existing RCFD fire stations and would not cause the construction of a new fire station or physical alteration of an existing fire station. In addition, the Project Applicant is required to pave a 32-foot section of Perry Street from the Project site to Harvill Avenue, which would improve emergency vehicle access. This segment of Perry Street is an unimproved dirt road under existing conditions.

The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County Development Impact Fee (DIF)), which requires a fee payment by developers for the funding of public facilities, including fire protection facilities.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for public services, including the need for fire protection services that would be created by the Project.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigated Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impacts</i>
3 I. Sheriff Services Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 <u>sheriff</u> services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d); Riverside County General Plan Safety Element (Riverside County, 2016c); Riverside County General Plan Draft Environmental Impact Report (EIR) No. 521, Section 4.17, Public Facilities (Riverside County, 2015b)

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 sheriff services?

The Project site receives police protection services from the Riverside County Sherriff Department (RCSD). Development of the Project site with a warehouse facility has the potential to increase the frequency of sheriff calls to the site due to the addition of structures, traffic, and workers. The RCSD Perris Station, located at 137 North Perris Boulevard, Suite A, Perris, CA 92570 would provide sheriff services to the Project site and vicinity of the site.

As discussed in General Plan Amendment (GPA) No. 960, Draft EIR No 521, in terms of changes to existing levels of service, localized development increases would incrementally create demand for additional law enforcement personnel and services in specific areas; however, none of the increases would trigger the need for new or improved facilities in order to meet the demand. The additional personnel (officers, supervisors, and support staff), equipment and vehicles necessary could readily be accommodated by existing facilities. In addition, the Project would comply with the existing regulatory policies and General Plan policies that would further reduce any impacts to law enforcement services associated with the Project. (Riverside County, 2015b, pp. 4.17-34-35)

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for law enforcement, including the need for law enforcement services that would be created by the Project.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
32. Schools Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 <u>school</u> services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Appendix F-1, Population and Employment Forecasts (Riverside County, 2015a); County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d); Senate Bill 50

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 school services?**

Because the subject property would be developed with non-residential uses that would not directly generate any school-aged children requiring public education, development of the subject property with one warehouse building would not create a direct demand for public school services, nor would it indirectly draw a substantial number of students to the area for the reasons discussed above. In summary, jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960 demonstrates that future employees of the Project would primarily consist of existing County residents; as such, the Project would not affect the existing or projected housing supply, and thus it would not generate a school-aged population in the County. As such, the proposed Project would not directly cause or contribute to a need to construct new or physically altered public school facilities.

Although the Project would not directly create a demand for additional public school services, the Project Applicant would still be required to contribute fees to the Val Verde Unified School District (VVUSD) in compliance with California Senate Bill 50 (SB 50, Greene), California Government Code §§ 65995.5–65998, which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs. The payment of school mitigation impact fees authorized by SB 50 is deemed to provide “full and complete mitigation of impacts” on school facilities from the development of real property (California Government Code Section 65995).

Project implementation would not result in or require new or expanded public school facilities. In addition, no schools are located on the site or are planned to be located on the site, therefore, there is no potential

for the Project to have a direct physical impact on school services. For these reasons, impacts to school services would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to building permit inspection, the Project Applicant shall comply with the provisions of California Government Code §§ 65995.5-65998 by payment of required school impact fees to the Val Verde Unified School District, in accordance with the District's Level 1 Fee Schedule.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
33. Libraries Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 <u>library</u> services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Appendix F-1, Population and Employment Forecasts (Riverside County, 2015a); County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d)

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 library services?**

Development of the Project site with a light industrial warehouse building and associated site improvements would not directly create a demand for public library facilities and would not directly result

in the need to modify existing or construct new library buildings. Demand placed on libraries is based on the generation of a resident population associated with a person's place of residence, and not typically their place of employment. As discussed above, based on the Countywide jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960, the Project would not result in an increase in the County's population and would therefore not directly result in an increased demand for library facilities. Accordingly, Project-related impacts to library facilities would be less than significant. There are no other public services for which Project-related service demands would have the potential to physically impact public facilities. The Project Applicant would be required to comply with Riverside County Ordinance No. 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including public libraries and other public facilities.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
34. Health Services Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 <u>health</u> services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Riverside County General Plan Appendix F-1, Population and Employment Forecasts (Riverside County, 2015a); County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d)

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 health services?**

As indicated above, based on the jobs and housing data presented in Appendix F-1 to Riverside County General Plan Amendment No. 960, implementation of the proposed Project is not anticipated to result in

an increase in the County's population because Riverside County as a whole has an abundance of housing relative to jobs (Riverside County, 2015a, Appendix F-1, pp. 8-9). As such, it is not anticipated that the proposed Project would result in a substantial increase in demand for public and/or private health care facilities. Moreover, the provision of private health care, which serves a majority of County residents, is largely based on economic factors and demand and is beyond the scope of analysis required for this MND. Nonetheless, the Project could result in an incremental increase in demand for health services associated with the Project's addition of employees in the area. Existing public health facilities would accommodate nominal increases in demand, such as demand from the Project. Project implementation would not result in or require the physical construction, expansion, or alteration of public health facilities; therefore, impacts would be less than significant. The Project Applicant would be required to comply with Riverside County Ordinance 659 (the County DIF), which requires a fee payment by developers for the funding of public facilities, including public health facilities.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Applicable Regulatory Requirements. The following are applicable regulations and design requirements to which the Project is required to comply. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are listed below for information purposes.

- Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for public services, including health care services.

5.1.17 Recreation

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
35. Parks and Recreation				
a. 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"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
b. Increase the use of existing neighborhood or 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"/>
c. Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County GIS Database (RCIT, 2019); County of Riverside Ordinance No. 659, Establishing a Development Impact Fee Program (Riverside County, 2015d); County of Riverside Ordinance No. 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications) (Riverside County, 2014)

- a) **Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**
- b) **Would the Project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The Project would provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue. The impacts from the construction of the trail are evaluated throughout this MND as an inherent part of the Project. The Project does not propose to construct any other recreational facilities; thus, no impacts from proposed recreational facilities would result from the Project. Additionally, the Project proposes a light industrial land use that would not directly result in an increase in the County's population. Although the jobs generated by the Project have the potential to result in some new residents within the County, it is expected that a majority of the jobs created would be filled by existing County residents. As such, the Project would not result in a substantial increase in demand for the construction or expansion of recreational facilities, and impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

c) Would the Project be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

According to Riverside County GIS, the Project site is not located within a Community Service Area (CSA) (RCIT, 2019). Also, the Project site is not located within the boundaries of any adopted Community Parks and Recreation Plan and therefore the Project is not subject to Quimby Fees. The Project proposes to develop the site with warehouse uses, is not located within the purview of any Community Parks and Recreation Plans, and would not be subject to payment of Quimby fees. Thus, no impact would occur.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
36. Recreation Trails				
a. Include the construction or expansion of a trail system?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan Figure C-6, Riverside County Trails and Bikeway System (Riverside County, 2015a)

a) Would the Project include the construction or expansion of a trail system?

The Project would provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue. Impacts associated with the construction of this trail have been evaluated throughout this MND. Additionally, the Project would not generate a measurable increase in the County's population as it is expected that the majority of jobs generated by the Project would be filled by existing County residents. Thus, the Project would not result in the use of existing recreational trails that could have a significant environmental effect.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.18 Transportation

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
37. Transportation				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Cause an effect upon circulation during the project's construction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan (Riverside County, 2015a); Riverside County General Plan, Circulation Element (Riverside County, 2016b); Traffic Impact Analysis (Urban Crossroads, Inc., 2019e)

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

The Project is designed to accommodate pedestrians along its street frontages via sidewalks along Seaton Avenue and Perry Street, in addition to a multi-use trail segment along Seaton Avenue. With the provision of the trail segment, the Project is consistent with the Countywide trails program. The County of Riverside is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes in close proximity to

the Project site. Existing transit routes in the area are RTA Routes 41, 27, and 208/212, which run along the I-215 Freeway and Cajalco Expressway. (Urban Crossroads, Inc., 2019e, p. 28) Because there are no public transit services within the area immediately surrounding the Project site, the Project has no potential to conflict with a transit service program.

The remaining analysis of Threshold 37(a) focuses on potential impacts to the local circulation network (i.e., roadways and intersections). A Traffic Impact Analysis (TIA) was prepared for the Project by Urban Crossroads to evaluate the potential impacts related to traffic and circulation deficiencies that may result from the development of the proposed Project. The TIA was prepared in accordance with the County of Riverside's *Traffic Impact Analysis Preparation Guide* (August 2008) and through consultation with County of Riverside staff during the TIA scoping process. (Urban Crossroads, Inc., 2019e, p. 1) The TIA is included as *Technical Appendix K1* to this MND and its findings are incorporated into the analysis presented herein.

Level of Service (LOS)

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. (Urban Crossroads, Inc., 2019e, p. 17) The definition of an intersection deficiency was obtained from the County of Riverside General Plan, Policy C 2.1. The applicable minimum LOS utilized for the purposes of the TIA and the analysis herein is LOS D per the County-wide target LOS for projects located within a Community Development Area, which the proposed Project is located within the Mead Valley Area Plan (MVAP) (Urban Crossroads, Inc., 2019e, pp. 20, 21)

The following deficiency criteria was utilized in the TIA for the County of Riverside and Caltrans to determine whether the addition of Project traffic at a study area intersection would result in a deficiency (Urban Crossroads, Inc., 2019e, p. 21).

- A deficiency occurs at study area intersections if the pre-Project condition is at or better than LOS D (i.e., acceptable LOS), and the addition of Project trips causes the peak hour LOS at the study area intersection to operate at acceptable LOS (i.e., LOS E or F). Per the County of Riverside traffic study guidelines, for intersections currently operating at unacceptable LOS (LOS E or F), a deficiency would occur if the Project contributes 50 or more peak hour trips to pre-Project traffic conditions. (Urban Crossroads, Inc., 2019e, p. 21)

Project Study Area

The four study area intersections that were identified by the County of Riverside staff to be analyzed in the Project's TIA are shown in Figure 5-6, *Existing Number of Through Lanes and Intersection Controls*, and identified in Table 5-17, *Intersection Analysis Locations*. The four study area intersections represent existing and future intersections where the Project is calculated to contribute 50 or more peak hour trips

per the County of Riverside's traffic guidelines, or that have been included for study at the direction of County of Riverside staff. The "50 peak hour trip" criteria generally represents a minimum number of trips at which a typical intersection would have the potential to be substantively impacted by a given development proposal. (Urban Crossroads, Inc., 2019e, p. 4)

Pursuant to the Traffic Study Guidelines, Caltrans typically requires analysis of freeway mainline segments when the Project contributes 50 or more peak hour trips. Based on the Project trip distributions, assessment of State facilities is not required because the Project's traffic contribution to the State facilities is fewer than 50 peak hour trips and is considered less than significant. (Urban Crossroads, Inc., 2019e, p. 4)

Table 5-17 Intersection Analysis Locations

ID	Intersection Location	Jurisdiction	CMP?
1	Seaton Avenue & Markham Street	County of Riverside	No
2	Seaton Avenue & Perry Street	County of Riverside	No
3	Driveway 1 & Perry Street – Future Intersection	County of Riverside	No
4	Driveway 2 & Perry Street – Future Intersection	County of Riverside	No

(Urban Crossroads, Inc., 2019e, Table 1-1)

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected by Urban Crossroads in October 2018, while schools were in session. The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

The weekday AM and weekday PM peak hour count data is representative of typical weekday peak hour traffic conditions in the study area. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. (Urban Crossroads, Inc., 2019e, p. 28)

Analysis Scenarios

Potential impacts to traffic and circulation were assessed for each of the following conditions:

- **Existing (2018) Conditions (Existing 2018):** Information for Existing (2018) conditions is disclosed to represent the baseline traffic conditions as they existed at the time the TIA was prepared. Traffic counts were conducted in October 2018 based on vehicle classification and were converted to (passenger car equivalents (PCE) due to the presence of heavy trucks within the study area. (Urban Crossroads, Inc., 2019e, p. 3)

- **Existing Plus Project Conditions (E+P):** The Existing Plus Project (E+P) analysis determines any significant traffic impacts and circulation system deficiencies that would occur on the existing roadway system in the scenario of the Project being placed upon Existing conditions. (Urban Crossroads, Inc., 2019e, p. 3)
- **Existing Plus Ambient Growth Plus Project Conditions (EAP 2020):** The EAP (2020) conditions analysis determines the potential traffic impacts based on a comparison of the EAP traffic conditions to Existing (2018) conditions. To account for background traffic growth, an ambient growth factor from Existing (2018) conditions of 4.04% (2 percent per year, compounded over 2 years) is included for EAP (2020) traffic conditions. Consistent with Riverside County traffic study guidelines, the EAP analysis is intended to identify “Opening Year” deficiencies associated with the development of the proposed Project based on the expected background growth within the study area. (Urban Crossroads, Inc., 2019e, p. 3)
- **Existing Plus Ambient Growth Plus Project Plus Cumulative (2020) Conditions (EAPC (2020):** The EAPC (2020) traffic conditions analysis determines the potential near-term cumulative circulation system deficiencies. To account for background traffic growth, an ambient growth factor of 4.04% from Existing conditions are included for EAPC traffic conditions (2 percent per year, compounded over 2 years). (Urban Crossroads, Inc., 2019e, p. 3)

Conservatively, the TIA estimates the area traffic growth then adds traffic generated by other known or probable related projects. These related projects are at least in part already accounted for in the assumed 4.04% total ambient growth in traffic noted above; and some of the related projects would likely not be implemented and operational within the 2020 Opening Year time frame assumed for the Project. The resulting traffic growth rate utilized in the TIA (4.04 percent ambient growth + traffic generated by related projects) would therefore tend to overstate rather than understate background cumulative traffic impacts under 2020 conditions. (Urban Crossroads, Inc., 2019e, p. 4)

Intersection Analysis for Existing (2018) Conditions

Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. The following study area intersection currently warrants a traffic signal for Existing traffic conditions:

- Seaton Avenue & Markham Street (#1)

However, as indicated on Table 5-18, *Intersection Analysis for Existing 2018 Conditions*, this intersection currently operates at an acceptable LOS as an all-way stop-controlled intersection. Existing conditions traffic signal warrant analysis worksheets are provided in Appendix 3.3 of *Technical Appendix K1* to this MND (Urban Crossroads, Inc., 2019e, p. 35).

Table 5-18 Intersection Analysis for Existing 2018 Conditions

#	Intersection	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (secs.)		Level of Service	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
1	Seaton Av. & Markham St.	AWS	1	1	0	0	1	0	0	1	0	0	1	1	24.0	18.3	C	C
2	Seaton Av. & Perry St.	CSS	0	1	0	0	1	0	0	1	0	0	1	0	9.2	9.8	A	A
3	Dwy. 1 & Perry St.		Future Intersection															
4	Dwy. 2 & Perry St.		Future Intersection															

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right

² Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross-street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

³ CSS = Cross-street Stop; AWS = All-Way Stop

(Urban Crossroads, Inc., 2019e, Table 3-1)

Projected Future Traffic

Vehicle and truck traffic access to the interior of the Project site is proposed to be provided via the following driveways:

- Perry Street via Driveway 1 - full access for passenger cars only
- Perry Street via Driveway 2 – full access for both trucks and passenger cars

Trip generation represents the amount of traffic that is attracted and produced by a development and is based on the specific land uses planned for a given project. The Project's trip generation is based on the Institute of Engineers (ITE) Trip Generation Manual, 10th Edition, 2017, for High-Cube Transload and Short-Term Warehouse (ITE Land Use Code 154) and General Light Industrial (ITE Land Use Code 110). (Urban Crossroads, Inc., 2019e, p. 37) Refer to the Project's Traffic Impact Analysis attached to this MND as *Technical Appendix K1*.

As shown on Table 5-19, *Project Trip Generation Summary (PCE)*, the Project is calculated to generate a net total of 600 passenger-car-equivalents (PCE) trip-ends per day on typical weekdays with approximately 55 net AM PCE peak hour trips and 55 net PM PCE trips (Urban Crossroads, Inc., 2019e, pp. 37, 40, Table 4-1, Exhibit 4-1 and 4-2) Note that the trip generation reported and analyzed herein and in the Traffic Impact Analysis is based on a slightly larger building (approximately 555 s.f. larger) than currently proposed, so the trip generation is slightly overstated herein compared to the number of trips that would be generated by the proposed Project as currently designed.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered to identify the route where the Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site for both passenger cars and truck traffic, and are consistent with other similar projects that have been reviewed and approved by County of Riverside staff. The Project trip distribution patterns for both

passenger cars and trucks were developed based on an understanding of existing travel patterns in the area, the geographical location of the site, and the site's proximity to the regional arterial and state highway system. (Urban Crossroads, Inc., 2019e, p. 40)

The Project's truck distribution patterns were reviewed by the County of Riverside as part of the TIA's scoping process and are depicted on Figure 5-7, *Project (Truck) Trip Distribution* and Project's passenger car trip distribution is depicted on Table 5-19, *Project Trip Generation Summary (PCE)*. As shown on Figure 5-8, Driveway 1 will serve as the entrance/exit for passenger cars only and Driveway 2 will serve as the truck access driveway for the proposed Project. The Project's truck traffic will use Perry Street east of the Project site to access Harvill Avenue. The Project will post signs at Project Driveway 2 to direct truck traffic per the truck route plan. (Urban Crossroads, Inc., 2019e, p. 40) (See Figure 5-8, *Truck Route Sign*). The assignment of traffic from the Project area to the adjoining roadway system is based upon the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project (Urban Crossroads, Inc., 2019e, p. 43).

Background Traffic

Future year traffic forecasts are based upon a background (ambient) growth factor of 2% per year for 2020 traffic conditions. The ambient growth factor is intended to approximate traffic growth. The total ambient growth is 4.04% for 2020 traffic conditions (compounded growth of 2 percent per year over 2 years). This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth was added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. (Urban Crossroads, Inc., 2019e, p. 43)

Cumulative Development Traffic

The CEQA Guidelines require that other reasonably foreseeable development projects which are either approved or being processed concurrently in the study area also be included as part of a cumulative analysis scenario. A cumulative project list was developed for the purposes of the TIA through consultation with planning and engineering staff from the County of Riverside and outreach to the City of Perris and the City of Moreno Valley. The cumulative project list includes known and foreseeable projects that are anticipated to contribute measurable traffic (i.e., 50 or more peak hour trips) to the study area intersections. Where applicable, the trips generated by the cumulative projects were manually added to the study area network to generate EAPC forecasts. Refer to *Technical Appendix K1*, Table 4-3, for a list of the cumulative projects. (Urban Crossroads, Inc., 2019e, pp. 45-49)

Although it is unlikely that all of the cumulative projects identified on Table 4-3 of *Technical Appendix K1* would be fully built and occupied by Year 2020, they were included in an effort to conduct a conservative analysis and overstate, as opposed to understate, potential traffic impacts. Any other cumulative projects located beyond the cumulative study area that are not expected to contribute measurable traffic to study area intersections are not included in the cumulative development list because the traffic would dissipate

due to the distance from the Project site and study area intersections. Any additional traffic generated by other projects not on the cumulative development list is accounted for through background ambient growth factors that were applied to the peak hour volumes at study area intersections. (Urban Crossroads, Inc., 2019e, p. 45)

Table 5-19 Project Trip Generation Summary (PCE)

PCE Trip Generation Rates									
Land Use¹	ITE LU Code	Units²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
General Light Industrial ³	110	TSF	0.616	0.084	0.700	0.082	0.548	0.630	4.960
Passenger Cars (78.6%)			0.484	0.066	0.550	0.064	0.431	0.495	3.899
2-Axle Trucks (8.0%) (PCE = 1.5)			0.074	0.010	0.084	0.010	0.066	0.076	0.595
3-Axle Trucks (3.9%) (PCE = 2.0)			0.048	0.007	0.055	0.006	0.043	0.049	0.387
4-Axle+ Trucks (9.5%) (PCE = 3.0)			0.176	0.024	0.200	0.023	0.156	0.180	1.414
High-Cube Transload Short-Term Warehouse ⁴	154	TSF	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars (AM-69.2%; PM-78.3%; Daily-67.8%)			0.043	0.013	0.055	0.022	0.056	0.078	0.949
2-Axle Trucks (AM-10.69%; PM-7.53%; Daily-11.17%) (PCE = 1.5)			0.005	0.001	0.006	0.002	0.004	0.005	0.113
3-Axle Trucks (AM-3.39%; PM-2.39%; Daily-3.54%) (PCE = 2.0)			0.008	0.002	0.010	0.003	0.006	0.009	0.187
4-Axle+ Trucks (AM-16.76%; PM-11.80%; Daily-17.52%) (PCE = 3.0)			0.036	0.011	0.046	0.011	0.029	0.041	0.847
Project Trip Generation (PCE)									
Project	Quantity	Units²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
General Light Industrial (20%)	40.717	TSF							
Passenger Cars			20	3	23	3	18	21	160
2-Axle Trucks			3	0	3	0	3	3	24
3-Axle Trucks			2	0	2	0	2	2	16
4-Axle+ Trucks			7	1	8	1	6	7	58
- Truck Trips (PCE)			12	1	13	1	11	12	98
High-Cube Transload Short-Term Warehouse (80%)	162.867	TSF							
Passenger Cars			7	2	9	4	9	13	156
2-Axle Trucks			1	0	1	0	1	1	18
3-Axle Trucks			1	0	1	0	1	1	30
4-Axle+ Trucks			6	2	8	2	5	7	138
- Truck Trips (PCE)			8	2	10	2	7	9	186
TOTAL TRIPS (PCE)⁵			47	8	55	10	45	55	600

¹ Trip Generation Source: Institute of Transportation Engineers (ITE) Trip Generation Manual (2017).

² TSF = Thousand Square Feet

³ Vehicle Mix Source: City of Fontana Truck Generation Study, August 2003.

⁴ Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014).

Normalized %-Without Cold Storage:

16.7% 2-Axle trucks, 20.7% 3-axle trucks. 62.5 % 4-axle trucks.

⁵ TOTAL TRIPS (PCE) = Passenger Cars + Truck Trips (PCE).

(Urban Crossroads, Inc., 2019e, Table 4-1)

Near-Term Traffic Conditions

The “buildup” approach combines existing traffic counts with a background ambient growth factor to forecast EAP (2020) and EAPC (2020) traffic conditions. An ambient growth factor of 2.0% per year account for background (area-wide) traffic increases that occur over time up to the year 2020 from the year 2018 (2.0 percent per year growth rate, compounded over a 2-year period). Traffic volumes generated by the Project are then added to assess the near-term traffic conditions. The 2020 roadway networks are similar to the Existing conditions roadway network, with the exception of future driveways proposed to be developed by the Project. (Urban Crossroads, Inc., 2019e, p. 50)

The near-term traffic analysis includes the following traffic conditions, with the various traffic components:

- Existing Plus Ambient Growth Plus Project (EAP) (2020)
 - Existing 2018 counts
 - Ambient growth traffic (4.04%)
 - Project traffic
- Existing Plus Ambient Growth Plus Project Plus Cumulative (EAPC) (2020)
 - Existing 2018 counts
 - Ambient growth traffic (4.04%)
 - Cumulative Development traffic
 - Project traffic (Urban Crossroads, Inc., 2019e, p. 50)

Impact Analysis for E+P Traffic Conditions

The lane configurations and traffic controls assumed to be in place for E+P conditions are consistent with those shown previously on Figure 5-6, *Existing Number of Through Lanes and Intersection Controls*, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access (including the paving of Perry Street east of the Project site) are also assumed to be in place for E+P conditions only (e.g., intersection and roadway improvements at the Project’s frontage and driveways). (Urban Crossroads, Inc., 2019e, p. 51)

The Existing Plus Project (E+P) scenario includes Existing traffic volumes plus Project traffic. As indicated in Table 5-20, *Intersection Analysis for E+P Conditions*, the study area intersections are anticipated to continue to operate at acceptable LOS under E+P traffic conditions, consistent with Existing traffic conditions. (Urban Crossroads, Inc., 2019e, p. 51)

Table 5-20 Intersection Analysis for E+P Conditions

#	Intersection	Traffic Control ²	Existing (2018)				E+P			
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)		Level of Service	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Seaton Av. & Markham St.	AWS	24.0	18.3	C	C	24.3	18.4	C	C
2	Seaton Av. & Perry St.	CSS	9.2	9.8	A	A	9.3	9.8	A	A
3	Dwy. 1 & Perry St.	<u>CSS</u>	Future Intersection				8.6	8.5	A	A
4	Dwy. 2 & Perry St.	<u>CSS</u>	Future Intersection				8.3	8.5	A	A

¹ Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross-street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

² CSS = Cross-street Stop; AWS= All-Way Stop; CCC = Improvement
(Urban Crossroads, Inc., 2019e, Table 5-1)

There are no additional study area intersections anticipated to meet planning level (ADT) or peak hour volume-based traffic signal warrants under E+P traffic conditions, in addition to the Seaton Avenue/Markham Street intersection previously identified under Existing (2018) traffic conditions. The study area intersections are anticipated to continue to operate at an acceptable LOS during the peak hours with the addition of Project traffic; therefore, no improvements are recommended for E+P traffic conditions. Impacts under E+P traffic conditions would be less than significant; therefore, no mitigation is required. (Urban Crossroads, Inc., 2019e, p. 51)

Impact Analysis for EAP (2020) Traffic Conditions

The lane configurations and traffic controls assumed to be in place for EAP (2020) conditions are consistent with those shown previously on Figure 5-6, *Existing Number of Through Lanes and Intersection Controls*, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access (including the paving of Perry Street east of the Project site) are also assumed to be in place for EAP conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways). (Urban Crossroads, Inc., 2019e, p. 55)

The EAP (2020) scenario includes Existing (2018) traffic volumes plus an ambient growth factor of 4.04% and the addition of Project traffic. As shown in Table 5-21, *Intersection Analysis for EAP (2020) Conditions*, and consistent with Existing conditions, the study area intersections are anticipated to continue to operate at acceptable LOS during the peak hours with the addition of Project traffic for EAP (2020) traffic conditions (Urban Crossroads, Inc., 2019e, p. 55).

Table 5-21 Intersection Analysis for EAP (2020) Conditions

#	Intersection	Traffic Control ²	Existing (2018)				EAP (2020)			
			Delay ¹ (secs.)		Level of Service		Delay ¹ (secs.)		Level of Service	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Seaton Av. & Markham St.	AWS	24.0	18.3	C	C	27.7	20.1	D	C
2	Seaton Av. & Perry St.	CSS	9.2	9.8	A	A	9.3	9.8	A	A
3	Dwy. 1 & Perry St.	<u>CSS</u>	Future Intersection				8.6	8.5	A	A
4	Dwy. 2 & Perry St.	<u>CSS</u>	Future Intersection				8.3	8.5	A	A

¹ Per the Highway Capacity Manual (6th Edition), overa;; average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross-street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

² CSS = Cross-street Stop; AWS= All-Way Stop; CCC = Improvement
(Urban Crossroads, Inc., 2019e, Table 6-1)

Traffic signal warrants were performed for EAP (2020) traffic conditions based on peak hour and daily volumes. With the addition of Project traffic, there are no additional study area intersections anticipated to meet planning level (ADT and peak hour) volume-based traffic signal warrants under EAP (2020) traffic conditions, in addition to the Seaton Avenue and Markham Street intersection previously identified under Existing (2018) traffic conditions. The study area intersections are anticipated to continue to operate at an acceptable LOS during the peak hours with the addition of Project traffic; therefore, no improvements are recommended for EAP (2020) traffic conditions. (Urban Crossroads, Inc., 2019e, p. 59)

Impact Analysis for EAPC (2020) Traffic Conditions

The lane configurations and traffic controls assumed to be in place for EAPC (2020) conditions are consistent with those shown previously on Figure 5-6, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access (including the paving of Perry Street east of the Project site) are also assumed to be in place for EAPC conditions only (e.g., intersection and roadway improvements along the Project's frontage and driveways) (Urban Crossroads, Inc., 2019e, p. 61).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for EAPC (2020) conditions only (e.g., intersection and roadway improvements along the cumulative development's frontages). (Urban Crossroads, Inc., 2019e, p. 61).

To account for background traffic, other known cumulative development projects in the study area are included in addition to 4.04% of ambient growth for EAPC (2020) traffic conditions in conjunction with traffic associated with the proposed Project.

Level of service calculations were conducted for the study intersections to evaluate their operations under EAPC (2020) conditions with existing roadway and intersection geometrics. The following study area

intersection is anticipated to operate at an unacceptable LOS under EAPC (2020) traffic conditions; therefore, impacts would be potentially significant and mitigation for the Project's cumulatively considerable contribution to the impact is required:

- Seaton Avenue & Markham Street (Intersection #1) – LOS E AM peak hour only (Urban Crossroads, Inc., 2019e, p. 61)

Table 5-22 Intersection Analysis for EAPC (2020) Conditions

#	Intersection	Traffic Control ²	Delay ¹ (secs.)		Level of Service	
			AM	PM	AM	PM
1	Seaton Av. & Markham St.	AWS	37.0	25.3	E	D
2	Seaton Av. & Perry St.	CSS	9.3	9.5	A	A
3	Dwy. 1 & Perry St.	<u>CSS</u>	8.6	8.5	A	A
4	Dwy. 2 & Perry St.	<u>CSS</u>	8.3	8.5	A	A

BOLD = Level of Service (LOS) does not meet or exceed the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹ Per the Highway Capacity Manual (6th Edition), overa;; average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross-street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. HCM delay reported in seconds.

² CSS = Cross-street Stop; AWS= All-Way Stop; CCC = Improvement
(Urban Crossroads, Inc., 2019e, Table 7-1)

Traffic signal warrants were performed for EAPC (2020) traffic conditions based on peak hour and daily volumes. For EAPC (2020) traffic conditions, no additional study area intersections are anticipated to meet planning level (ADT) and peak hour volume-based traffic signal warrants under EAPC (2020) traffic conditions, in addition to the Seaton Avenue and Markham Street intersection previously identified under Existing (2018) traffic conditions. (Urban Crossroads, Inc., 2019e, p. 65)

To mitigate the Project's cumulatively-considerable significant impact to the Seaton Avenue & Markham Street intersection (Intersection #1) under EAPC traffic conditions, a fair share payment toward implementing the necessary improvements under the County's DIF program is identified to improve the peak hour delays and associated LOS grade to an acceptable LOS (LOS D or better).

Findings of Fact: Impacts would be cumulatively considerable and significant under EAPC (2020) conditions and would be less than significant under E+P traffic conditions and EAP (2020) traffic conditions.

Mitigation: Mitigation is required to address the Project's cumulatively considerable impact to the Seaton Avenue and Markham Street intersection under EAPC (2020) traffic conditions.

Transportation MM-1: Prior to issuance of a building permit, the Project Proponent shall make a fair share monetary contribution to the County of Riverside for improvements to the Seaton Avenue and Markham

Street Intersection through the payment of the Riverside County Development Impact Fee (DIF) program. The County will use DIF funds to make the following improvements:

- Install a traffic signal.
- Add a southbound and eastbound left turn lane.
- Restripe the westbound approach to provide a left and shared through-right turn lane. (Urban Crossroads, Inc., 2019e, p. 65)

Transportation MM-2: Prior to the issuance of a building permit, the Project shall comply with the Transportation Uniform Mitigation Fee (TUMF) program as administered by the County of Riverside, which requires the Project Applicant to pay a fee that is used to fund regional transportation improvements.

As shown on Table 5-23, *Intersection Analysis for EAPC (2020) Conditions with Improvements*, with the implementation of the improvements identified in Transportation MM-1, the peak hour delays and associated LOS would improve to an acceptable LOS (LOS A and B). It should be noted, however, that traffic congestion as measured by LOS is not a physical environmental impact pursuant to CEQA. The impact conclusion is based on compliance with Riverside County General Plan Circulation Element criterion for acceptable levels of service. With the implementation of mitigation, impacts would be reduced to less than significant under EAPC (2020) traffic conditions. (Urban Crossroads, Inc., 2019e, p. 63)

Table 5-23 Intersection Analysis for EAPC (2020) Conditions with Improvements

#	Intersection	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (secs.)		Level of Service	
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
			L	T	R	L	T	R	L	T	R	L	T	R				
1	Seaton Av. & Markham St.																	
	Without Improvements:	AWS	1	1	0	0	1	0	0	1	0	0	1	1	37.0	25.3	E	D
	With Improvements:	TS	1	1	0	1	1	0	1	1	0	1	1	0	10.1	9.6	B	A

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; 1 = Improvement

² Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross-street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ AWS = All-Way Stop; TS = Traffic Signal; TS = Improvement

(Urban Crossroads, Inc., 2019e, Table 7-2)

Monitoring: Monitoring is required pursuant to the MMRP.



1	Seaton Av. & Markham St.	2	Seaton Av. & Perry St.	3	Dwy. 1 & Perry St.	4	Dwy. 2 & Perry St.
				Future Intersection		Future Intersection	

LEGEND:

- ALL WAY STOP
- STOP SIGN
- 4** NUMBER OF LANES
- D** DIVIDED
- U** UNDIVIDED
- SPEED LIMIT (MPH)

Source(s): Urban Crossroads (08-15-2019)



NOT TO SCALE



Figure 5-6
**EXISTING NUMBER OF THROUGH LANES
AND INTERSECTION CONTROLS**



LEGEND:

10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (08-15-2019)

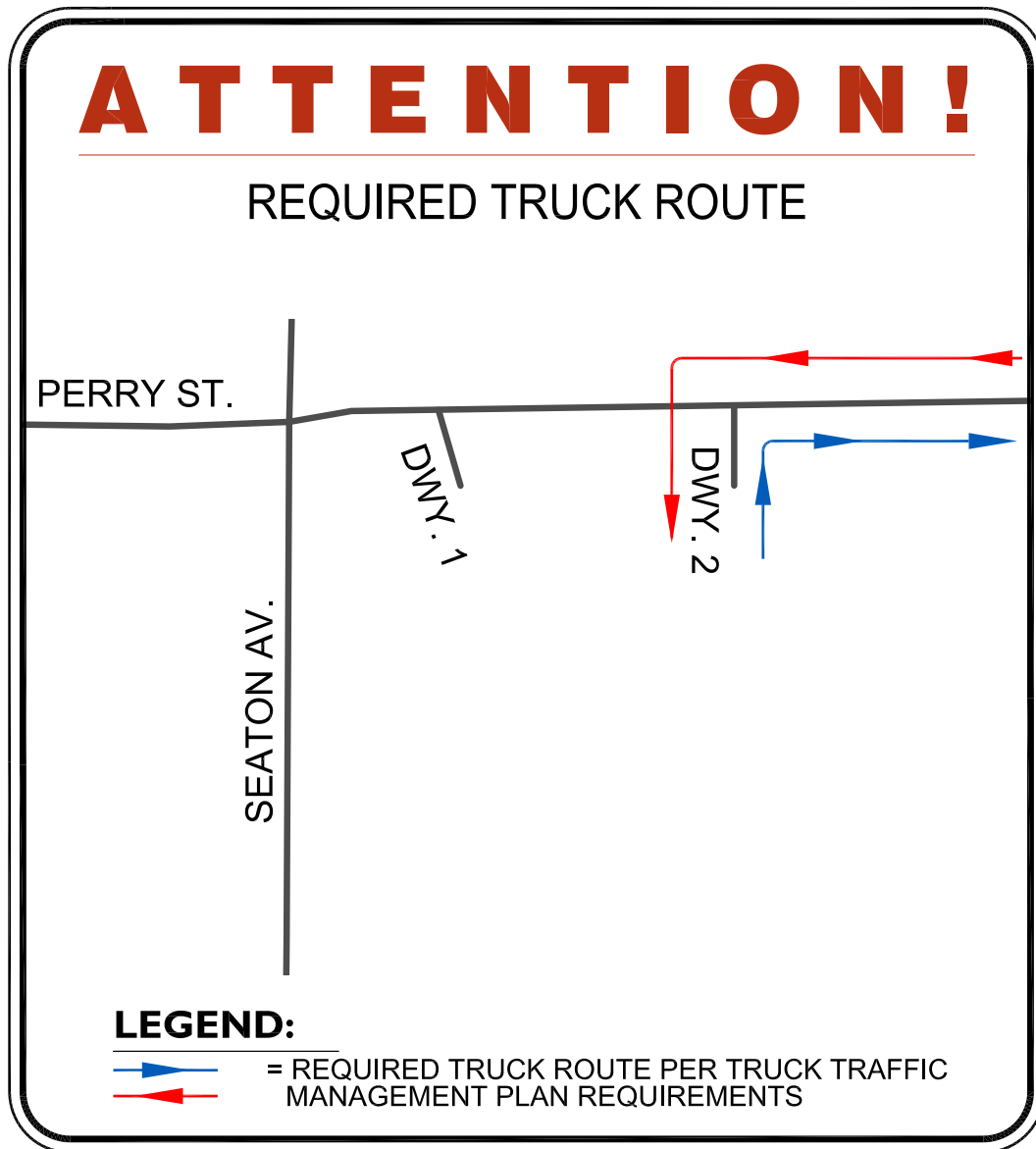


NOT TO SCALE



Figure 5-7

PROJECT (TRUCK) TRIP DISTRIBUTION



Source(s): Urban Crossroads (08-15-2019)

Figure 5-8



NOT TO SCALE



TRUCK ROUTE SIGN



LEGEND:

10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (08-15-2019)



NOT TO SCALE



Figure 5-9

PROJECT (PASSENGER CAR) TRIP DISTRIBUTION

- b) Would the Project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Refer to the analysis above under Thresholds 37(a), which concludes that all potential impacts to transportation facilities using a LOS-based analysis methodology would be mitigated to less than significant levels. As discussed above under Threshold 37(a), pursuant to the Traffic Study Guidelines, Caltrans requires analysis of freeway mainline segments when the Project contributes 50 or more peak hour trips. Based on the Project trip distributions, assessment of State highway system facilities is not required because the Project's traffic contribution to the State facilities is fewer than 50 peak hour trips and is considered less than significant (see Table 5-17, *Intersection Analysis Locations*). (Urban Crossroads, Inc., 2019e, p. 4)

Findings of Fact: There will be no impact.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

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

The Project site is located in a portion of Riverside County around the I-215 corridor that is developing as an employment center, containing business park, distribution warehousing, e-commerce, and light industrial land uses. As described in Section 2.0, located west of the Project site and west of Seaton Avenue is land designated by the General Plan and MVAP as Rural Community - Very Low Density Residential (RC-VLDR). RC-VLDR allows for single-family detached residences on parcels of 1-2 acres, and limited agriculture such as intensive equestrian and animal keeping uses. According to Ordinance No. 625, these uses do not meet the definition of agricultural activity.

As described in Section 3.0, the Project Applicant would be required construct AC pavement, driveway, sidewalk, curb and gutter along its frontages with Perry Street and Seaton Avenue. The Project Applicant also would provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue. The trail will be required to comply with Riverside County specifications to ensure public safety. The County's General Plan Circulation Element includes several policies that the County will comply with when the trail is installed. Specifically, Policy C16.7p of the General Plan requires the following, which will be implemented by the County of Riverside at the time the trail is installed: "All trails along roadways shall be appropriately signed to identify safety hazards, and shall incorporate equestrian crossing signals, mileage markers, and other safety features as appropriate (Riverside County, 2016b, p. C-46)."

The eastern portion of the Project site and interior to the truck trailer parking area and dock doors will be devoid of plant materials to avoid inference with truck movements. Furthermore, all Project driveways are designed to be stop-sign controlled and sight distances at each Project driveway will be reviewed by

the County of Riverside at the building permit stage of Project implementation at the time the roadway improvement plans are submitted in order to ensure that sight distance meets minimum County safety standards.

As discussed in Section 3.0, all trucks are expected to enter and exit the site at proposed Driveway 2 and use Perry Street east of the Project site to access Harvill Avenue. Perry Street east of the Project site would be paved to a 32-foot wide section by the Project Applicant to accommodate passenger car and truck access to Harvill Avenue. A sign is proposed to be installed at the Driveway 2 exit indicating that trucks are to turn right onto eastbound Perry Street, and are prohibited from making left turns out of the driveway. This proposed circulation pattern for Project truck traffic would limit potential conflicts associated with trucks using Seaton Avenue where residential homes and other sensitive receptors are located.

The types of traffic generated by the Project (i.e., passenger cars and trucks) would be compatible with the type of existing traffic on Project Study Area roadways. In addition, proposed roadway improvements along the Project site frontage would occur within the existing and planned public right-of-ways and be installed following County design standards. The County of Riverside Transportation Department reviewed the Project's Plot Plan application materials and determined that no hazardous transportation design features would be introduced by the Project. All improvements planned as part of the Project would be in conformance with applicable Riverside County roadway standards, and would not result in any hazards due to a design feature and would not result in inadequate emergency access. Therefore, impacts would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

d) Would the Project cause an effect upon, or a need for new or altered maintenance of roads?

As described in MND Section 2.0, the proposed Project would improve the public streets of Seaton Avenue and Perry Street along the frontage of the Project site. The Project also is required to pave a 32' width of Perry Street from the Project site's eastern boundary to Harvill Avenue. These improved roadways would require routine, intermittent maintenance; however, maintenance of public streets along the Project's frontage to Seaton Avenue and Perry Street would not result in any significant impacts to the environment. The Project would contribute traffic to off-site public roadways; however, public roads require periodic maintenance as part of their inherent operational activities, and such maintenance would not result in substantial impacts to the environment. Public roadway maintenance would be funded through the Project Proponent's payment of Development Impact Fees (DIF) and the Project site owner(s) future payment of property taxes. Maintenance of roads would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this MND. Therefore, the Project's potential to cause an effect upon, or a need for new or altered maintenance of roads, would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

e) Would the Project cause an effect upon circulation during the project's construction?

During the construction phase of the Project, traffic to and from the Project site would be generated by activities such as construction employee trips, delivery of construction materials, and use of heavy equipment. Vehicular traffic associated with construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities, especially because construction activities typically begin and end outside of the peak hour; therefore, a majority of the construction employees would not be driving to or from the Project site during hours of peak congestion. Traffic volumes from construction workers is not expected to result in a substantial adverse effect to the local roadway system because most trips would occur during non-peak hours. Deliveries of construction materials to the Project site would also have a nominal effect to the local roadway network because most trips would occur during non-peak hours. To ensure that construction traffic volumes do not exceed the volumes calculated for Project operation, Mitigation Measure Transportation MM-3 is provided below.

Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. Because most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase on need. Seaton Avenue and Perry Street would remain open with no reasonably foreseeable lane closures during Project construction except for along the currently unimproved segment of Perry Street while it is undergoing paving. Any inconveniences associated with paving Perry Street would be addressed by Transportation MM-3; therefore, the Project's potential to cause an effect upon circulation during the Project's construction would be less than significant. Mitigation is included to ensure compliance during construction activities.

Findings of Fact: Impacts will be less than significant with implementation of mitigation.

Mitigation: Mitigation is required.

Transportation MM-3: During construction activities, Project construction activities shall comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site. To implement this requirement, the requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors, including the following notes.

- Delivery trucks shall use the most direct route between the construction site and the I-215 Freeway.
- Construction traffic during the AM peak hours (7:00 AM-9:00 AM) and PM peak hours (4:00 PM-6:00 PM) shall be minimized. The construction contractor shall assure that construction-related trips (passenger car and truck trips) do not exceed 55 net AM PCE peak hour trips and 55 net PM peak hour trips (inbound and outbound combined). The construction contractor shall be responsible for periodic monitoring and shall be required to supply the County of Riverside with monitoring records upon request.

Monitoring: Monitoring is required pursuant to the MMRP.

f) Would the Project result in inadequate emergency access or access to nearby uses?

During the course of the County of Riverside's review of the proposed Project, the County evaluated the Project's design, including but not limited to, the layout of the Project's proposed warehouse building, drive aisles, parking lots, and truck court, to ensure that the Project would provide adequate emergency access and access to nearby uses at Project buildout. Furthermore, as described above, the Project would provide adequate emergency access along abutting roadways during temporary construction activities within the public right-of-way. In addition, the proposed Project would be required to comply with Riverside County Ordinance Nos. 460 and 461, which regulate access road provisions. With required adherence to County requirements for emergency access, impacts would be less than significant.

The Project site does not provide access to any abutting parcels or nearby uses. Therefore, there is no potential for the Project to result in inadequate access to nearby uses and paving the offsite 32' extension of Perry Street to Harvill Avenue would actually provide a benefit to nearby uses.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
38. Bike Trails				
a. Include the construction or expansion of a bike system or bike lanes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Riverside County General Plan, Circulation Element (Riverside County, 2016b); Traffic Impact Analysis (Urban Crossroads, Inc., 2019e)

a) Would the Project include the construction or expansion of a bike system or bike lanes?

No designated bike lanes are proposed to be provided as part of the Project's roadway frontage improvements. The Project would, however, provide a trail segment to accommodate a segment of the County's multi-use trail system. Bikes would be able to utilize the trail. The construction and use of the trail is analyzed as an inherent part of the Project throughout this MND and no adverse impacts to the environment are identified as being specifically attributable to the trail installation and ongoing use.

Findings of Fact: Impacts will be less than significant.

Mitigation: Mitigation is not required.

Monitoring: Monitoring is not required.

5.1.19 Tribal Cultural Resources

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
39. Tribal Cultural Resources 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:				
a. 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Phase I and Phase II Cultural Resources Assessment for the Seaton Commerce Center Project (BFSa, 2019a); County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standards Scopes of Work (Riverside County, 2009); Public Resources Code Section 5020.1 (PRC 5020.1, 1974); Public Resources Code Section 5024.1 (PRC 5024.1, 1993)

- 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 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)?**
- b) **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 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe).**

In accordance with AB 52, Native American scoping and consultation was conducted as part of the CEQA process for the proposed Project. In compliance with Assembly Bill 52 (AB52), notices regarding this Project were mailed to all requesting tribes on December 6, 2018. The following tribes were sent email letters by the County:

- Pechanga Band of Mission Indians
- Soboba Band of Luiseno Indians
- Morongo Band of Mission Indians,
- Rincon Band of Mission Indians

No response was received from the Rincon Band of Mission Indians within the 30-day review period. The Soboba Band of Luiseno Mission Indians responded in a letter dated December 11, 2018 requesting consultation. Consultation was initiated and the project cultural report and conditions of approval were provided to the tribe. Consultation was concluded by Soboba on March 12, 2019.

The Pechanga Band of Mission Indians requested consultation in a letter dated December 13, 2018. Consultation was initiated and the project cultural report and conditions of approval were provided to the tribe. Three separate communications were sent to Pechanga over the span of 5 months wherein the County requested Pechanga provide their input on the proposed conditions of approval and on any potential Tribal Cultural Resources (TCR's) that may be impacted by this project. Pechanga provided no input to either of these issues. Hence, consultation was concluded by the County on July 1, 2019.

The Morongo Band of Mission Indians requested consultation on December 14, 2018 and would provide additional input once they had reviewed the cultural report. Consultation was concluded on February 8, 2019 by Morongo and they deferred to other interested Tribes.

As a result of the AB52 consultation, no TCR's were identified and, thus, no impacts are anticipated.

Findings of Fact: There will be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.20 Utilities/Service Systems

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>Would the project:</i>				
40. Water				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020; Thienes Engineering, Inc., 2020a); Eastern Municipal Water District (EMWD) Will Serve Letter (EMWD, 2019); EMWD 2015 Urban Water Management Plan (EMWD, 2016a); EMWD Water System Planning & Design, Principal Guidelines Criteria (EMWD, 2007)

- a) **Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?**

Water demand associated with the proposed Project would consist of interior plumbing devices (e.g., sinks, toilets, faucets) as well as outdoor landscape irrigation. The Project's water lines would be connected to existing lines installed in Perry Street and Seaton Avenue. There are no sewer lines that currently exist directly adjacent to the Project site in either Seaton Avenue or Perry Street; therefore, the

Project includes the installation of sewer line in Perry Street to extend off site approximately 396' east of the Project site to a point of connection that exists approximately 300' west of the intersection of Perry Street and Harvill Avenue. Similarly, for the storm drain system, the Project Applicant would be required to install a storm drain in Perry Street extending from the Project site east to connect with the upstream terminus of the Perris Valley Master Drainage Plan (MDP) Lateral E-10, located approximately 300 feet west of the intersection of Perry Street and Harvill Avenue. Potential impacts associated with the installation of on-site and off-site utility improvements are evaluated throughout this MND and mitigation measures are identified for construction-related effects that would reduce construction-phase impacts to the maximum feasible extent. There would be no significant impacts specifically related to the installation of water, wastewater, or storm drain infrastructure beyond the overall construction-related effects of the Project as a whole.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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

EMWD is responsible for supplying potable water to the Project site and its region. The Project would be consistent with Riverside County's General Plan land use designation (LI) and zoning classifications (M-SC and I-P). According to EMWD's Water System Planning & Design, commercial and industrial development have the same average day water demand rate (2,000 gpd per acre) (EMWD, 2007, p. 4). As discussed in the 2015 EMWD Urban Water Management Plan, herein incorporated by reference as the "UWMP," which applies to and was adopted by the EMWD, adequate water supplies are projected to be available to meet EMWD's estimated water demand through 2040 under normal, historic single-dry and historic multiple-dry year conditions (EMWD, 2016a, p. XV). EMWD forecasts for projected water demand are based on the population projections of SCAG, which rely on the adopted land use designations contained within the general plans that cover the geographic area within EMWD's service. Because the Project's water demand would be identical to the projection for the site's existing land use designation (as mentioned above), EMWD would have sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed.

EMWD provided a Will Serve letter stating that it is willing to provide water and sewer services to the proposed Project (EMWD, 2019). Pursuant to CEQA Guidelines §15155 (a)(E), Water Supply Analysis, because the Project does not involve a land use that would house more than 1,000 persons, occupy more than 40 acres of land, or have more than 650,00 SF of floor area, a Water Supply Assessment (WSA) is not required for the proposed Project.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
41. Sewer				
a. Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); Eastern Municipal Water District, Perris Valley Regional Water Reclamation Facility, Fact Sheet (EMWD, 2016b); EMWD Sanitary Sewer System Planning & Design Principle Guidelines Criteria (EMWD, 2006)

- a) **Would the Project require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects?**
- b) **Would the Project result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Wastewater generated by the Project would be treated by the EMWD, which operates the Perris Valley Regional Water Reclamation Facility (PVRWRF). The PVRWRF has a current capacity of 22 million gallons per day (gpd), and receives typical daily flows of 13.8 million gpd. The ultimate planned capacity at the PVRWRF is 100 million gpd. In March 2014, EMWD completed the most recent expansion of the PVRWRF. With an ultimate capacity of 100 mgd EMWD says that the facility is poised to meet the current and future demands to the region as well as help to meet the increasing demand for recycled water throughout EMWD's service area. (EMWD, 2016b, p. n.p.)

According to information available from the EMWD, industrial uses generate approximately 1,700 per acre of wastewater for light industrial land uses, the proposed Project would generate approximately 15,555 gallons (0.016 million gallons) of wastewater per day (1,700 gpd per acre × 9.15 Project acres = 15,555 gpd) (EMWD, 2006, Table 1). Under existing conditions, the Perris Valley Regional Water

Reclamation Facility has an excess treatment capacity of approximately 8.2 million gallons per day (mgpd). Implementation of the Project would utilize approximately 0.2 percent of the Perris Valley Regional Water Reclamation Facility daily excess treatment capacity ($0.016 \text{ mgpd} \div 8.2 \text{ mgpd} = 0.001 \text{ percent}$) (EMWD, 2016b). Accordingly, the Perris Valley Regional Water Reclamation Facility has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations). Because there is adequate capacity at existing treatment facilities to serve the Project's projected sewer demand, impacts would be less than significant.

The Project would construct an on-site network of sewer pipes that would connect to existing sewer lines beneath Perry Street. There are no sewer lines that currently exist directly adjacent to the Project site in either Seaton Avenue or Perry Street; therefore, the Project includes the installation of a sewer line in Perry Street to extend off site approximately 396' east of the Project site to a point of connection that exists approximately 300' west of the intersection of Perry Street and Harvill Avenue. Similarly, for the storm drain system, the Project Applicant would be required to install a storm drain in Perry Street extending from the Project site east to connect with the upstream terminus of the Perris Valley Master Drainage Plan (MDP) Lateral E-10, located approximately 300 feet west of the intersection of Perry Street and Harvill Avenue.

The installation of sewer line connections as proposed by the Project would result in physical impacts; however, these impacts are considered to be part of the Project's construction phase and are evaluated throughout this MND accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this MND to reduce impacts to less-than-significant levels. The construction of sewer lines necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this MND. Accordingly, additional mitigation measures beyond those identified throughout this MND would not be required.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
42. Solid Waste				
a. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a); CalRecycle, "SWIS Facility/Site Search" (CalRecycle, 2019a); SWIS Facility Detail: Badlands Sanitary Landfill (CalRecycle, Badlands, 2019b); SWIS Facility Detail: El Sobrante Sanitary Landfill (CalRecycle, El Sobrante, 2019c); SWIS Facility Detail: Lamb Canyon Sanitary Landfill (CalRecycle, Lamb Canyon, 2019d); EPA Estimating 2003 Building Related Construction and Demolition Amounts (EPA, 2009); Legislative Counsel Bureau of California, Assembly Bill No. 939 (Legislative Counsel Bureau of California, 2015); Legislative Counsel Bureau of California, Public Resources Code Section 42911 (Legislative Counsel Bureau of California, 2005); Legislative Counsel Bureau of California, Assembly Bill 341, Chesbro. Solid Waste: Diversion (Legislative Counsel Bureau of California, 2011)

a) Would the Project 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?

Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. The Project would be required to comply with AB 939, which requires a minimum of 50 percent of all construction waste and debris to be recycled. Additionally, the Project would be required to comply with mandatory waste reduction requirements as described below. Solid waste generated by the Project would be disposed at the El Sobrante Landfill, the Badlands Sanitary Landfill, and/or the Lamb Canyon Sanitary Landfill. Existing capacities at each of these landfills is discussed below and shown on Table 5-24, Permitted and Remaining Capacity of Area Landfills, shows the maximum daily capacity and total remaining capacity for these landfills.

Table 5-24 Permitted and Remaining Capacity of Area Landfills

Landfill	Maximum Capacity (Tons/Day)	Maximum Permitted Capacity (Cubic Yards)	Remaining Capacity (Cubic Yards)
El Sobrante	16,054	209,910,000	143,977,170 ¹
Lamb Canyon	5,000	38,935,653	19,242,950 ²
Badlands	4,800	34,400,000	15,748,799 ³

¹ Remaining capacity as of April 1, 2018, which is the most recent information reported by CalRecycle.

² Remaining capacity as of January 8, 2015, which is the most recent information reported by CalRecycle.

³ Remaining capacity as of January 1, 2015, which is the most recent information reported by CalRecycle.

(CalRecycle, 2019a)

Construction Impact Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project (i.e., 203,029 SF building) and the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds per s.f. for non-residential uses, approximately 451.1 tons of waste is expected to be generated during the Project's construction phase ($[(203,029 \text{ SF} \times 4.34 \text{ pounds per s.f.}) \div 2,000 \text{ pounds per ton}] = 440.57 \text{ tons}$) (EPA, 2009, p. 10). California Assembly Bill 939 (AB 939) requires that a minimum of 50% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies); therefore, the Project is estimated to generate approximately 220.28 tons during its construction phase. The Project's construction phase is estimated to last for up to 280 days; therefore, the Project is estimated to generate approximately 0.78 tons of solid waste per day during its construction ($220.28 \text{ tons} \div 280 \text{ days} = 0.78 \text{ tons per day}$) requiring landfill disposal.

Non-recyclable construction waste generated by the Project would be disposed at the El Sobrante Landfill, the Badlands Sanitary Landfill, and/or the Lamb Canyon Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, the El Sobrante Landfill, the Badlands Sanitary Landfill, and the Lamb Canyon Sanitary Landfill are not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The El Sobrante Landfill, the Badlands Sanitary Landfill, and the Lamb Canyon Sanitary Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.

Operational Impact Analysis

Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of industrial building area obtained from CalRecycle, long-term, on-going operation of the Project would generate approximately 1.44 tons of solid waste per day ($[(1.42 \text{ pounds} \div 100 \text{ s.f.}) \times 203,029 \text{ SF}] \div 2,000 \text{ pounds} = 1.44 \text{ tons per day}$) (CalRecycle, 2019). Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate a maximum of 0.72 tons

of solid waste per day requiring landfilling (1.44 tons per day × 50% = 0.72 tons per day). (Legislative Counsel Bureau of California, 2015)

Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the El Sobrante Landfill, the Badlands Sanitary Landfill, and/or the Lamb Canyon Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

b) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?

The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the Riverside County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. (Legislative Counsel Bureau of California, 2015)

In order to assist the County of Riverside in achieving the mandated goals of the Integrated Waste Management Act, the Project's building tenant(s) would be required to work with future refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Public Resources Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. (Legislative Counsel Bureau of California, 2005) Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant(s) of the proposed Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (Legislative Counsel Bureau of California, 2011). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be required to comply with all applicable

solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
43. Utilities				
Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?				
a. Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Source: Project Application Materials (HPA, 2020) (Thienes Engineering, Inc., 2020a)

Would the Project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?

- a) Electricity?
- b) Natural gas?
- c) Communications systems?
- d) Street lighting?
- e) Maintenance of public facilities, including roads?
- f) Other governmental services?

The proposed Project would include connections to existing electricity, natural gas, and communications infrastructure that already exist in the area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. Impacts associated with the construction and operation of electricity, natural gas, communications systems, street lighting, public facilities maintenance, and other governmental services are an inherent part of the Project's construction process and operational characteristics, and the environmental effects associated with the Project's construction phase have been evaluated throughout this MND. Mitigation measures have been identified to reduce construction- and operational-related impacts to the maximum feasible extent. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this MND. Impacts would be less than significant.

Refer to Threshold 37(d) for the analysis of the maintenance of roads (43) (a)).

Findings of Fact: Impacts will be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.21 Wildfire

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<i>If located in or near a State Responsibility Area ("SRA"), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:</i>				
44. Wildfire Impacts				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
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"/>
e. 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"/>

Source: Riverside County General Plan Figure S-11 “Wildfire Susceptibility (Riverside County, 2015a);” Riverside County GIS Database (RCIT, 2019); Mead Valley Area Plan (Riverside County, 2016a); California Department of Forestry and Fire Protection (CAL FIRE), Fire Hazard Severity Zones in SRA. Adopted by CAL FIRE on November 7, 2007 (CAL FIRE, 2007); CAL FIRE Western Riverside County State Responsibility Areas for Fire Protection (CAL FIRE, 2012a).

If located in or near a State Responsibility Area (“SRA”), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief:

- a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Would the Project 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?
- c) Would the Project 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?

- d) **Would the Project 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?**
- e) **Would the Project expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

CAL FIRE adopted Fire Hazard Severity Zone (FHSZ) maps for State Responsibility Areas (SRAs) in November 2007. The fire hazard model considers the wildland fuels. Fuel is that part of the natural vegetation that burns during the wildfire. The model also considers topography, especially the steepness of the slopes. Fires burn faster as they burn up-slope. Weather (temperature, humidity, and wind) has a significant influence on fire behavior. The model recognizes that some areas of California have more frequent and severe wildfires than other areas. Finally, the model considers the production of burning fire brands (embers) how far they move, and how receptive the landing site is to new fires. All SRAs are rated moderate, high or very high fire hazard. (CAL FIRE, 2012b)

According to GPA No. 960 Draft EIR No. 521, as analyzed by the State Multi-Hazard Mitigation Plan (MHMP), there are three types of fires. Urban fires tend to be of limited extent such as a single building or a block, wildland fires generally occur in open lands, vegetated, and undeveloped, but can occur with some homes in them, and wildland-urban interface (WUI) fires occur in the most hazardous and risky areas where the environment extends into open areas, resulting in a complex mixture of fuels, properties, and threats. (Riverside County, 2015b) As discussed in Section 3.0, the Project site is located in a developed area of Riverside County and is therefore not located in any of these areas that are subject to wildland fires.

According to CAL FIRE adopted FHSZ maps for SRAs, the Project site is not located within a Fire Hazard Severity Zone in a SRA (CAL FIRE, 2007) (CAL FIRE, 2012a). Also, as shown in Mead Valley Area Plan Figure 12, *Wildfire Susceptibility*, the Project site is not located in a Fire Hazard Severity Zone and is therefore not located within an area of wildfire susceptibility. The nearest area subject to wildland fire hazards occurs over 1.0 mile south of the Project site and south of Cajalco Road in the area of the Motte Rimrock Reserve. (Riverside County, 2016a, Figure 12) Additionally, the Project site is located adjacent to developed land uses that do not pose a high fire risk as well as being bound by the roadways of Seaton Avenue and Perry Street. (V3 Companies, 2018) (Google Earth, 2018)

There is over 1.0 mile of intervening development, including roadways, between the Project site and the Motte Rimrock Reserve. The Project site is not located in or near an SRA, nor is the Project site classified as a very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief (CAL FIRE, 2007) (CAL FIRE, 2012a). There is over 1.0 mile of intervening development, including roadways between the Project site and the Motte Rimrock Reserve.

Because the Project site is not located in an SRA, the Project is not subject to Wildfire Thresholds 44(a) through (e).

In addition, a number of California regulations, including Public Resources Code Sections 4290-4299 and California Government Code Section 51178, would apply to the proposed Project, as well as to every other development project in the area, and would address fire safety. In particular, these sections require minimum state-wide fire safety standards pertaining to: roads for fire equipment access; signage for identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and, fire fuel breaks. In addition, they set fire safety standards for all buildings and structures in, or adjoining, mountainous areas, or forest-, brush- or grass-covered lands or any land covered with flammable material to protect property from wildland fires. Mandatory compliance with California regulations related to fire hazards would reduce the Project's potential to expose people or structures to wildland fire hazard risks. (Riverside County, 2015b, p. 4.17-23)

In addition, to ensure adequate fire protection for all residents of Riverside County, the Riverside County Department of Building and Safety and the RCFD enforce fire standards as they review building plans and conduct building inspections. This includes a review for compliance with Riverside County Ordinance No. 787, which requires, among other measures, the County to review all future building plans to ensure that every building is positioned in a way that allows adequate access for emergency vehicles and has adequate fire hydrant placement and fire flows. (Riverside County, 2015b, p. 4.17-23)

Findings of Fact: No impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

5.1.22 Mandatory Findings of Significance

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
45. 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source: All sources are noted in the appropriate threshold as analyzed within this Initial Study.

All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study. Throughout this Initial Study, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less than significant. Accordingly, with incorporation of the mitigation measures imposed throughout this Initial Study, the Project would not 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.

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring: Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Applicable Regulatory Requirements. Applicable regulations and design requirements to which the Project is required to comply are included in this Initial Study. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are included herein for information purposes.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
46. Does the project have impacts which 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, other current projects and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source: All sources are noted in the appropriate threshold as analyzed within this Initial Study.

As discussed throughout this Initial Study, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, but cumulatively considerable. In all instances where the Project has the potential to contribute to a cumulatively-considerable impact to the environment, mitigation measures have been imposed to reduce potential effects to less than significant.

Aesthetics

New development on the Project site and in the surrounding area would change the existing character of the Project's viewshed; however, the proposed Project, as well as all development in the immediate vicinity of the Project would be required to comply with the development regulations and design standards contained in the County's Land Development Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively-considerable.

Agriculture and Forest Resources

The Project would have no impact on agricultural resources. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact associated with agriculture and forest resources.

Air Quality

Based on SCAQMD guidance, any direct exceedance of a regional or localized threshold also is considered to be a cumulatively considerable effect, while air pollutant emissions below applicable regional and/or localized thresholds are not considered cumulatively considerable. As discussed in Threshold 6, the Project's daily localized PM_{2.5} emissions during construction activities during the site preparation phase (10 days in duration) has the potential to expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations. Therefore, impacts associated with daily localized construction PM_{2.5} emissions would be direct and cumulatively considerable and require the implementation of mitigation to reduce the PM_{2.5} emissions. With the implementation of mitigation, which is required herein as Air Quality MM-1, direct and cumulatively considerable impacts would be reduced to less than significant.

Biological Resources

As discussed under Threshold 7, *Biological Resources*, regarding applicable MSHCP provisions for properties located outside of conservation areas such as the proposed Project, the Project would result in significant direct and cumulatively considerable impacts to the western burrowing owl if the species is present on the site when construction activities commence. The Project site is within the SKR HCP and effects to SKR habitat are addressed through the SKR HCP. With mandatory payment of SKR fees, impacts would be less than significant on a direct and cumulatively considerable basis. The Project would result in the loss of ephemeral drainages which qualify as a MSHCP riverine/riparian resources. The loss of this resource on the Project site would be a direct and cumulatively-considerable impact associated with the loss of riverine resources in the Western Riverside County MSHCP area. Complete avoidance of the riparian/riverine resources is not feasible. Because there are no feasible avoidance alternatives available, the MSHCP requires the Project to provide compensatory mitigation to ensure the replacement of any lost functions and values as it related to the plan and wildlife species covered by the MSHCP. With implementation of mitigation, which required herein as Biological Resources MM-1, Biological Resources MM-2, Biological Resources MM-3, direct and cumulatively considerable impacts would be reduced to less than significant.

Cultural Resources

As discussed under Thresholds 8 and 9, *Cultural Resources*, the proposed Project would result in direct and cumulatively considerable impacts to a cultural resource, which the County of Riverside has determined is not CEQA-significant. However, because previously uncovered and undiscovered significant resources may be uncovered by the Project's ground-disturbing construction activities; mitigation is required. With implementation of mitigation, which is required herein as Cultural Resources MM-1, Cultural Resources MM-2, Cultural Resources MM-3, and Cultural Resources MM-4, to properly identify and treat resources that may be uncovered during the Project's earth-moving activities, impacts would be reduced to less than significant on a direct and cumulatively considerable basis.

Energy

As discussed under Threshold 10, *Energy Impacts*, during construction and operation, the Project and other cumulative developments would be subject to regional, State, and federal requirements related to energy consumption, including requirements related to energy efficiency (e.g., Title 24 energy efficiency requirements) and fuel efficiency. Moreover, energy consumed by the Project is expected to be comparable to other light industrial uses of similar scale and intensity that are constructed and operating in California, because the Project does not propose uses or operations that would inherently result in excessive and wasteful energy consumption. There are no components of the warehouse uses proposed by the Project that would result in the inefficient, wasteful, or otherwise unnecessary use of energy resources on either a direct or cumulatively-considerable basis. Additionally, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As such, Project-related impacts due to energy consumption would be less-than-cumulatively considerable.

Geology and Soils

Potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides).

Greenhouse Gas Emissions

As discussed in Threshold 20, *Greenhouse Gas Emissions*, global climate change (GCC) occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines § 15130(f)).

At Project buildout, the Project's total annual GHG emissions would fall below the Riverside County CAP's annual GHG emissions threshold of 3,000 MTCO₂e. Refer to Threshold 20, *Greenhouse Gas Emissions*, for a detailed discussion. With implementation of Project design features and the adherence to applicable regulations, the Project would not cause a significant impact due to a conflict with the County's CAP and impacts would be less than significant. (Urban Crossroads, Inc., 2019d, p. 47).

Hazards and Hazardous Materials

Potential effects related to hazards and hazardous materials are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Hydrology and Water Quality

Construction and operation of the Project and other projects in the Santa Ana River watershed would have the potential to result in a cumulatively considerable water quality impact, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and WQMP) to minimize adverse effects to water quality, which would avoid a cumulatively-considerable impact.

The Project and other projects in the Santa Ana River Basin would be required to comply with federal, State, and local regulations in order to preclude flood hazards both on- and off-site. Compliance with federal, State, and local regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and that proposed development would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively-considerable effect related to flooding would not occur.

Land Use and Planning

The Project would not physically divide an established community, or conflict with applicable land use/planning documents and the Project is consistent with the County's land use designation and zoning classifications for the Project site; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact related to land use and planning.

Mineral Resources

The Project would have no impact on mineral resources. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Noise

Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no construction projects planned adjacent to the Project site that would overlap with Project-related construction activities. Accordingly, cumulatively considerable impacts related to periodic noise and construction-related vibration would not occur. Under long-term operating conditions the Project would comply with the County's Noise Ordinance and would not produce noticeable levels of vibration; therefore, cumulatively considerable impacts related to these issue areas would not occur. The analysis under Threshold 27, *Noise*, demonstrates that the Project would not result in a cumulatively considerable impact related to transportation noise under long-term conditions.

Paleontological Resources

No paleontological resources are identified on or near the Project site; however, grading and excavation activities on Project site that occur greater than 4.0 feet in depth and are mapped Quaternary very old alluvial fan sediments (which are mapped by Riverside County as having “High B” paleontological sensitivity), have the potential to unearth paleontological resources that may exist below the ground surface. Similarly, cumulative development in this same geologic formation have the potential to unearth paleontological resources. With implementation of mitigation, which required herein as Paleontological Resources MM-1, to properly identify and treat resources that may be uncovered during the Project’s earth-moving activities, the Project’s impacts would be reduced to less than significant on a direct and cumulatively considerable basis.

Population and Housing

The Project would not implement land uses that generate new residents and would not require the construction of replacement housing. Accordingly, the County has anticipated – and planned for – the growth that would occur on the Project site and there is no potential for the Project to result in an adverse, cumulatively-considerable environmental effect related to population and housing.

Public Services

All development projects in the County of Riverside, including the Project, would be required to pay development impact fees, a portion of which would be used by the County for the provision of public services to offset the incremental increase in demand for public services. Furthermore, future development would generate an on-going stream of property tax revenue and sales tax revenue, which would provide funds that could be used by the County for the provision of public services. The Project would not directly result in the introduction of new residents to the County and, therefore, would have no potential to result in cumulatively-considerable impacts to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services.

Recreation

The Project would have no impact to recreation facilities. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Transportation

The Project would contribute cumulatively considerable traffic volumes at one intersection (Seaton Avenue & Markham Street intersection (Intersection #1)) under EAPC (2020) traffic conditions. The Project shall comply with the Transportation Uniform Mitigation Fee (TUMF) program as administered by the County of Riverside, which requires the Project Applicant to pay a fee that is used to fund regional transportation improvements. With the implementation of the improvements identified in Transportation MM-1, the peak hour delays and associated LOS would improve to an acceptable LOS (LOS A and B). Therefore, with the implementation of mitigation, which required herein as Transportation MM-1, Transportation MM-2, Transportation MM-3, impacts would be reduced to less than significant under EAPC (2020) traffic conditions. (Urban Crossroads, Inc., 2019e, p. 63)

Tribal Cultural Resources

Development activities on the Project site would not impact any known tribal cultural resources. No impact would occur and as such there is no potential for the Project to contribute to a cumulative tribal cultural resource impact.

Utilities/ Service Systems

The Project would require water and wastewater infrastructure, as well as solid waste disposal. Development of public utility infrastructure is part of an extensive planning process involving service providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively-considerable impacts to utilities and service systems would not occur.

Wildfire

The Project site is not located in an SRA; therefore, no cumulatively considerable impacts associated with wildfire would occur as a result of development of the Project.

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring: Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Applicable Regulatory Requirements. Applicable regulations and design requirements to which the Project is required to comply are included in this Initial Study. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are included herein for information purposes.

	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
47. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source: All sources are noted in the appropriate threshold as analyzed within this Initial Study.

The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. In instances where the Project has the potential to result in direct or indirect adverse effects to human beings (air quality and associated effects on human health from air pollutants, and construction-related noise and potential effects on hearing impairment), project design feature best practices and mitigation measures have been applied to ensure impacts do not rise above a level of significance. With required implementation of project design features and the mitigation measures identified in this Initial Study, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

Findings of Fact: Impacts will be less than significant with mitigation.

Mitigation: Mitigation is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Monitoring: Monitoring is required. Refer to individual thresholds herein and the attached Mitigation, Monitoring, and Reporting Program (MMRP).

Applicable Regulatory Requirements. Applicable regulations and design requirements to which the Project is required to comply are included in this Initial Study. Although these regulations and requirements technically do not meet CEQA's definition for mitigation, they are included herein for information purposes.

5.2 AUTHORITIES CITED

Authorities cited: Public Resources Code Sections 21083 and 21083.05; References: California Government Code Section 65088.4; Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095 and 21151; Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

2019 CEQA Statute and Guidelines, January 1, 2019: Riverside County, California Code of Ordinances

6.0 References

Documents Appended to this MND	
<p><i>The following reports, studies, and supporting documentation were used in preparing this MND and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the Riverside County Planning Department 4080 Lemon Street, 12th Floor Riverside, CA 92502.</i></p>	
<u>Cited As:</u>	<u>Source:</u>
(BFSA, 2019a)	Brian F. Smith and Associates, Inc. (BFSA), 2019a. <i>A Phase I and II Cultural Resources Assessment for the Seaton Commerce Center Project</i> . February 5, 2019. MND Technical Appendix C.
(BFSA, 2018)	Brian F. Smith and Associates, Inc. (BFSA), 2018. <i>Paleontological Resource and Mitigation Monitoring Assessment</i> . December 6, 2018. MND Technical Appendix J1.
(BFSA, 2019b)	Brian F. Smith and Associates, Inc. (BFSA), 2019b. <i>Paleontological Resource Impact Mitigation Program (PRIMP)</i> . MND Technical Appendix J2.
(GLA, 2019a)	Glenn Lukos Associates, Inc., 2019a. <i>Jurisdictional Delineation for the Seaton Commerce Center Project</i> . February 25, 2019. MND Technical Appendix B1.
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5.1.1 Aesthetics				
Threshold 1.a): Because the Project site is not located within or adjacent to a scenic highway corridor and is not visible from a designated or eligible corridor, the proposed Project would not have a substantial effect upon a scenic highway corridor.	No Impact	CRDR 5.1.1-1 The Project is required to comply with Riverside County Ordinance No. 655, which is intended to restrict the permitted use of certain light fixtures emitting light into the night sky which could have a detrimental effect on astronomical observation and research. Ordinance No. 655 sets forth requirements for lamp sources and shielding of light emissions for outdoor fixtures to reduce “skyglow” or light pollution that affects day or nighttime views from Mt. Palomar Observatory (located approximately 40 miles southeast of the Project site in northern San Diego County).	N/A	N/A
Threshold 1.b): Due to the lack of public viewing locations on the Project site and the design elements incorporated as part of the Project, the Project would not substantially damage scenic resources, including, but not limited to trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view.	Less than Significant			
Threshold 1.c): The proposed Project would be required to comply with the development standards of the zoning designations on the site; therefore, with compliance with the zoning development standards and regulations; the Project’s potential to result in a conflict with applicable zoning and other regulations governing scenic quality would be less than significant.	Less than Significant	CRDR 5.1.1-2 The Project is required to comply with Riverside County Ordinance No. 915, which is intended to provide minimum requirements for outdoor lighting in order to reduce light trespass. Ordinance No. 915 provides regulations on adequate lighting shielding, glare, and light trespass in order to ensure all development in Riverside County installs lighting in a way that does not jeopardize the health, safety, or general welfare of Riverside County residents and degrade their quality of life.		
Threshold 2.a): The Project would be required to comply with Ordinance No. 655; thus, the Project’s potential to interfere with the nighttime use of the Mt. Palomar observatory would be less than significant.	Less than Significant			
Thresholds 3.a and 3.b): The proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or expose	Less than Significant			

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residential property to unacceptable light levels, and impacts would be less than significant				
5.1.2 Agriculture and Forest Resources				
Threshold 4.a): Because the Project site does not contain land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), the Project has no potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use.	No Impact	N/A	N/A	N/A
Threshold 4.b): The Project would not conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve.	No Impact			
Threshold 4.c): Because the Project site is not located within 300 feet of agriculturally zoned property used for agricultural purposes, the proposed Project has no potential to cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm").	Less than Significant			
Threshold 4.d): There are no components of the proposed Project that would result in changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use and no impact would occur as a result of development of the proposed Project.	No Impact			
Thresholds 5.a, 5.b, and 5.c): Implementation of the proposed Project would not conflict with existing zoning for,	No Impact			

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or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and because the Project would not result in the loss of forest land or conversion of forest land to non-forest use, no impact would occur as a result of development of the proposed Project.				
5.1.3 Air Quality				
<p>Threshold 6.a): The Project would not exceed the applicable regional thresholds and LST thresholds for operational activity. However, as evaluated under Threshold 6(c), below, the Project would exceed localized significance thresholds for particulate matter 2.5 microns in diameter or less (PM_{2.5}) emissions during construction. Therefore, the Project has the potential to conflict with the AQMP according to consistency criterion No. 1 and a significant impact would occur associated with consistency with the AQMP. Therefore, impacts are determined to be significant and mitigation is required.</p> <p>Threshold 6.b): The Project's daily construction emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_x) carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM₁₀ and PM_{2.5}) would not exceed SCAQMD regional criteria thresholds. Project-related operational emissions of VOCs, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} would also not exceed SCAQMD regional criteria threshold. Therefore, impacts are determined to be less than significant and mitigation is not required.</p> <p>Threshold 6.c): The Project would not exceed the SCAQMD's localized significance threshold for NO_x, CO, or PM₁₀ emissions during construction. Accordingly, Project</p>	<p>Less than Significant with Mitigation Incorporated</p> <p>Less than Significant</p> <p>Less than Significant with Mitigation</p>	<p>Air Quality MM 1: Prior to grading permit issuance, the County of Riverside shall verify that the following note is included on the grading plan. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. The note shall also be specified in bid documents issued to prospective construction contractors.</p> <ul style="list-style-type: none"> When using construction equipment greater than 150 horsepower (>150 HP), the construction contractor(s) shall ensure that off-road diesel construction equipment complies with the EPA/CARB Tier 3 emissions standards and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. <p>CRDR 5.1.3-1 The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required</p>	Project Applicant, Project Construction Manager/ Riverside County Building & Safety Department	Throughout the duration of construction activities

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		<p>CRDR 5.1.3-3 The Project's construction activities are required to comply with the provisions of the SCAQMD Rule 1186 "PM10 Emissions from Paved and Unpaved Roads and Livestock Operations," which requires the use of a street sweeper certified by the SCAQMD, and the use of non-toxic chemical stabilizers for dust control.</p> <p>CRDR 5.1.3-4 Project construction activities are required to comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site.</p> <p>CRDR 5.1.3-5 The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce air pollutant emissions.</p> <p>CRDR 5.1.3-6 Diesel-fueled vehicles at the Project site are required to comply with the California Air Resources Board (CARB) idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project's truck courts specifying the idling restriction requirement.</p>		

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		CRDR 5.1.3-7 The Project is required to comply with the provisions of the SCAQMD Rule 402, "Nuisance" which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public.		
5.1.4 Biological Resources				
<p>Threshold 7.a): No conflict would occur with the SKR HCP, as the Project Applicant would be required to contribute fees pursuant to Ordinance No. 663. Prior to mitigation, the proposed Project has the potential to result in a conflict with the MSHCP due to potential impacts to the burrowing owl and potential impacts to MSHCP riverine areas. Refer to Biological Resources MM-1 and MM-3.</p> <p>Thresholds 7.b) and 7.c): Although no native habitat types are present on the site and no listed species (currently protected by state or federal endangered species acts) are expected to occur due to absence of suitable habitat, the potential presence of BUOW is considered a significant direct and cumulatively considerable impact since the species is migratory and could be present on the Project site at the time that the Project's construction activities. In addition, other migratory bird species protected by the MBTA could be impacted by the Project if active nests are present on the site at the time that nesting habitat (trees and shrubs) are removed. Mitigation is thus required. Refer to Biological Resources MM-1 and MM-2.</p> <p>Threshold 7.d): No impacts to wildlife movement corridors or native wildlife nurseries would occur. However, the Project</p>	<p>Less than Significant with Mitigation Incorporated</p> <p>Less than Significant with Mitigation Incorporated</p> <p>Less than Significant with</p>	<p>Biological Resources MM-1: Pre-Construction Surveys for Western Burrowing Owl. Pursuant to Objectives 5, 6, and 7 of the Species Account for the Burrowing Owl in the Western Riverside County MSHCP, within 30 days prior to the issuance of a grading permit, a pre-construction presence/absence survey for the burrowing owl shall be conducted by a qualified biologist who holds a Memorandum of Understanding (MOU) with the County. The survey results shall be provided in writing to the Environmental Programs Department/County Biologist. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required. If it is determined that the Project site is occupied by the burrowing owl, take of "active" nests shall be avoided pursuant to the MSHCP and the MBTA. Burrowing Owl relocation shall only be allowed to take place outside of the burrowing owl nesting season (March 1 through August 31) and is required to be performed by a qualified biologist familiar with relocation methods. The County Biologist shall be consulted to determine appropriate type of relocation (active or passive) and potential translocation sites. Burrowing Owl Protection and Relocation Plans and Biological Monitoring Plans are required to be reviewed and approved by the CDFW.</p> <p>If it is determined during the 30-day preconstruction survey that burrowing owls have colonized the Project site prior to initiation</p>	Project Applicant, Project Biologist/ Riverside County Building & Safety Department, County Biologist, Riverside County Environmental Programs Department (EPD)	Prior to the issuance of grading permits

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has the potential to impact nesting birds if vegetation is removed during the nesting season (February 1 through August 31). Refer to Biological Resources MM-1 and MM-2.	Mitigation Incorporated.	of construction, the Project Applicant will immediately inform the Riverside County Biologist, CDFW, and the Regional Conservation Authority (RCA), and would need to retain a biologist that holds a MOU with the County of Riverside to prepare a Burrowing Owl Protection and Relocation Plan for approval by the County of Riverside and Wildlife Agencies prior to initiating ground disturbance. The relocation plan will include the following:		
Threshold 7.e): The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by CFFW or USFWS. The Project site contains 0.31 acre of MSHCP riverine areas, impacts to which would be addressed through permits from the ACOE, CDFW, and RWQCB. Refer to Biological Resources MM-1, MM-2, and MM-3.	Less than Significant with Mitigation Incorporated	<ul style="list-style-type: none"> The locations of the nests and owls proposed for relocation. The locations of the proposed relocation sites. The numbers of adult owls and juveniles proposed for relocation. The time of year when relocation is proposed to take place, The name of the biologist proposed to supervise the relocation, and the details of his/her previous experience capturing, handling, and relocating borrowing owls, including the outcomes of the previous relocation efforts (survival/mortality rates and site-fidelity rates of the relocated owls), and relevant permits held. 		
Threshold 7.f): The Project would not 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.	No Impact	<ul style="list-style-type: none"> A detailed description of the proposed method of capture, transport, and acclimation of the current project's owls on the proposed relocation site. A detailed description of relocation site preparations (e.g., the design and dimensions of the artificial release burrows and hacking cage, duration of hacking activities (including food and water provision). 		
Threshold 7.g): The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no impact would occur as a result of implementation of the Project as proposed on the Project site.	No Impact	<ul style="list-style-type: none"> Description of the monitoring methods and monitoring 		

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		<p>duration to be employed to verify survival of the relocated owls and their long-term retention on the relocation site.</p> <p>Biological Resources MM-2: Vegetation Clearing Outside of the Migratory Nesting Bird Season. As a condition of a grading permit, a migratory nesting bird survey of all trees to be removed from the site shall be conducted by a qualified biologist within 10 days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree. A copy of the migratory nesting bird survey results report shall be provided to the Riverside County Environmental Programs Department (EPD). If the survey identifies the presence of active nests, then the qualified biologist shall provide the Riverside County EPD with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the Riverside County EPD and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County EPD verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.</p> <p>Biological Resources MM-3: In-Lieu Payment for Loss of MSHCP Riverine/Riparian Area. To mitigate for permanent impacts to</p>	<p>Project Applicant, Project Biologist/ County Planning Department, County EPD</p> <p>Project Applicant/County</p>	<p>Within 10 days prior to initiating tree removal or vegetation within 500 feet of a mature tree</p> <p>Prior to the issuance of a</p>

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		<p>0.31 acres (1,202 linear feet) of ephemeral drainage feature on the Project site, the Project Applicant shall purchase compensatory mitigation credits at a 2:1 mitigation-to-impact ratio. Evidence of fee payment shall be supplied to the Riverside County Environmental Programs Department (EPD) prior to the issuance of a grading permit. The Project Applicant shall be required to provide for the purchase of 0.62 acre of mitigation credits from the Riverpark Mitigation Bank.</p> <p>CRDR 5.1.4-1 The Project Applicant shall comply with Riverside County Ordinance No. 810 (Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Fee Program Ordinance), which requires a per-acre local development impact and mitigation fee payment prior to the issuance of a building permit.</p> <p>CRDR 5.1.4-2 The Project Applicant shall comply with Riverside County Ordinance No. 663 (Stephens' Kangaroo Rat Mitigation Fee Ordinance) which requires a per-acre local development and mitigation fee payment prior to the issuance of a grading permit.</p> <p>CRDR 5.1.4-3 The Project Applicant shall comply with the Migratory Bird Treaty Act (MBTA).</p> <p>CRDR 5.1.4-4 The Project Applicant is required to obtain a Section 404 Nationwide Permit from the U.S. Army Corps of Engineers (ACOE) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.</p>	EPD	grading permit

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		<p>CRDR 5.1.4-5 The Project Applicant is required to obtain a Section 1602 Streambed Alteration Permit from the California Department of Fish and Wildlife (CDFW) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.</p> <p>CRDR 5.1.4-6 The Project Applicant is required to obtain a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB) prior to the issuance of a grading permit that would allow physical disturbance of the onsite drainage and its tributary.</p>		
5.1.5 Cultural Resources				
<p>Thresholds 8.a) and 8.b): No historic artifacts or historical sites were observed during the field survey and the potential for any historic deposits or sites is extremely remote. Additionally, the Project site is not identified as containing a historic resource by the Riverside County General Plan Update Draft EIR, Figure 4.9.2, Historical Resources. Accordingly, the Project has no potential to impact a historical resource as defined by CEQA Guidelines Section 15064.5.</p>	No Impact	N/A	N/A	N/A
<p>Thresholds 9.a) and 9.b): One (1) cultural resource site is recorded on the property. However, due to the lack of any significant subsurface deposits, the County of Riverside determined that the resources is not significant under CEQA. Because previously undiscovered significant resources may be uncovered by the Project's ground-disturbing construction activities, the potential exists that previously uncovered undiscovered archaeological resources may be exposed during the Project's ground-disturbing construction activities. If significant resources are uncovered and are not</p>	Less than Significant with Mitigation Incorporated	<p>Cultural Resources MM-1: Native American Monitor. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow</p>	Project Applicant, Project Archaeologist, Native American Monitor/ County Archaeologist	Prior to Grading Permit issuance and during all initial ground disturbing activities

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<p>appropriately treated, impacts would be significant. Refer to Cultural Resources MM-1, MM-2, MM-3, and MM-4.</p> <p>Threshold 9.c): There is a remote potential that human remains may be unearthed during the Project's ground-disturbing construction activities. This same potential for the discovery of human remains occurs on nearly every construction site that disturbs an undeveloped ground surface. If human remains are found on the site, the developer/permit holder or any successor in interest is required by law to comply with State Health and Safety Code Section 7050.5.</p>	Less than Significant	<p>identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.</p> <p>Cultural Resources MM-2: Project Archaeologist. Prior to issuance of grading permits, the developer/permit applicant shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A CIMP shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with the Project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.</p> <p>Cultural Resources MM-3: Artifact Disposition. Prior to Grading</p>	<p>Project Applicant/ County Archaeologist</p> <p>Project</p>	<p>Prior to Grading Permit issuance and during earth moving activities</p> <p>Prior to Grading</p>

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		<p>Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project's property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. All historic archaeological materials recovered during the archaeological investigations, shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.</p> <p>Prehistoric Resources - One of the following treatments shall be applied.</p> <p>a. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.</p> <p>b. If reburial is not agreed upon by the Consulting Tribes then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of</p>	Archaeologist/ Planning Department, County Archaeologist	Permit Final Inspection

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		<p>Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.</p> <p>Cultural Resources MM-4: Phase IV Cultural Monitoring Report. Prior to Grading Permit Final Inspection and upon completion of the implementation phase (clearing, grubbing, grading, trenching), a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with the Grading Permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the Transportation and Land Management Agency (TLMA) website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting.</p> <p>CRDR 5.1.5-1 If human remains are found on the Project site, the developer/permit holder or any successor in interest shall comply with the following codes:</p>	Project Archaeologist/ Planning Department	<p>Prior to Grading Permit Final Inspection</p> <p>During grading, If human remains are encountered</p>

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		<ul style="list-style-type: none"> Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. The Coroner will have two working days to determine if the remains are subject to his or her authority as part of a crime. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted by the Coroner within the period specified by law (24 hours). The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, inspect the site of the discovery of the Native American human remains and may recommend means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall make recommendations or preferences for treatment within 48 hours of being granted access to the site. Upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, where the Native American human remains are located, is not damaged or disturbed. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. The descendants' preferences for treatment may include the following: 		

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		<ul style="list-style-type: none"> ○ The nondestructive removal and analysis of human remains and items associated with Native American human remains. ○ Preservation of Native American human remains and associated items in place. ○ Relinquishment of Native American human remains and associated items to the descendants for treatment. ○ Other culturally appropriate treatment. <p>The parties may also mutually agree to extend discussions, taking into account the possibility that additional or multiple Native American human remains, as defined in this section, are located in the project area, providing a basis for additional treatment measures.</p> <p>Human remains of a Native American may be an inhumation or cremation, and in any state of decomposition or skeletal completeness. Any items associated with the human remains that are placed or buried with the Native American human remains are to be treated in the same manner as the remains, but do not by themselves constitute human remains.</p> <p>Whenever the commission is unable to identify a descendant, or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in</p>		

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		<p>subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. To protect these sites, the landowner shall do one or more of the following:</p> <ul style="list-style-type: none"> ○ Record the site with the commission or the appropriate Information Center. ○ Utilize an open space or conservation zoning designation or easement. ○ Record a document with the county in which the property is located. The document shall be titled "Notice of Reinternment of Native American Remains" and shall include a legal description of the property, the name of the owner of the property, and the owner's acknowledged signature, in addition to any other information required by this section. The document shall be indexed as a notice under the name of the owner. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with the descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. ○ Human remains from other ethnic/cultural groups 		

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		with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the County Archaeologist.		
5.1.6 Energy				
<p>Threshold 10.a): Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy.</p> <p>Threshold 10.b): The Project would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the Project's operation is calculated to be comparable to, or less than, energy consumed by other industrial uses of similar scale and intensity that are constructed and operating in California. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the Project would not cause or result in the need for additional energy producing facilities or energy delivery systems.</p>	<p>Less than Significant</p> <p>Less than Significant</p>	<p>CRDR 5.1.6-1 The Project is required to comply with CALGreen, including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use.</p> <p>CRDR 5.1.6-2 Diesel-fueled vehicles at the Project site are required to comply with the CARB idling restriction requirements, which currently restrict vehicles from idling for more than 5 minutes. Prior to building permit final inspection, the County of Riverside shall verify that signs are posted in the Project's truck courts specifying the idling restriction requirement.</p>	N/A	N/A
5.1.7 Geology/Soils				
<p>Threshold 11.a): The Project site is not located within an Alquist-Priolo Earthquake Fault Zone or within an area of a known fault.</p> <p>Threshold 12.a): Design of the Project in conformance with</p>	<p>Less than Significant</p> <p>Less than</p>	<p>CRDR 5.1.7-1 The Project is required by law to comply with the California Building Standards Code which address construction standards including those related to geologic and soil conditions.</p> <p>CRDR 5.1.7-2 As a standard condition of Project approval, the</p>	N/A	N/A

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the latest Building Code provisions for earthquake design is expected to provide adequate attenuation of any ground-shaking hazards, including, liquefaction hazards that are typical to southern California.	Significant	Project will be required to comply with the site-specific recommendations contained in the geotechnical report prepared for the Project site by NorCal Engineering and dated January 11, 2019, which is included as <i>Technical Appendix E</i> . The recommendations cover grading, soil removal, and recompaction activities; building foundation, floor slab, retaining wall, and paving design; shoring of excavations and trenches, and related topics.		
Threshold 13.a): Design of the proposed Project in conformance with the latest California Building Standards Code provisions for earthquake design is expected to provide adequate attenuation of ground-shaking hazards that are typical to southern California.	Less than Significant	CRDR 5.1.7-3 Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.		
Threshold 14.a): The Project site is not subject to on- or off-site landslides or rockfall hazards. The geotechnical evaluation prepared for the Project site also evaluated the potential for collapse and lateral spreading hazards on site, and identifies site-specific recommendations to preclude collapse or lateral spreading hazards. As a standard condition of Project approval, the Project will be required to comply with site-specific recommendations contained in a Project-specific geotechnical report included as <i>Technical Appendix E1</i> , which would reduce potential impacts to less than significant.	Less than Significant	CRDR 5.1.7-4 Prior to issuance of a grading permit, the Project Applicant shall prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.		
Threshold 15.a): The potential for subsidence to impact the site is low. The Project site's geotechnical report (<i>Technical Appendix E1</i>) indicates that the site's settlement potential would be attenuated through the proposed removal of near surface soils down to competent materials and replacement with properly compacted fill. Through standard conditions of approval, the proposed Project would be required by the County to incorporate the recommendations contained within	Less than Significant	CRDR 5.1.7-5 Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance. CRDR 5.1.7-6 The Project is required to comply with the provisions of the SCAQMD Rule 403 "Fugitive Dust." Rule 403 requires implementation of best available dust control measures		

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the Project site's geotechnical report (<i>Technical Appendix E1</i>) into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with ground subsidence.				
Threshold 16.a): There is no potential for the Project to be subject to hazards associated with seiches, mudflows, and/or volcanic hazards.	No Impact	during construction activities that generate fugitive dust, such as earth moving, grading, and construction equipment travel on unpaved roads. To comply with Rule 403, and prior to grading permit issuance, the County of Riverside shall verify that notes are specified on the Project's grading plans requiring Rule 403 compliance. Project construction contractors would be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of Riverside staff or its designee to confirm compliance. To comply with Rule 403:		
Thresholds 17.a) and 17.b): The Project would not change topography or ground surface relief features. The Project would not create a substantial adverse effect associated with changes in topography nor create cut or fill slopes greater than 2:1 or higher than 10 feet. Impacts would be less than significant.	Less than Significant	<ul style="list-style-type: none"> In order to limit fugitive dust emissions, all clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines. 		
Threshold 17.c): The Project site does not contain any operational subsurface sewage disposal systems under existing conditions. The Project site does not serve as a leach field for any off-site properties and has no potential to affect or negate operating subsurface sewage disposal systems.	No Impact	<ul style="list-style-type: none"> The construction contractor(s) shall ensure that all distributed unpaved roads and disturbed areas within the Project site are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three (3) times a day, preferably in the mid-morning, afternoon, and after work is done for the day. 		
Threshold 18.a): With mandatory compliance to the requirements identified in the Project's SWPPP, as well as applicable regulatory requirements, the potential for water and/or wind erosion impacts during Project construction would be less than significant. Mandatory compliance with the Project's WQMP would ensure that the Project does not result in substantial soil erosion or the loss of topsoil under long-term operating conditions.	Less than Significant	<ul style="list-style-type: none"> The construction contractor(s) shall ensure that traffic speeds on unpaved roads and the Project site area are reduced to 15 miles per hour or less. <p>CRDR 5.1.7-7 The Project's construction activities are required to comply with the provisions of the SCAQMD Rule 1186 "PM₁₀ Emissions from Paved and Unpaved Roads and Livestock Operations," which requires the use of a street sweeper certified by the Air Quality Management District</p>		

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<p>Threshold 18.b): Through standard conditions of approval, the proposed Project would be required by the County to incorporate the recommendations contained within the Project site's geotechnical report (<i>Technical Appendix E</i>) into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with expansive soils and would not create substantial risks to life or property.</p> <p>Threshold 18.c): The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.</p> <p>Threshold 19.a): With mandatory compliance to Rule 403 regulatory requirements, the potential for the Project to result in an increase in wind erosion and blowsand, either on- or off-site, would be less than significant.</p>	<p>Less than Significant</p> <p>No Impact</p> <p>Less than Significant</p>	(AQMD), and the use of non-toxic chemical stabilizers for dust control.		
5.1.8 Greenhouse Gas Emissions				
<p>Thresholds 20.a) and 20.b): Because the Project would result in approximately 2,950.35 MTCO₂e per year; the proposed Project would not exceed the County's screening threshold of 3,000 MTCO₂e per year. Impacts would be less than significant and no mitigation is required.</p>	Less than Significant	<p>CRDR 5.1.8-1 The Project is required to comply with the California Green Building Standards Code (CALGreen), including all Nonresidential Mandatory Measures, including but not limited to requirements for bicycle parking, parking for clean air vehicles, charging stations, lighting, water conservation, waste reduction, and building maintenance. The provisions of CALGreen reduce energy use and fossil fuel use, which reduce greenhouse gas emissions.</p> <p>CRDR 5.1.8-2 In compliance with the County's Climate Action Plan, prior to issuance of a building permit, the Project Applicant shall provide documentation to the County of Riverside Building Department demonstrating implementation of Climate Action</p>		

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		Plan measure R2-CE1, which requires on-site renewable energy production to offset 20% of the building's energy demand.		
5.1.9 Hazards and Hazardous Materials				
Thresholds 21.a) and 21.b): With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during construction or operation, and impacts would be less than significant.	Less than Significant	<u>Airport Land Use Commission (ALUC) Conditions:</u> CRDR 5.1.9-1 Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.		
Threshold 21.c): The Project would not interfere with an adopted emergency response or evacuation plan.	No Impact	CRDR 5.1.9-2 The following uses/activities are not included in the proposed project and shall be prohibited at this site, in accordance with Note A on Table 4 of the Mead Valley Area Plan.		
Threshold 21.d): There would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with the routine transport of hazardous substances or materials to and from the Project site.	No Impact			
Threshold 21.e): The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, would not create a significant hazard to the public or the environment.	No Impact			
Thresholds 22.a), 22.b), and 22.c): The Project site is located within "Compatibility Zone C2" of the MARB Influence area. The Project was considered and conditionally approved by the Riverside County Airport Land Use Commission (ALUC) on May 9, 2019. The ALUC Staff report for the proposed Project concluded that the Project is conditionally consistent with the MARB ALUCP and the Project does not entail any uses prohibited or discouraged in Compatibility Zone C2. With	Less than Significant	<ul style="list-style-type: none"> Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. 		

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<p>compliance to the ALUC conditions of approval, the Project is consistent with the ALUCP and would not create a hazard.</p> <p>Threshold 22.d): There are no private airport facilities or heliports within the vicinity of the Project site. As such, the Project would not result in a safety hazard for people residing or working in the project area associated with private airports or heliports.</p>	No Impact	<ul style="list-style-type: none"> Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. <p>CRDR 5.1.9-3 The following uses/activities are specifically prohibited at this location: trash transfer stations that are open on one or more sides; recycling centers containing putrescible wastes; construction and demolition debris facilities; wastewater management facilities; incinerators; noise-sensitive outdoor non-residential uses; and hazards to flight. Children's schools are discouraged.</p> <p>CRDR 5.1.9-4 The following uses/activities are not included in the proposed project, but, if they were to be proposed through a subsequent use permit or plot plan, they would require subsequent Airport Land Use Commission review: Restaurants and other eating establishments; day care centers; health and exercise centers; churches, temples, or other uses primarily for religious worship; theaters.</p> <p>CRDR 5.1.9-5 The "Notice of Airport in Vicinity" included in the May 9, 2019 County of Riverside Staff Report shall be given to all prospective purchasers of the property and tenants of the building, and shall be recorded as a deed notice.</p> <p>CRDR 5.1.9-6 Any aboveground detention basins on the site (including water quality management basins) shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basins that</p>		

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		<p>would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.</p> <p>CRDR 5.1.9-7 March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.</p> <p>CRDR 5.1.9-8 Noise attenuation measures shall be incorporated into the design of the office areas of the structure, to the extent such measures are necessary to ensure that interior noise levels from aircraft operations are at or below 45 Community Noise Equivalent Level (CNEL).</p> <p>CRDR 5.1.9-9 The proposed Project has been evaluated for 200,392 square feet of manufacturing area, 5,000 square feet of first floor office area, and 2,500 square feet of second floor mezzanine office area. Any increase in building area or change in use other than for office, manufacturing, and/or warehousing uses will require an amended review by the Airport Land Use Commission.</p> <p>CRDR 5.1.9-10 For the installation of solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.</p>		

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		<p>CRDR 5.1.9-11 It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or within 5 days after the construction of the Project's building reaches its greatest height (7460-2, Part 2).</p> <p><u>Federal Aviation Commission (FAA) Conditions</u></p> <p>CRDR 5.1.9-12 It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or within 5 days after the construction of the Project's building reaches its greatest height (7460-2, Part 2).</p> <p>CRDR 5.1.9-13 FAA approval is required for cranes or other construction equipment that would rise above an elevation 1,551.4 feet AMSL.</p>		
5.1.10 Hydrology/Water Quality				
<p>Threshold 23.a): Mandatory compliance with the SWPPP will ensure that the Project does not violate any water quality standards or waste discharge requirements during short-term construction activities. The Project Applicant also would be required to demonstrate compliance with the NPDES program, which requires certain land uses (e.g., industrial uses) to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. Mandatory compliance with the NPDES Industrial General Permit would reduce water quality impacts during long-term operation of the Project to below significant levels.</p> <p>Threshold 23.b): The Project would not install any water</p>	<p>Less than Significant</p> <p>Less than</p>	<p>CRDR 5.1.10-1 Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under a NPDES permit from the State Water Resources Control Board. Evidence that a NPDES permit has been issued shall be provided to the County of Riverside prior to issuance of a grading permit.</p> <p>CRDR 5.1.10-2 Prior to issuance of a grading permit, the Project Applicant shall prepare a SWPPP. Project contractors shall be required to ensure compliance with the SWPPP and shall permit periodic inspection of the construction site by the County of Riverside staff or its designee to confirm compliance.</p> <p>CRDR 5.1.10-3 Prior to issuance of a grading permit, the Project Applicant shall prepare and the County of Riverside shall</p>	N/A	N/A

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wells; therefore, the Project would not directly extract groundwater from the Perris North Groundwater Basin. LID Principals and Low Impact Development (LID) BMPs are incorporated into the site design to minimize potential adverse effects related to groundwater recharge.	Significant	approve a Final WQMP. The Project Applicant or its property manager shall be required to ensure compliance with the Final WQMP and shall permit periodic inspection of the Project site by County of Riverside staff or its designee to confirm compliance.		
Threshold 23.c): The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a river or stream or through the addition of impervious surfaces.	Less than Significant	CRDR 5.1.10-4 The site is located within the bounds of the Perris Valley ADP for which drainage fees and mitigation fees have been established by the Board of Supervisors. Applicable ADP mitigation fees will be due (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) prior to permits for this Project. The drainage fee is required to be paid prior to the issuance of the grading permits.		
Threshold 23.d): With mandatory compliance to the requirements noted in the Project's SWPPP, as well as mandatory compliance to applicable regulatory requirements including but not limited to SCAQMD Rule 403, the potential for water and/or wind erosion impacts during Project construction would be less than significant. Following construction, wind and water erosion on the Project site would be minimal because the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. With compliance of the Project-specific WQMP, implementation of the proposed Project would not result in substantial erosion or siltation on-site or off-site.	Less than Significant			
Threshold 23.e): All runoff would be directed to the storm drain infrastructure and the Project would not substantially increase the amount of surface runoff in a manner which would result in flooding on-site or off-site.	Less than Significant			

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Threshold 23.f): There is no potential for the Project's storm water to exceed the capacity of available infrastructure or to discharge polluted runoff. As such, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Less than Significant			
Threshold 23.g): The Project site is located in Flood Zone X, an area of minimal flood hazard and the Project would not impede or redirect flood flows.	Less than Significant			
Threshold 23.h): The Project site is not located within any dam inundation areas or special flood hazard areas. The Project site is not located close enough to an enclosed water body or the Pacific Ocean to contribute to a seiche or tsunami impact.	No Impact			
Threshold 23.i): The proposed Project would not conflict or obstruct implementation of a groundwater management plan or implementation of a groundwater sustainability plan	No Impact			
5.1.11 Land Use/Planning				
Threshold 24.a): With implementation of the mitigation measures identified for air quality and biological resources, the Project would not 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.	Less than Significant	N/A	N/A	N/A
Threshold 24.b): The Project would not divide an established community.	Less than Significant			

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5.1.12 Mineral Resources				
Threshold 25.a): The Project site is not designated by the State Mining and Geology Board as being of regional or statewide significance. Because the site is not located within an area known for mineral resources that are of value to the region and the residents of the State, no impact would occur.	No Impact	N/A	N/A	N/A
Threshold 25.b): The Project does not have a designation or zoning for mining and is not located within an area designated by the State Mining and Geology Board as being of regional or statewide significance. Therefore, there is no potential for the Project to 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.	No Impact			
Threshold 25.c): The site is not located in a State designated sector of valuable resources and there are no known quarries or mines in the immediate vicinity of the Project site. Therefore, no impact would occur.	No Impact			
5.1.13 Noise				
Threshold 26.a): The Project site is located outside the 65 dBA CNEL noise level contour boundary of the March Air Reserve Base. The Project would not expose people residing or working in the Project area to excessive airport noise levels. Impacts would be less than significant.	Less than Significant	CRDR 5.1.13-1 All construction activities shall comply with Riverside County Noise Ordinance Ordinances No. 847. This requirement shall be noted on all grading and building plans and in bid documents issued to construction contractors.	N/A	N/A
Threshold 26.b): There are no private airfields or airstrips in the vicinity of the Project site. Therefore, the Project would not expose people to excessive noise levels associated with operations at a private airstrip. No impact would occur.	No Impact			

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<p>Threshold 27.a): The Project would not cause a substantial construction-related temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, and impacts would be less than significant. The Project would also not contribute to a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project and impacts would be less than significant</p> <p>Threshold 27.b): Project-related vibration velocity levels would remain below the County of Riverside threshold of 0.01 in/sec RMS at all receiver locations during the Project's construction activities and operational activities. Thus, the Project would not expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.</p>	<p>Less than Significant</p> <p>Less than Significant</p>			
5.1.14 Paleontological Resources				
<p>Threshold 28.a): Grading and excavation activities that occur deeper than 4' feet in depth in the eastern portion of the Project site in areas composed of very old alluvial fan sediments ranked with a High Potential/Sensitivity (High B), have the potential to unearth paleontological resources that may exist below the ground surface. If significant paleontological resources are unearthed there is a potential for a significant impact if the resources are not properly identified and treated. Therefore, the Project's potential to directly or indirectly destroy unique paleontological resources that may be present beneath the ground surface in the eastern portion of the site in areas mapped with a High Potential/Sensitivity (High B), is a potentially significant impact and mitigation is required.</p>	<p>Less than Significant with Mitigation incorporated</p>	<p>Paleontological Resources MM-1: The County of Riverside shall require implementation of the Project's Paleontological Resource Impact Mitigation Program (PRIMP) by a qualified paleontologist as a condition of the Project's grading permit, for any mass grading and excavation-related activities, including utility trenching, that will exceed 4.0 feet in depth in exposed Quaternary older alluvial fan sediments (Qvofa) located in the northeast portion of the property. The PRIMP shall be followed in the event that fossils are discovered in order to ensure that significant resources are properly identified and treated and that no significant paleontological resource, site, or unique geologic feature is destroyed. The protocols documented in the PRIMP are required to be followed. [Refer to Technical Appendix J2 for a copy of the preliminary PRIMP.]</p>	<p>Project Applicant, Project Paleontologist or Geologist/ County Geologist</p>	<p>Prior to the issuance of grading permits that involve grading at depths that exceed 4.0 feet in depth and that encompass areas of exposed Quaternary older alluvial fan sediments</p>

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5.1.15 Population and Housing				
Threshold 29.a): Development of the Project would not displace existing housing or displace people, necessitating the construction of replacement housing elsewhere.	No Impact	No impacts due to population and housing would occur; thus, mitigation is not required.	N/A	N/A
Threshold 29.b): The Project is not expected to be a catalyst for any population growth and no impact associated with population projections or affordable housing needs would occur.	Less than Significant			
Threshold 29.c): The Project site would not directly generate a residential population. The on-site employment generation would not induce substantial growth in the area because it is anticipated that the Project's future employees would already be living in the Riverside County area. The Project does not propose the construction of any new homes or dwelling units that would directly result in the introduction of new residents to the area.	Less than Significant			
5.1.16 Public Services				
Threshold 30.a): The Project would be served from existing RCFD fire stations and would not cause the construction of a new fire station or physical alteration of an existing fire station.	Less than Significant	CRDR 5.1.16-1 Prior to building permit inspection, the Project Applicant shall comply with the County's Development Impact Fee (DIF) Ordinance (Riverside County Ordinance No. 659), which requires payment of a development mitigation fee to assist in providing revenue that the County can use to improve public facilities and/or equipment, to offset the incremental increase in the demand for law enforcement, including the need for law enforcement services that would be created by the Project.	N/A	N/A
Threshold 31.a): The Project would not trigger the need for new or improved law enforcement facilities. In addition, the Project would comply with the existing regulatory policies and General Plan policies that would further reduce any impacts to law enforcement services associated with the Project.	Less than Significant	CRDR 5.1.16-2 Prior to building permit inspection, the Project Applicant shall comply with the provisions of California		

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Threshold 32.a): The Project would not directly create a demand for additional public school facilities.	Less than Significant	Government Code Sections 65995.5 to 65998 by payment of required school impact fees to the Val Verde Unified School District, in accordance with the District's Level 1 Fee Schedule.		
Threshold 33.a): The Project would not directly create a demand for public library facilities and would not directly result in the need to modify existing or construct new library buildings.	Less than Significant.			
Threshold 34.a): The Project would not result in a substantial increase in demand for public and/or private health care facilities.	Less than Significant			
5.1.17 Recreation				
Thresholds 35.a) and 35.b): The Project would provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue. The impacts from the construction of the trail are evaluated throughout this MND an inherent part of the Project. The Project does not propose to construct or increase the use of any other recreational facilities; thus, no impacts from proposed recreational facilities would result from the Project.	Less than Significant	N/A	N/A	N/A
Threshold 35.c): The Project proposes to develop the site with warehouse uses, is not located within the purview of any Community Parks and Recreation Plans, and would not be subject to payment of Quimby fees. Thus, no impact would occur.	No Impact			
Threshold 36.a): The Project would provide for a segment of the County's multi-use trail system along the Project site's frontage with Seaton Avenue. The impacts from the construction of the trail are evaluated throughout this MND	Less than Significant			

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an inherent part of the Project. The Project does not propose to construct any other recreational facilities; thus, no impacts from proposed recreational facilities would result from the Project.				
5.1.18 Transportation				
<p>Threshold 37.a): Traffic generated by the Project's construction phase would not result in a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The analysis in the Project's Traffic Impact Analysis (TIA) demonstrates that the Seaton Avenue & Markham Intersection is anticipated to operate at an unacceptable LOS under EAPC (2020) traffic conditions; therefore, impacts would be potentially significant and mitigation for the Project's cumulatively considerable contribution to the impact is required. Refer to Transportation MM-1 and MM-2.</p> <p>Threshold 37.b): The Project's traffic contribution to State facilities is fewer than 50 peak hour trips and is considered less than significant.</p> <p>Threshold 37.c): The Project would not result in any hazardous transportation design features and would provide for adequate emergency access.</p> <p>Threshold 37.d): Maintenance of roads would not result in any new impacts to the environment beyond that which is already disclosed and mitigated by this MND. Therefore, the Project's potential to cause an effect upon, or a need for new or altered maintenance of roads, would be less than significant.</p>	<p>Less than Significant with Mitigation Incorporated</p> <p>Less than Significant</p> <p>Less than Significant</p> <p>Less than Significant</p>	<p>Transportation MM-1: Prior to issuance of a building permit, the Project Proponent shall make a fair share monetary contribution to the County of Riverside for improvements to the Seaton Avenue and Markham Street Intersection through the payment of the Riverside County Development Impact Fee (DIF) program. The County will use DIF funds to make the following improvements:</p> <ul style="list-style-type: none"> • Install a traffic signal. • Add a southbound and eastbound left turn lane. • Restripe the westbound approach to provide a left and shared through-right turn lane. <p>Transportation MM-2: Prior to the issuance of a building permit, the Project shall comply with the Transportation Uniform Mitigation Fee (TUMF) program as administered by the County of Riverside, which requires the Project Applicant to pay a fee that is used to fund regional transportation improvements.</p> <p>Transportation MM-3: During construction activities, Project construction activities shall comply with the California Manual on Uniform Traffic Control Devices, which specify that temporary traffic controls shall be provided during construction, such as a flag person, during all phases of construction to facilitate the flow of construction traffic on streets abutting the Project site. To implement this requirement, the requirement to</p>	<p>Project Proponent</p> <p>Project Proponent</p> <p>Project Proponent, Construction Contractor</p>	<p>Prior to issuance of a building permit.</p> <p>Prior to issuance of a building permit.</p> <p>During construction activities</p>

Appendix A: Mitigation Monitoring and Reporting Program (MMRP)				
Potential Environmental Impact	Significance Determination	Mitigation Measures (MM) and County Regulations & Design Requirements (CRDR)	Responsible/Monitoring Parties	Implementation Stage
<p>Threshold 37.e): Circulation facilities in the Project study area would have adequate capacity to accommodate the Project's construction-related traffic while maintaining acceptable LOS. Mitigation is included to ensure construction activities do not impede traffic flow. Refer to Transportation MM-3.</p> <p>Threshold 37.f): The Project would provide adequate emergency access along abutting roadways during temporary construction activities within the public right-of-way. In addition, the proposed Project would be required to comply with Riverside County Ordinance Nos. 460 and 461, which regulate access road provisions. With required adherence to County requirements for emergency access, impacts would be less than significant.</p> <p>Threshold 38.a): The Project would provide a trail segment to accommodate a segment of the County's multi-use trail system along the Project's frontage with Seaton Avenue.</p>	<p>Less than Significant with Mitigation Incorporated</p> <p>Less than Significant</p> <p>Less than Significant</p>	<p>comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors, including the following notes.</p> <ul style="list-style-type: none"> Delivery trucks shall use the most direct route between the construction site and the I-215 Freeway. Construction traffic during the AM peak hours (7:00 AM-9:00 AM) and PM peak hours (4:00 PM-6:00 PM) shall be minimized. The construction contractor shall assure that construction-related trips (passenger car and truck trips) do not exceed 55 net AM PCE peak hour trips and 55 net PM peak hour trips (inbound and outbound combined). The construction contractor shall be responsible for periodic monitoring and shall be required to supply the County of Riverside with monitoring records upon request. 		
5.1.19 Tribal Cultural Resources				
Thresholds 39.a) and 39.b): There are no known tribal cultural resources present on the Project site.	No Impact	N/A	N/A	N/A
5.1.20 Utilities/Service Systems				
Threshold 40.a): Potential impacts associated with the installation of on-site and off-site utility improvements are evaluated throughout this MND and mitigation measures are identified for construction-related effects that would reduce construction-phase impacts to the maximum feasible extent. There would be no significant impacts specifically related to the installation of water, wastewater, or storm drain	Less than Significant	N/A	N/A	N/A

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<p>infrastructure beyond the overall construction-related effects of the Project as a whole.</p> <p>Threshold 40.b): As discussed in the 2015 EMWD Urban Water Management Plan, adequate water supplies are projected to be available to meet EMWD's estimated water demand through 2040 under normal, historic single-dry and historic multiple-dry year conditions. EMWD forecasts for projected water demand are based on the population projections of SCAG, and the Project's water demand would be identical to the projection for the site's existing land use designation.</p> <p>Thresholds 41.a) and 41.b): The Perris Valley Regional Water Reclamation Facility has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Project would not create the need for any new or expanded wastewater facility.</p> <p>The installation of water, sewer, and storm drain line connections as proposed by the Project would result in physical impacts; however, these impacts are considered to be part of the Project's construction phase and are evaluated throughout this MND accordingly. Additional mitigation measures beyond those identified throughout this MND would not be required.</p> <p>Threshold 42.a): The El Sobrante Landfill, the Badlands Sanitary Landfill, and the Lamb Canyon Sanitary Landfill have sufficient daily capacity to accept solid waste generated by the Project. Impacts to regional landfill facilities during the Project's construction and long-term operational activities</p>	<p>Less than Significant</p> <p>Less than Significant</p> <p>Less than Significant</p>			

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would be less than significant.				
Threshold 42.b): The Project would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.	Less than Significant			
Thresholds 43.a) through 43.f): The proposed Project would include connections to existing electricity, natural gas, and communications infrastructure that already exist in the area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. There are no unique conditions associated with the Project's proposed utility service connections that would result in impacts to the environment that have not already been addressed by this MND Impacts would be less than significant.	Less than Significant			
5.1.21 Wildfire				
Thresholds 44.a) through 43.e): The Project site is located is an area that does not pose a high fire risk. The Project site is not located in or adjacent to a State Responsibility Area (SRA), nor is the Project site classified as a very high fire hazard severity zone, or other hazardous fire areas.	No Impact	N/A	N/A	N/A