



SADDLE RANCH SOUTH

DRAFT INITIAL STUDY

LEAD AGENCY:

City of Norco
2870 Clark Avenue
Norco, California 92860
Attention: Steve King, Planning Director

Applicant:

CapRock Partners
1300 Dove Street
Newport Beach, CA 92660
Attention: Clark Cashion

CEQA Consultant:

Kimley-Horn and Associates, Inc.
3880 Lemon Street, Suite 420
Riverside, CA 92501
Attention: Kevin Thomas, CEP, ENV SP

May 2020

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- E. Phase I Environmental Site Assessment
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- G. Preliminary Grading Plan
- H. Noise Study
- I. Traffic Impact Analysis
- I-2. SB 743 VMT Memo
- J. Riverside County Parcel Report

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1. INTRODUCTION

1.1 Project Information

Project Title: Saddle Ranch South

Lead Agency Name and Address

City of Norco
2870 Clark Avenue
Norco, California 92860

Contact Person and Phone Number

Steve King, Planning Director, City of Norco
2870 Clark Avenue Norco, CA 92860
Phone: (951) 270-5661

Project Location and Setting

The Project site is located on approximately 23.8 acres of land at 3166 Horseless Carriage Drive, in the City of Norco, Riverside County, California, Assessor Parcel Number (APN) 129-200-010. The site currently occupied by HCI Inc., a communications construction company, and contains four occupied buildings totaling approximately 133,000 square feet of industrial uses. The site includes several parking areas that are utilized throughout. Three parking lots are located near the buildings and a large open portion of the site is being used for storage of various equipment. The site includes limited landscaping consisting of native bushes, shrubs and ornamental ground cover. The site is zoned for M-1 (Heavy Commercial/Light Manufacturing) and has an (I) Industrial land use designation. *Section 12 of Township 3 South, Range 7 West, San Bernardino Baseline and Meridian. It is depicted on the United States Geological Survey (USGS) Corona North (1981), California 7.5-minute topographic quadrangle.*

Latitude: 33.927135 **Longitude:** -117.564029

Assessor Parcel Numbers

129-200-010

Project Sponsor's Name and Address

CapRock Partners
1300 Dove Street
Newport Beach, CA 92660

General Plan and Zoning Designations

General Plan: (I) Industrial
Zoning: (M-1) Heavy Commercial/Light Manufacturing

Description of Project

The Project involves the construction of three new concrete tilt-up structures including warehouse uses with limited manufacturing uses and incidental office uses on an approximately 23.8-acre site. The proposed Project is consistent with current site General Plan land use and zoning designations

(see **Section 2, Project Description**, for more detailed discussion). The approximate square footage of each structure is provided below. The total building area is approximately 374,170 square feet including mezzanine space, and maximum building height is proposed at 42 feet. The site coverage is approximately 35 percent. The Project square footage is planned to comprise approximately 15% manufacturing, 25% cold storage warehousing, and 60% warehousing uses.

- Building 1 is 154,600 square feet
- Building 2 is 119,630 square feet
- Building 3 is 99,940 square feet

In addition, the Project proposes development of 42 trailer parking stalls, 324 automobile parking stalls (expandable to 552 parking stalls), and 35 dock doors. Additionally, the Project would include a stormwater detention and a stormwater quality basin along the southern property line.

Construction

Construction would begin with the demolition and removal of all on-site structures and debris. Following this phase of construction, the entire site would be mass graded to achieve a balanced site requiring no soil import or export, after which the actual building construction would commence. The building construction phase accounts for the simultaneous actions of carpentry, asphalt paving, and painting and construction is projected to last between 9 to 13 months.

Discretionary Approvals

The City is the Lead Agency under CEQA and is responsible for reviewing and approving the MND. The City will consider the following discretionary approvals for the Saddle Ranch South Project:

- Site Plan approval
- Tentative Tract Map (TTM) to subdivide the Project site into three lots.
- Conditional Use Permit (CUP) application to allow for a height increase of 42 feet, pursuant to City Municipal Code provision 18.24.08¹.

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- None, other than various ministerial permits through existing regulatory programs.

1.2 Purpose of the Initial Study and Background

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.), this Initial Study has been prepared to evaluate the potential environmental effects associated with the construction and operation of the proposed Saddle Ranch South Project (Project). Pursuant to §15367 of the State CEQA Guidelines, the City of Norco (City) is the lead agency for the Project. The lead agency is the public agency that has the principal responsibility for carrying out or approving a Project.

As set forth in State CEQA Guidelines §15070, an Initial Study (IS) leading to a Mitigated Negative Declaration (MND) (IS/MND) can be prepared when the Initial Study has identified potentially significant

¹ City of Norco. 2020. *Municipal Code Chapter 18.24.08 – Uses Which may be Permitted by Conditional Use Permit*. Available at <https://www.codepublishing.com/CA/Norco/#!/Norco18/Norco1824.html>, accessed on March 27, 2020.

environmental impacts, but revisions have been made to the Project, prior to public review of the Initial Study, that would avoid or mitigate the impacts to a level considered less than significant; and there is no substantial evidence in light of the whole record before the public agency that the Project, as revised, may have a significant effect on the environment.

1.3 Summary of Findings

Based on the environmental checklist form completed for the proposed Project and supporting environmental analysis, the proposed Project would have a less than significant impact with implementation of mitigation measures (agreed to by the Applicant) in all environmental impact areas (discussed further in **Section 3, Initial Study Checklist**). Therefore, it is appropriate to prepare a Mitigated Negative Declaration for the proposed Project (CEQA Guidelines §15070).

1.4 Initial Study/Mitigated Negative Declaration Public Review Process

The Notice of Intent (NOI) to Adopt an MND was made available to responsible agencies, the public, and provided the Clerk of the County of Riverside and interested organizations and individuals. Reviewers are given a 20-day review period to provide written comments on the IS/MND. During the public review period, the IS/MND (including the technical appendices) can also be accessed at the City's website: norco.ca.us/news/default.asp and is available for review at the locations identified below. In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing potential Project impacts on the environment, and the ways in which the potential significant effects of the Project are proposed to be avoided or mitigated. Refer to Table 1, Public Review Period Document Review Locations.

Table 1: Public Review Period Document Review Locations

Location	Address	Hours
City of Norco Planning Department	2870 Clark Avenue Norco, CA 92860	10:00 AM to 4:00 PM, Monday–Thursday
Norco Branch Library	3240 Hamner Ave, Suite 101B Norco, CA 92860	Monday–Thursday: 10:00 AM to 8:00 PM Closed Friday and Sunday Saturday: 10:00 AM to 4:00 PM

Comments on the IS/MND should be submitted by the close of the workday of the end of the 20-day public review period. Written comments should be submitted to:

Steve King, City of Norco, Planning Director
c/o Kevin Thomas, Kimley-Horn and Associates, Inc.
Re: Saddle Ranch South Project
3880 Lemon Street, Suite 420
Riverside, CA 92501

Written comments may also be sent via email to kevin.thomas@kimley-horn.com. Comments sent via email should include the Project title in the subject line and a valid mailing address in the email. If you have any questions regarding this document or the proposed Project, please contact Steve King at (951) 270-5661 or Kevin Thomas at (951) 543-9875.

Following the receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If not or if the

issues raised do not provide substantial evidence that the Project will have a significant effect on the environment, the IS/MND and the Project will be considered during a public hearing for adoption and approval, respectively.

2. DESCRIPTION OF PROPOSED PROJECT

2.1 Project Setting and Location

The Project site is located on approximately 23.8 acres of land at 3166 Horseless Carriage Drive, in the City of Norco, Riverside County, California; Assessor Parcel Number (APN) 129-200-010; refer to **Exhibit 1, Regional Vicinity**. The site is zoned for M-1 (Heavy Commercial/Light Manufacturing) and has an (I) Industrial land use designation. The site is surrounded by the Saddle Ranch North industrial park to the north, a naval facility and the Norconian Club to the south and west (the Norconian Club is not operational), and the Department of Motor Vehicles and other commercial uses to the east; refer to **Exhibit 2, Project Location**; and **Exhibit 3, Aerial View**.

The Project site is occupied by HCI Inc., a communications construction company, and contains four buildings totaling approximately 133,000 square feet of industrial uses. The site also contains ancillary buildings and structures, and several large paved lots used for parking and storage.²

The site contains approximately 4.5 acres of developed ornamental grass and non-native plant species and trees. Most native vegetation has previously been removed and replaced with ornamental species including wattle (*Acacia sp.*), rosemary (*Rosmarinus officinalis*), pepper tree (*Schinus molle*), pine tree (*Pinus sp.*), and eucalyptus (*Eucalyptus sp.*).³

The site is located on two natural hills that have been terraced and paved. The nearest natural water source is the Santa Ana River approximately one mile to the northwest.⁴ The elevation of the Project site ranges from approximately 670 to 730 feet above mean sea level (AMSL).

2.2 Project Characteristics

The proposed Project involves the construction of an approximately 374,170 square foot (SF) industrial/warehouse/manufacturing/cold storage warehouse and distribution complex. The complex would include three new concrete tilt-up warehouse structures on one parcel, along with associated mezzanine and office space. The proposed warehouse buildings can be characterized as poured-in-place concrete tilt-up structures.

The proposed Project would be consistent with the site's existing General Plan land use (Industrial) and zoning (M-1) Heavy Commercial/Light Manufacturing; refer to **Table 2, General Plan Land Use and Zoning**.

² BCR Consulting. 2019. *Cultural Resources Assessment*. (See Appendix C)

³ Hernandez Environmental Services. 2019. *General Biological Assessment and Western Riverside County MSHCP Consistency Analysis*. (See Appendix B)

⁴ BCR Consulting. 2019. *Cultural Resources Assessment*. (See Appendix C)

Table 2: General Plan Land Use and Zoning

Location	General Plan Land Use	Zoning
Project Site	(I) Industrial	(M-1) Heavy Commercial/Light Manufacturing
North	(I) Industrial + (HDO) Housing Development Overlay	(M-1) Heavy Commercial/Light Manufacturing + (HDO) Housing Development Overlay
South	(PAD) Preservation and Development	(PAD) Preservation and Development
East	(M-1) Heavy Commercial/Light Manufacturing + (HDO) Housing Development Overlay + (C-G) Commercial General	(M-1) Heavy Commercial/Light Manufacturing + (HDO) Housing Development Overlay + (C-G) Commercial General
West	(PAD) Preservation and Development	(PAD) Preservation and Development
Source: City of Norco. May 25, 2012. <i>General Plan Land Use Map</i> . Available at http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=2798 , accessed October 2019. City of Norco. May 21, 2012. <i>Zoning Map</i> . Available at http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=2803 , accessed October 2019.		

Building 1

Building 1 is a 154,600-square foot warehouse located on the southeast corner of the Project site. This building includes 14 dock doors and 116 automobile parking stalls (expandable to 227 parking stalls located around the building and within the overflow parking area). All auto stalls and dock doors associated with Building 1 would be located along the north and west portions of the building.

Building 2

Building 2 is a 119,630-square foot warehouse located on the northeast corner of the Project site. This building includes 12 dock doors and 115 automobile parking stalls (expandable to 176 parking stalls located around the building and within the overflow parking area). All auto stalls and dock doors associated with Building 2 would be located along the south and west portions of the building.

Building 3

Building 3 is a 99,940-square foot warehouse located on the northwest corner of the Project site. This building includes 9 dock doors and 94 automobile parking stalls (expandable to 149 parking stalls located around the building and within the overflow parking area). All auto stalls and dock doors associated with Building 3 would be located along the south and east portions of the building.

All proposed buildings are anticipated to exceed the maximum allowed 35-foot building height within the M-1 zone. Municipal Code Section 18.24.08 allows for building heights of up to 50 feet with a Conditional Use Permit (CUP). Therefore, the Project is requesting a CUP to allow for an anticipated maximum building height of 42 feet (similar to the CUP recently approved for the adjacent industrial development).

Refer to **Table 3, Project Summary**, which includes a breakdown of building heights and landscaping, among other Project details; refer to **Exhibit 4, Site Plan**, which also shows site grading.

Table 3: Project Summary

Project Elements	Proposed Project
Land Use	Industrial/Warehouse/ Distribution Facility
Site Area	23.8 acres
Building Area	
Building 1:	154,600 SF
Building 2:	119,630 SF
Building 3:	99,940 SF
Total Building Area	374,170 SF
Landscaping	
Required:	51,784 SF / 5.0%
Provided:	225,000 SF / 21.7%
Building Heights	
M-1 Zone Permitted Building Heights	35' feet
Proposed Building Height:	42' feet building heights with CUP approval.
Trailer Parking Stalls (12'x55")	42 Trailer Stalls
Truck Loading Area	35 dock doors
Vehicle Parking Stalls:	116
Building 1:	115
Building 2:	94
Building 3:	324 Stalls (expandable to 552 parking stalls)
Total Parking Stalls Provided:	
Planned Use:	15% manufacturing, 25% cold storage warehousing, and 60% warehousing uses distributed among all three proposed buildings.
Source: RGA. January 3, 2020. <i>Preliminary Site Plan</i> .	

Site Access

Regional access is provided on Interstate 15 (I-15) via the Norco Drive and Second Street ramps. Local access is provided via Hamner Avenue, 5th Street, Horseless Carriage Drive, and Town and Country Drive. Truck and passenger vehicle site access would be provided via one existing forty -foot-wide paved driveway located on the southern property line where Horseless Carriage Drive and Town and Country Drive meet.

Parking

All automobile and truck trailer parking would be provided on-site. Approximately 42 trailer parking stalls would be consolidated on the southwest corner of the site, away from Horseless Carriage Drive street view. As previously stated, each warehouse building would include its own parking areas for both vehicle and truck loading and unloading areas. The trailer parking yard including 42 stalls would also be enclosed by ornamental landscape and ingress and egress to this area would be located via the main Project driveway, on the southwest corner of the site.

Building Design and Landscaping

The conceptual architectural design for the Project assumes concrete tilt-up panels with architectural treatments, such as concrete wood grain siding, reflective glass, and steel canopies with standing seam roofs over entry points. As shown in **Exhibits 5a-5c, Building Elevations**, the exterior elevations would be painted in shades of brown and earth tones to comply with the City's western themed architectural standards, similar to those used on the neighboring industrial development contiguous to the north.

The minimum landscape required is 5.0 percent, or 51,784 square feet of the site. The Project would provide 21.7 percent, or 225,000 square feet of landscaped areas. Landscaping around the buildings would include irrigated trees and various low-water use shrubs and ground cover. Landscaping around the perimeter of the site would include additional trees and groundcover including shrubs and grasses. Additionally, the Project would include a stormwater detention and a stormwater quality basin along the southern property line. Refer to **Exhibit 6, Concept Landscape Plan**.

Lighting

Site lighting would be used to provide adequate lighting for circulation, safety, and security. Night lighting would be provided seven days per week. Outdoor lighting for the parking areas would be provided consistent with the requirements set forth in the Municipal Code. Additionally, a lighting plan is required by the City and would be submitted with construction plans.

Hours of Operation

Tenant(s) of the industrial/manufacturing/warehouse/distribution facility have not been identified, so the precise nature of the facility operation cannot be determined at this time. Any future occupant would be required to adhere to the requirements of the pertinent City regulations. The hours of operation are assumed to be up to 7 days a week, may include all three shifts (24 hours per day), typically with more limited staffing between 7:00 PM and 6:00 AM.

Infrastructure and Off-site Improvements

The Project would be served by existing utilities with relatively nominal connections required. Proposed onsite utilities would tie to an existing water line, an existing storm drain line, an existing sanitary sewer line running along Horseless Carriage Drive and to a recycled water line for irrigation purposes. The Project would also connect to appropriate additional utilities, including an existing natural gas line, a communications line, and an electrical line.⁵ These existing and proposed utilities are described in greater detail in the Initial Study Section 19, Utilities and Services Systems.

Construction

Construction would begin with the demolition and removal of all on-site structures and debris. Following this phase of construction, the entire site would be mass graded to achieve a balanced site requiring no soil import or export, after which the actual building construction would commence. The building construction phase accounts for the simultaneous actions of carpentry, asphalt paving, and painting.

Construction would occur in one phase and would take place as follows: Demolition is anticipated to begin the third quarter of 2021. Construction is also anticipated to begin the fourth quarter of 2021, or the first quarter of 2022 (existing tenant has lease until summer of 2021). The site is anticipated to balance on-site and would not require any soil import or export. Construction is anticipated to end the fourth quarter of 2022, or the first quarter of 2023. Opening Year is anticipated in 2023.

2.1.1 Project Approvals

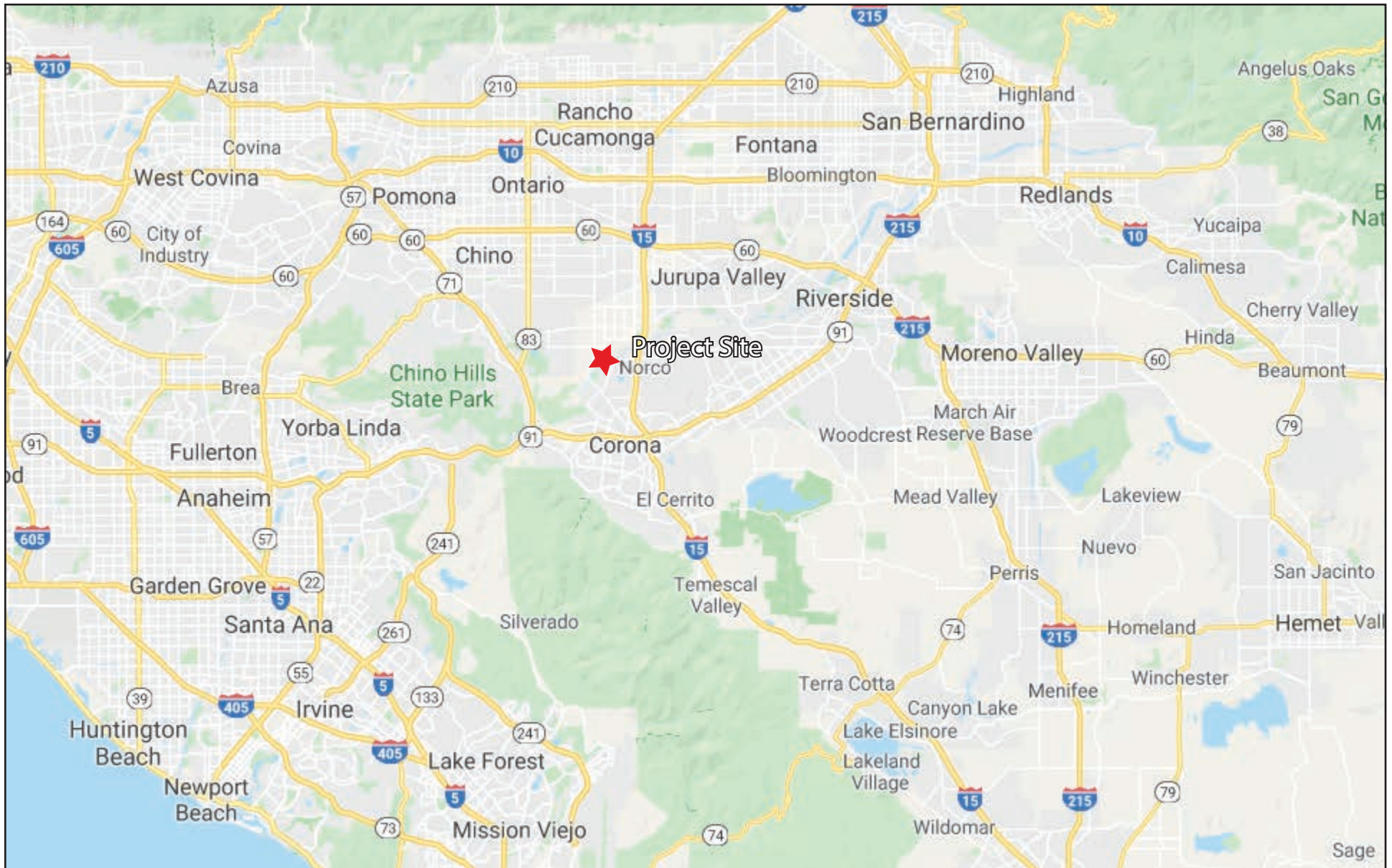
The City is the Lead Agency under CEQA and is responsible for reviewing and approving the MND. The City will consider the following discretionary approvals for the Saddle Ranch South Project:

⁵ R.A. Smith. April 24, 2020. *Preliminary Utility Plan*.

- Adoption of the MND
- Site Plan
- Conditional Use Permit (CUP) application to allow for proposed building heights of up to 42 feet, consistent with City Municipal Code Section 18.24.08.⁶
- Tentative Parcel Map (TPM) anticipated to be submitted following adoption of the MND.

Other permits required for the Project may include but are not limited to: the issuance of encroachment permits for driveways, sidewalks, and utilities; demolition permits for existing buildings; grading permits; building permits; occupancy permits. The Project may also require various ministerial actions including the approval of the grading plan and the utilities improvement plans, filing a Notice of Intent and Stormwater Pollution Prevention Plan with the Regional Water Quality Control Board, and compliance with applicable rules and regulations of the South Coast Air Quality Management District.

⁶ City of Norco. 2020. *Municipal Code Chapter 18.24.08 – Uses Which may be Permitted by Conditional Use Permit*. Available at <https://www.codepublishing.com/CA/Norco/#!/Norco18/Norco1824.html>, accessed on March 27, 2020.



Source: Kimley-Horn, 2020; Google, 2020.

EXHIBIT 1: Regional Location

Saddle Ranch South Project - Initial Study/Mitigated Negative Declaration

City of Norco



Kimley»Horn



Source: Kimley-Horn, 2020; Nearmap, 2020.

EXHIBIT 2: Project Location

Saddle Ranch South Project - Initial Study/Mitigated Negative Declaration
City of Norco



Kimley»Horn



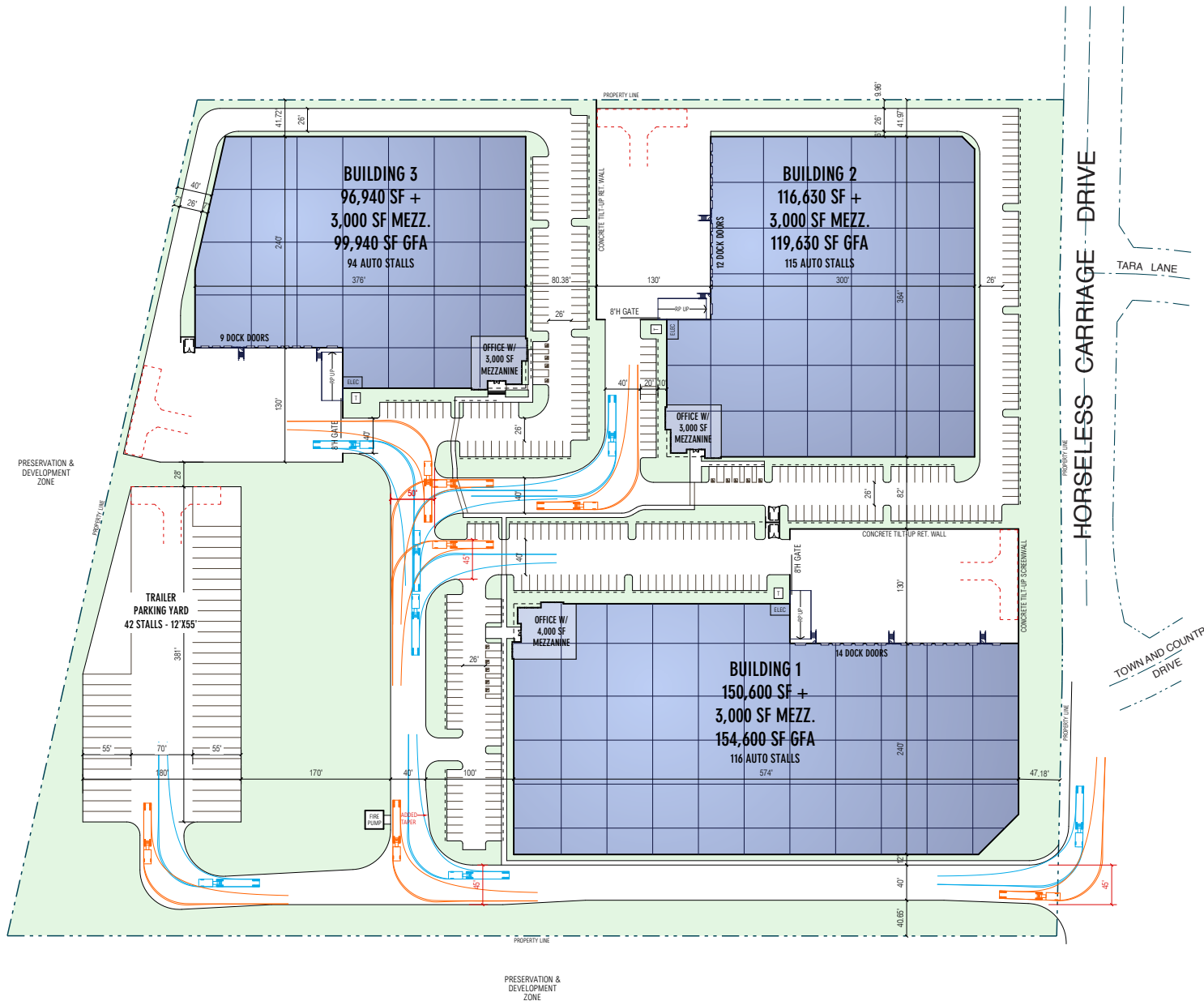
Source: Kimley-Horn, 2020; Nearmap, 2020.

EXHIBIT 3: Aerial View

Saddle Ranch South Project - Initial Study/Mitigated Negative Declaration
City of San Norco



Kimley»Horn



PROJECT DATA:

ZONE: M-1: HEAVY COMMERCIAL / LIGHT MANUF.

PROPOSED USE: WAREHOUSE
CONSTRUCTION TYPE: III-B

SUMMARY PROJECT DATA:
APPROX. NET SITE AREA: 1,035,678 SF / 23.8 AC

GROSS BUILDING AREA:
FOOTPRINT: 364,170 SF
MEZZANINE: 10,000 SF
GROSS FLOOR AREA: 374,170 SF

GROSS COVERAGE: 35.2 %
GROSS F.A.R. 36.1 %

LANDSCAPE REQUIRED: 51,784 SF / 5.0 %
LANDSCAPE PROVIDED: 270,000 SF / 26.0 %

BUILDING 1 PROJECT DATA

OFFICE: 4,000 SF
MEZZANINE OFFICE: 3,000 SF
WAREHOUSE: 146,600 SF
TOTAL AREA: 154,600 SF

PARKING REQUIRED:
OFFICE - 1/250 SF @ 8,000 SF: 32 STALLS
WAREHOUSE - 1/1000 < 20,000 SF: 20 STALLS
WAREHOUSE - 5/1000 > 20,000 SF: 63 STALLS
TOTAL REQUIRED: 115 STALLS

PARKING PROVIDED:
STANDARD STALLS: 101 STALLS
ACCESSIBLE STALLS: 5 STALLS
CARPOOL / EV STALLS: 10 STALLS
TOTAL STALLS: 116 STALLS

BUILDING 2 PROJECT DATA

OFFICE: 3,000 SF
MEZZANINE OFFICE: 3,000 SF
WAREHOUSE: 113,630 SF
TOTAL AREA: 119,630 SF

PARKING REQUIRED:
OFFICE - 1/250 SF @ 6,000 SF: 24 STALLS
WAREHOUSE - 1/1000 < 20,000 SF: 20 STALLS
WAREHOUSE - 5/1000 > 20,000 SF: 47 STALLS
TOTAL REQUIRED: 91 STALLS

PARKING PROVIDED:
STANDARD STALLS: 99 STALLS
ACCESSIBLE STALLS: 5 STALLS
CARPOOL / EV STALLS: 10 STALLS
TOTAL STALLS: 114 STALLS

BUILDING 3 PROJECT DATA

OFFICE: 3,000 SF
MEZZANINE OFFICE: 3,000 SF
WAREHOUSE: 93,940 SF
TOTAL AREA: 99,940 SF

PARKING REQUIRED:
OFFICE - 1/250 SF @ 6,000 SF: 24 STALLS
WAREHOUSE - 1/1000 < 20,000 SF: 20 STALLS
WAREHOUSE - 5/1000 > 20,000 SF: 37 STALLS
TOTAL REQUIRED: 81 STALLS

PARKING PROVIDED:
STANDARD STALLS: 78 STALLS
ACCESSIBLE STALLS: 4 STALLS
CARPOOL / EV STALLS: 8 STALLS
TOTAL STALLS: 94 STALLS

GENERAL NOTES:

1. THE PROPOSED PROJECT SHALL COMPLY WITH THE PROVISIONS OF THE CITY OF NORCO PLANNING PLAN.
2. A LANDSCAPING PLAN SHALL BE SUBMITTED TO THE PLANNING DEPARTMENT FOR APPROVAL PRIOR TO ISSUANCE OF BUILDING PERMITS AND SHALL BE IMPLEMENTED PRIOR TO OCCUPANCY.
3. THE PROJECT DOES NOT PROPOSE ANY TENTANT SIGNAGE AT THIS TIME.
4. THERE ARE NO PROTECTED PLANTS ON SITE.
5. ALL ROOF DRAINS AT STREET FRONTS SHALL BE IN THE INTERIOR OF THE BUILDING ENVELOPE.
6. ALL LANDSCAPE SHALL BE BOUND BY A 6" HIGH CONCRETE CURB.
7. A LIGHT PLAN SHALL BE SUBMITTED SHOWING CONFORMANCE WITH MINIMUM FOOTCANDLE LEVELS.

EXHIBIT 4: Site Plan
Saddle Ranch South Project
City of Norco
(Source: R.A. Smith Date)



Kimley»Horn



WEST ELEVATION



SOUTH ELEVATION



EAST ELEVATION



NORTH ELEVATION

SCALE: 1/16" = 1'-0"
0 5 10 20 40

EXHIBIT 5A: Building Elevations

Saddle Ranch South Project
City of Norco



Kimley»Horn



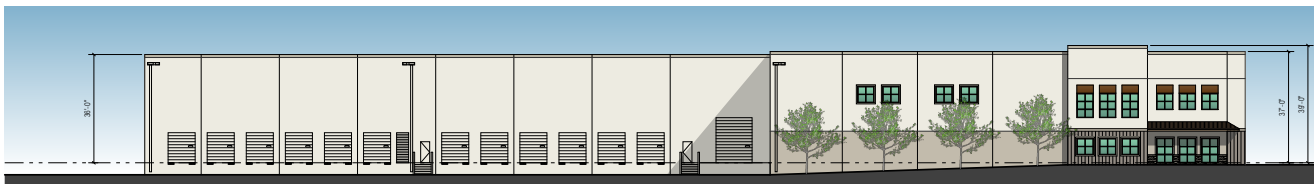
SOUTH ELEVATION



EAST ELEVATION



NORTH ELEVATION



WEST ELEVATION

SCALE: 1/16" = 1'-0"



EXHIBIT 5B: Building Elevations

Saddle Ranch South Project
City of Norco



Kimley»Horn



EAST ELEVATION



NORTH ELEVATION



WEST ELEVATION



SOUTH ELEVATION

SCALE: 1/16" = 1'-0"



EXHIBIT 5C: Building Elevations

Saddle Ranch South Project

City of Norco



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3. INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist and supporting analysis on the following pages (the environmental issue areas checked below indicate that potentially significant impacts require mitigation measures to reduce impacts to less than significant levels; these mitigation measures have been agreed to by the Applicant, and are in addition to Project compliance with City standard development policies and procedures, other existing regulatory programs and other agency’s permit requirements).

- | | |
|--|--|
| ☐ Aesthetics | ☐ Air Quality |
| ☒ Biological Resources | ☐ Energy |
| ☐ Geology/Soils | ☒ Hazard and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Mineral Resources |
| ☐ Noise | ☐ Tribal Cultural Resources |
| ☐ Recreation | ☐ Mandatory Findings of Significance |
| ☐ Utilities/Services | |
| ☐ Agricultural Resources | |
| ☐ Cultural Resources | |
| ☐ Greenhouse Gas | |
| ☐ Land Use Planning | |
| ☐ Population and Housing | |
| ☒ Transportation | |
| ☐ Wildfire | |

DETERMINATION:

On the basis of this initial evaluation (check one):

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

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

Prepared by:

DocuSigned by:



Kevin Thomas, CEP, ENV SP
Kimley-Horn and Associates, Inc.

Date:

4/30/2020

Approved by:



Steve King, Planning Director
City of Norco

Date:

4/30/20

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?			x	
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				x
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			x	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			x	

Threshold (a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Generally, scenic vistas are points accessible to the general public that provide a view with visual and aesthetic qualities of high value to the community. The City of Norco does not identify any portions of the City as a scenic vista. Directly southwest of the site is the Lake Norconian Club, also known as the Norconian Resort (listed on the National Register of Historic Places). This area is currently not accessible to the general public, as the area is operated by the U.S. Navy and California Department of Corrections, with an access control gate via Fifth Street (additional discussion regarding views from the Lake Norconian Club is provided in Checklist Response 5(a) below). The Project has been designed to include appropriate landscaping and architectural elements to be compatible with site zoning and adjacent commercial and industrial buildings.

The dominant scenic views from the Project site and the surrounding area include the San Gabriel Mountains to the northwest, and the San Bernardino Mountains to the northeast. Existing industrial and commercial uses border the Project site to the north and east, respectively; refer to **Exhibit 3, Aerial View** and **Exhibit 6, Site Photos**. The Project site elevation ranges from approximately 670 feet to approximately 730 feet AMSL. The proposed development would be located on a higher elevation site compared to development to the east, west, and south which is situated at approximately 695 feet msl; however, the Project would be at a similar elevation as the Saddle Ranch North project (formerly referred to as Shea Ranch Norco) contiguous to the north. As shown in Exhibit 6, the current two-story buildings that will be replaced are similar in scale as the proposed buildings, and therefore the Project does not represent a substantial change in the overall scale and massing of structures on the Project site.

The City's Municipal Code allows a maximum height of 35 feet in an (M-1) Heavy Commercial/Light Manufacturing zone but notes that a Conditional Use Permit (CUP) application may allow for a height increase up to 50 feet. The Project includes the request for a CUP to allow building heights up to approximately 42 feet. The proposed 42-foot-high buildings would be similar in height and scale as the

existing site buildings, and similar in height and design as the recently approved Saddle Ranch North project (formerly referred to as Shea Ranch Norco). The proposed Project will not have a substantial adverse effect on a scenic vista. For these reasons, any encroachment by the Project into the viewshed would not be significant.

Threshold (b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no State- or County-designated scenic highways in the vicinity of the Project site. Further, the General Plan does not identify any designated scenic corridors. The Project site has been previously disturbed and currently serves as an industrial site. The surrounding area is fully developed or planned for development.

There are no historically significant buildings, rock outcroppings, or trees within a scenic highway that could be affected by the proposed development. Historic resources are further discussed under the Cultural Resources analysis in this Initial Study. The nearest scenic highway is a portion of SR-91 and SR-71, located approximately 3.2 miles north and 5.2 miles west of the Project site, respectively.

Although the Lake Norconian Club, located just west, is listed on the National Register of Historic Places, the Project would not affect it in any form as minimum grading would occur on the site. Essentially, the Project site would continue to serve for industrial purposes as it currently does. Therefore, no adverse impacts on scenic resources, including resources within a State scenic highway, would result from the proposed Project's implementation. No impacts would occur, and no mitigation is required.

Threshold (c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Refer to Response (a) above. The proposed Project would not substantially change the current site's character or surrounding. The site is currently developed with four industrial buildings, formerly occupied by HCI Inc. utility construction services, and constructed in the early 2000s. The site also contains ancillary buildings and structures, and several large paved lots used for parking and storage.⁷ The proposed Project would erect three warehouse/industrial buildings of similar size and scale as the current buildings; refer to **Table 3, Project Summary**, for a breakdown of building sizes and proposed associated amenities.

Although the new structures will be visible from the eastern portions of the Lake Norconian Club (a significant historical resource under CEQA and operated as a State prison), the overall size, scale and massing of site buildings would be similar to current site buildings. Furthermore, the existing rather aesthetically sparse site (older steel buildings, large site area with asphalt and dirt, outdoor unscreened storage areas with limited landscaping) would be replaced with modern landscaped buildings of a much higher aesthetic value, consistent with the adjacent Saddle Ranch North industrial development. Therefore, the change in visual character would not significantly impact the site or the surrounding area. Impacts are less than significant.

⁷ BCR Consulting. 2019. *Cultural Resources Assessment*.

Threshold (d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Existing sources of light and glare in the vicinity of the site include street lighting and lights from commercial and industrial uses. The site also produces light and glare from existing security and parking lighting from the existing buildings. The nearest sensitive uses near the Project site is the residential community and the St. Anthony & St. Abanoub Coptic Orthodox church located approximately 0.3 miles northwest.

The Project would include the implementation of onsite safety and security lighting. Lighting would be provided throughout the parking areas as required according to the Municipal Code Section 15.12.080D. Lighting plans would be reviewed by the City to ensure conformance with the 2019 California Building Code, Title 24 (California Code of Regulations), as well as the 2019 California Green Building Standard Code (Part 11 of Title 24, California Code of Regulations) such that only the minimum amount of lighting is used, and no light spillage occurs. Consistent with City requirements, required landscaping may also help reduce light effects on adjacent development. For these reasons, lighting and glare impacts from the proposed Project are not anticipated to be significant and no mitigation is required, other than compliance with existing City standards.

Cumulative Impacts

The potential aesthetic impacts related to views, aesthetics, and light and glare would be minimally cumulative in nature considering that the Project site is currently fully developed and includes four buildings, parking areas, and outdoor security lighting. The proposed Project would also include outdoor lighting; however, the impacts of the proposed Project would only be incremental in that the Project proposes three buildings, onsite landscaping and perimeter landscaping using modern lighting fixtures that will be consistent with City Municipal DCode and the State's CALGreen building code requirements. Additionally, the Project site has a perimeter wall that will be maintained for the proposed Project. Compared to the existing conditions, the proposed Project would minimally change the existing aesthetic impacts related to views, aesthetics, and light and glare from implementation of the Project. The proposed Project would essentially replace existing site features with newer and more up-to-date ones, including shielded lighting (according to City code), and other site enhancements.

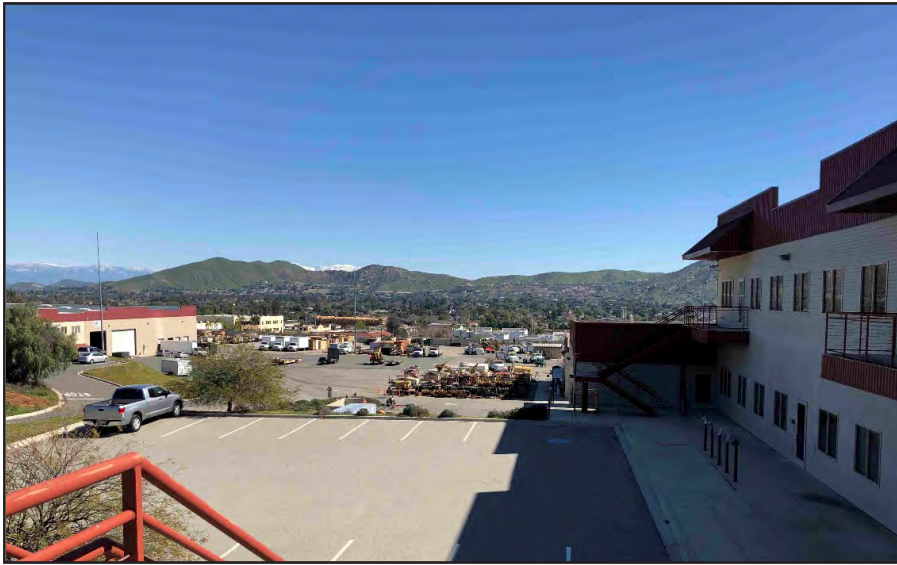
The Project itself does not have any unavoidable significant impacts. As noted above, the current site is occupied with similar light industrial uses and the Project represents a continuation of these current uses. The Project is consistent with the zoning and the City's General Plan and has therefore been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁸ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.⁹ Therefore, aesthetic impacts are not expected to be cumulatively considerable and no adverse impacts would occur.

Mitigation Measures

⁸ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020. (General Plan No. 960 EIR addresses cumulative impacts associated with buildout throughout the entire County. Although the document focuses on unincorporated County, the regional modeling includes forecasted development from all of the incorporated cities, including Norco).

⁹ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscsc.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

No mitigation is required, other than compliance with existing City standards and City Municipal Code requirements.



Building A - Parking Lot



Building A



Building C

Source: Kimley-Horn, 2020; Hillman Consulting, 2019.



Building D

EXHIBIT 6: Site Photos

Saddle Ranch South Project - Initial Study/Mitigated Negative Declaration

City of Norco

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dep. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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?				x
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				x
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				x
d) Result in the loss of forest land or conversion of forest land to non-forest use?				x
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				x

Threshold (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?

Threshold (b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Threshold (c) 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 Government Code section 51104(g))?

Threshold (d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Threshold (e) 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 or conversion of forest land to non-forest use?

No Impact. The Project site is fully developed and no agricultural or forestry resources exist on or adjacent to the Project site. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the Project vicinity; the Project site is designated as Urban and Built-Up Land.¹⁰ Furthermore, the Project site is not the subject of a Williamson Act Contract.¹¹ The Project site has a zoning designation which does not permit agricultural or forestry land uses (as defined in Public Resources Code §12220(g)). No impacts related to the loss of farmland would occur and no mitigation is required.

Cumulative Impacts

The proposed Project would have no impact on agricultural and forestry resources. Therefore, the proposed project would not contribute to any cumulative agricultural or forestry resources impacts.

Mitigation Measures

No mitigation is required.

¹⁰ DOC. 2019. *California Important Farmland Finder – Williamson Act Map*. Available at. <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed on December 3, 2019.

¹¹ DOC. 2019. *California Important Farmland Finder – Williamson Act Map*. Available at. <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed on December 3, 2019.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			x	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable state or federal ambient air quality standard?			x	
c) Expose sensitive receptors to substantial pollutant concentrations?			x	
d) Create objectionable odors affecting a substantial number of people?			x	

An air quality analysis, greenhouse gas analysis and a Health Risk Assessment were performed by Kimley-Horn (February 2020) for the Project. The air quality modeling outputs and results are included as Appendix A, Air Quality, Greenhouse Gas, and Health Risk Assessment of this Initial Study and the results are summarized herein.

Threshold (a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The City of Norco area is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and its Air Quality Management Plan (AQMP) is the applicable air quality plan for the region. Projects that are consistent with the regional population, housing, and employment forecasts identified by Southern California Association of Governments (SCAG) are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **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. 2** – The Project will not exceed the assumptions noted in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans,

and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in Table 3, Table 4, Table 5, and Table 6 below, the Project would not exceed the construction standards or operational standards. Therefore, the Project would not contribute to an existing air quality violation. Thus, the Project would be consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is consistent with the land use designation and development density presented in the City's General Plan and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP. Thus, the Project is also consistent with the second criterion.

Overall, implementation of the proposed Project would be consistent with Consistency Criterion 1 and 2; therefore, the proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. Also, the proposed Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. The Project would not conflict with or obstruct implementation of the AQMP, and there would not be any significant impacts.

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

Less Than Significant Impact.

Construction

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include O₃-precursor pollutants (i.e., ROG and NO_x) and PM₁₀ and PM_{2.5}. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the Project is estimated to last approximately between 7 to 13 months. Construction-generated emissions associated the Project were calculated using the CARB-approved CalEEMod version 2016.3.2 computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See [Appendix A: Air Quality Modeling Data](#) for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are summarized in in [Table 4: Construction Emissions](#).

Table 4: Construction Emissions (lbs/day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Year 1 (2020)	4.55	50.26	32.76	0.08	9.43	5.95
Year 2 (2021)	29.77	41.20	45.62	0.11	5.40	2.64
SCAQMD Significance Threshold	75	100	550	150	55	150
Exceed Significance?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions. Standard Condition (SC) AQ-1 requires the implementation of Rule 402 and 403 dust control techniques to minimize PM₁₀ and PM_{2.5} concentrations. The recommended mitigation measures would be required to ensure compliance with SCAQMD Rules and Regulations, which would be verified and enforced through the City's development review process.

Rule 1113 provides specifications on painting practices and regulates the ROG content of paint. As required by law, all architectural coatings for the Project structures would comply with SCAQMD Rule 1113. Table 4 shows that Project construction would not exceed ROG thresholds with the implementation of SC **AQ-2**, which limits the VOC content of paint to 50 grams per liter or less. Compliance with SC AQ-2 would ensure that construction ROG emissions would not exceed SCAQMD thresholds.

The proposed Project would not result in a significant impact to air quality during construction activities. The calculated emission results from CalEEMod demonstrate that the construction of this project would not exceed the SCAQMD thresholds, and that construction related impacts on regional air quality would be less than significant.

Operation

Project-generated emissions would be primarily associated with motor vehicle use and area sources, such as the use of landscape maintenance equipment and architectural coatings. Long-term operational emissions attributable to the Project are summarized in Table 5: Operational Emissions. The Project's "Net" operational emissions are based on the Project Traffic Impact Analysis contained in Appendix I to this MND and described further in checklist response 17. Also note that emissions rates differ from summer to winter because different weather patterns affect pollutant mixing, dispersion, O₃ formation, and other factors. As shown in Table 5, the Project emissions would not exceed SCAQMD thresholds for any criteria air pollutants. Therefore, regional operations emissions would result in a less than significant long-term regional air quality impact.

Table 5: Operational Emissions (lbs/day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Existing Conditions						
Area ¹	3.15	<0.01	0.08	<0.01	<0.01	<0.01
Energy ¹	0.12	1.16	0.97	<0.01	0.08	0.08
Mobile ¹	3.19	20.51	29.24	0.11	8.19	2.32
Total Emissions¹	6.47	21.67	30.30	0.12	8.27	2.41
Proposed Project						
Summer Emissions						
Area	8.22	<0.01	0.08	<0.01	<0.01	<0.01
Energy	0.20	1.86	1.56	0.01	0.14	0.14
Mobile	5.29	49.32	48.95	0.20	9.58	2.85
Off-Road	0.68	6.33	6.92	<0.01	0.42	0.39
Total Emissions	14.40	57.51	57.51	0.22	10.14	3.38
Winter Emissions						
Area	8.22	<0.01	0.08	<0.01	<0.01	<0.01
Energy	0.20	1.86	1.56	0.01	0.14	0.14
Mobile	4.50	52.26	47.95	0.20	9.58	2.86
Off-Road	0.68	6.33	6.92	<0.01	0.42	0.39
Total Emissions	13.61	60.45	56.52	0.22	10.14	3.38
Net Emissions						
Existing Conditions	6.47	21.67	30.30	0.12	8.27	2.41
Proposed Project ¹	14.40	64.45	57.51	0.22	10.14	3.38
Net Change	7.93	38.78	27.21	0.10	1.87	0.97
SCAQMD Significance Thresholds	55	55	550	150	55	150
Exceed thresholds?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Note: Total values are from CalEEMod and may not add up 100% due to rounding.

1. For consistency, the highest values between summer and winter results were compared for existing and proposed Project.

Area Source Emissions

Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment that were previously not present on the site.

Energy Source Emissions

Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for miscellaneous warehouse equipment, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

Mobile Sources

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_x, PM₁₀, and PM_{2.5} are all pollutants of regional concern. NO_x and ROG react with sunlight to form O₃, known as photochemical smog. Additionally, wind currents readily transport PM₁₀ and PM_{2.5}. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using the applicable Institute of Transportation Engineers trip generation rate within CalEEMod as recommended by the SCAQMD. Trip generation rates associated with the Project were based on the Saddle Ranch South Transportation Impact Study (February 2020). Based on these trip generation rates in the Project transportation impact study, the Project would generate 802 daily non-passenger car equivalent trips. The existing use currently generates 564 daily trips. Therefore, the Project would result in a net increase of 226 daily trips.

Off-Road Sources

CalEEMod also calculates emissions from off-road equipment such as forklifts, cranes, loaders, and generators used during the operation of the Project. For this analysis, it was assumed the Project would use two electric forklifts per building, for a total of six.

As discussed above, the operational emissions of criteria pollutants that would be generated by the Project would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not substantially contribute to emissions concentrations that exceed the NAAQS and CAAQS and impacts would be less than significant.

Cumulative Short-Term Emissions

The SCAB is designated nonattainment for O₃, PM₁₀, and PM_{2.5} for State standards and nonattainment for O₃ and PM_{2.5} for Federal standards. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in [Table 4](#) above, Project construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications per SCAQMD Rule 403. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the

operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in Table 5, the Project operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

As shown in Table 5, the total operational emissions of criteria pollutants that would be generated by the Project would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not substantially contribute to emissions concentrations that exceed the NAAQS and CAAQS and impacts would be less than significant.

The Project would nonetheless comply with standard City grading permit conditions as well as applicable SCAQMD rules and regulations, including the following:

SCAQMD Rules:

- **SCAQMD Rule 402** prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property.
- **SCAQMD Rule 403** applies to fugitive dust that include, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the construction site, and maintaining effective cover overexposed areas.
- **SCAQMD Rule 1108** governs the VOC content of asphalt, **Rules 1113 and 1143** that govern the VOC content in architectural coating, paint, thinners, and solvents, was accounted for in the construction emissions modeling. Furthermore, the use of low VOC coatings was included to reduce the ROG emissions that would be generated from the application of architectural coating.

Standard Conditions and Requirements

SC AQ-1. Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

SC AQ-2. The applicant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less. Contract specifications shall be included in the construction documents for the Project, which shall be reviewed and approved by the City of Norco prior to the issuance of building permits.

Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The State CEQA Guidelines indicate that a potentially significant impact could occur if a project would expose sensitive receptors to substantial pollutant concentrations.

Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: residences, long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, churches, schools, playgrounds, child care centers, and athletic facilities.

In an urbanized environment, air pollutant concentrations are usually most prominent along busy streets and at busy intersections, where automotive exhausts can build up while vehicles stop and idle or slow down to approach and proceed through or make turning movements. The primary source of potential air toxics associated with operation of the proposed Project include diesel particulates from trucks use and idling on the Project site.

The nearest sensitive receptor is a dialysis clinic located 100 feet (30 meters) to the east of the Project's property line. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Localized Construction Air Quality Impacts – Criteria Air Pollutants

Construction activities would be short-term and sensitive receptors would be exposed to air pollutants from construction emissions for short-term limited time during construction activities. Health risk is evaluated assuming a constant exposure to emissions of a 70-year lifetime, 24 hours a day, seven days a week. As the exposure to receptors would be short-term and limited during development activities, impacts from construction activities would be less than significant.

Implementation of the proposed Project would result in new warehousing land uses that may utilize solvents, cleaners, and generate motor vehicle emissions, which are not anticipated to emit TAC emissions in appreciable quantities. In addition, any industrial use that would be a stationary source of TAC emissions would be subject to the rules and regulations of SCAQMD. SCAQMD Regulation XIV (Toxics and Other Non-Criteria Pollutants), and Rule 1401 (New Source Review), would require that all sources that possess the potential to emit TACs be required to obtain permits from SCAQMD. Permits are granted if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures.

As discussed previously, the daily on-site construction emissions generated by the proposed Project were evaluated against SCAQMD's LSTs for a 4-acre site to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The nearest sensitive receptor is approximately 100 feet (30 meters) to the Project site under construction; thus, the mass rate look-up table receptor distance of 25 meters is conservatively used to evaluate the potential localized air impacts.

The LST results provided in Table 6: Construction LST Evaluation and Table 7: On-Site Operational LST Evaluation identify the daily localized on-site emissions that are estimated to occur during the Project construction. Building construction, paving, the architectural coating phases are anticipated to overlap, therefore these emissions have been combined. However, demolition, site preparation, and grading activities have been scheduled so that they will not overlap. As shown in Table 6, the daily emissions are under the SCAQMD LSTs significance threshold.

Table 6: Construction LST Evaluation

Construction Activity	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Demolition	33.20	21.75	4.23	1.93
Site Preparation	42.41	21.51	9.24	5.89
Grading	50.20	31.96	5.56	3.40
Building Construction, Paving, and Architectural Coating	33.64	33.32	1.89	1.76
Architectural Coating	1.53	1.82	0.09	0.09
SCAQMD Localized Screening Threshold (adjusted for 4.0 acres at 25 meters)	296	1,469	10	7
Exceed SCAQMD Threshold?	No	No	No	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Table 7: On-Site Operational LST Evaluation

Operations	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
On-Site and Mobile Source Emissions	18.65	18.15	2.49	1.11
SCAQMD Localized Screening Threshold (5 acres at 100 meters)	337	1,700	3	2
Exceed SCAQMD Threshold?	No	No	No	No

1. SRA Zone 22 – Norco/Corona; 5-acre area, 25 meters to receptor; conservatively assumes 20 percent of all mobile emissions occur on-site.

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Based on the estimates of the emissions associated with Project operations, the emissions are below the significance criteria for all pollutants. Because emissions are less than the significance levels, they would not conflict or obstruct the implementation of the AQMP. Additionally, vehicle emissions are projected to decrease with time due to phase-out of older, more polluting vehicles and increasingly stringent emissions standards. The proposed Project's construction and operational emissions would not exceed SCAQMD LSTs. Therefore, the Project would not result in significant localized construction or operational emissions.

CO Hotspots

CO concentration is a direct function of motor vehicle activity (e.g., idling time and traffic flow conditions), particularly during peak commute hours and certain meteorological conditions. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels with respect to local sensitive land uses such as residential areas, schools, and hospitals. Because of reduced speeds and vehicle queuing, "hot spots" typically occur at high traffic volume intersections.

As described above, the proposed Project would result in 788 daily non-passenger car equivalent trips, which is a net increase of 226 daily trips over existing conditions. Of the total Project trips 82 would occur in the a.m. peak hour and 87 would occur in the p.m. peak hour. At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the NAAQS and CAAQS for CO. It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. However, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Air Basin is now designated as attainment. Also, CO concentrations in the Project vicinity have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. As part of the SCAQMD CO Hot spot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. The proposed Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. The Air Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections as a result of 226 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant in this regard.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential

exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of nine, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time which would limit the exposure of any proximate individual sensitive receptor to TACs.

Additionally, construction is subject to and would comply with California regulations (e.g., California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, Sections 2485 and 2449), which reduce diesel PM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited. Therefore, considering the relatively short duration of DPM-emitting construction activity at any one location and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Impacts would be less than significant.

Operational Diesel Particulate Matter

An operational phase mobile source HRA was conducted based on the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and the SCAQMD Risk Assessment Procedures and the guidance from the California Office of Environmental Health Hazard Assessment (OEHHA). The analysis includes on-site and off-site impacts from the diesel trucks accessing the site on nearby sensitive receptors.

The On-Road Motor Vehicle Emission Inventory Model (EMFAC) 2017 version 1.0.2 was used to obtain the emission factors for in grams per mile for vehicle travel and grams per hour for vehicle idling. Truck emissions were based on the first possible year of operations for a fleet mix of various aged vehicles, as opposed to average emissions over a 30-year window. Trucks were assumed to travel at a speed of 25 to 50 miles per hour (mph) (depending on roadway) for off-site truck travel and 10 mph for on-site truck travel.

Idling emissions were represented in the model via line volume sources along each loading dock and 15 minutes of idling for each truck was assumed. Truck travel emissions were represented in the model via line volume sources along local roads and inside the facility where the trucks are expected to travel. The trucking routes were determined per the transportation analysis conducted for the proposed Project.

Air dispersion modeling for the HRA was performed using the United States Environmental Protection Agency (U.S. EPA) AERMOD dispersion model. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly

meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Uniform Cartesian receptors were used to evaluate the locations of the maximally exposed sensitive receptors. Surface and upper air meteorological data from the Fontana Monitoring Station provided by the SCAQMD was selected as being the most representative meteorology. In addition, National Elevation Dataset (NED) terrain data was imported into AERMOD for the Project. The modeling and analysis were prepared in accordance with the SCAQMD Modeling Guidance for AERMOD.¹²

Note that the concentration estimate developed using this methodology is conservative and is not a specific prediction of the actual concentrations that would occur at the Project site any one point in time. Actual 1-hour and annual average concentrations are dependent on many variables, particularly the number and type of vehicles and equipment operating at specific distances during time periods of adverse meteorology. A health risk computation was performed to determine the risk of developing an excess cancer risk calculated on these worst-case exposure duration scenarios. The chronic and carcinogenic health risk calculations are based on the standardized equations contained in the OEHHA Guidance Manual. Only the risk associated with the worst-case location of the Project was assessed.

Based on the AERMOD outputs, the highest expected hourly average diesel PM₁₀ emission concentrations from diesel truck traffic near sensitive receptors would be 0.0306 µg/m³. The highest expected annual average diesel PM₁₀ emission concentrations near sensitive receptors would be 0.01 µg/m³. The calculations conservatively assume no cleaner technology with lower emissions in future years. As shown in Table 8: Risk Assessment Results, the highest calculated carcinogenic risk resulting from the Project is 3.22 per million residents. As shown, impacts related to cancer risk would be less than significant at nearby residential communities.

Table 8: Risk Assessment Results

Exposure Scenario	Maximum Cancer Risk (Risk per Million) ^{1, 2}	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Residents	6.60	10	No
¹ Refer to Appendix A, Air Quality, Greenhouse Gas, and Health Risk Assessment.			
² The maximum cancer risk is based on worst-case exposure durations for the Project, 95 th percentile breathing rates, and 30-year averaging time.			

Acute and chronic impacts were also evaluated in the HRA. An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the reference exposure level. The highest maximum chronic and acute hazard index associated with both DPM and acrolein emissions¹³ from the Project would be 0.0019 and 0.0122, respectively. Therefore, non-carcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's significant air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] 6 Cal.5th 502).

¹² South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>, accessed February 5, 2020.

¹³ DPM is made up of various pollutants. Acrolein is the component of DPM that is used to determine the acute risk, because there is no acute reference exposure level for DPM. Note that DPM is used for cancer and chronic risk.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds (refer to [Table 4](#) and [Table 5](#)). Localized effects of on-site project emissions on nearby receptors were also found to be less than significant (refer to [Table 6](#) and [Table 7](#)). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. Ambient air quality standards establish levels of air quality necessary, with an adequate margin of safety, to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of those standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels exceeding ambient air quality standards.

Threshold (d) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The SCAQMD Air Quality Handbook identifies the following uses as having a potential odor issues: wastewater treatment plants, food processing plants, agricultural uses, chemical plants, composting, refineries, landfills, dairies, and fiberglass moldings. None of these uses are proposed with the Project.

In addition, odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states: A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

During construction of the Project, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary and localized to the construction site; and therefore, are not expected to affect a substantial number of people. Thus, odors generated from construction activities and the proposed land use of the Project would be less than significant.

Cumulative Impacts

Cumulative regional air quality impacts are addressed above in thresholds (a) and (b), which indicates that the Project does not have any cumulatively considerable contribution to a regional air quality impact, with respect to air quality planning and criteria pollutants. With respect to local cumulative air quality, the Project does not have any individually significant impacts to health risk or odor. As discussed above, the Project is replacing an existing industrial use with similar uses, is consistent with site zoning and the City's General Plan, will include all required modern site utilities and compliance with City and other agency construction and operational requirements. The Project site has therefore been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,¹⁴ and SCAG's Final Program EIR for the 2016-2040 Regional

¹⁴ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

Transportation Plan/Sustainable Communities Strategy.¹⁵ As such, the Project is not anticipated to result in a cumulatively considerable contribution to any local air quality impact.

Mitigation Measures

No mitigation is required.

¹⁵ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				x
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				x
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
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?		x		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				x

A General Biological Assessment and Western Riverside County MSHCP Consistency Analysis was prepared for the proposed Project by Hernandez Environmental Services (HSE), Inc. in March 2019. The report is summarized below and is included as Appendix B of this Initial Study.

On February 19, 2019, HES conducted a field survey of the site. The purpose of the field survey was to document the existing habitat conditions, obtain plant and animal species information, view the surrounding land uses, assess the potential for state and federal waters, assess the potential for wildlife movement corridors, and assess the presence of constituent elements for critical habitat if present.

Linear transects spaced approximately 50 feet apart were walked across the project site for 100 percent coverage. All species observed were recorded. Global Positioning System (GPS) waypoints were taken to delineate specific habitat types, species locations, state or federal waters, and any other information that

would be useful for the assessment of the project site. A comprehensive list of all plant and wildlife species that were detected during the field survey within the Project site is included in the technical report in Appendix B of this initial study.

Threshold (a) 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 Game or U.S. Fish and Wildlife Service?

No Impact.

According to the California Natural Diversity Data Base (CNDDB), a total of 45 sensitive species of plants, 8 sensitive habitat types, and 61 sensitive species of animals have the potential to occur on or within the vicinity of the project area. These include those species listed or candidates for listing by the U. S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the site visit. A list of all the sensitive plant and animal species is provided in Appendix B, of the General Biological Assessment.

Sensitive Plant Species

A total of 21 plant species are listed as state and/or federal Threatened, Endangered, or Candidate species which are required to be reviewed under the Narrow Endemic Plant section of the Western Riverside MSHCP, the 1B.1 listed plants on the CNPS Rare Plant Inventory or have been found to have a potential to exist on the Project site. Out of the potential eight sensitive habitats identified as having the potential to exist within the general Project area, none were recorded to exist during the field survey. The following plants were ranked 1B.1 in the CNPS rare plant inventory with potential to occur in the general area:

Chaparral sand-verbena (*Abronia villosa* var. *aurita*), Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), Marsh sandwort (*Arenaria paludicola*), Branton's milk-vetch (*Astragalus brauntonii*), Malibu baccharis (*Baccharis malibuensis*), Nevin's barberry (*Berberis nevinii*), Lucky morning-glory (*Calystegia felix*), Smooth tarplant (*Centromadia pungens* ssp. *laevis*), Salt marsh bird's beak (*Chloropyron maritimum* ssp. *maritimum*), San Fernando Valley spineflower (*Chorizanthe parryi* var. *Fernandina*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), Slender-horned spineflower (*Dodecahema leptoceras*), Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*), Tecate cypress (*Hesperocyparis forbesii*), Mesa horkelia (*Horkelia cuneate* var. *puberula*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), Jokerst's monardella (*Monardella australis* ssp. *jokerstii*), Prostrate vernal pool navarretia (*Navarretia prostrata*), Allen's pentachaeta (*Pentachaeta aurea* ssp. *allenii*), Brand's star phacelia (*Phacelia stellaris*).

The field survey found that no sensitive plant species occur in the Project site.¹⁶ Consistent with the findings in the General Biological Assessment, the City's General Plan also identifies the Project site as free of any vegetation communities.¹⁷

Sensitive Animal Resources

¹⁶ HES. 2019. *General Biological Assessment & MSHCP Consistency Analysis*, page 8.

¹⁷ General Plan. 2014. *Exhibit 3.8 – Wildfire Resources (Vegetation Communities)*.

A total of 15 animal species listed as state and/or federal Threatened, Endangered, Candidate and sensitive species which have a potential to occur on the site were analyzed as part of the General Biological Assessment and are listed below. Below is a list of species with the 15 potential animal species to occur in the general Project area:

Tricolored blackbird (*Agelaius tricolor*) is state listed candidate endangered species and listed by CDFW as a species of special concern, Arroyo Toad (*Anaxyrus californicus*) is a federally listed endangered species and a CDFW Species of Special Concern, San Diego fairy shrimp (*Branchinecta sandiegonensis*) is a federally listed endangered species, Swainson's hawk (*Buteo swainsoni*) is a state listed threatened species, Santa Ana sucker (*Catostomus santaanae*) is a federally listed threatened species, Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) is a federally listed threatened and state listed endangered species, San Bernardino kangaroo rat (*Dipodomys merriami parvus*) is a federally listed endangered species and a CDFW Species of Special Concern, Stephens' kangaroo rat (*Dipodomys stephensi*) is a federally listed endangered and state listed threatened species, Southwestern willow flycatcher (*Empidonax traillii extimus*) is a federally and state listed endangered species, Bald eagle (*Haliaeetus leucocephalus*) is a state listed endangered and CDFW fully protected species, California black rail (*Laterallus jamaicensis coturniculus*) is a state listed threatened species and is a CDFW fully protected species, Steelhead-southern California DPS (*Oncorhynchus mykiss irideus* pop. 10) is a federally listed endangered species, Coastal California gnatcatcher (*Poliophtila californica californica*) is a federally listed threatened species and CDFW species of special concern, Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) is a federally listed endangered species, and the Least Bell's vireo (*Vireo bellii pusillus*) is a federal and state listed endangered species.

The field survey revealed that none of the above-mentioned animal species listed as state and/or federal Threatened, Endangered, Candidate and sensitive species occur in the Project site.¹⁸

Additionally, the Project site has been completely altered by previous activities, including major site grading. The Project site is fully developed with four buildings, pavement, ancillary structures and ornamental grasses. Onsite vegetation is not suitable for wildlife. The site does not contain riparian habitat or other sensitive natural communities listed in local or regional plans, policies or regulations. The proposed Project would not impact, either directly or through habitat modifications, any species identified as a candidate, as a sensitive, or as a special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Therefore, no impact would occur.

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

No Impact. See Response 4(a) above. The Project site is not vegetated and does not contain jurisdictional waters or associated riparian habitat or other sensitive natural community listed in local or regional plans, policies, or regulations or by the CDFW or U.S. Fish and Wildlife Service (USFWS).¹⁹ No impacts associated with the proposed Project would occur.

Threshold (c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh,

¹⁸ HES. 2019. *General Biological Assessment & MSHCP Consistency Analysis*, page 9.

¹⁹ HES. 2019. *General Biological Assessment & MSHCP Consistency Analysis*.

vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As discussed above in Biological Resources Threshold (b), the Project site does not include wetlands. As such, the proposed Project would not impact any jurisdictional waters, including federally protected wetlands such as marshes, vernal pools, or coastal areas, since no channels or other features that carry water, including blue line features or drainages. Therefore, no impact would occur.

Threshold (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?

Less than Significant with Mitigation. The Project site is currently developed and does not contain any ephemeral streams or hillsides that could have the potential to function as wildlife movement corridors. Migratory non-game native bird species are protected under the federal Migratory Bird Treaty Act (MBTA). Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests.

The Project site contains shrubs and trees that can support nesting songbirds or raptors. The ornamental vegetation could be utilized by nesting birds and raptors during the nesting bird season of February 1 through September 15. Therefore, a potentially significant impact to nesting birds could occur. As a result, Mitigation Measure BIO-1 has been identified to reduce this impact to a level of less than significant, by reducing the potential for Project construction to disturb nesting birds.

Threshold (e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City's Municipal Code Section 12.12.025 establishes standards for removal and replacement of street trees.²⁰ The proposed Project would not conflict with any local policies or ordinances protecting biological resources. The City does not have a tree protection ordinance for trees located in private parcels. Therefore, no impacts would occur.

Threshold (f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project is zoned as M-1, which is designated for heavy commercial and light manufacturing. The Project is located within the boundaries of the Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP). The Project site is consistent with the Riverside County Multi-Species Habitat Conservation Plan and does not contain any sensitive habitat or criteria cells.²¹ The Project site is located in a general area requiring surveys for burrowing owl (*Athene cunicularia*). However, the site-specific habitat assessment conducted for burrowing owls determined that the Project site does not provide suitable habitat, as the site consists of heavily disturbed and developed habitat. Therefore, the

²⁰ Norco Municipal Code. 2019. 12.12.025 Planting of trees, removal, and replacement. Available at <https://www.codepublishing.com/CA/Norco/#!/Norco12/Norco1212.html#12.12.025>, accessed on December 4, 2019.

²¹ Riverside County. 2020. Map My County, parcel export obtained March 27, 2020. Available at https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public, accessed on March 27, 2020.

biological resources assessment and MSHCP consistency analysis concluded that focused burrowing owl surveys are not necessary to be conducted on the site. No impact would occur.

Cumulative Impacts

As discussed above, the Project site is a fully developed, disturbed industrial site that will be replaced with similar uses, and is consistent with City zoning and General Plan land use designations. As such, the Project would not result in any significant impacts to biological resources, with implementation of Mitigation Measure BIO-1. Cumulative impacts to biological resources are best addressed at the City and regional levels, through implementing the City General Plan and related regulations, and through compliance with the MSHCP and County General Plan. The Project is consistent with site zoning and the City's General Plan and has therefore been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,²² and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.²³ Therefore, the Project is not expected to result in a cumulatively considerable impact to biological resources.

Mitigation Measures

MM BIO-1

- Tree removal shall be conducted during the non-nesting season for migratory birds to avoid direct impacts. The Nesting Season is between February 1 and September 15
- If tree removal will occur during the migratory bird nesting season, between February 1 and September 15, it is recommended that pre-construction nesting bird surveys be performed within three days prior to tree removal.
- If active nests are found during nesting bird surveys, they shall be flagged, and a 200-foot buffer shall be fenced around the nests. When the biologist has determined that all birds have left the nest, and it is no longer occupied, the tree(s) can be removed, and Project construction need not wait until September 15 to remove the tree(s).

²² Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

²³ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscsc.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				x
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				x
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				x

A Cultural Resources Assessment has been prepared by BCR Consulting LLC, October 2019. The report is summarized below and is included as Appendix C of this Initial Study.

Threshold (a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Threshold (b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No Impact. A Cultural Resources Assessment was completed for the Saddle Ranch South Project. A cultural resources records search, reconnaissance pedestrian field survey, Sacred Lands File search with the Native American Heritage Commission, and paleontological overview were conducted for the Project in fulfillment of the California Environmental Quality Act (CEQA). The cultural resources records search revealed that 13 cultural resource studies have taken place resulting in six cultural resources recorded within one mile of the Project site. Of the 13 previous studies, none have previously assessed the Project site and no cultural resources have been previously recorded within the Project site boundaries.

During the records search and field survey, BCR Consulting archaeologists did not identify any cultural resources (including prehistoric or historic-period archaeological sites or historic-period buildings) or evidence of cultural resource sensitivity within the project site. The Project site has been previously disturbed, graded, and is fully developed. The Project would construct new buildings, but minimal grading will be required. As a result, BCR Consulting recommends a finding of no impacts to historical or archaeological resources under CEQA for the proposed Project. The cultural resources study also concluded that no additional cultural resources work, or monitoring is necessary during proposed activities associated with the development of the Project site. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

The Norconian Resort. The Project's Cultural Resource Assessment did not identify any significant historic resource impacts on-site, and none are anticipated to occur. However, the historic Norconian Resort is located immediately west of the site, as shown in **Exhibit 3, Aerial View**. The Norconian Resort (Lake Norconian Club) a National Register of Historic Places (listed in February 4, 2000), and a significant historical resource under CEQA, borders the Project's western boundary.²⁴ This western boundary where

²⁴ Refer to Appendix C, page 6, and <http://www.lakenorconianclub.org/> for additional information.

the Norconian Resort is located has a Preservation and Development (PAD) Zoning. The Norconian Resort is comprised of the Corpsmen's Quarters, Old Wave's Quarters, Garage/Laundry building, Plumbing House and Truck Shelter buildings which are located closest to the Project site.²⁵ The Project will not directly impact any Norconian Resort structures (refer to Checklist Response 12(b) below regarding temporary construction-related noise and vibration).

The proposed Project is not anticipated to cause a substantial adverse change in the significance of a historical or archaeological resource. A less than significant impact would occur, and no mitigation is necessary.

Threshold (c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. The Project site is not located within a known or suspected cemetery and there are no known human remains within the Project site. However, if human remains are encountered during any proposed project activities, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discover. Therefore, a less than significant impact would occur, and no mitigation is necessary.

Cumulative Impacts

The proposed Project would not result in unavoidable significant impacts to historical, known archaeological, or known human remains. The current site is occupied with light industrial uses and the Project represents a similar continuation of these current uses. The Project is consistent with site zoning and the City's General Plan and has therefore been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,²⁶ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.²⁷ The proposed Project, as well as all other proposed projects within the City, would be subject to individual project-level environmental review including AB52 and SB18 consultation where required. Since there would be no Project-specific impacts, the proposed Project is not anticipated to result in any cumulatively considerable impacts to cultural resources.

Mitigation Measures

No mitigation is required.

²⁵ United States Department of the Interior. 2000. *Staff Report to the City Council and Historic Preservation Commission regarding the "Norconian Property Historic Resources Survey & Evaluation Draft Report*. Available at <https://npgallery.nps.gov/pdfhost/docs/NRHP/Text/00000033.pdf>, accessed December 4, 2019, page 1.

²⁶ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

²⁷ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpsc.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			x	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				x

Building Energy Conservation Standards²⁸

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and are updated every three years (Title 24, Part 6, of the CCR). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the California Energy Commission (CEC) adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020.

The 2019 Standards improve upon the 2016 Standards. Under the 2019 Title 24 standards, residential buildings are expected to be about seven percent more energy-efficient and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.

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

Less than Significant. This section analyzes energy use on three sources of energy that are relevant to the Project, including electricity, natural gas, and transportation fuel for vehicle trips associated with new development, as well as the fuel necessary for Project construction. The analysis of Project electricity and natural gas use is based on the California Emissions Estimator Model (CalEEMod), which quantifies energy use for occupancy. The results of CalEEMod are included in the Air Quality Assessment and Greenhouse Gas Emissions Assessment located in Appendix A. The amount of operational fuel use was estimated using CalEEMod outputs for the Project and the California Air Resources Board (CARB) Emissions Factor (EMFAC) 2017 computer program for typical daily fuel use in Riverside County. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

Electricity

²⁸ The emissions model uses 2016 building code energy consumption rates. The project would be subject to the 2019 code. The adjustments are incorporated in the mitigation module of CalEEMod to meet current regulatory standards. As these are adjustments to be consistent with current code requirements, they are not mitigation or design features.

SCE provides electricity to the Project area. Therefore, Project implementation would result in a permanent increase in electricity over existing conditions. Based on the CalEEMod emissions modeling, the Project would have a gross annual demand of 4,685,692-kilowatt hours (kWh) (4.685692 Gigawatt hours [GWh]). This represents a net increase of 3,095,295 kWh over existing conditions. In 2018, the County consumed 15,323 GWh and SCE consumed 83,400 GWh.²⁹ The Project's increased demand represents approximately 0.03 percent of electricity consumption of the County's and 0.0056 percent of SCE's consumption. Therefore, the Project's increased demand is expected to be adequately served by the existing SCE electrical facilities. Total electricity demand in SCE's service area is forecasted to increase by approximately 23,000 Gigawatt hours (GWh)—between 2019 and 2035.³⁰ The increase in electricity demand from the Project would represent an insignificant percent increase (i.e., less than a fraction of one percent) compared to overall demand in SCE's service area. Therefore, projected electrical demand would not significantly impact SCE's level of service.

It should also be noted that the Project design and materials would be required to comply with the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. Prior to issuance of a building permit, the City of Norco Building and Safety Division would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

Some design features include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting in educational units, common areas, and landscape design. Project development would not interfere with achievement of the 60 percent Renewable Portfolio Standard set forth in SB 100 for 2030 or the 100 percent standard for 2045. These goals apply to SCE and other electricity retailers. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. As electricity retailers reach these goals, end-user non-renewable electricity use would decrease from current estimates. The Project would also be required to comply with the latest applicable building energy efficiency standards, which would minimize building energy consumption.

Natural Gas

SoCalGas provides natural gas service to the Project area. The increased demand is expected to be adequately served by the existing SoCalGas facilities. From 2018 to 2035, natural gas demand is expected to decline from 236 billion cubic feet (bcf) (2.36 billion therms) to 186 Bcf, (1.90 billion therms), while supplies remain constant at 3.775 billion cubic feet per day (bcfd) (0.04 billion therms per day) from 2015 through 2035. Based on the CalEEMod emissions modeling, the Project would have a gross annual demand of 6,456,112 kBtu (0.064561 million therms) of natural gas. This represents a net increase of 2,134,942 kBtu over existing conditions. In 2018, the County consumed 399 million therms and SoCalGas consumed 5,156 million therms of natural gas.³¹ The Project's increased demand represents approximately 0.016

²⁹ California Energy Commission, *California Energy Consumption Database*. Available at <https://ecdms.energy.ca.gov/>, accessed on October 17, 2019.

³⁰ State of California Energy Commission. 2018. *California Energy Demand 2018-2030 Revised Forecast -Figure 49: Historical and Projected Baseline Consumption, SCE Planning Area*.

³¹ California Energy Commission, *California Energy Consumption Database*. Available at <https://ecdms.energy.ca.gov/>, accessed on October 17, 2019.

percent of natural gas consumption the County and 0.001 percent of SoCalGas' consumption. Therefore, the natural gas demand from the proposed Project would represent a nominal percentage of overall demand in SoCalGas' service area (i.e., less than a fraction of one percent). The proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Fuel

During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Most construction equipment during demolition and grading would be gas-powered or diesel-powered, and the later construction phases would require electricity-powered equipment. Impacts related to transportation energy use during construction would not require expanded energy supplies or the construction of new infrastructure; impacts would not be significant.

During Project operations, the major source of energy consumption would be associated trucks transporting goods to and from the warehouse. The Project will be located near I-15 and the California 91 Express Lanes, reducing the need to drive long distances to a major highway, and adjacent to existing residential development. Based on the Project's vehicle trip generation and emissions modeled in CalEEMod, the Project would consume approximately 434,688 gallons of fuel (gasoline and diesel fuel combined) per year and the existing land uses consume approximately 218,379 gallons of fuel per year. Therefore, the project would result in a net increase of 216,309 gallons of fuel per year. In 2019, Riverside County consumed 1,004,639,936 gallons of fuel.³² The Project's increased demand represents approximately 0.02 percent of gasoline consumption for Riverside County. Therefore, the fuel demand from the proposed Project would represent a nominal percentage of overall consumption in the region (i.e., less than a fraction of one percent). Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Project operations would comply with all applicable fuel efficiency standards and would not substantially affect existing fuel supplies or resources. Additionally, fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary.

The proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is required.

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

No impact. Currently, there are no adopted local or regional GHG reduction plans applicable to the proposed Project. Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

³² EMFAC2017. Available at <https://www.arb.ca.gov/emfac/2017/>, accessed on February 25, 2020.

Cumulative Impacts

Construction and operations associated with the proposed Project would not result in the wasteful use of energy because the Project would adhere to all regulations relating to idling and fuel efficiency. X. The use of energy would not be substantial in comparison to statewide and countywide electricity, natural gas, gasoline and diesel demands. New capacity or supplies of energy resources would not be required. The Project will replace an existing similar use with a more modern industrial use, complying with all applicable local and state regulations for energy conservation.

The Project and new development projects located within the Project area would also be required to comply with all the same applicable federal, State, and local measures aimed at reducing fossil fuel consumption and the conservation of energy. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. As noted above, the Project would not result in significant impacts to state or local plans for renewable energy or energy efficiency. Project and cumulative energy resources impacts are also addressed in the Initial Study Air Quality and Greenhouse Gas sections, as it relates to energy conservation. Thus, the Project is not anticipated to result in a cumulatively considerable impact to energy resources.

Mitigation Measures

No mitigation is required.

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

Threshold (a) Would the project expose persons or structures to seismic hazards, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as defined on the most recent Alquist-Priolo Earthquake Fault Zoning map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
- ii) Strong seismic ground shaking?*

Less Than Significant Impact. All of southern California is subject to ground shaking. The primary seismic hazards are ground shaking and the potential for ground rupture along the surface trace of the fault. Secondary seismic hazards result from the interaction of ground shaking with existing soil and bedrock conditions, and include liquefaction, settlement, landslides, tsunamis or tidal waves, and seiches (oscillating waves in lakes and reservoirs). There are no active or potentially active faults in the Norco area. However, moderately strong shaking can still be expected in the City as a result from faults in the Chino/Elsinore zone.³³ The nearest fault zone near the Project site is located approximately 5.5 miles east.³⁴

The proposed structures will be designed to according to the 2019 California Building Code and as such, the Project site would not expose persons or structures to seismic hazards from earthquakes, Alquist-Priolo faults or strong ground shaking. A less than significant impact would occur.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of strength in generally cohesionless, saturated soils when the porewater pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and grain size characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean (d₅₀) grain size in the range of 0.075 to 0.2 mm. Clayey (cohesive) soils or soils that possess clay particles (d<0.005mm) in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table.

The General Plan does not identify the site as being located in an area prone to ground failure or liquefaction, due to the area's underlying bedrock layer.³⁵ Similarly, the California Geological Survey (CGS) does not identify the Project site as being located in a liquefaction hazard zone.³⁶ Therefore, a less than significant impact would occur, and no mitigation is necessary.

iv) Landslides?

No Impact. Landslides can occur if areas of steep slopes consisting of unstable soils are disturbed by ground shaking and/or heavy rainfall. The Project site and the surrounding parcels and roadways are relatively flat. There are no visual indications of active landslides in the general area. Additionally, according to CGS, the closest landslide zone is delineated approximately 7.5 miles east of the Project site. Therefore, no impacts would occur.

Threshold (b) Would the project result in substantial erosion or loss of topsoil?

Less Than Significant Impact. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the proposed Project would be

³³ General Plan. 2013 Update. *Safety Element*, page 2.

³⁴ DOC. 2019. *Earthquake Zones of Required Investigation*. Available at <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed on December 4, 2019.

³⁵ General Plan. 2013 Update. *Safety Element*, Exhibit 1 – Seismic Hazards Map.

³⁶ DOC. 2019. *Earthquake Zones of Required Investigation*. Available at <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed on December 4, 2019.

required to comply with the erosion and siltation control measures. This would include measures such as sand-bagging to reduce site runoff or hold topsoil in place prior to final grading and construction. Additionally, the proposed Project is required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting process, consistent with City Municipal Code Chapter 15.70, *City of Norco Stormwater/Urban Runoff Management and Discharge Controls*. Construction impacts would be minimized through compliance with the Construction General Permit. The NPDES permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. Compliance with City and construction requirements such as NPDES, SWPP and BMPs would ensure that the proposed Project has a less than significant from erosion or loss of topsoil.

Threshold (c) 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, subsidence, liquefaction or collapse?

Less Than Significant Impact. As stated above, the Project site is not located in an area prone to soil instability, landslides, or liquefaction. The Project site is currently fully developed with four buildings and associated amenities. The proposed Project would introduce similar uses to the site. A less than significant impact from unstable soil, landslide, lateral spreading, subsidence, liquefaction or collapse is anticipated to occur.

Threshold (d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. The Natural Resources Conservation Service shows that the Project site is composed of Cieneba sandy loam, Cieneba rock sandy loam, Greenfield sandy loam, and Vista coarse sandy loam.³⁷ No portion of the site is composed of clay or expansive soils. A less than significant impact would occur.

Threshold (e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?

No Impact. No septic tanks would be used as part of the proposed Project. The Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impacts associated with the use of septic tanks would occur as part of the proposed Project's implementation.

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

Less than Significant. As discussed above, a Cultural Resources Assessment was conducted for the Project to determine if paleontological resources exist within the Project boundaries. The entirety of the Project site has been subject to previous ground disturbance. Additionally, consultation with the Western Science Center (WSC) for paleontological resources concluded that the geologic units underlying the Project area

³⁷ NRCS. 2019. Soil Properties and Qualities. Available at <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, accessed December 4, 2019.

are entirely tonalite deposits dating from the Cretaceous period, which are considered to be of low paleontological value. The WSC does not have sensitive paleontological resource localities within the Project area or within a 1.0-mile radius of the Project site.³⁸ As such, implementation of the proposed Project is anticipated to have a less than significant impact to paleontological resources.

Cumulative Impacts

The discussion above demonstrates that the Project will not have any significant individual impacts to Geology and Soils, as the Project will comply with all applicable local and state regulations, and the site is not known to contain any unique geologic or soils hazards that cannot be addressed through standard design and construction practices. Furthermore, the Project replaces an existing similar use with a more modern industrial buildings, designed to meet all current applicable regulations related to geology and soils. Cumulative impacts to geology and soils are best addressed at the local and regional level, through the City's General Plan, and compliance with the Municipal Code and the state's building codes and other applicable regulations.

Mitigation Measures

No mitigation is required.

³⁸ BCR Consulting. 2019. *Cultural Resources Assessment - Western Sciences Center Consultation dated October 10, 2019*. (See Appendix C of this Initial Study)

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			x	
b) Conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			x	

An air quality and greenhouse gas analysis were performed by Kimley-Horn (February 2020) for the proposed Project. The modeling outputs are included as Appendix A, Air Quality, Greenhouse Gas, Health Risk Assessment of this Initial Study and the results are summarized herein.

Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns and precipitation. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), as well as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These “greenhouse” gases allow solar radiation (sunlight) into the Earth’s atmosphere but prevent radiative heat from escaping and therefore warms the Earth’s atmosphere. Greenhouse gases (GHGs) are emitted by both natural processes and human activities. Concentrations of GHG have increased in the atmosphere since the industrial revolution. Human activities that generate GHG emissions include combustion of fossil fuels (CO₂ and N₂O); natural gas generated from landfills, fermentation of manure and cattle farming (CH₄); and industrial processes such as nylon and nitric acid production (N₂O).

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the “cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit of mass of gas relative to a reference gas.” The reference gas for GWP is CO₂; therefore, CO₂ has a GWP factor of 1. The other main greenhouse gases that have been attributed to human activity include CH₄, which has a GWP factor of 21, and N₂O, which has a GWP factor of 310. When accounting for GHGs, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

State regulatory requirements and standards include the following:

In June 2005, Governor Schwarzenegger issued **Executive Order S-3-05**, which set GHG emissions reduction targets for the State of California and laid out responsibilities among the State agencies for implementing the Executive Order and for reporting on progress toward the targets. In 2006, the State adopted the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). **AB 32** declared that global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. AB 32, codified as *California Health and Safety Code* Sections 38500 – 38599, established a State goal of reducing GHG emissions to 1990 levels by the year 2020, which would require a reduction of approximately 28 percent from “business as usual” or forecasted emission levels.

Senate Bill (SB) 97, a companion bill, directed the California Natural Resources Agency (Resources Agency) to certify and adopt guidelines for the mitigation of GHG or the effects of GHG emissions. SB 97 was the State Legislature’s directive to the Resources Agency to specifically establish that GHG emissions and their impacts are appropriate subjects for CEQA analysis.

Executive Order B-30-15 was enacted by Governor Brown on April 29, 2015. Executive Order B-30-15 establishes an interim GHG emission reduction goal for the State to reduce GHG emissions to 40 percent below 1990 levels by 2030. This Executive Order directs all State agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the year 2050.

SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, **SB 100** increased California’s renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

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

Less Than Significant Impact. Due to the nature of global climate change, it is not anticipated that any single development project would have a substantial effect on global climate change. GHG emissions from the proposed Project would combine with emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project’s GHG emissions would have a “significant” impact on the environment. The guidelines direct that agencies are to use “careful judgment” and “make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” the project’s GHG emissions (14 CRC §15064.4(a)).

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD is

proposing a screening threshold of 10,000 metric tons of CO₂e (MTCO₂e) per year for stationary source industrial projects and 3,000 MTCO₂e for non-stationary source industrial projects. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO₂e per service population per year or 3.0 MTCO₂e per service population per year for projects opening after 2020. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Although the 10,000 MTCO₂e per year industrial screening threshold would appear appropriate since the Project involves the construction of new warehouse and manufacturing buildings, the City has elected to use the lower 3,000 MTCO₂e per year screening threshold which is applicable for all “land-development” and non-stationary source industrial projects.”³⁹

Construction Emissions

Construction activities would be temporary but could contribute to global climate change impacts. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers. Construction activities would be short-term in duration and would cease upon Project completion.

Total estimated construction-related GHG emissions for the proposed Project are shown in [Table 9: Construction-Related GHG Emissions](#). As shown, the total estimated unmitigated and mitigated GHG emissions during construction would equal approximately 1,018.88 MTCO₂e. This would equal to approximately 33.96 MTCO₂e per year after amortization over 30 years per SCAQMD methodology.⁴⁰ Once construction is complete, the generation of these GHG emissions would cease. Forecasted GHGs from construction have been quantified and amortized over the life of the proposed Project (30 years). The amortized construction emissions are added to the annual average operational emissions.

Table 9: Construction-Related GHG Emissions

Construction	CO ₂ e Emissions (metric tons/year)
Total (Years 1 and 2)	1,018.88
Emissions amortized over 30 years	33.96

³⁹ The 10,000 MTCO₂e threshold is also likely appropriate, because the proposed Project is analogous to an industrial use much more closely than any other land use such as commercial or residential in terms of its expected operating characteristics. Typical industrial zoned areas include storage facilities, warehouses, plants, and airports, while commercial land uses are generally designated as businesses that have some kind of interaction with the public and typically include offices, retail stores, hotels, or restaurants. Note also that the SCAQMD has not yet formally adopted any GHG CEQA significance thresholds other than interim guidance where SCAQMD is the CEQA Lead Agency.

⁴⁰ The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs of the GHG analysis found in Appendix A of this Initial Study.

Operational Emissions

Area and indirect sources of GHG emissions associated with the proposed Project would primarily result from electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed within the Project site would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. In addition, the Project would generate GHG emissions from motor vehicle trips.

The estimated operational GHG emissions that would be generated from implementation of the Project are shown in Table 9: Project GHG Emissions. Additionally, in accordance with SCAQMD's recommendation, the amortized construction-related GHG emissions from the study are added to the operational emissions estimate to determine the total annual GHG emissions.

As shown in Table 10, the proposed Project's annual GHG emission generation would be approximately 5,402.30 MTCO₂e per year and the net GHG emissions would be approximately 2,734.47 MTCO₂e per year (detailed calculations are included in Appendix A of this report), which would not exceed SCAQMD's threshold of 3,000 MTCO₂e per year. Therefore, the increase in GHG emissions from implementation of the proposed Project would be less than significant.

Table 10: Project GHG Emissions

Emissions Source	CO ₂ e Emissions, metric tons/year
Existing Site	
Total	2,660.87
Proposed Project	
Area	0.02
Energy	1,436.80
Mobile	3,433.13
Off-road	105.59
Waste	90.16
Water	295.68
Subtotal Total	5,402.30
Amortized Construction Emissions	33.96
Total Annual Project GHG Emissions	5,395.34
Net GHG Emissions	2,734.47
Threshold	3,000
Exceeds Threshold?	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs of the GHG analysis found in Appendix A of this Initial Study.

Note: Total values are from CalEEMod and may not add up 100% due to rounding.

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

Less Than Significant Impact. The City of Norco is a participant in the Western Riverside Council of Government (WRCOG) Subregional CAP. The specific goals and actions included in the WRCOG Subregional CAP that are applicable to the proposed Project include those pertaining to energy and water use reduction, promotion of green building measures, waste reduction, and reduction in vehicle miles traveled. The proposed Project would be required to include all mandatory green building measures for new developments under the CALGreen Code, as required by the City's Municipal Code Chapter 15.08, which requires that the new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. In addition, the code requires that all landscaping comply with water-efficient landscaping requirements. Furthermore, implementation of CALGreen compliant building and appliance standards would result in water, energy, and construction waste reductions for the proposed Project. In addition, as described above, the proposed Project would not exceed the GHG thresholds. Therefore, the proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for reducing the emissions of greenhouse gases.

Cumulative Impacts

The Project's emissions would be below the SCAQMD's threshold for GHG emissions. As discussed above, the Project would not result in a cumulatively considerable impact associated with GHGs.

Mitigation Measures

No mitigation is required, other than compliance with applicable City, SCAQMD and state standards.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		x		
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?			x	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				x
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				x
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				x
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				x
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				x
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires?				x

The scope of discussion and findings herein are based in part on the following studies:

- Hazardous Materials Survey prepared by Hillman Consulting on February 2019 and is provided as Appendix D of this initial study.
- Phase I Environmental Site Assessment (ESA) prepared by Hillman Consulting on February 2019 and is provided as Appendix E of this initial study.

On February 19 and 20, 2019, Hillmann conducted a Hazardous Materials Survey which included an inspection of interior and exterior for Asbestos-Containing Building Materials (ACBM), Lead-Based Paint (LBP) and Polychlorinated Biphenyls (PCBs). The survey made the following findings:

Hazardous Materials Present During Survey

- Fluorescent light fixtures containing “Ballasts”
- Mercury-containing light bulbs
- Bulk Hazardous Chemical Containers

Hazardous Materials Not Present During Survey

- Tritium Exit Signs
- Asbestos-containing building materials (ACBM)
- Lead-Based Paint (LBP)

Although the previously mentioned hazardous materials were present during the hazardous materials survey, these were not designated as Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), or Controlled Recognized Environmental Conditions (CREC). This is consistent with the findings of the Phase I Environmental Site Assessment which found no RECs, HRECs, or CRECs. These findings are available as Appendix D, Hazardous Materials Survey, and Appendix E, Phase I Environmental Site Assessment of this initial study.

Threshold (a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact With Mitigation.**Construction**

Both the EPA and the US Department of Transportation (DOT) regulate the transport of hazardous waste and material, including transport via highway. The EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The DOT regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

Project construction activities may include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills. The use and handling of hazardous materials during construction would occur in accordance with applicable federal, state, and local laws, including California Division of Occupational Safety and Health (Cal/OSHA) requirements.

All construction activities would be subject to the NPDES permit process that requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP), and the latest industry BMPs. Additionally, the Project site is not included on the list of hazardous waste sites (Cortese List) compiled by the Department of Toxic

Substances Control (DTSC) pursuant to Government Code Section 65962.5 and therefore is not anticipated to release known hazardous materials due to ground-disturbing activities.⁴¹

A Phase I Environmental Site Assessment determined that asbestos-containing materials (ACM) or lead-based paint (LBP) were not evident (refer to Appendix E). However, a comprehensive inspection for both ACM and LBP is recommended. ACM and LBP surveys and abatement would be required prior to demolition of the existing buildings, pursuant to the existing South Coast Air Quality Management District (SCAQMD), Cal/OSHA, and the sections of the California Health and Safety Code. Compliance with these existing regulations, as ensured through the permitting process and included as HAZ-1 and HAZ-2, would reduce impacts related to routine transport and disposal of asbestos-containing materials and lead-based paint during construction activities to a less than significant level.

Operations

Project operations could result in the use, storage, and disposal of hazardous materials. These can include, but are not limited to art supplies, pesticides and fertilizers, and maintenance supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, fuels) (U.S. EPA 2006). Additionally, as part of the warehouse/industrial nature of the proposed Project, some chemicals could be handled; thus, the proposed Project must comply with regulations regarding the management, transport, and disposal of hazardous waste in accordance with the EPA's Resource Conservation and Recovery Act and other applicable State and local requirements (EPA 2006, 2018a). Hazardous materials involved in Project operations are anticipated to be similar to the current industrial uses on the site, which the Project will replace with similar industrial uses built and operated under all applicable hazardous materials regulations.

To avoid accidental release/or uncover potential hazardous materials during demolition activities, the Accidental Release Prevention (CalARP) program (CCR Title 19, Division 2, Chapter 4.5) covers certain businesses that store or handle more than a certain volume of specific regulated substances. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive. A list of regulated substances is provided in Article 8, Section 2770.5 of the CalARP program regulations. The businesses that use or handle potentially harmful quantities of a regulated substance must implement an accidental release prevention program and may be required to complete a Risk Management Plan (RMP). An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. The purpose of an RMP is to decrease the risk of release of a regulated substance that might harm the environment and community. An RMP includes safety information, hazard review, operating procedures, training, maintenance, compliance audits, and incident investigation. In addition, the RMP is required to consider proximate sensitive populations, such as residential areas and schools.

With compliance with EPA's Resource Conservation and Recovery Act and compliance with MM HAZ-1 and MM HAZ-2, the Project would cause a less than significant impact from the routine transport, use, or disposal of hazardous materials. Adherence to federal, state, and local health and safety requirements regarding these substances would reduce the potential impacts to less than significant.

⁴¹ Department of Toxic Substances Control (DTSC) EnviroStor. 2019. *Hazardous Waste and Substances Site List*. Available at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=city+of+norco>. Accessed on December 5, 2019.

Threshold (b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?

Less Than Significant Impact. Refer to Response 9(a) above. The proposed Project is not anticipated to result in a release of hazardous materials into the environment. A less than significant impact would occur.

Threshold (c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located within ¼-mile of the Project site. The nearest schools are Norco College and John F. Kennedy Middle School (¾ miles south) and Highland Elementary School (0.6 miles north). The proposed Project would involve hazardous emissions or large quantities of hazardous materials typical of warehouse industrial use, consistent with the site's M1 Zoning. Any future school developed within the surrounding area will be subject to the oversight of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), as required by State law. New school sites are required to be free of contamination or, if the properties were previously contaminated, they must be cleaned up under DTSC's oversight. No impacts are anticipated.

Threshold (d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would create a significant hazard to the public or the environment?

No Impact. The Project site is not included on a hazardous site list compiled pursuant to California Government Code Section 65962.5. The closest site listed in the EnviroStor site is the Wyle Labs facility located at 1841 Hillside Avenue, approximately 1.7 miles southeast from the Project site.⁴² In addition, according to Phase I ESA, there were no Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), Controlled Recognized Environmental Conditions (CRECs), and no significant data gaps (SDGs) were identified, (as defined by ASTM Practice E 1527-13). No significant adverse impacts relative to hazardous materials sites would result from Project implementation.

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

⁴² DTSC. 2019. *EnviroStor*, page 8. Available at

https://www.envirostor.dtsc.ca.gov/public/search.asp?PAGE=8&CMD=search&ocierp=&business_name=&main_street_number=&main_street_name=&city=&zip=&county=&branch=&status=ACT%2CBKLG%2CCOM&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&cleanup_type=&npl=&funding=&reporttype=CORTESE&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCE+S+SITE+LIST&federal_superfund=&state_response=&voluntary_cleanup=&school_cleanup=&operating=&post_closure=&non_operating=&corrective_action=&tiered_permit=&evaluation=&spec_prog=&national_priority_list=&senate=&congress=&assembly=&critical_pol=&business_type=&case_type=&display_results=&school_district=&pub=&hwmp=False&permitted=&pc_permitted=&inspections=&complaints=&censustract=&cesdecile=&ORDERBY=upper%28business_name%29&next=Next+50, accessed on December 5, 2019.

Threshold (f) For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact (thresholds (e) and (f)). There are no airports located in the immediate vicinity of the Project site. The nearest airports are the Corona Municipal Airport located approximately three miles southwest, and the Chino Airport located approximately four miles northwest. Therefore, no impact would occur.

Threshold (g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. The City has adopted a General Plan Safety Element and a Local Hazard Mitigation Plan⁴³ to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. No revisions to the adopted Plans would be required as a result of the proposed Project. Primary access to all major roads would be maintained during construction. Therefore, no impacts would occur.

Threshold (h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Also refer to Checklist Responses 20, Wildfire, (a through d). The proposed Project would not expose people or structures to a risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The Project is proposed in an area that is mostly developed and is not located adjacent to wildland areas. Additionally, the General Plan shows that the Project site is not located on a Fire Hazard Severity Zone (FHSZ).⁴⁴ Therefore, no impacts are anticipated.

Cumulative Impacts

The incremental effects of the proposed Project related to hazards and hazardous materials, if any, are anticipated to be minimal with the implementation of Mitigation Measures HAZ-1, and any effects would be site-specific. Therefore, the proposed Project would not result in incremental effects to hazards or hazardous materials that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The proposed Project would not result in cumulatively considerable impacts to or from hazards or hazardous materials.

Mitigation Measures

MM HAZ-1: SCAQMD Rule 1403. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule (SCAQMD) 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction

⁴³ City of Norco. 2017. Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=24754>, accessed on December 5, 2019.

⁴⁴ General Plan. 2005. *Safety Element, Exhibit 2 – Fire Hazards Map*.

activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

MM HAZ-2: Lead. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. CalOSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

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

A Water Quality Management Plan (February 19, 2020) and a Preliminary Grading Plan (March 24, 2020) were prepared by R.A. Smith. The results and conclusions are summarized herein, and the reports are included as Appendices F Appendix G, respectively, to this Initial Study.

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

Less Than Significant Impact.

The California Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.) and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require 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 Regional Water Quality Control Board (RWQCB).

Construction

Construction of the proposed Project and offsite improvements would involve clearing, soil stockpiling, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

The proposed Project would disturb more than one acre of land surface; therefore, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) stormwater program. The City of Norco is a co-permittee under Riverside County's NPDES Permit, and as such is required to adhere to the County-wide NPDES permit requirements.⁴⁵ To minimize water quality impacts during construction, construction activities would be required to comply with a Stormwater Pollution Prevention Plan (SWPPP) consistent with the General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit). To obtain coverage, the Project Applicant is required to submit a Notice of Intent prior to construction activities and develop and implement a SWPPP and monitoring plan. The SWPPP identifies erosion-control and sediment-control Best Management Practices (BMPs) that would meet or exceed measures required by the Construction Activity General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. These requirements would ensure that potential Project impacts related to soil erosion, siltation, and sedimentation remain less than significant and avoid violation to any water quality standards or waste discharge requirements.

Operations

The development of the Project site would result in an increase of impervious surface which would increase stormwater runoff; however, this runoff would be captured and conveyed to the proposed stormwater detention basin, which would allow for onsite water treatment and percolation. The Project would be required to implement a Water Quality Management Plan (WQMP), pursuant to the requirements of the City's NPDES permit. The WQMP is a post-construction management program that ensures the on-going protection of the watershed basin by requiring structural and programmatic controls. The WQMP identifies structural controls (including a contained, onsite wastewater treatment plant) and programmatic controls to minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the Project does not violate any water quality standards or waste discharge requirements during long-term operation. Therefore, water quality impacts associated with long-term operation of the Project would be less than significant and no mitigation measures would be required.

⁴⁵ City of Norco. 2019. Municipal Code Chapter 15.70 (Stormwater/Urban Runoff Management and Discharge Controls).

Available at <https://www.codepublishing.com/CA/Norco/#!/Norco15/Norco1570.html#15.70>, accessed December 9, 2019.

Threshold (b) Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. No potable groundwater wells are proposed as part of the Project, and the Project will not rely on groundwater supplies for its water. Therefore, no depletion of groundwater supplies would result from Project implementation. As discussed in the Public Utilities section, the proposed Project would be served with potable water by the City of Norco. City staff have indicated that adequate water supplies are available for the Project. Thus, the Project's demand for water service would not substantially deplete groundwater supplies.

The Project also would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The Project site is already developed with impervious surfaces (such as the parking area and buildings), and the proposed Project would have similar site coverage and permeability, including substantial onsite landscaping.⁴⁶ Additionally, the Project would provide a stormwater detention and a stormwater quality basin along the southern property line that would also help replenish groundwater. Therefore, the Project would have No Impact on groundwater supplies and groundwater recharge.

Threshold (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, in a manner which would:

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

Less Than Significant Impact. There are no natural drainage courses that traverse the Project site. The Project site is relatively flat and is currently developed. The proposed Project would include the development of a storm drainage system consistent with City requirements to convey stormwater runoff to the mainline storm drain system. Stormwater management practices as required under City of Norco Municipal Code (Section 17.24.080 - Drainage Improvements) would further reduce any impacts to a less than significant level. In addition, required on-site detention would further limit the release of storm water from the site; therefore, minimizing the potential for flooding to occur on site or off site. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Refer to Response (i) above. The site does not include any streams or rivers, which could be altered by the proposed Project. In addition, the required on-site detention and storm drain facilities would minimize the potential for flooding to occur on-site or off-site and would be required as a condition of Project approval. Therefore, impacts would be less than significant.

⁴⁶ The existing site development has approximately 810,494 square feet of impervious areas. The proposed Project would reduce the amount of impervious area to 671,124 square feet (R.A. Smith. February 2020. Water Quality Management Plan, page 6).

- iii) *Would the project 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 Impact. Refer to Response (i) above and the WQMP (Appendix F) which documents the Project's ability to adequately convey stormwater runoff into existing City drainage facilities. The Project would provide substantial onsite landscaping and appropriate stormwater runoff retention basins consistent with City and NPDES permit requirements, which will capture low flow storm water runoff from the site. On-site stormwater runoff associated with the Project would be engineered to be conveyed through public street improvements and storm drains. Additionally, with required adherence to a SWPPP and WQMP as discussed above under Response a), the proposed Project would not be a substantial source of polluted runoff. Therefore, less than significant impacts would occur, and mitigation is not required.

- iv) *Would the Project impede or redirect flood flows?*

Less Than Significant Impact. Refer to Responses 10(c)(i) through 10(c)(iii) above. The Project includes on-site storm drainage facilities to adequately convey flood flows as discussed further in Appendix G, Preliminary Grading Plan. The site is served by a fully functional storm water drainage system which would continue to operate as in existing conditions. The Project would not otherwise impede flows, nor would the Project redirect flood flows because the Project site is not in a flood-prone area. As such, a less than significant impact would occur.

Threshold (d) Would the project be located in flood hazard, tsunami, or seiches zones, and risk release of pollutants due to Project inundation?

No Impact. The proposed Project is outside of any mapped floodplain area.⁴⁷ The nearest significant surface water bodies are Lake Norconian (elevation 640 feet msl), located approximately ¼-mile southwest of the site at its nearest point, and the Santa Ana River (elevation approximately 580 feet msl), located approximately ¾-mile northwest of the Site at its nearest point. Both of these water bodies are below the site elevation and therefore pose no flooding or seiches hazard to the site. According to the EDR Radius Map Report, the site is not located in a 100-year or 500-year flood zone. The nearest 100-year flood zone is located approximately 3/8-mile southwest of the site, and the nearest 500-year flood zone is located approximately ½-mile east of the Site. No flood hazard would occur with Project implementation.

The Project site is located approximately 31 miles inland from the Pacific Ocean. Given the distance from the coast, there is no potential for the Project site to be inundated by a large, catastrophic tsunami or seiche. Additionally, the Project site is at an elevation greater than the surrounding parcels, for this reason, the Project site would not be exposed to seiches or the release of pollutants due to Project site inundation. Lastly, no steep slopes are located in the Project vicinity; therefore, the risk of mudflow is insignificant.

⁴⁷ Riverside County Flood Control District. 2020. RCFCWCD – Public Flood Hazard Determination. Available at http://rcflood.org/FloodDetermination/FloodDetermination_V11.aspx, accessed on February 25, 2020.

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

No Impact. The proposed Project's potable water supply would continue to be served by the City of Norco through its Public Works Department division. The City of Corona completed a Groundwater Management Plan (GWMP) that the City of Norco has reviewed. The report indicates that overdraft conditions may have occurred in the Temescal basin during three years between 1990 to 2004 period as pumping increased from about 10,000 acre-feet per year (AFY) to almost 20,000 AFY. The City will continue to rely on the groundwater basin for a substantial amount of its local groundwater water supply. The City has identified numerous strategies for managing groundwater while maintaining groundwater production and supply. The City of Corona GWMP concluded that, assuming no other significant changes in the water extraction amount, average pumping totals of about 12,000 AFY in Temescal basin would result in no significant loss of groundwater storage. The City anticipates shifting a portion of its local groundwater production/extraction from the Temescal groundwater basin to the Chino groundwater basin.⁴⁸ As discussed above, with the City's anticipated groundwater forecasting and the fact that the Project is consistent with the land use and zoning, the Project is not anticipated to result in any significant water quality impacts or groundwater management plan impacts.

Additionally, the Project is subject to appropriate stormwater runoff requirements as set forth in City municipal code and in NPDES permit requirements, including preparation of a construction WQMP and operational SWPPP.⁴⁹ The Project has no effect on the Water Quality Control Plan for the Santa Ana River Basin, as the Project will meet all applicable stormwater discharge requirements and does not involve any direct discharge into the Santa Ana River.⁵⁰ Therefore, the Project is anticipated to have a less than significant impact on water quality.

Cumulative Impacts

As noted above, the Project does not have any unavoidable significant impacts regarding hydrology or water quality. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁵¹ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁵² Cumulative impacts to hydrology and water quality are best addressed on a local or regional level through such planning programs as the City's General Plan and municipal code, as well as the County General Plan, Santa Ana River Basin Water Quality Control Plan, and Santa Ana Watershed Project Authority's Integrated Regional Water Management (IRWM) Plan.⁵³ The Project is consistent with City zoning and General Plan designations and will comply with all applicable local and State water quality regulations. No significant Project impacts are anticipated, nor is the Project anticipated to result in a cumulatively considerable contribution to hydrology or water quality impacts.

⁴⁸ City of Norco. 2015. *Urban Water Management Plan*, page 43. Available at: <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=23893>, accessed on February 25, 2020.

⁴⁹ R.A. Smith. February 2020. *Water Quality Management Plan, Appendix 8: Source Control of the WQMP*.

⁵⁰ https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed March 31, 2020).

⁵¹ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

⁵² Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtppscs.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

⁵³ <https://sawpa.org/owow/> (accessed March 31, 2020).

Mitigation Measures

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				x
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				x
c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?				x

As discussed on Section 2.0, Description of the Proposed Project, the proposed Project would be consistent with the site's existing General Plan land use (Industrial) and zoning (M-1) Heavy Commercial/Light Manufacturing; refer to **Table 2, General Plan Land Use and Zoning**. The proposed Project site is currently a fully developed site including four industrial buildings and ornamental landscaping and other ancillary structures. The Project would replace these structures with three industrial buildings.

Threshold (a) Would the project physically divide an established community?

No Impact. The proposed Project would be located in an existing built-up urban area with similar surrounding land uses to the north and commercial uses to the east. The proposed Project is consistent with the General Plan Land Use and Zoning for the Project site and would not physically divide an already established community. Therefore, no impacts would occur, and no mitigation is required.

Threshold (b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The proposed Project is consistent with both the City General Plan land use and zoning designations. The Project site is zoned M-1, designated for heavy commercial or light manufacturing use. The Project proposes a building height variance, requiring a Conditional Use Permit (CUP). The M-1 zoning allows for building heights up to 35 feet high; the Project is requesting a CUP to allow for building heights of 42 feet high. The requested building heights would be consistent with the industrial development contiguous to the north. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect with the approval of the CUP. No impacts would occur, and no mitigation is required.

Threshold (c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. Refer to Section 4, Biological Resources Response (f). The Project is located within the boundaries of the Western Riverside County MSHCP and also within the Norco Area Plan. However, the Project site is not located within an Area Plan Subunit, Specific Plan, Cell Group, or Cell Number. No impact relative to a designated conservation area would occur; however, Project development would be required to pay the applicable MHSCP mitigation fees.

Cumulative Impacts

As discussed above, the Project would not result in any significant impacts to land use and planning. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁵⁴ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁵⁵ The Project is consistent in nature, design and use as the recently approved Saddle Ranch North Project (previously referred to as Shea Ranch Norco) to the immediate north of this Project. Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant land use or planning impact.

Mitigation Measures

No mitigation is required.

⁵⁴ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

⁵⁵ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscsc.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
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?				x

The California Department of Conservation (CDC) has a classification system for soils based on the suitability of the soils for mining and extraction of resources. The CDC establishes a hierarchy of mineral resources zones as follows⁵⁶:

MRZ-1	Areas where geologic information indicates no significant mineral deposits are present.
MRZ-2	Areas that contain identified mineral resources.
MRZ-2a	Areas underlain by mineral deposits where geologic data shows that significant measured or indicated resources are present.
MRZ-3	Areas of undetermined resources significance.
MRZ-3a	Areas containing known mineral deposits that may qualify as mineral resources.
MRZ-3b	Areas containing inferred mineral deposits that may qualify as mineral resources.
MRZ-4	Areas where geologic information does not rule either the presence or absence of mineral resource (no known mineral resources).

Threshold (a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Threshold (b) Would the project result in the loss of availability of a locally important mineral resources recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact: According to the General Plan, the Project site has a split designation of MRZ-3a and No Zoning Classification. As shown above, the MRZ-3a is an area containing known mineral deposits that may qualify as mineral resources. Although a portion of the Project is designated as MRZ-3a, the site has been previously heavily disturbed and is currently fully developed with industrial uses. No mining has taken place on the site or in the vicinity of the site. The Project would not affect mineral resources or recovery site that would be of value to the region, residents, or state. No impact would occur, and no mitigation is necessary.

Cumulative Impacts

As discussed above, the Project would not result in any significant impacts to mineral resources. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside

⁵⁶ General Plan. Updated 2014. *Conservation Element – Exhibit 3.7, Mineral Resources Zones*.

County General Plan Amendment No. 960 Program EIR,⁵⁷ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁵⁸ Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant mineral resource impact.

Mitigation Measures

No mitigation is required.

⁵⁷ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

⁵⁸ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generate excessive ground borne vibration or ground borne noise levels?			X	
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?			X	

The primary sources of noise associated with the proposed Project would be construction activities and project-related traffic volumes associated with the operation of the warehouses. The increase in noise levels generated by these activities and other sources associated with the proposed Project have been quantitatively estimated and compared to the applicable noise standards and thresholds of significance. A noise analysis was prepared by Kimley-Horn (February 2020) for the proposed Project and is provided below. Relevant noise data is included as Appendix H of this document.

Threshold (a) Would the Project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

Less Than Significant Impact.

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach levels that could exceed on a short-term basis adopted noise standards. During construction, exterior noise levels could affect the residential neighborhoods surrounding the construction site. However, it is acknowledged that construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors. The nearest sensitive receptor is a dialysis clinic located approximately 100 feet to the east of the Project property line, there are no residential properties within the vicinity of the Project.

Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Such activities would require graders, scrapers, and tractors during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during

building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are listed in [Table 11: Construction Equipment Noise Levels](#).

Table 11: Construction Equipment Noise Levels

Construction Equipment	Noise Level at 50 Feet (dBA, Leq)	Noise Level at 100 Feet ¹ (dBA, Leq)
Air Compressor	80	74
Backhoe	80	74
Compactor	82	76
Concrete Mixer	85	77
Concrete Pump	82	76
Concrete Vibrator	76	79
Crane, Derrick	88	76
Crane, Mobile	83	70
Dozer	85	82
Generator	82	77
Grader	85	79
Impact Wrench	85	76
Jack Hammer	88	79
Loader	80	79
Paver	85	82
Pile-driver (Impact)	101	74
Pile-driver (Sonic)	95	79
Pneumatic Tool	85	95
Pump	77	89
Roller	85	79
Saw	76	71
Scraper	85	84
Shovel	82	89
Truck	84	79
¹ Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1 + 20\log(d_1/d_2)$ dBA2 = estimated noise level at receptor; dBA1 = reference noise level; d1 = reference distance; d2 = receptor location distance		

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

The noise levels calculated in [Table 12: Project Construction Noise Levels](#), show estimated exterior construction noise without accounting for attenuation from existing physical barriers. The construction activities would expose the nearby existing uses to increased noise levels. As shown in [Table 12](#), the Leq (equivalent continuous noise level) for these activities would range between 80.4 dBA and 82.2 dBA. However, it is acknowledged that construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors.

Table 12: Project Construction Noise Levels

Construction Phase	Noise in dBA at 100 feet	
	Leq	Lmax
Demolition	80.4	83.6
Site Preparation	81.6	78.0
Grading	82.2	79.0
Construction/Paving/Painting	81.3	78.0

Source: FHWA Construction Noise Handbook Table 8.1.

Pursuant to Section 15.30.20, Hours of Construction Activity, of the City's Municipal Code, including equipment start-up and use, and the loading, unloading and handling of materials, shall not commence before 6:30 a.m., or continue beyond 7 p.m., on weekdays. No construction activity for residential development projects that consist of more than one unit is permitted on Saturdays, Sundays, or national holidays unless otherwise permitted with conditions on entitlements. The restrictions from Saturdays, Sundays, and national holidays shall not apply to single-building permits for expansion and upgrade to existing buildings; however, no such construction shall begin before 8 a.m. Thus, the proposed Project would be in compliance with the City's construction-related noise regulations, and impacts would be less than significant.

Operation

Implementation of the proposed Project would create new sources of noise in the Project vicinity. The major noise sources associated with the Project would include stationary noise equipment (i.e., trash compactors, air conditioners, etc.); truck and loading dock (i.e., slow-moving truck on the site, maneuvering and idling trucks, equipment noise); parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and off-site traffic noise. Section 9.07 of the City's Municipal Code includes exterior sound level standards based on land use:

- Residential, the limit is 55 dBA during the daytime and 45 dBA during nighttime.
- Commercial, the limit is 65 dBA during the daytime and 55 dBA during nighttime.
- Light Industrial, the limit is 75 dBA during the daytime and 55 dBA during nighttime

Mechanical Equipment

The Project is surrounded by industrial and commercial uses. The nearest sensitive receptor to the Project site is a dialysis clinic located 100 feet to the east from the property line, on the opposite side of Horseless Carriage Drive. Potential stationary noise sources related to long-term operation of the Project site would include mechanical equipment. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 50 to 60 dBA at 50 feet. Although the operation of this equipment would generate noise, the design of these onsite HVAC units and exhaust fans would be required to comply with the noise limit regulations of the City's Municipal Code Section 9.07.040. The areas surrounding the Project are designated for commercial and industrial uses, therefore mechanical noise would be below the City's noise standards. The proposed Project would result in a less than significant impact related to stationary noise levels.

Truck and Loading Dock Noise

During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities; backing up toward the docks; dropping down the dock ramps; and maneuvering away from the docks. Loading/unloading activities would be directed toward the center of the site. Access to the site would occur along Horseless Carriage Drive.

Loading dock noise is typically 68 dB at 50 feet. The nearest loading dock is approximately 100 feet from the property line, and approximately 200 feet from the nearest sensitive receptor. Noise levels from the loading docks would attenuate to approximately 55.9 dBA. Therefore, noise levels associated with truck maneuvering/parking and loading/unloading would not exceed the City's 65 dBA exterior noise standard for the adjacent commercial uses. Furthermore, loading dock doors would also be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior activities, and as such, interior loading and associated activities would be permissible during all hours of the day. As described above, noise levels associated with trucks and loading/unloading activities would not exceed the City's standards and impacts would be less than significant.

Parking Noise

The Project provides 324 automobile parking stalls and 42 trailer parking stalls. Automobile parking is located around each of the three buildings and trailer parking is located in the southwest corner of the site. Nominal parking noise would occur within the on-site parking facilities. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 60 to 63 dBA however there are no adjacent noise-sensitive receptors. Parking lot noise would not exceed the City's 65 dBA exterior noise standard for the adjacent commercial uses. Therefore, noise impacts associated with parking would be less than significant.

Off-Site Traffic Noise

Future development generated by the proposed Project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise near existing and proposed land uses. Based on the Traffic Impact Analysis, the proposed Project would result in approximately 788 daily trips. The Opening Year "2022 Without Project" and "2022 Plus Project" scenarios are compared in Table 13: Opening Year Traffic Noise Levels. As shown in Table 11, roadway noise levels without the Project would range from 54.2 dBA to 72.3 dBA, while roadway noise with the Project range from 55.4 dBA to 72.3 dBA. As shown in Table 11, Project generated traffic would result in a maximum increase of 1.3 dBA. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. As the noise level increase is below 3.0 dBA, a less than significant impact would occur in this regard.

Table 13: Opening Year Traffic Noise Levels

Roadway Segment	2022 Without Project		2022 Plus Project		Change	Significant Impact
	ADT	dBA CNEL at 100 feet from Roadway Centerline	ADT	dBA CNEL at 100 feet from Roadway Centerline		
Horseless Carriage Drive, between Project Driveway and Town and Country Drive	660	54.6	886	55.9	1.3	No
Horseless Carriage Drive, between Tara Lane and 5 th Street	2,080	59.6	2,132	59.7	0.1	No
Town and Country Drive, between	600	54.2	776	55.4	1.2	No
Town and Country Drive, between	6,820	64.8	6,996	64.9	0.1	No
5 th Street, west of Horseless Carriage Drive	6,700	65.1	6,706	65.1	0	No
5 th Street, between Horseless Carriage Drive and Hamner Avenue	7,460	65.6	7,500	65.6	0	No
5 th Street, east of Hamner Avenue	5,330	64.1	5,342	64.1	0	No
6 th Street, east of Hamner Avenue	19,210	69.8	19,266	69.8	0	No
2 nd Street, west of Hamner Avenue	11,580	67.6	11,592	67.6	0	No
2 nd Street, east of Hamner Avenue	20,510	69.7	20,566	69.7	0	No
Mountain Avenue, west of Hamner Avenue	8,550	67.1	8,562	67.1	0	No
Hidden Valley Parkway, east of Hamner Avenue	22,110	71.4	22,132	71.4	0	No
Hamner Avenue, south of Mountain Avenue-Hidden Valley Parkway	24,560	72.0	24,582	72.0	0	No
Hamner Avenue, between Mountain Avenue-Hidden Valley Parkway and Second Street	23,910	71.9	23,966	71.9	0	No
Hamner Avenue, between Second Street and Town and Country Drive	26,680	72.3	26,804	72.3	0	No
Hamner Avenue, between Town and Country Drive and 5 th Street	21,180	71.0	21,232	71.0	0	No
Hamner Avenue, between 5 th Street and Norco Drive-6 th Street	21,470	71.4	21,550	71.4	0	No
Hamner Avenue, north of Norco Drive-6 th Street	19,320	70.7	19,342	70.7	0	No

Source: Appendix H, Noise Study.

Threshold (b) Would the project result in the exposure of persons to or generation of, excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. The *CEQA Guidelines* do not define the levels at which groundborne vibration or groundborne noises are considered “excessive.” The City does not have a significance threshold to assess vibration impacts during construction. Additionally, there are no federal, state, or local vibration regulations or guidelines directly applicable to the proposed Project. However, publications of the FTA and Caltrans are two of the seminal works for the analysis of vibration relating to transportation and construction-induced vibration. The proposed Project is not subject to FTA or Caltrans regulations; nonetheless, these guidelines serve as a useful tool to evaluate vibration impacts. For the purpose of this analysis, the vibration criteria for structural damage and human annoyance established in the most recent Caltrans’ *Transportation and Construction Vibration Guidance Manual* (2013) are used to evaluate the potential vibration impacts of the Project on sensitive receptors.

As described previously, construction activities for the Project would include demolition, site preparation, and grading activities which have the potential to generate groundborne vibration. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

The construction of the Project would involve the temporary use of construction equipment, which can result in the generation of groundborne vibration levels. The various PPV vibration velocities for several types of construction equipment that can generate perceptible vibration levels are identified in Table 14. As shown, vibration velocities could range from approximately 0.003 to 0.089 inch-per-second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. For the purpose of this analysis, the vibration level for a large bulldozer provided in Table 14 was used to evaluate vibration source levels at the nearest sensitive receptor from construction activity. In comparison to the Caltrans vibration criteria, vibration impacts from construction activities would not exceed the criteria.

Table 14: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 Feet	PPV (in/sec) at 50 Feet	PPV (in/sec) at 100 Feet
Large Bulldozer	0.089	0.031	0.011
Loaded Trucks	0.076	0.027	0.010
Jackhammer	0.035	0.012	0.004
Small Bulldozer	0.003	0.001	<0.000
Notes: Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment Manual</i> , 2018; D = the distance from the equipment to the receiver.			

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

As described above, the closest sensitive use to the Project site is a dialysis clinic, which is a modern structure located 100 feet away from the property line. At this distance, the maximum vibration of 0.11 in/sec PPV is estimated to occur from large bulldozer operating during construction. Table 14 shows that

the vibration levels generated would be below levels that could create structural damage to modern buildings (0.5 in/sec PPV), and below the strongly perceptible level for human response (0.9 in/sec PPV). Thus, vibration at 100 feet away from construction activity would be less than significant.

Operation

The proposed Project does not involve activities or operation of stationary or mobile equipment that would result in high vibration levels, which are more typical for large industrial projects that employ heavy machinery. During Project operations, the primary source of vibration would likely be truck circulation within the Project area. However, the FTA's *Transit Noise and Vibration Impact Assessment* states that it is unusual for vibration from vehicular sources (including buses and trucks) to be perceptible, even in locations close to major roads. As such, no sources of "excessive" groundborne vibration or noise levels are anticipated during project operations.

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

Less Than Significant Impact. The closest airport to the Project site is the Corona Municipal Airport located approximately three miles southwest, and the Chino Airport located approximately four miles northwest. The Project is not within 2.0 miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people working in the Project area to excessive airport- or airstrip-related noise levels and no mitigation is required.

Cumulative Impacts

As discussed above, all Project-related construction and operational noise impacts have been determined to be less than significant. Construction noise impacts are by nature localized. Based upon the cumulative projects list (Appendix D of the Project TIA, contained in Appendix J to this MND), there are no projects in the immediate vicinity of this Project that will be under construction at the same time. The temporary noise and vibration effects of the proposed Project would not be compounded or increased by similar noise or vibration effects from other cumulative Projects. The Project is proposed as having balanced grading, which minimizes construction traffic on the City's regional street network.

The noise analysis performed for Project operations incorporated cumulative noise levels from forecasted traffic volumes in the study area. The future "Cumulative" and "Cumulative Plus Project" scenarios are compared in Table 15: Cumulative Traffic Noise Levels. Operationally the cumulative impact of this Project and other nearby projects will not be significant. As shown in Table 15, Project generated traffic would result in a maximum increase of 1.3 dBA. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. As the noise level increase is below 3.0 dBA, a less than significant cumulative noise impact would occur. Noise impacts are also addressed in applicable local and regional planning documents such as the City's General Plan, County General Plan, and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁵⁹

⁵⁹ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscsc.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

Table 15: Cumulative Traffic Noise Levels

Roadway Segment	Cumulative		Cumulative		Change	Significant Impact
	ADT	dBA CNEL at 100 feet from Roadway Centerline	ADT	dBA CNEL at 100 feet from Roadway Centerline		
Horseless Carriage Drive, between Project Driveway and Town and Country Drive	660	54.6	886	55.9	1.3	No
Horseless Carriage Drive, between Tara Lane and 5 th Street	2,870	61.0	2,922	61.1	0.1	No
Town and Country Drive, between	600	54.2	776	55.4	1.1	No
Town and Country Drive, between	6,820	64.8	6,996	64.9	0.1	No
5 th Street, west of Horseless Carriage Drive	6,940	65.3	6,946	65.3	0	No
5 th Street, between Horseless Carriage Drive and Hamner Avenue	8,610	66.2	8,650	66.2	0	No
5 th Street, east of Hamner Avenue	5,770	64.5	5,782	64.5	0	No
6 th Street, east of Hamner Avenue	20,910	70.2	20,966	70.2	0	No
2 nd Street, west of Hamner Avenue	14,070	68.5	14,082	68.5	0	No
2 nd Street, east of Hamner Avenue	22,400	70.1	22,456	70.1	0	No
Mountain Avenue, west of Hamner Avenue	10,330	67.9	10,342	67.9	0	No
Hidden Valley Parkway, east of Hamner Avenue	24,980	71.9	25,002	71.9	0	No
Hamner Avenue, south of Mountain Avenue-Hidden Valley Parkway	26,600	72.3	26,622	72.3	0	No
Hamner Avenue, between Mountain Avenue-Hidden Valley Parkway and Second Street	25,330	72.1	25,386	72.1	0	No
Hamner Avenue, between Second Street and Town and Country Drive	28,480	72.6	28,604	72.6	0	No
Hamner Avenue, between Town and Country Drive and 5 th Street	22,620	71.3	22,672	71.3	0	No
Hamner Avenue, between 5 th Street and Norco Drive-6 th Street	22,750	71.6	22,830	71.6	0	No
Hamner Avenue, north of Norco Drive-6 th Street	20,270	70.9	20,292	70.9	0	No

Source: Appendix H, Noise Study.

Mitigation Measures

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial 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)?				x
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				x

According to the California Department of Finance (DOF), as of 2019, the City of Norco has a population of 26,386 residents with approximately 7,326 homes. The City's housing vacancy rate is estimated at 4.8 percent, with an average of 3.42 persons per household.⁶⁰

Threshold (a) Would the project induce substantial 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)?

Threshold (b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently developed with industrial buildings and no housing exists onsite. The proposed Project would allow for the construction of new warehouse buildings and would not involve any type of residential development. Additionally, the proposed Project would be consistent with the City's General Plan and zoning. Therefore, no growth or development beyond what was assumed in the City General Plan area would occur. No impacts would occur to people or housing and no mitigation is required.

Cumulative Impacts

As discussed above, the Project would not result in any significant impacts to population and housing. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁶¹ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁶² Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant population and housing impact.

Mitigation Measures

⁶⁰ California Department of Finance (DOF). 2019. *Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*. Available at:

<http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>, accessed on December 5, 2019.

⁶¹ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at

<https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

⁶² Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at

<http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?			x	
b) Police protection?			x	
c) Schools?			x	
d) Parks?			x	
e) Other public facilities?			x	

Threshold a-e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for: fire protection, police protection, schools, parks, and other public facilities?

Less Than Significant Impact. The proposed Project is consistent with the designated land uses for the area, and as such has been considered in City-wide public services planning. The specific proposed uses (warehouse, with relatively limited manufacturing, cold storage, and office space) are low density in terms of employee population and would not be anticipated to result in substantial or unusual public service requirements. Project buildings will be designed to current City and state standards including fire suppression and crime safety design such as adequate lighting and signage, as well as consistent with the 2019 CBC. Future Project tenants will be required to comply with applicable local, state and federal requirements including provision of onsite chemical storage information to the City Fire Department.

To protect the health, safety, and general welfare of the City's populations, the City has established a fire protection facilities fee that is charged to all new development within the City's boundaries. Continuous fire access roadways and public hydrants would be provided throughout the Project site to allow adequate emergency service. The fee varies depending on development type and size. Individual developers are required to pay the most current development impact fees according to the City's fee schedule at the time of development for industrial uses. The fire facility fees associated with the proposed Project would help the City provide fire service at the Project site and finance new fire stations and equipment. Payment of impact fees as the Project is developed would result in a less than significant impact in regard to fire services. Therefore, implementation of the proposed Project with payment of the required development impact fees, would result in a less than significant impact to fire services.

The City also has established general government facilities fees that, like the fire facility fees, are based on development type and size. The general government facilities fee shall be used to finance general government capital improvements such as general City facilities, library facilities and other general capital

needs. A parkland and open space acquisition fee are also imposed on all new development in the City, and provides funds for the acquisition, improvement, and development of park and open space land and recreational facilities. As such, the Project would be subject to the most current development fees for parks, fire, general governmental, streets, storm drains, animal control, sewer and water for industrial development, in addition to various other fees such as permit fees, plan check fees, service/response fees and property tax revenues which also fund public services.⁶³ As previously discussed, the Project does not include the development of residential uses that could increase the population and require additional services. Thus, no impacts to schools, parks, or other public facilities is anticipated.

Cumulative Impacts

The proposed Project would not result in a significant impact to any public services or facilities. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁶⁴ and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy.⁶⁵ Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant public services impact.

Mitigation Measures

No mitigation is required.

⁶³ City of Norco. *FY 2019-2020 Miscellaneous Fee Schedule*. Available at <http://www.norco.ca.us/depts/fiscal/fees.asp>, accessed December 5, 2019.

⁶⁴ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

⁶⁵ Southern California Association of Governments. 2016. *RTP/SCS 2016-2040*. Available at <http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>, accessed March 28, 2020.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				x
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				x

Threshold (a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Threshold (b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. Refer to Response 15 (a) through (e), above. The proposed Project does not involve residential development and as such would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities. The proposed Project is consistent with the designated General Plan land use and zoning. As noted above, the Project would pay required park fees and other applicable fees. No impacts would occur, and no mitigation is required.

Cumulative Impacts

The proposed Project would not result in a significantly increased use of recreational facilities or require construction or expansion of existing recreational facilities. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR, and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant recreation impact.

Mitigation Measures

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?		x		
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.4, subdivision (b)?			x	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				x
d) Result in inadequate emergency access?			x	

A Traffic Impact Analysis was prepared by Kimley-Horn (February 2020) for the Project site and is included as Appendix I of this Initial Study and the results are summarized herein.

Existing Street System

Regional Access is provided via Interstate 15 (I-15) at 2nd Street and at Norco Drive/6th Street. A description of the roadways surrounding the Project site is provided below:⁶⁶

Hamner Avenue is a major north-south roadway within the City and lies approximately 0.25 mile to the east of the Project site. Hamner Avenue is designated as an Urban Arterial and a truck route by the City of Norco General Plan Circulation Element (March 15, 2000). Within the study vicinity, Hamner Avenue is a four-lane roadway with a two-way left-turn median lane. Pedestrian sidewalks exist intermittently along Hamner Avenue within the study area. The posted speed limit on Hamner Avenue is 40 mph.

Sixth Street runs east-west and is classified as a Major Arterial (4-lane) and a truck route from Hamner Avenue to California Avenue by the Circulation Element. Within the study vicinity, Sixth Street is a four-lane roadway with a two-way left-turn median lane. Equestrian trails exist on both sides of Sixth Street. The posted speed limit on Sixth Street is 35 mph.

Hidden Valley Parkway runs east-west and is classified as a Major Arterial (4-lane) by the Circulation Element. Within the study vicinity, Hidden Valley Parkway is a four-lane roadway with a two-way left-turn median lane. Pedestrian sidewalks and equestrian trails exist on the north side of Hidden Valley Parkway. The posted speed limit on Hidden Valley Parkway is 45 mph.

Norco Drive runs east-west and is classified as a Major Arterial by the Circulation Element. Within the study vicinity, Norco Drive is a two-lane roadway. Pedestrian sidewalks and equestrian trails exist on both sides of Norco Drive. The posted speed limit on Norco Drive is 35 mph.

Fifth Street runs east-west and is classified as a Collector Street by the Circulation Element west of Hamner Avenue. Fifth Street is a two-lane roadway west of Hamner Avenue and a four-lane roadway with a raised

⁶⁶ General Plan. 2020. *Circulation Element*, page 17.

center median west of Broken Lance Drive. Equestrian trails are present on the north side of Fifth Street. The posted speed limit on Fifth Street is 35 mph.

Second Street runs east-west and is classified as a Collector Street by the Circulation Element west of Valley View, and it is classified as a Collector Street east of Valley View. Second Street is a two-lane roadway west of Mountain Avenue, a four-lane roadway between Mountain Avenue and Corona Avenue and a two-lane roadway east of Corona Avenue. Pedestrian sidewalks and equestrian trails exist intermittently on both sides of Second Street. The posted speed limit on Second Street is 35 mph.

Mountain Avenue runs north-south before curving east and forming the eastbound approach of the Mountain Avenue-Hidden Valley Parkway / Hamner Avenue intersection and is classified as a Collector Street by the Circulation Element. Mountain Avenue is a four-lane roadway west of Hamner Avenue and a two-lane roadway north of 1st Street. Pedestrian sidewalks are present south of 1st Street and equestrian trails exist on only one side of Mountain Avenue north of Second Street. The posted speed limit on Mountain Avenue is 40 mph.

Horseless Carriage Drive runs north-south along the Project frontage. Horseless Carriage Drive is a two-lane local roadway with street parking allowed on both sides of the road. There are pedestrian sidewalks and equestrian trails present intermittently on both sides of Horseless Carriage Drive. There is no posted speed limit on Horseless Carriage Drive, but as it is a local roadway, the speed limit can be assumed to be 25 mph.

Town and Country Drive is an east-west two-lane local roadway with pedestrian sidewalks on both sides of the road. Street parking is not allowed on Town and Country Drive. There is no posted speed limit on Town and Country Drive, but as it is a local roadway, the speed limit can be assumed to be 25 mph.

Tara Lane is an east-west two-lane local roadway with pedestrian sidewalks on both sides of the road and street parking allowed on both sides of the road. There is no posted speed limit on Tara Lane, but as it is a local roadway, the speed limit can be assumed to be 25 mph.

Existing Transit Facilities

Transit service in the City of Norco is provided by the Riverside Transit Agency (RTA). The closest bus stops to the Project site are located at the intersection of Town and Country Drive and Hamner Avenue, approximately 0.25 miles to the east of the Project site. These stops are served by Route 3, which operate between the cities of Eastvale and Corona at approximately 60-minute headways on weekdays and 2-hour headways on weekends.

Existing Bicycle and Pedestrian Facilities

The City of Norco adopted the City of Norco Comprehensive Trail Master Plan on March 21, 2018. It documents the trail circulation network, provided as Appendix A to the Traffic Impact Analysis provided as Appendix I of this Initial Study, which is designed for pedestrian, equestrian, and bicycle use.

The only striped Class II Bicycle Lanes found in the study area are located on Hidden Valley Parkway east of Garland Way. Bicycle connectivity in the study area would primarily be provided via Hamner Avenue, although there is currently no Class III Bicycle Route signage present along this roadway.

Site Access and Circulation

Project access and circulation was evaluated as part of this study. For the purposes of this study, it is anticipated that sight distances and emergency access for these locations will be verified during final design in accordance with the City's applicable design standards.

- **Project Driveway at Horseless Carriage Drive** – Project-related traffic would access the site via the existing stop-controlled driveway located at the south end of Horseless Carriage Drive. The existing driveway would be repaved. Pedestrians and bicycles would continue to use the Project Driveway to access the surrounding pedestrian and bicycle network.

Threshold of Significance

Project impacts are determined by comparing conditions with the proposed Project to those without the proposed Project.

At signalized intersections, the Project will be considered to have an impact that requires mitigation if the addition of Project traffic causes an intersection to degrade from LOS "D" or better to LOS "E" or "F." The mitigation would be required to bring the intersection back to LOS "D" or better. The Project will also be considered to have an impact that requires mitigation if the addition of Project traffic causes the delay at an intersection already operating at LOS "E" or "F" to increase by 2 or 1 seconds, respectively. Any study intersection operating at LOS "E" or "F" without Project traffic shall mitigate any impacts to bring the intersection back to the overall level of delay established prior to Project traffic being added in the form of a fair share contribution since the Project contributes to an already deficient intersection.

At unsignalized intersections, the Project will be considered to have an impact that requires mitigation if addition of Project traffic causes an intersection to degrade from LOS "D" or better to LOS "E" or "F." The mitigation would be required to bring the intersection back to LOS "D" or better. The Project will also be considered to have an impact that requires mitigation if the addition of Project traffic causes the delay at an intersection already operating at LOS "E" or "F" to increase by 2 or 1 seconds, respectively. Any study intersection operating at LOS "E" or "F" without Project traffic shall mitigate any impacts to bring the intersection back to the overall level of delay established prior to Project traffic being added in the form of a fair share contribution since the Project contributes to an already deficient intersection.

Table 16: LOS Criteria for Intersections

LOS	LOS Criteria for Intersections Control Delay (sec/veh)		Description
	Signalized Intersection ^a	Unsignalized Intersection ^b	
A	≤10	≤10	Operations with very low delay and most vehicles do not stop.
B	>10 - 20	>10 - 15	Operations with good progression but with some restricted movement.
C	>20 - 35	>15 - 25	Operations where a significant number of vehicles are stopping with some backup and light congestion.
D	>35 - 55	>25 - 35	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines
E	>55 - 80	>35 - 50	Operations where there is significant delay, extensive queuing, and poor progression.
F	>80	>50	Operations that is unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

(a) Highway Capacity Manual 6th Edition, Exhibit 18-4 of the Traffic Impact Analysis, available at Appendix I of the Initial Study.

LOS	LOS Criteria for Intersections Control Delay (sec/veh)		Description
	Signalized Intersection ^a	Unsignalized Intersection ^b	

^(b) Highway Capacity Manual 6th Edition, Exhibit 19-1 and 20-2 of the Traffic Impact Analysis, available at Appendix I of the Initial Study.

Study Intersections

Existing roadway classifications from the City of Norco's General Plan are provided in Table 17, Study Intersection Traffic Configuration.

Table 17: Study Intersection Traffic Configuration

ID	Intersection	Traffic Control
1	Town and Country Drive* / Horseless Carriage Drive	One-Way Stop
2	Tara Lane* / Horseless Carriage Drive	One-Way Stop
3	Fifth Street / Horseless Carriage Drive	Signal
4	Tara lane* / Town and Country Drive	One-Way Stop
5	Mountain Avenue-Hidden Valley Parkway / Hamner Avenue	Signal
6	Second Street / Hamner Avenue	Signal
7	Town and Country Drive / Hamner Avenue	Signal
8	Fifth Street / Hamner Avenue	Signal
9	Norco Drive-Sixth Street / Hamner Avenue	Signal
10	Project Driveway / Horseless Carriage Drive	Stop-Controlled Driveway
* Indicates Stop-Controlled Movements of the intersection		

Analysis Scenarios

This traffic impact study includes evaluation of the following development conditions:

- **Existing Conditions** – Based on current traffic counts taken in May 2019 and existing roadway geometry and traffic control.
- **Project Opening Year (2022) Conditions without Project**– Estimated by applying an average annual growth rate of 2% to the Existing Conditions.
- **Project Opening Year (2022) Conditions with Project**– Traffic generated by the proposed Project added to Project Opening Year (2022) conditions.
- **Cumulative Conditions** – Estimated by adding traffic generated by nearby cumulative (approved and/or pending) projects to Project Opening Year conditions.
- **Cumulative Plus Proposed Project Conditions** – Based on traffic generated by the proposed Project added to Cumulative conditions.

Project Trip Generation

The Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, was used to estimate the daily and peak hour traffic trips attracted to and produced by a specific land use. Details on the trip generation assumptions for the study are listed below:

- **ITE Land Use Code 150** is described as devoted to the storage of materials and may also include office and maintenance areas.
- **ITE Land Use Code 157** (High-Cube Cold Storage Warehouse) is described as a temperature-controlled warehousing environment for food or other perishable products.
- **ITE Land Use Code 140** (Manufacturing) is described as an area where the primary activity is the conversion of raw materials into finished products.
- **ITE Land Use Code 110** (General Light Industrial) is described as a free-standing facility devoted to a single use. The facility has an emphasis on activities other than manufacturing and typically have minimal office space. Peak hour trips generated by the existing General Light Industrial land use are based on Counts taken at the Horseless Carriage Drive / Tara Lane intersection adjacent to the existing Project driveway. Daily trips for the existing land use are based on General Light Industrial rates (ITE 110).

The Project square footage is planned to comprise of 15% manufacturing, 25% cold storage warehousing, and 60% warehousing uses. A summary of the Project's net trip generation is included in [Table 18, Summary of Project Trip Generation](#). Passenger car equivalent (PCE) factors were applied to the Project trip generation and truck type mix was applied based on the City of Fontana Truck Trip Generation Study (August 2003).⁶⁷

Table 18: Summary of Project Trip Generation

ITE Land USE	ITE Code	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Warehousing	150	KSF	1.740	0.131	0.039	0.170	0.051	0.139	0.190
Manufacturing	140	KSF	3.93	0.48	0.14	0.62	0.21	0.46	0.67
High-Cube Cold Storage Warehouse	157	KSF	2.12	*	*	0.11	*	*	0.12
Project Trip Generation									
Project Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Warehousing	218.400	KSF	380	29	9	38	11	30	41
High-Cube Cold Storage Warehouse	91.00	KSF	193	5	5	10	5	5	10
Passenger Vehicles – 79.57%			456	27	11	38	13	28	41
Trucks – 20.43%			117	7	3	10	3	7	10
Total Warehousing Vehicles			573	34	14	48	16	35	51
Manufacturing	54.60	KSF	215	26	8	34	11	25	36
Passenger Vehicles – 78.60%			169	20	6	26	9	20	29
Trucks – 21.40%			46	6	2	8	2	5	7
Total Manufacturing Vehicles			215	26	8	34	11	25	36

⁶⁷ Note that peak hour volumes for the existing land use on the Project site are based on volumes counted at the adjacent Town and Country / Horseless Carriage Drive intersection. The potential for Project trips to use public transit, walking, or bicycling were not defined enough to include any reductions in Project vehicle trip generation. The City of San Bernardino and Riverside County generally use the Fontana Truck Trip Study to determine fleet mix by percentage for land uses that generate truck trips to apply PCE factors.

Table 18: Summary of Project Trip Generation

Project Trips – Passenger Car Equivalents (PCE)										
Vehicle Type	Vehicle Mix²	Daily Vehicles	PCE Factor	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Passenger Vehicles	79.6%	456	1.0	456	27	11	38	13	28	41
2-Axle Trucks	3.5%	20	1.5	30	2	1	3	1	2	3
3-Axle Trucks	4.6%	27	2.0	53	3	1	4	1	3	4
4+ Axle Trucks	12.3%	71	3.0	212	13	5	18	6	13	19
Total truck PCE Trips – Warehousing				295	18	7	25	8	18	26
Total Project PCE Trips - Warehousing				751	45	18	63	21	46	67
Passenger Vehicles	78.6%	169	1.0	169	20	6	26	9	20	29
2-Axle Trucks	8.0%	17	1.5	26	3	1	4	1	3	4
3-Axle Trucks	3.9%	8	2.0	16	2	1	3	1	2	3
4+ Axle Trucks	9.5%	20	3.0	60	7	2	9	3	7	10
Total Truck PCE Trips – Manufacturing				102	12	4	16	5	12	17
Total Project PCE Trips - Manufacturing				271	32	10	42	14	32	46
¹ Source: Institute of Transportation Engineers (ITE) <i>Trip Generation Manual</i> , 10th Edition. AM and PM peak hour in/out splits are not available for High-Cube Cold Storage land use. A 50/50 in/out split was assumed. ² Source: City of Fontana Truck Trip Generation Study, August 2003 ³ Peak hour Existing trips are based on Counts taken at the Horseless Carriage Drive / Tara Lane intersection adjacent to the existing Project driveway on 05/23/2019. Daily trips for the existing land use are based on General Light Industrial rates (ITE 110). PCE = Passenger Car Equivalent KSF = Thousand Square Feet										

As shown in [Table 18, Summary of Project Trip Generation](#), the Project is estimated to generate a net total of 309 daily PCE trips with 85 trips occurring during the AM peak hour (63 inbound and 22 outbound) and 47 occurring during the PM peak hour (13 inbound and 34 outbound).

City Planned Roadway Network Changes

Project Opening Year (2022) conditions have been analyzed under existing lane geometries and traffic controls. The following two roadway improvement projects are included in the City's online interactive map that displays planned capital improvement projects (CIP) for each fiscal year:

- Intersection #6 – Second Street / Hamner Avenue: Addition of dual southbound left-turn lanes on Hamner Avenue.
- Intersection #9 – Norco Drive-Sixth Street / Hamner Avenue: Addition of dual southbound left-turn lanes on Hamner Avenue.

This study conservatively assumes both of the above projects will not be in place under Project Opening Year (2022) conditions.

Methodology

The Highway Capacity Manual (HCM) 6th Edition published by the Transportation Research Board establishes procedures to evaluate highway facilities and rate their ability to process traffic volumes. The terminology "level of service" is used to provide a qualitative evaluation based on certain quantitative calculations, which are related to empirical values. The criteria for the various levels of service designations for intersections are provided below.

Level of service (LOS) for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay.

LOS for unsignalized intersections is determined by the computed or measured control delay and is defined for each movement. At an all-way stop control intersection, the delay reported is the average control delay of all movements at the intersection. At a one-way or two-way stop control intersection, the delay reported represents the worst movement, which is typically the left-turn from the minor street.

Consistent with the City of Norco General Plan Circulation Element and previous traffic studies prepared for the City of Norco, this study utilizes LOS "D" as the minimum acceptable condition that should be maintained during the peak commute hours. It is assumed that LOS "D" or better will be considered acceptable, any intersection operating at LOS "E" or "F" is considered deficient.

Additionally, Existing Plus Project scenario is not required in the Riverside County Traffic Impact Analysis Preparation Guide. Analysis of an Opening Year Plus Project Scenario, which is included in this study, reflects an actual scenario that would occur with development of the Project.

Existing Conditions

Traffic operations were evaluated at the study intersections under existing traffic conditions. Results of the analysis are presented in Table 19, Existing Conditions Intersection Level of Service Summary.

Table 19: Existing Conditions Intersection Level of Service Summary

INTERSECTION		TRAFFIC CONTROL	PEAK HOUR	EXISTING	
				DELAY ¹	LOS ²
1	Town and Country Dr / Horseless Carriage Dr	One-Way Stop	AM	8.8	A
			PM	9.1	A
2	Tara Ln / Horseless Carriage Dr	One-Way Stop	AM	10.1	B
			PM	10.8	B
3	Fifth St / Horseless Carriage Dr	Signal	AM	10.3	B
			PM	12.0	B
4	Tara Ln / Town and Country Dr	One-Way Stop	AM	9.4	A
			PM	10.4	B
5	Mountain Ave-Hidden Valley Pkwy / Hamner Ave	Signal	AM	36.1	D
			PM	41.1	D
6	Second St / Hamner Ave	Signal	AM	55.8	E
			PM	109.9	F
7	Town and Country Dr / Hamner Ave	Signal	AM	14.2	B
			PM	19.0	B
8	Fifth St / Hamner Ave	Signal	AM	55.2	E
			PM	46.6	D
9	Norco Dr-Sixth St / Hamner Ave	Signal	AM	51.5	D
			PM	58.5	E
10	Project Driveway / Horseless Carriage Dr		AM	8.5	A

INTERSECTION	TRAFFIC CONTROL	PEAK HOUR	EXISTING	
			DELAY ¹	LOS ²
	One-Way Stop	PM	8.7	A
Notes: Bold values indicate intersections operating at LOS E or F. Bold and shaded values indicate project significant impact. ¹ Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement. ² LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6 th Edition and performed using Vistro				

As shown in the table above, the following study intersections are currently operating at unacceptable levels of service:

- #6: Second Street / Hamner Avenue – AM: LOS E; PM: LOS F
- #8: Fifth Street / Hamner Avenue – AM: LOS E
- #9: Norco Drive-Sixth Street / Hamner Avenue – PM: LOS E

Analysis sheets are provided as Appendix C of the Traffic Impact Analysis, available as Appendix I of this Initial Study.

OPENING YEAR SCENARIOS

Opening Year (2022) Without Project

Volumes for this scenario were derived by applying a 2 percent annual growth rate (compounded annually) to the Existing (2019) Conditions to obtain project Opening Year (2022) volumes. Opening Year (2022) Without Project volumes were evaluated at the study intersections and results are presented in Table 20, Opening Year (2022) Without and With Project Intersection Level of Service.

As shown in the Table 20 (below), the following study intersections are projected to continue to operate at unacceptable levels of service without Project:

- #6: Second Street / Hamner Avenue – AM: LOS E; PM: LOS F
- #8: Fifth Street / Hamner Avenue – AM: LOS E
- #9: Norco Drive-Sixth Street / Hamner Avenue – AM: LOS E, PM: LOS E

Analysis sheets are provided as the Appendix C to the Traffic Impact Analysis included as Appendix I of this Initial Study.

Opening Year (2022) With Project

Volumes for this scenario were derived by adding trips from the proposed Project to Opening Year (2022) volumes. Opening Year (2022) With Project volumes were evaluated at the study intersections and results are also provided in Table 20, Opening Year (2022) Without and With Project Intersection Level of Service.

Table 20: Opening Year (2022) Without and With Project Intersection Level of Service

#	Intersection	Peak Hour	Opening Year (2022)		Opening Year (2022) + Project		Change in Delay (s)	Impact?
			Delay	LOS	Delay	LOS		
1	Town and Country Dr / Horseless Carriage Dr	AM	8.8	A	9.3	A	0.5	NO
		PM	9.1	A	9.5	A	0.4	NO

#	Intersection	Peak Hour	Opening Year (2022)		Opening Year (2022) + Project		Change in Delay (s)	Impact?
			Delay	LOS	Delay	LOS		
2	Tara Ln / Horseless Carriage Dr	AM	10.3	B	10.5	B	0.2	NO
		PM	11.0	B	11.1	B	0.1	NO
3	5th St / Horseless Carriage Dr	AM	10.6	B	11.5	B	0.9	NO
		PM	12.2	B	12.6	B	0.4	NO
4	Tara Ln / Horseless Carriage Dr	AM	9.5	A	10.0	A	0.5	NO
		PM	10.6	B	11.0	B	0.4	NO
5	Mountain Ave/Hidden Valley Pkwy / Hamner Ave	AM	38.8	D	39.3	D	0.5	NO
		PM	44.0	D	44.1	D	0.1	NO
6	2nd St / Hamner Ave	AM	63.5	E	68.2	E	4.7	YES
		PM	118.3	F	120.9	F	2.6	YES
7	Town and Country Dr / Hamner Ave	AM	14.7	B	16.3	B	1.6	NO
		PM	19.5	B	20.1	C	0.6	NO
8	5th St / Hamner Ave	AM	55.2	E	55.6	E	0.4	NO
		PM	48.9	D	49.5	D	0.6	NO
9	Norco Dr/6th St / Hamner Ave	AM	55.7	E	57.1	E	1.4	NO
		PM	65.9	E	66.6	E	0.7	NO
10	Proposed Project Dwy / Horseless Carriage Dr	AM	8.5	A	8.6	A	0.1	NO
		PM	8.7	A	8.8	A	0.1	NO

Notes:

Bold values indicate intersections operating at LOS E or F. Bold and shaded values indicate project significant impact.

¹Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

²LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Vistro

³Change in delay due to addition of Project traffic. Addition of Project traffic may cause a decrease in delay at some locations. This counterintuitive result occurs when the volume being added to the intersection is on movements with less delay than the current overall intersection average delay, decreasing the overall intersection average delay.

As shown in Table 20 (above), intersections #6, #8, and #9 under both Opening Year (2022) *Without* Project and Opening Year (2022) *With* Project scenarios would continue to operate at unacceptable levels of service (without mitigation):

- #6: Second Street / Hamner Avenue – AM: LOS E; PM: LOS F
- #8: Fifth Street / Hamner Avenue – AM: LOS E
- #9: Norco Drive-Sixth Street / Hamner Avenue – AM: LOS E, PM: LOS E

Opening Year (2022) Summary of Impacts

As shown on Table 20 (above), although intersection #6 is operating at an unacceptable LOS during Existing Conditions and during Opening Year (2022) Without Project conditions, because the Project traffic causes the intersection delay to increase by at least 2 or 1 seconds, in the AM and PM, respectively, from Opening Year (2022) Without Project conditions to Opening Year (2022) With Project conditions, the Project traffic is considered to cause a significant impact at intersection #6, even if the LOS did not change between the Without Project and With Project conditions. Mitigation for this impact has been identified as installation of dual southbound left-turn lanes, which is a planned capital improvement project (CIP) in the City of Norco (see Mitigation Measure TRF-1). Analysis sheets are as Appendix C to the Traffic Impact Analysis included as Appendix I of this Initial Study.

CUMULATIVE FUTURE CONDITIONS

Cumulative (Future) conditions traffic volumes were determined by adding background cumulative traffic generated by cumulative projects to the study area roadway network. The Palomino Business Park Traffic Impact Analysis⁶⁸ included a table and map of the projects in the vicinity of the Project site and was used for the proposed Project. The cumulative projects information was used to estimate background cumulation traffic on the roadway network. The full list and locations of projects provided from the Palomino Business Park Traffic Impact Analysis, as well as a cumulative projects trip generation, can be found as Appendix D to the Traffic Impact Analysis included as Appendix I of this Initial Study.

Table 21: Cumulative (Future) Conditions Intersection Level of Service

INTERSECTION		PEAK HOUR	CUMULATIVE CONDITIONS		CUMULATIVE PLUS PROJECT		Change in Delay ³	SIGNIFICANT?
			DELAY ¹	LOS ²	DELAY	LOS		
1	Town and Country Dr / Horseless Carriage Dr	AM	8.8	A	9.3	A	0.5	NO
		PM	9.1	A	9.5	A	0.4	NO
2	Tara Ln / Horseless Carriage Dr	AM	10.3	B	10.5	B	0.2	NO
		PM	11.0	B	11.1	B	0.1	NO
3	Fifth St / Horseless Carriage Dr	AM	14.2	B	15.0	B	0.8	NO
		PM	15.4	B	15.7	B	0.3	NO
4	Tara Ln / Town and Country Dr	AM	9.5	A	10.0	A	0.5	NO
		PM	10.6	B	11.0	B	0.4	NO
5	Mountain Ave-Hidden Valley Pkwy / Hamner Ave	AM	46.3	D	47.2	D	0.9	NO
		PM	54.0	D	54.2	D	0.2	NO
6	Second St / Hamner Ave	AM	80.2	F	87.9	F	7.7	YES
		PM	121.5	F	123.9	F	2.4	YES
7	Town and Country Dr / Hamner Ave	AM	14.7	B	16.2	B	1.5	NO
		PM	19.5	B	20.2	C	0.7	NO
8	Fifth St / Hamner Ave	AM	60.7	E	61.6	E	0.9	NO
		PM	53.6	D	54.1	D	0.5	NO
9	Norco Dr-Sixth St / Hamner Ave	AM	64.6	E	66.8	E	2.2	YES
		PM	75.9	E	77.1	E	1.2	NO
10	Project Driveway / Horseless Carriage Dr	AM	8.5	A	8.6	A	0.1	NO
		PM	8.7	A	8.8	A	0.1	NO

Notes:
Bold values indicate intersections operating at LOS E or F. **Bold and shaded** values indicate Project significant impact.
¹ Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
² LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Vistro
³ Change in delay due to addition of Project traffic. Addition of Project traffic may cause a decrease in delay at some locations. This counterintuitive result occurs when the volume being added to the intersection is on movements with less delay than the current overall intersection average delay, decreasing the overall intersection average delay.

⁶⁸ The Palomino Business Park Traffic Impact Analysis (TIA) was prepared for the proposed Palomino Business Park project, which would develop commercial, industrial, and office uses south of Second Street between Mountain Avenue and Pacific Avenue, approximately 1.2 miles south of the Saddle Ranch South project site. The Palomino Business Park TIA studies the same Future year (2022) as the Saddle Ranch South project. As such, cumulative project information contained in the Palomino Business Park TIA was applied to the Future Conditions traffic analysis for Saddle Ranch South.

Future (Cumulative) Conditions Without Project

Volumes for this scenario were derived by applying a 2 percent annual growth rate (compounded annually) to the Existing (2019) Conditions to obtain Project Opening Year (2022) volumes and by adding traffic generated by cumulative projects, as previously stated.

Cumulative without Project volumes were evaluated at the study intersections and results are presented in Table 21, Future (Cumulative) Conditions Intersection Level of Service. As shown in Table 21 (above), the following study intersections are projected to continue to operate at unacceptable levels of service without the addition of Project traffic (and without already planned City CIP improvements):

- #6: Second Street / Hamner Avenue – AM: LOS F; PM: LOS F
- #8: Fifth Street / Hamner Avenue – AM: LOS E
- #9: Norco Drive-Sixth Street / Hamner Avenue – AM: LOS E, PM: LOS E

Future (Cumulative) Conditions With Project

Volumes for this scenario were derived by adding traffic volumes generated from the proposed Project to Cumulative without Project volumes. Cumulative With Project volumes were evaluated at the study intersections and results are presented in Table 21, Future (Cumulative) Conditions Intersection Level of Service. As shown in Table 21 (above), the following study intersections are projected to continue to operate at unacceptable levels of service with the addition of Project traffic:

- #6: Second Street / Hamner Avenue – AM: LOS F; PM: LOS F
- #8: Fifth Street / Hamner Avenue – AM: LOS E
- #9: Norco Drive-Sixth Street / Hamner Avenue – AM: LOS E, PM: LOS E

Analysis sheets are provided as the Appendix C to the Traffic Impact Analysis included as Appendix I of this Initial Study.

Although intersection #8: Fifth Street / Hamner Avenue operates at LOS E under Project Opening Year (2022) With and Without Project conditions and Cumulative With and Without Project conditions, the delay is projected to increase by less than 2 seconds with the addition of Project trips. Therefore, the Project is not considered to have an impact at this intersection that would require mitigation. Mitigation for intersection #6 (Second Street/Hamner) is discussed above and would mitigate the Future (Cumulative) Condition With Project to less than significant levels (see Mitigation Measure TRF-1). The impact at intersection #9 (Norco/6th) can be mitigated to less than significant levels through installation of dual southbound left-turn lanes, which is a planned capital improvement project (CIP) in the City of Norco (refer to Mitigation Measure TRF-1).

Mitigation Measure TRF-1 is required to mitigate impacts on intersections #6 and #9, as discussed further below.

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

Less Than Significant Impact With Mitigation. The City of Norco adopted the City of Norco Comprehensive Trail Master Plan on March 21, 2018. It documents the trail circulation network, provided as Appendix A to the Traffic Impact Analysis included as Appendix I of this Initial Study, which is designed for pedestrian, equestrian, and bicycle use. The only striped Class II Bicycle Lanes found in the study area

are located on Hidden Valley Parkway east of Garland Way. Bicycle connectivity in the study area would primarily be provided via Hamner Avenue, although there is currently no Class III Bicycle Route signage present along this roadway.

The proposed Project was evaluated to determine if it would likely conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks) or generate pedestrian, bicycle, or transit travel demand that would not be accommodated by transit, bicycle, or pedestrian facilities and plans. The City of Norco Comprehensive Trail Master Plan documents the City's current multi-use trail network. Project frontage on Horseless Carriage Drive currently contains pedestrian sidewalk improvements that allow connectivity to nearby bus stops at the Town and Country / Hamner Avenue intersection. Employees of the proposed development have the option of driving, taking transit, walking, or bicycling. Based on Traffic Impact Analysis results, it was concluded that the proposed Project would not conflict with adopted plans and does not prohibit implementing transit facilities or plans. The impact on transit, pedestrian or bicycle facilities is determined to be less than significant.

Additionally, consistent with the City of Norco General Plan Circulation Element and previous traffic studies prepared for the City of Norco, the traffic study utilized LOS "D" as the minimum acceptable condition that should be maintained during the peak commute hours. It is assumed that LOS "D" or better will be considered acceptable, any intersection operating at LOS "E" or "F" is considered deficient. As shown in the discussion above, intersections #6, #8, and #9 function at an unacceptable LOS throughout all scenarios.

Required Mitigation Measures

With implementation of Mitigation Measure TRF-1 (below), the impacted intersections would be mitigated to less than significant levels.

Impact #1:

- Intersection #6 – Second Street / Hamner Avenue, under Project Opening Year (2022), and Future (Cumulative) Conditions Without and With Project

The intersection of Second Street at Hamner Avenue is projected to operate at LOS E and F during the AM and PM peak hours without the addition of Project traffic and the addition of Project traffic is projected to increase delay at this intersection by over 2 and 1 seconds during the AM and PM peak hours, respectively.

As identified in the City's online list of capital improvement projects (CIP), dual southbound left-turn lanes are planned to be installed at this intersection. With the implementation of Mitigation Measure TRF-1, the intersection of Second Street at Hamner Avenue is projected to operate at pre-project conditions or better under Project Opening Year and Cumulative conditions. Refer to [Table 22: Project Opening Year \(2022\) with Mitigation LOS Summary](#).

Table 22: Project Opening Year (2022) with Mitigation LOS Summary

INTERSECTION		MITIGATION	PEAK HOUR	OPENING YEAR (2022)		OPENING YEAR (2022) PLUS PROJECT		OPENING YEAR (2022) PLUS PROJECT PLUS MITIGATION	
				DELAY	LOS	DELAY	LOS	DELAY	LOS
6	Second St / Hamner Ave		AM	63.5	E	68.2	E	56.9	E

		Mitigation: Install dual SB Left-Turn Lanes	PM	118.3	F	120.9	F	54.1	D
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Impact #2:

- Intersection #9 – Sixth Street-Norco Drive / Hamner Avenue, under Cumulative Conditions only

The intersection of Sixth Street-Norco Drive at Hamner Avenue is projected to operate at LOS E during the AM and PM peak hours without the addition of Project traffic and the addition of Project traffic is projected to increase delay at this intersection by over 1 second during the AM peak hour under Cumulative conditions.

As identified in the City's online list of capital improvement projects (CIP), dual southbound left-turn lanes are planned to be installed at this intersection. With the implementation of Mitigation Measure TRF-1, the intersection of Sixth Street-Norco Drive at Hamner Avenue is projected to operate at pre-project conditions or better under Project Opening Year and Cumulative conditions. Refer to [Table 23: Cumulative Conditions with Mitigation LOS Summary](#).

Table 23: Future (Cumulative) Conditions with Mitigation LOS Summary

INTERSECTION	MITIGATION	PEAK HOUR	CUMULATIVE CONDITIONS		CUMULATIVE PLUS PROJECT		CUMULATIVE PLUS PROJECT PLUS MITIGATION	
			DELAY	LOS	DELAY	LOS	DELAY	LOS
6	Second St / Hamner Ave	AM	80.2	F	87.9	F	65.8	E
		PM	121.5	F	123.9	F	55.6	E
9	Sixth St-Norco Dr / Hamner Ave	AM	64.6	E	66.8	E	47.7	D
		PM	75.9	E	77.1	E	55.2	E

The Project's fair share contribution percentage is shown in [Table 24: Summary of Project Fair Share for Mitigation Measures](#).

Table 24: Summary of Project Fair Share for Mitigation Measures

INTERSECTION		PEAK HOUR	TOTAL VOLUME		TOTAL GROWTH	PROJECT TRIPS	%
			2019	2022			
6	Second St / Hamner Ave – Install dual SB Left-Turn Lanes	AM	3,563	4,121	558	47	8.4%
		PM	3,895	4,539	644	25	3.9%
9	Sixth St-Norco Dr / Hamner Ave – Install dual SB Left-Turn Lanes	AM	3,038	3,446	408	30	7.4%
		PM	3,073	3,516	443	16	3.6%

Threshold (b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3 provides that for land use projects, impacts related to vehicle miles traveled (VMT) exceeding an applicable threshold of significance may

indicate a significant impact. The City of Norco has not adopted a VMT threshold. While the City has not yet adopted an VMT threshold, the Project can also be qualitatively analyzed to understand factors such as the availability of transit, proximity to other destination, etc. Also note that, with adoption CEQA Guidelines Section 15064.3, use of Level of Service has been replaced by VMT as a CEQA significance threshold. This MND addresses LOS in checklist response 17(a) above for General Plan consistency and for informational purposes. This MND also addresses VMT for informational purposes, although the City has not yet adopted a threshold and SB743 is not mandatory until July 1.

Accordingly, the City has provided a qualitative VMT analysis, included as Appendix I-2 to this VMT. Key findings of the VMT analysis are as follows:

Employee commute trips. The City of Norco is a rural residential community in character and as such it is understood that many of its residents travel considerable distance for employment. Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT.

Truck trips related to shipping activities. Page 4 of the OPR guidance indicates that, although heavy vehicle traffic can be included for analysis convenience, the provided analysis requirements are specific to passenger-vehicles and light duty trucks.⁶⁹ While it may be appropriate to consider heavy vehicle traffic if directed by the lead agency, it is generally understood that Interstate commerce and related heavy vehicle traffic are regulated by the federal government as it relates to commerce. Irrespective of this and considering that the end-user of this facility is unknown at this time (so the nature of the business enterprise and its probable origins and destinations are unknown), it is reasonable to assume that the ultimate end user will select this location, at least in part, as to how it affects their transportation costs. Most often businesses who have shipping as a significant part of their operations are sensitive to transportation costs and their relative proximity to customers and suppliers. Accordingly, it is reasonable to assume that warehouses are often located in a manner to reduce VMT given that it is the interest of the business.

Other trips. These are often the smallest number and shortest distance of trips for a facility like this and include a broad range of trip types, such as employee lunches off-site, maintenance teams for on-site infrastructure, office supply deliveries, etc. As such their impact to the overall VMT of the site is likely minimal. As such it is not likely that they are impactful to the local transportation system and are secondary to the other two trip types discussed.

Therefore, based upon available information, and in consideration that the proposed Project represents a replacement of a similar use and is consistent with City zoning and General Plan land use designations, it is not anticipated that the Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and a less than significant impact would occur.

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

No Impact. The design features of the proposed Project would not create new roadways and/or intersections. The proposed uses are consistent with the existing neighborhood and impacts of the Project

⁶⁹ http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf (accessed March 31, 2020).

are evaluated throughout this IS/MND. The driveway and internal driving aisle would allow for trucks and vehicles to move throughout the facility. The internal traffic system within the Project site has been designed to be both efficient and safe for vehicular and pedestrian traffic. There will be no incompatible or hazardous uses associated with the Project. Therefore, no impact will occur.

Threshold (e) Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed Project would provide access points on Horseless Carriage Way. Constructed roadways and driveways are required to meet access standards of the Riverside County Fire Dept. / Cal Fire. Construction of the proposed Project is not expected to require road closures or otherwise affect emergency access around the site perimeter. As a standard practice, if road closures (complete or partial) were necessary, the Police and Fire Departments would be notified of the construction schedule and any required detours would allow emergency vehicles to use alternate routes for emergency response. A less than significant impact would occur.

Cumulative Impacts

The Traffic Impact Analysis addresses both the Project-specific impacts and the Project's contribution to cumulative impacts. Mitigation has been provided to address the Project's contribution to cumulatively significant impacts. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR, and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant traffic impact.

Mitigation Measures

MM TRAF-1: The Project shall make a fair share contribution toward CIP implementation for intersection #6 - Second Street and Hamner Avenue and intersection #9 – Sixth Street/Norco Drive and Hamner Avenue. The percentage of fair share contribution to be made towards the CIP implementation for both intersections are noted in **Table 24, Summary of Project Fair Share for Mitigation Measures.**

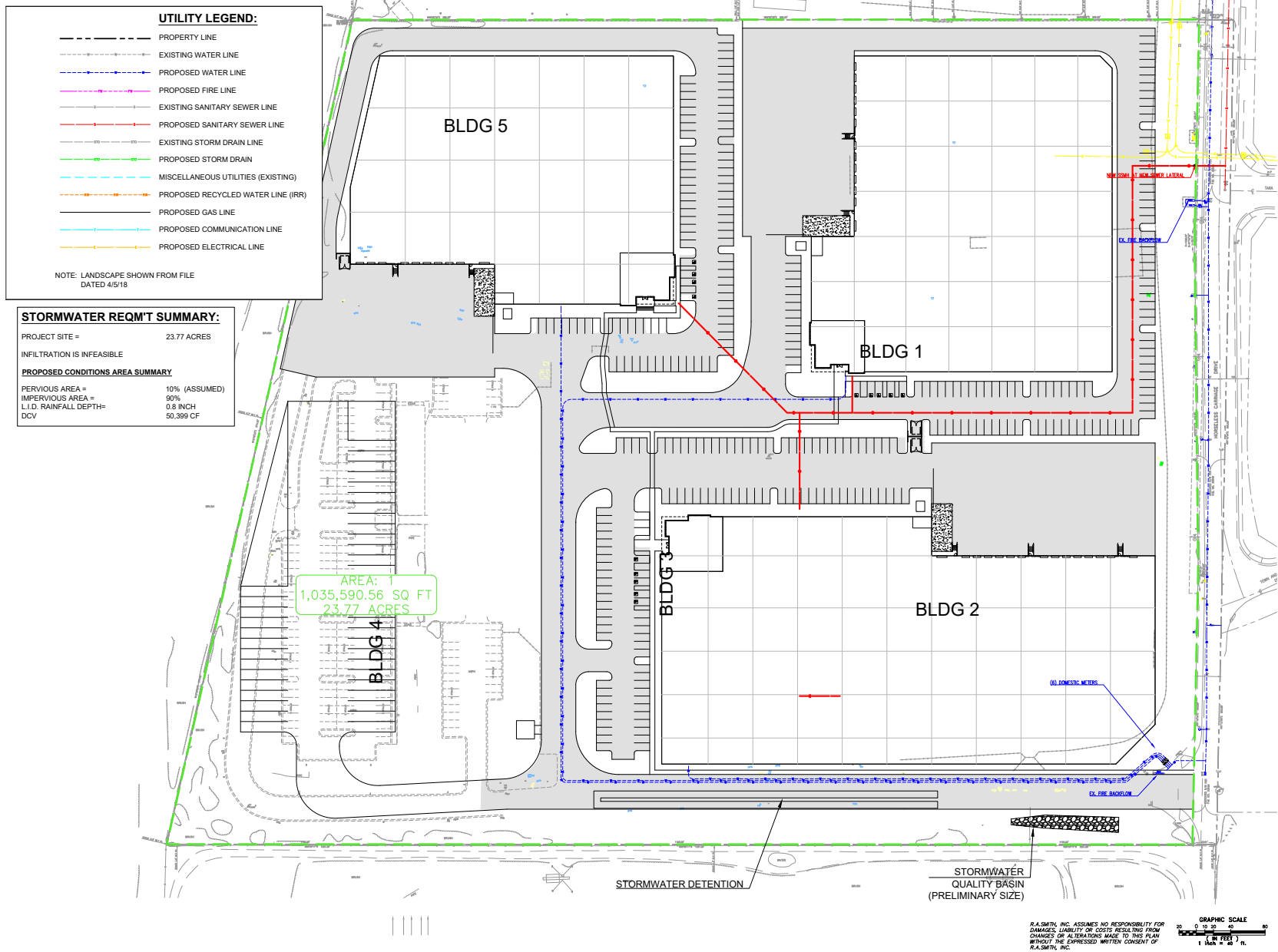


EXHIBIT 7: Utility Plan
Saddle Ranch South Project
City of Norco
(Source: R.A. Smith Date)



Town and Country Dr/ Horseless Carriage Dr	Tara Ln/ Horseless Carriage Dr	Fifth St/ Horseless Carriage Dr	Tara Ln/ Town and Country Dr	Mountain Ave & Hidden Valley Pkwy/ Hamner Ave
Second St/ Hamner Ave	Town and Country Dr/ Hamner Ave	Fifth St/ Hamner Ave	Norco Dr & Sixth St/ Hamner Ave	Project Dwy/ Horseless Carriage Dr

- Signalized Intersection
- Unsignalized Intersection
- Project Site
- D De Facto Right Turn

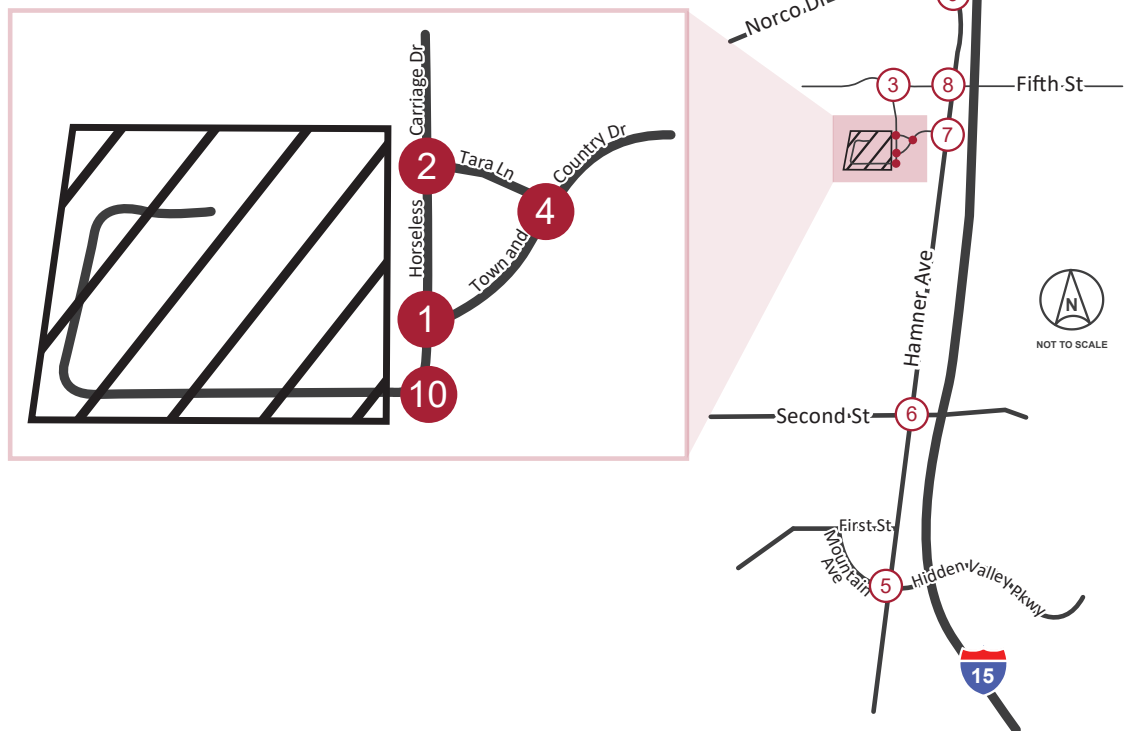


EXHIBIT 8: Existing Conditions – Lane Geometry and Traffic Control

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

1	2 / 5 8 / 10 Horselless Carriage Dr	17 / 8 9 / 13 Town and Country Dr	0 / 9 5 / 25	2	10 / 8 53 / 99 Horselless Carriage Dr	42 / 42 3 / 5 Tara Ln	14 / 16 7 / 7	3	265 / 231 89 / 25 Fifth St	374 / 311 28 / 36 Horselless Carriage Dr	9 / 54 16 / 81	4	3 / 1 56 / 159 Tara Ln	65 / 75 30 / 29 Town and Country Dr	0 / 1 21 / 39	
5	10 / 13 346 / 770 107 / 430 Mountain Ave Hammer Ave	537 / 256 420 / 288 622 / 343 Hidden Valley Pkwy	41 / 105 507 / 584 211 / 451	6	110 / 155 430 / 889 159 / 457 Hammer Ave	417 / 239 308 / 222 354 / 227 Second St	177 / 139 387 / 430 22 / 67	31 / 78 943 / 635 225 / 357	7	92 / 102 1082 / 746 12 / 13 Town and Country Dr Hammer Ave	7 / 16 0 / 3 0 / 11 Commercial Dwy	8	160 / 108 933 / 725 53 / 42 Hammer Ave	38 / 26 125 / 77 87 / 75 Fifth St	99 / 189 183 / 134 125 / 99	93 / 95 508 / 855 37 / 147
9	48 / 28 694 / 510 396 / 296 Norco Dr Hammer Ave	262 / 383 79 / 137 589 / 357 Sixth St	41 / 41 187 / 164 45 / 47 64 / 73 348 / 563 285 / 474	10	14 / 22 Project Driveway Horselless Carriage Dr	6 / 44	X / Y AM / PM Peak Hour Turning Volumes ⊗ Signalized Intersection ⊗ Unsignalized Intersection ▨ Project Site									

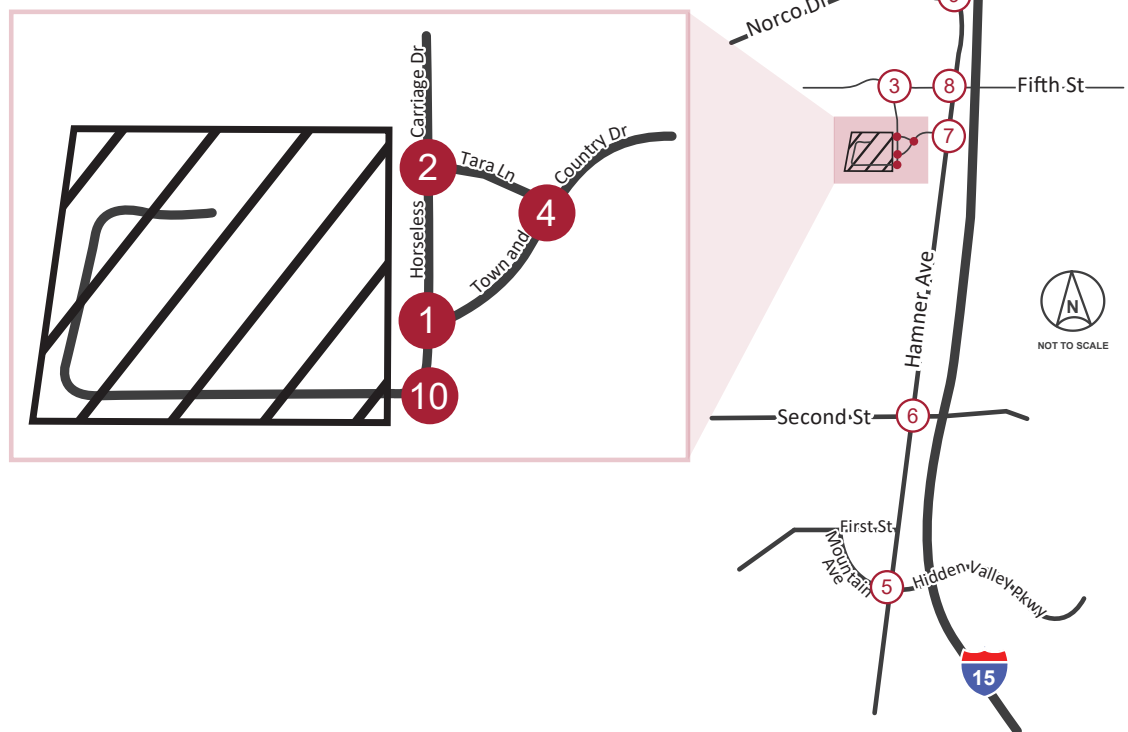


EXHIBIT 9: Existing Peak-Hour Turning Movement Volumes

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

1 2 / 5 ↕ 8 / 11 Horsless Carriage Dr 18 / 8 10 / 14 Town and Country Dr 0 / 10 5 / 27	2 11 / 8 ↕ 56 / 105 Horsless Carriage Dr 45 / 45 3 / 5 Tara Ln 15 / 17 7 / 7	3 281 / 245 94 / 27 Fifth St 397 / 330 30 / 38 Horsless Carriage Dr 10 / 57 17 / 86	4 3 / 1 ↕ 59 / 169 Tara Ln 69 / 80 32 / 31 Town and Country Dr 0 / 1 22 / 41
5 11 / 14 ↕ 367 / 817 Hammer Ave 570 / 272 446 / 306 660 / 364 Hidden Valley Pkwy 44 / 111 538 / 620 224 / 479	6 117 / 164 ↕ 456 / 943 169 / 485 Hammer Ave 443 / 254 327 / 236 376 / 241 Second St 33 / 83 1001 / 674 239 / 379	7 98 / 108 ↕ 1148 / 792 13 / 14 Hammer Ave 7 / 17 0 / 3 0 / 12 Commercial Dwy 123 / 180 595 / 960 0 / 4	8 170 / 115 ↕ 990 / 769 56 / 45 Hammer Ave 40 / 28 133 / 82 92 / 80 Fifth St 105 / 201 194 / 142 133 / 105
9 51 / 30 ↕ 736 / 541 420 / 314 Norco Dr 278 / 406 84 / 145 625 / 379 Sixth St 44 / 44 198 / 174 48 / 50	10 14 / 22 ↕ Horsless Carriage Dr Project Driveway 6 / 44	X / Y AM / PM Peak Hour Turning Volumes ⊗ Signalized Intersection ⊗ Unsignalized Intersection ▨ Project Site	

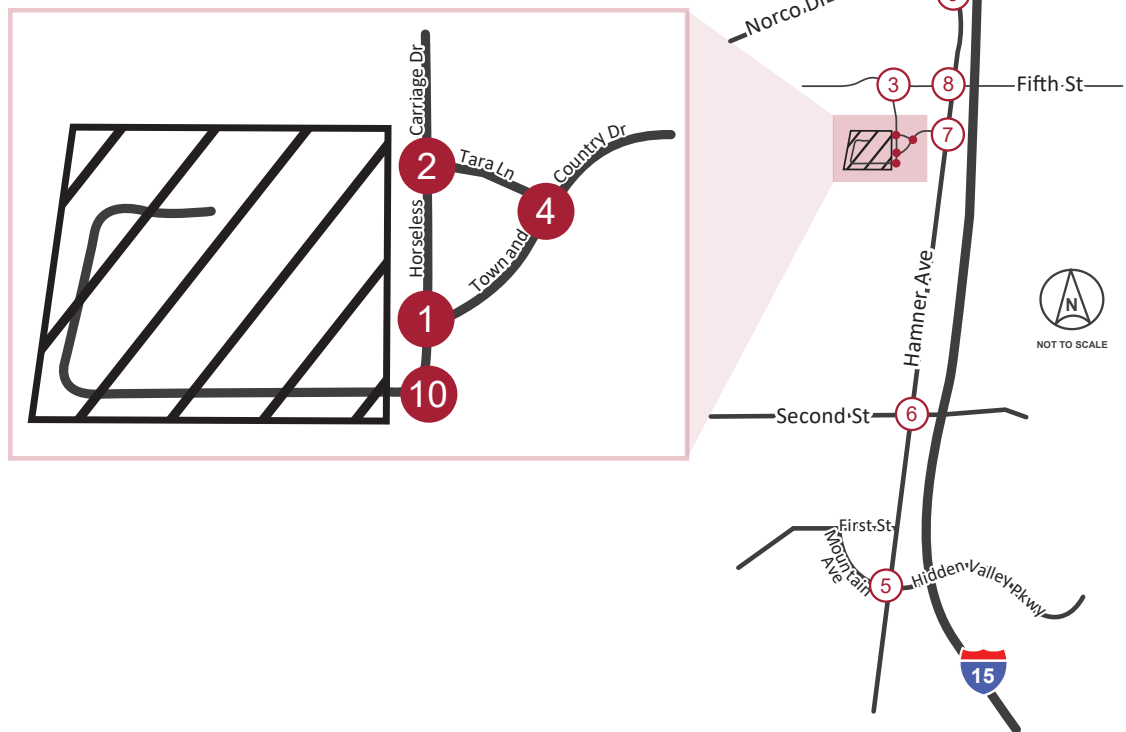


EXHIBIT 10: Opening Year (2022) Without Project Traffic Volumes

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

1	16 / 8 ↕ 8 / 11 Horsless Carriage Dr 18 / 8 ↕ 59 / 24 Town and Country Dr 5 / 18 22 / 53	2	25 / 11 ↕ 56 / 105 Horsless Carriage Dr 45 / 45 ↕ 3 / 5 Tara Ln 20 / 35 7 / 7	3	281 / 245 105 / 29 Fifth St 397 / 330 33 / 39 ↕ Horsless Carriage Dr 11 / 59 21 / 92	4	3 / 1 ↕ 59 / 169 Tara Ln 69 / 80 81 / 41 ↕ Town and Country Dr 0 / 1 39 / 67 ↕
5	12 / 18 369 / 820 116 / 459 Mountain Ave 577 / 273 446 / 306 660 / 364 Hidden Valley Pkwy 44 / 111 544 / 621 224 / 479	6	118 / 166 461 / 951 175 / 493 Hamner Ave 459 / 257 327 / 236 376 / 241 Second St 33 / 83 1017 / 677 239 / 379	7	112 / 111 ↕ 1148 / 792 13 / 14 Town and Country Dr 7 / 17 0 / 3 0 / 12 Commercial Dwy 158 / 187 595 / 960 0 / 4	8	181 / 117 ↕ 1001 / 771 56 / 45 Hamner Ave 40 / 28 133 / 82 95 / 81 ↕ Fifth St 109 / 207 194 / 142 133 / 105 ↕
9	51 / 30 ↕ 742 / 542 420 / 314 Norco Dr 278 / 406 84 / 145 651 / 382 Sixth St 44 / 44 198 / 174 48 / 50 ↕	10	77 / 35 ↕ Horsless Carriage Dr Project Driveway 28 / 78 ↕	X / Y AM / PM Peak Hour Turning Volumes ⊗ Signalized Intersection ⊗ Unsignalized Intersection ▨ Project Site			

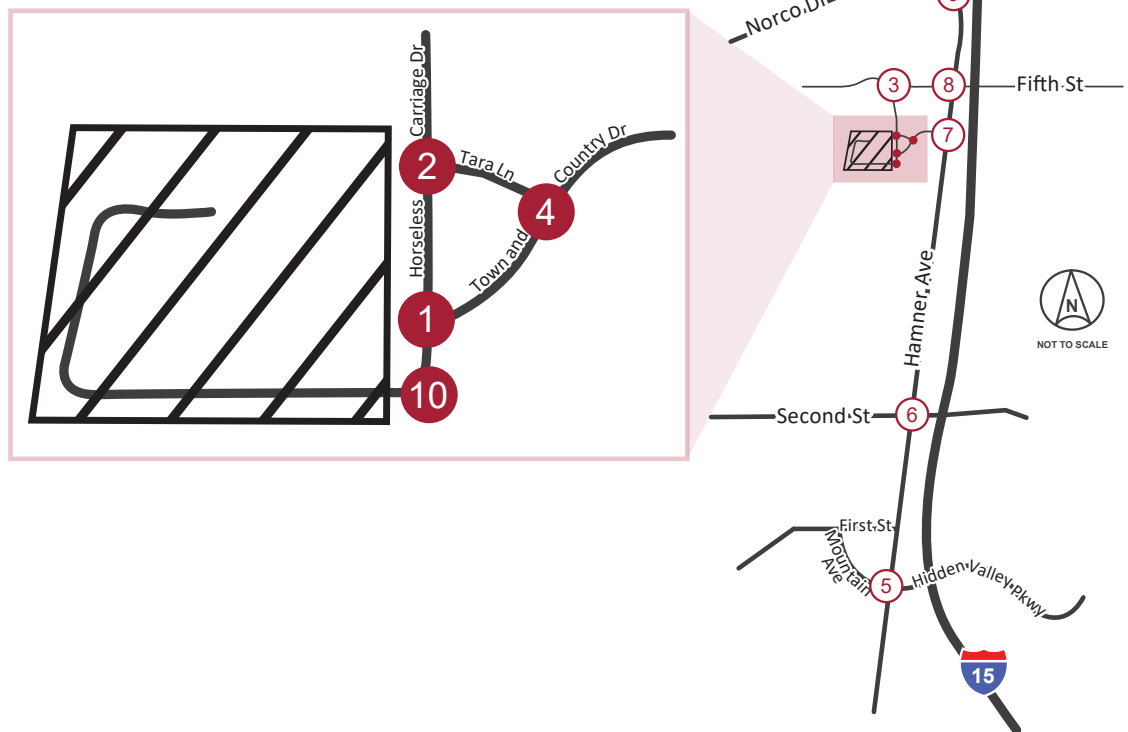


EXHIBIT 11: Opening Year (2022) With Project Traffic Volumes

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

1 2 / 5 8 / 11 Horseless Carriage Dr 18 / 8 10 / 14 Town and Country Dr 0 / 10 5 / 27	2 11 / 8 56 / 105 Horseless Carriage Dr 45 / 45 3 / 5 Tara Ln 15 / 17 7 / 7	3 292 / 255 145 / 47 Fifth St 408 / 340 33 / 39 Horseless Carriage Dr 11 / 60 33 / 141	4 3 / 1 59 / 169 Tara Ln 69 / 80 32 / 31 Town and Country Dr 0 / 1 22 / 41
5 11 / 14 397 / 878 126 / 480 Hammer Ave 594 / 290 500 / 395 698 / 394 Hidden Valley Pkwy 47 / 118 591 / 670 247 / 529	6 139 / 191 484 / 1006 173 / 487 Hammer Ave 455 / 259 393 / 318 377 / 244 Second St 207 / 176 467 / 540 32 / 85	7 98 / 108 1190 / 870 13 / 14 Hammer Ave 7 / 17 0 / 3 0 / 12 Commercial Dwy 40 / 150 64 / 241	8 189 / 122 1033 / 817 56 / 45 Hammer Ave 40 / 28 158 / 103 92 / 80 Fifth St 111 / 221 216 / 165 142 / 137
9 73 / 50 753 / 551 428 / 325 Hammer Ave 281 / 420 107 / 169 670 / 424 Sixth St 65 / 64 220 / 197 48 / 50	10 14 / 22 Horseless Carriage Dr Project Driveway 6 / 44	X / Y AM / PM Peak Hour Turning Volumes ⊗ Signalized Intersection ⊗ Unsignalized Intersection ▨ Project Site	

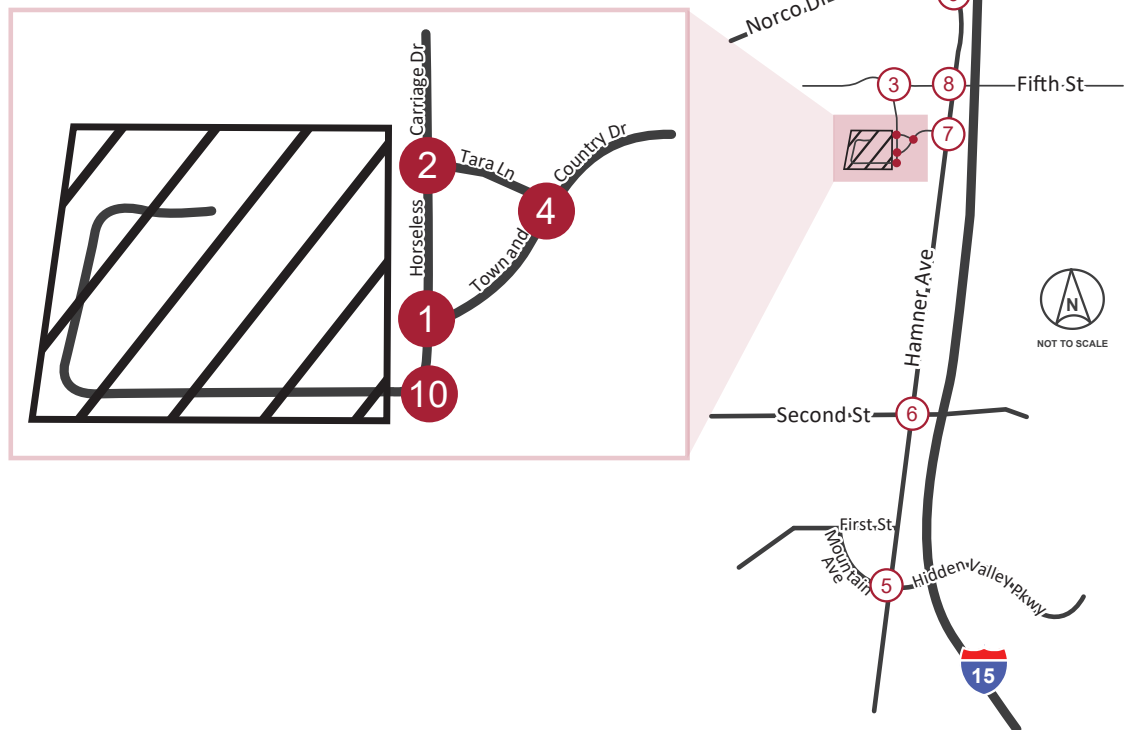


EXHIBIT 12: Cumulative Without Project Traffic Volumes

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
18. 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), or			x	
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			x	

Threshold (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).

Threshold (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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. Pursuant to Government Code Section 21080.3.2(b) and 21074(a)(1)(A)-(B) (AB 52) the City has provided formal notification to California Native American tribal representatives that have previously requested notification from the City regarding projects within the geographic area traditionally and culturally affiliated with tribe(s). Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074.

On January 13, 2020, the City of Norco initiated consultation with Gabrieleno Band of Mission Indians-Kizh Nation and Torres-Martinez Desert Cahuilla Indians (refer to Appendix C for AB52 consultation correspondence). On February 24, 2020, Torres-Martinez provided a statement via email that tribe defers to the Soboba Band of Luiseno Indians; no comments or concerns were made by Torres-Martinez. Although Soboba Band of Luiseno Indians has not officially requested to be part of the City's AB52 consultation list, on February 26, 2020, communication with Soboba Band of Luiseno Indians was initiated. No response has been received after more than 30 days and as such the City has concluded AB52 consultation. All contacted tribes will receive notification of the IS/MND when it is available for public review and may submit comments at that time.

Cumulative Impacts

No significant Project impacts have been identified, considering that the Project is a replacement of a similar use on a previously developed site. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR, and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to significant tribal cultural resource impacts.

Mitigation Measures

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			x	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			x	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			x	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			x	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				x

Threshold (a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The Project area is served by existing sewer lines, water lines, storm drain lines, miscellaneous utilities and infrastructure that run through and adjacent to the Project site along Horseless Carriage Drive. The proposed Project would install new onsite water lines connecting to six domestic meters located on the southeast corner of the site near the Project driveway. The water lines would then to the existing water lines along Horseless Carriage Drive. The Project will install a sewer line that will ultimately connect to the sewer lateral where Horseless Carriage Drive and Tara Lane meet. Additionally, storm water drainage will be installed throughout the Project site to collect storm water. Moreover, storm water will also be collected through the onsite stormwater detention basin and the stormwater quality basin located at the southeast corner of the site.

The Project would also install a recycled water line for irrigation purposes, a gas line, a communications line and an electrical line. Because the Project site is currently occupied by a similar industrial use which is fully functional, the proposed Project would only require the new layout of the proposed water, sewer, or storm drain facilities, but would not require expansion of these existing facilities to serve the proposed

development. Although new water infrastructure would be installed, this would only serve the Project site and Project water demands. The new water infrastructure would be designed to meet requirements of Municipal Code Chapter 14.04, Water System, which would be verified by the Fire Department and/or the Norco Building and Safety Division prior to permit approval. Therefore, the Project would not result in the construction of new or expanded water facilities that could cause significant environmental effects not described within this IS/MND. As a result, impacts would be less than significant.

Threshold (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?

Less Than Significant Impact.

The Proposed Project is consistent with City zoning and General Plan land uses, and as such has been accounted for in the City and regional water supply planning. The Project is also a replacement of a similar land use which already has water service, and therefore represents nominal if any additional potable water demand. Regarding long-term water supply planning, there are two primary aspects of supply reliability that should be considered. The first relates to immediate service needs and is primarily a function of the availability and adequacy of the supply facilities. The second aspect is climate-related and involves the availability of water during mild or severe drought periods.

Average Year

The normal or average year type is a year in the historical sequence that most closely represents median runoff levels and patterns. The supply quantities for this condition are derived from historical average production yields. The UWMP requires that the City demonstrate that sufficient water supplies be available to meet the next 25 years of projected water demands.

During normal water years, no curtailments or other reductions in supply are expected for any of the City's supplies. The projected normal water year supplies and demands from 2020 to 2040 are shown in Table 25: Normal Year Supply and Demand Comparison (AFY), as developed initially. The source water supply is larger than the demand in all years, so the City is not expected to have any supply shortfalls during normal water years or any issues with providing a reliable and consistent supply of water.

Table 25: Normal Year Supply and Demand Comparison (AFY)

Totals	2020	2025	2030	2035	2040
Supply Totals	10,825	11,025	11,025	11,025	11,025
Demand Totals	7,008	7,170	7,182	7,194	7,150
Difference	3,817	3,855	3,843	3,831	3,875
Source: Urban Water Management Plan. 2015. <i>Table 7-2 Retail: Normal Year Supply and Demand Comparison</i> . Available at http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=23893 , accessed March 31, 2020.					

Single-Dry Year

The single-dry year is defined as a year with the minimum useable supply. The supply quantities for this condition are derived from the minimum historical annual production yield. During single-dry water years, there may be up to a 50 percent curtailment in the City's surface water supplied by WMWD. No reductions are assumed for the City's purchased water, groundwater, or recycled water supplies. The projected

single-dry water year supplies from 2020 to 2040 are shown in Table 26: Single Dry Year Supply and Demand Comparison (AF).

Table 26: Single Dry Year Supply and Demand Comparison (AF)

Totals	2020	2025	2030	2035	2040
Supply Totals	10,825	11,025	11,025	11,025	11,025
Demand Totals	7,008	7,170	7,182	7,194	7,150
Difference	3,817	3,855	3,843	3,831	3,875
Source: Urban Water Management Plan. 2015. <i>Table 7-3 Retail: Normal Year Supply and Demand Comparison</i> . Available at http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=23893 , accessed March 31, 2020.					

Multiple-Dry Year

Multiple-dry year is defined as three or more consecutive years with the minimum useable supply. Water systems are more vulnerable to these droughts of long duration, because they deplete water storage reserves in local and state reservoirs and in groundwater basins. The supply quantities for this condition are derived from the minimum historical three consecutive years' annual average yields. Because the City's surface water supply is the only supply that is considered to be susceptible to dry water years, and because the City only relies on surface water in emergency situations, a reduction of 100 percent would not affect multiple dry-year demands. The City supplies available during multiple-dry water years are assumed to be no different than supplies available during single-dry water years. The projected multiple-dry water year supplies from 2020 to 2040 are shown in Table 27: Multiple Dry Years Supply and Demand Comparison (AF).

Table 27: Multiple Dry Years Supply and Demand Comparison (AF)

Year	Totals	2020	2025	2030	2035	2040
First Year	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Second Year	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Third Year	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Fourth Year (Optional)	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Fifth Year (Optional)	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Sixth Year (Optional)	Supply Totals	10,828	11,025	11,025	11,025	11,025
	Demand Totals	7,008	7,170	7,182	7,194	7,150
	Difference	3,820	3,855	3,843	3,831	3,875
Source: Urban Water Management Plan. 2015. <i>Table 7-4 Retail: Normal Year Supply and Demand Comparison</i> . Available at http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=23893 , accessed March 31, 2020.						

The previous tables demonstrate that WMWD anticipates adequate supplies for years 2020 to 2040 under multiple-dry year conditions based on current land use projections.⁷⁰

During construction, it is anticipated that water usage would be limited to minor and temporary watering uses associated with construction. Once operational, the proposed Project would consume water during daily operational use. The proposed Project would use approximately 53.36-acre feet per year of water-based on typical industrial water demands of 2,000 gallons per day per acre. Based on the Project's usage rate, the Project would consume a nominal percentage of the City's present and future water supplies, similar to current water demand from the existing site uses. The Project would be developed consistent with the General Plan land use and zoning designations, which have been used by the City to estimate future water demands from development of the Project site and included in the City's 2015 UWMP. Therefore, the proposed Project has been included in the water demand (and indirectly, water supply) projections of the latest UWMP. Therefore, impacts are considered less than significant.

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

Less Than Significant Impact. The Project will connect with the City's existing sanitary sewer system as shown on Exhibit 13, Utilities Plan. The City has indicated it has adequate capacity in its local system to receive Project wastewater, considering that the site is consistent with City zoning and replaces an existing similar use. The City's sanitary sewer system is conveyed to WMWD's Western Riverside County Wastewater Transfer Station ("the Corona Plant"), which is a joint powers authority governed by the Western Riverside County Regional Wastewater Authority (WRCRWA). The WRCRWA Corona plant, a facility capable of providing clean recycled water for irrigation or for discharge into the watershed, was brought online in 1998. It's designed to clean up to eight million gallons of wastewater per day with the capacity for future expansion. Wastewater from Western, the City of Norco, Jurupa Community Services District and Home Gardens Sanitary District is collected through many miles of pipelines, pumped to the WRCRWA Corona plant, processed and released into the Santa Ana River in a cleaner state than the existing river water.⁷¹

WMWD charges connection fees and usage fees to provide for necessary system capacity enhancements. Wastewater Control Ordinance No. 380 regulates wastewater discharges into the City's wastewater system and includes discharge limits (local limits) for select pollutants. The Wastewater Control Ordinance provides legal authority to implement the pretreatment program. The ordinance establishes regulations and charges for the collection, treatment and disposal of wastewater, as well as penalties for violations. Some industrial customers may also be subject to federal regulations for specific categories of businesses. These "categorical industries" are subject to additional regulations that include discharge limits (pretreatment standards) for pollutants specific to the category.⁷²

In consideration of the above, with the Project providing necessary sanitary sewer improvements and connection and treatment fees, being consistent with City zoning and replacing a similar existing industrial use, the Project is not anticipated to have any significant impacts to the local wastewater system.

⁷⁰ City of Norco. 2015 *Urban Water Management Plan – Chapter 7: Water Supply Reliability Assessment*. Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=23893>, accessed on February 26, 2020.

⁷¹ <https://www.wmwd.com/178/Wastewater> (accessed March 31, 2020).

⁷² Western Municipal Water District. 2020. *Wastewater Control Ordinance/Discharge Limits*. Available at <https://www.wmwd.com/385/Wastewater-Control-OrdinanceDischarge-Li>, accessed on February 25, 2020.

Threshold (d) 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?

Less Than Significant Impact. Solid waste generation from construction of the Project was estimated using CalRecycle solid waste generation factors derived for industrial warehouse/manufacturing. Solid waste volumes were then compared with recent estimates of remaining disposal capacity of the landfill serving the City.⁷³

As of April 1, 2018, the landfill had 143,977,170 cubic yards of capacity and permits up to 16,054 tons of waste per day. Implementation of the proposed Project is anticipated to generate approximately 5,310 pounds (lbs.) per day (2.6 tons) during operations or approximately 0.016 percent of the landfill's daily capacity, based on CalRecycle solid waste generation rate⁷⁴. Additional waste during the temporary, short-term construction phase would be generated, but it is not anticipated to result in inadequate landfill capacity. El Sobrante has a maximum throughput of 2 million tons annually, and the landfill has a capacity of approximately 209 million cubic yards. The landfill has an expected operational life through 2067 with the potential for vertical, or downward expansion.⁷⁵ Because the proposed Project is anticipated to generate well below the allowed permitted throughput at El Sobrante, it is anticipated that that Project would not generate solid waste in excess of State or local standards, or in excess capacity. In addition, the Project is a replacement of an existing industrial use. For these reasons, a less than significant impact would occur.

Threshold (e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The Resource Conservation and Recovery Act of 1976 (United States Code Title 42, Section 6901 et seq.) governs the creation, storage, transport, and disposal of hazardous wastes and operators of hazardous waste disposal sites. AB 939, the Integrated Waste Management Act of 1989 (California Public Resources Code Section 40000 et seq.) requires all local governments to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. Compliance with AB 939 is measured for each jurisdiction, in part, as actual disposal amounts compared to target disposal amounts. Actual disposal amounts at or below target amounts comply with AB 939. The City must comply with State law to reduce solid waste generation, promote reuse and require solid waste collection for recycling and composting. The City would require the Project to reduce solid waste generation and recycle materials as much as feasible to reduce solid waste. Because the Project would be required by the City to recycle, the Project would comply with all solid waste policies and objectives; and impacts to any federal, state or local statutes or regulations related to solid waste would not occur.

Cumulative Impacts

As discussed above, the Project is not anticipated to result in any significant impacts to utilities. The current site is occupied with light industrial uses and the Project represents a similar continuation of these

⁷³ CalRecycle. 2019. *Industrial Sector Generation Rates*. Available at <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>, accessed March 30, 2020.

⁷⁴ Based on CalRecycle solid waste factor generation rate (1.42 lbs per 100 sf per day): $374,170 \text{ sf}/100 = 3,740 \text{ sf} \times 1.42 \text{ lbs per day} = 5,310 \text{ lbs per day}$.

⁷⁵ Waste Management. 2020. *El Sobrante Land Fill*. Available at https://www.wmsolutions.com/pdf/factsheet/El_Sobrante_Landfill.pdf, accessed February 25, 2020.

current uses. The Project is consistent with site zoning and the City's General Plan and has therefore been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR,⁷⁶ SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, and the City's 2015 UWMP. Ultimately, the Project and other planned projects are subject to connection and service fees to assist in facility expansion and service improvements triggered by an increase in demand. Therefore, the Project is not anticipated to result in a cumulatively considerable impact to utilities.

Mitigation Measures

No mitigation is required.

⁷⁶ Riverside County. 2020. *General Plan Amendment No. 960 EIR No. 521 CAP (February 2015)*. Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan/Riverside-County-General-Plan-2015/General-Plan-Amendment-No960-EIR-No521-CAP-February-2015>, accessed on March 28, 2020.

1	16 / 8 ↕ 8 / 11 Horsless Carriage Dr 18 / 8 ↕ 59 / 24 Town and Country Dr 5 / 18 ↕ 22 / 53	2	25 / 11 ↕ 56 / 105 Horsless Carriage Dr 45 / 45 ↕ 3 / 5 Tara Ln 20 / 25 ↕ 7 / 7	3	292 / 255 ↕ 156 / 49 Fifth St 408 / 340 38 / 40 ↕ Horsless Carriage Dr 12 / 62 ↕ 37 / 147	4	3 / 1 ↕ 59 / 169 Tara Ln 69 / 80 ↕ 81 / 41 Town and Country Dr 0 / 1 39 / 67 ↕
5	12 / 16 ↕ 399 / 881 ↕ 128 / 483 Mountain Ave 601 / 291 ↕ 500 / 395 ↕ 698 / 394 Hidden Valley Pkwy 9 / 26 258 / 410 ↕ 33 / 71	6	140 / 193 ↕ 489 / 1014 ↕ 179 / 505 Hammer Ave 471 / 262 ↕ 393 / 318 ↕ 377 / 244 Second St 210 / 177 467 / 540 ↕ 32 / 85	7	112 / 111 ↕ 1190 / 870 ↕ 13 / 14 Hammer Ave 7 / 17 ↕ 0 / 3 ↕ 0 / 12 Commercial Dwy 45 / 158 ↕ 76 / 259	8	200 / 124 ↕ 1044 / 819 ↕ 56 / 45 Hammer Ave 40 / 28 ↕ 158 / 103 ↕ 95 / 81 Fifth St 115 / 227 216 / 165 ↕ 142 / 137
9	73 / 50 ↕ 759 / 552 ↕ 428 / 325 Hammer Ave 281 / 420 ↕ 107 / 169 ↕ 686 / 427 Sixth St 65 / 64 220 / 197 ↕ 48 / 50	10	77 / 35 ↕ Horsless Carriage Dr Project Driveway 28 / 78 ↕	X / Y AM / PM Peak Hour Turning Volumes ⊗ Signalized Intersection ⊗ Unsignalized Intersection ▨ Project Site			

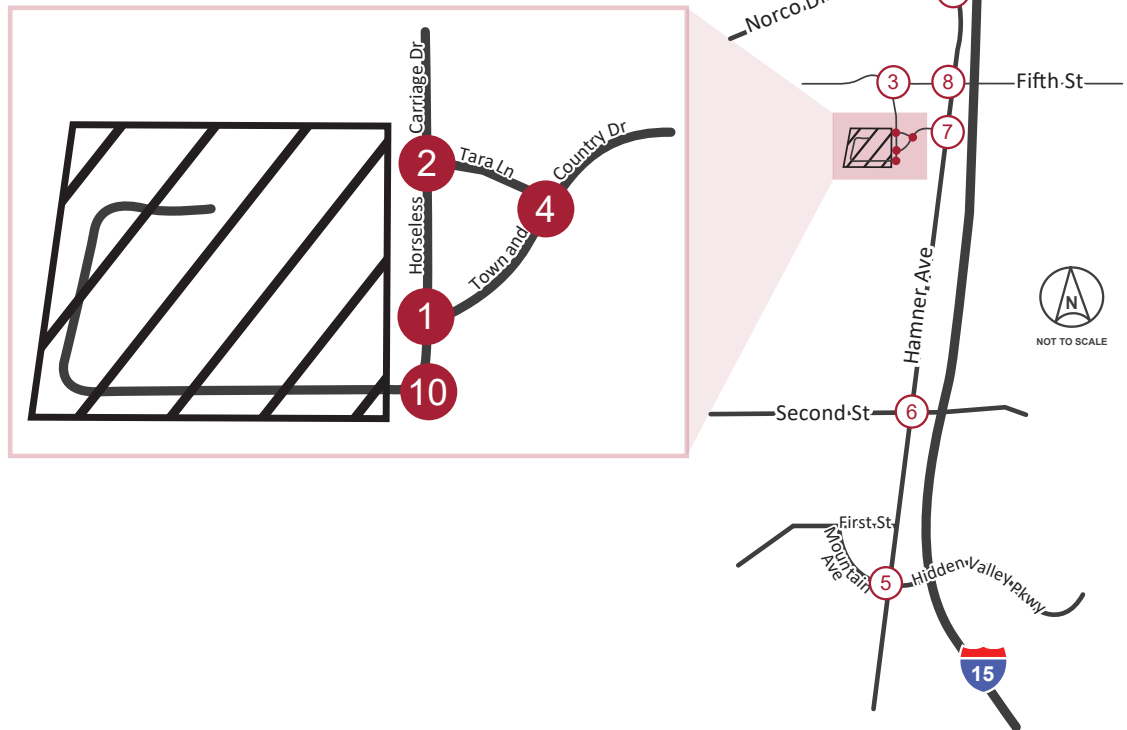


EXHIBIT 13: Cumulative Plus Project Traffic Volumes

Saddle Ranch South Project

City of Norco

(Source: Kimley-Horn, February 2020, Traffic Impact Analysis)

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE. Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			x	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			x	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				x
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?			x	

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

Less Than Significant Impact. Open areas surrounding and within the City are a potentially dangerous fire hazards due to established and dry vegetation communities, slopes that hamper fire personnel and equipment, and development adjacent to the open areas that increase the potential for loss. The risk is further exasperated by conservation areas designated to maintain important habitat for which there are restrictions against the removal of vegetation regardless of nearby development. Approximately 20 percent of the City is within an open space, confederation, or limited development area. The Project is neither a moderate, high, or very high Fire Hazard Severity Zone (FHSZ).⁷⁷ The nearest FHSZ areas are located approximately 0.3 miles north of the Project site.

During an emergency, the City's Emergency Operations Center (EOC) will establish contact as quickly as possible to local utility providers to provide a list of locations where service has been interrupted with updates, as available, as to when services are anticipated to be restored. The City will maintain, in cooperation with the Corona-Norco Unified School District, local churches, and other places of assembly locations where evacuation centers and temporary shelters can be established during emergency events. The proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. Therefore, no impact would occur.

⁷⁷ General Plan. 2013. Safety Element, *Fire Hazards Map*, page 5. Available at <http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Accessed on December 9, 2019.

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

Less Than Significant Impact. Portions of the City are under some threat of potential wildland fires especially along the hillside areas. From the State Fire Hazard Severity Zones Maps, the Local Response Area (LRA) Zones have been developed to determine the significance of local fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, then define the mitigation strategies to provide a system of fire protection for urban uses and protection for wildland fires, as shown in the Fire Hazards Map of the Safety Element. LRA Zones I and II are the areas with the highest potential for wildfire impacts and as a result should incorporate additional fire protections strategies including increased setback for development from fire hazard areas, better use of inflammable building and landscaping materials, vegetation clearance around structures, and maintained fuel modification zones. Because the Project site is not located within an LRA Zone I or II, the Project site is assumed to not be exposed to risks that would exacerbate wildfire risks.⁷⁸ A less than significant impact would occur.

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

No Impact. Refer to Threshold (b), above. As previously discussed, all proposed Project components (including infrastructure, etc.) would be within the boundaries of the Project site, and impacts associated with the development of the Project within this footprint area are analyzed throughout this document. The Project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risk. No impact would occur.

Threshold (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?

Less Than Significant Impact. The proposed Project is not located in an LRA Zone I or II. There are also no natural drainage courses located on-site. Additionally, the Project site is currently fully functional with a similar use. Existing workers have not, and future workers will not, be exposed to significant risks from downslope, flooding, or landslides. The Project site is relatively flat, and the Project site is not located in a landslide-prone zone. Therefore, no impact would occur.

Cumulative Impacts

No significant Project impacts have been identified, considering that the Project is a replacement of a similar use on a previously developed site. The Project is consistent with City zoning and General Plan land use designations, and as such has been accounted for in local and regional cumulative impact analyses, including the City's General Plan, Riverside County General Plan Amendment No. 960 Program EIR, and SCAG's Final Program EIR for the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy. Therefore, the Project is not anticipated to result in any cumulatively considerable contribution to a significant wildfire impact.

Mitigation Measures

⁷⁸ Riverside County. 2020. *Riverside County Parcel Report*, APN: 129-200-010. (see Appendix J)

No mitigation is required.

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) Have the potential to 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, 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?		x		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)		x		
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		x		

Threshold (a) Does the project have the potential to 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, 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?

Less Than Significant Impact with Mitigation. 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 IS/MND. Throughout this IS/MND, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. Accordingly, with incorporation of the mitigation measures imposed throughout this IS/MND, the Project would not substantially degrade the quality of the environment and impacts would be less than significant.

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

Less Than Significant Impact with Mitigation. As discussed throughout this IS/MND, in all instances where the proposed 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 levels. As such, with incorporation of the mitigation measures imposed throughout this IS/MND, the

Project would not contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be less than significant.

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

Less Than Significant Impact with Mitigation. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this IS/MND. In instances where the Project has potential to result in direct or indirect adverse effects to human beings, mitigation measures have been applied to reduce the impact to below a level of significance. With required implementation of mitigation measures identified in this IS/MND, 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.

4. PREPARERS

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