

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #**Project Title:** Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601, and Foundation GPA)Lead Agency: Riverside CountyContact Person: Russell BradyMailing Address: P.O. Box 1409Phone: (951) 955-3025City: RiversideZip: 92502-1409County: Riverside County**Project Location:** County: Riverside County City/Nearest Community: Mead ValleyCross Streets: Light Industrial use at SW Corner of Seaton Ave and Cajalco Exwy, with park proposed east and west of Decker Rd further south Zip Code: 92570Longitude/Latitude (degrees, minutes and seconds): 33 ° 50 ' 08 " N / 117 ° 15 ' 53 " W Total Acres: 64.97Assessor's Parcel No.: See NOC AttachmentSection: 11 Twp.: 4S Range: 4W Base: San BernardinoWithin 2 Miles: State Hwy #: Interstate 215Waterways: NoneAirports: March Air Reserve BaseRailways: Atchison, Topeka & Santa Fe Schools: Val Verde ES, Manuel L Real ES**Document Type:**

CEQA: ☒ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other: _____
☐ Mit Neg Dec Other: _____ ☐ FONSI _____

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☒ Rezone ☐ Annexation
☒ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☒ Site Plan ☒ Land Division (Subdivision, etc.) ☐ Other: _____

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☒ Industrial: Sq.ft. 1,003,510 Acres 44.2 (net) Employees 974
☐ Educational: _____
☒ Recreational: Future Park: 13.4 net acres
☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☒ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☒ Air Quality ☒ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☒ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☒ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: Paleontological Resources

Present Land Use/Zoning/General Plan Designation:

See NOC Attachment

Project Description: (please use a separate page if necessary)

The proposed Project consists of applications for PPT 220050, CZ 2200062, TPM 38601 and a Foundation GPA (case number is pending). The applications seek to entitle one industrial warehouse building and a public park within the Mead Valley community of unincorporated Riverside County. The industrial warehouse building would be located at the southwest corner of Seaton Avenue and Cajalco Expressway, between Seaton Avenue and Decker Road. The public park would be located south of the industrial warehouse building on Decker Road. The industrial warehouse building is proposed with 1,003,510 square feet (s.f.) of total building area on ±44.74 net acres. The building is designed to be up to 50 feet tall with 76 loading dock doors positioned on the building's northern façade and 76 loading dock doors positioned on the building's southern façade. No loading dock doors would face Seaton Avenue or Decker Road. The public park would occur on ±13.35 net acres and is conceptually designed to include play fields, hard surfaces sport courts, a playground, walking paths, and other amenities. Roadway frontage improvements would occur to Cajalco Expressway, Seaton Avenue, and Decker Road. The General Plan land use designation of the industrial warehouse site is proposed to change from Community Development - Commercial Retail (CD-CR) and Rural Community - Very Low Density Residential (RC-VLDR) to Community Development - Light Industrial (LI) and the existing zoning classification is proposed to change from R-R-1/2 (Residential, half-acre lots) and A-1-1 (Light Agriculture) to I-P (Industrial Park). The General Plan designation of the proposed public park site would change from its existing designation of Rural Community - Very Low Density Residential (RC-VLDR) to Open Space-Recreation (OS-R) and the zoning designation would remain A-1-1 (Light Agriculture). TPM 38601 seeks to consolidate and change the configuration of lot lines and designate public right-of-way for conveyance to the County for public streets.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<u>S</u> Air Resources Board	Office of Historic Preservation
Boating & Waterways, Department of	Office of Public School Construction
California Emergency Management Agency	Parks & Recreation, Department of
California Highway Patrol	Pesticide Regulation, Department of
<u>S</u> Caltrans District # <u>8</u>	Public Utilities Commission
Caltrans Division of Aeronautics	<u>S</u> Regional WQCB # <u>8</u>
Caltrans Planning	Resources Agency
Central Valley Flood Protection Board	Resources Recycling and Recovery, Department of
Coachella Valley Mtns. Conservancy	S.F. Bay Conservation & Development Comm.
Coastal Commission	San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
Colorado River Board	San Joaquin River Conservancy
<u>S</u> Conservation, Department of	Santa Monica Mtns. Conservancy
Corrections, Department of	State Lands Commission
Delta Protection Commission	SWRCB: Clean Water Grants
Education, Department of	SWRCB: Water Quality
Energy Commission	SWRCB: Water Rights
<u>S</u> Fish & Game Region # <u>6</u>	Tahoe Regional Planning Agency
Food & Agriculture, Department of	<u>S</u> Toxic Substances Control, Department of
Forestry and Fire Protection, Department of	Water Resources, Department of
General Services, Department of	
Health Services, Department of	Other: _____
Housing & Community Development	Other: _____
<u>S</u> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date June 30, 2023 Ending Date July 31, 2023

Lead Agency (Complete if applicable):

Consulting Firm: <u>T&B Planning, Inc.</u>	Applicant: <u>Industrial VI Enterprises LLC (Attn: John Grace)</u>
Address: <u>3200 El Camino Real, Suite 100</u>	Address: <u>901 Via Piemonte, Unit 175</u>
City/State/Zip: <u>Irvine, CA 92602</u>	City/State/Zip: <u>Ontario, CA 91764</u>
Contact: <u>Tracy Zinn, AICP</u>	Phone: <u>(909) 256-5924</u>
Phone: <u>(714) 505-6360, ext. 350</u>	

Signature of Lead Agency Representative:  Date: June 29, 2023

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: _____

Project Title: Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601, and Foundation GPA)

Lead Agency: Riverside County

Contact Name: Russell Brady

Email: rbrady@RIVCO.ORG

Phone Number: (951) 955-3025

Project Location: Mead Valley (Unincorporated), Riverside County

City

County

Project Description (Proposed actions, location, and/or consequences).

The Project consists of applications for PPT 220050, CZ 2200062, TPM 38601 and a Foundation GPA (case number is pending) to entitle one warehouse building on ± 44.74 net acres and a public park on ± 13.35 net acres. The warehouse building would be located at the southwest corner of Seaton Ave. and Cajalco Exwy with a public park to south along Decker Rd. The warehouse building would contain 1,003,510 s.f. of total building area, would be up to 50 feet tall, and would have 76 loading dock doors on the building's northern and southern façades. The public park conceptually is designed to include play fields, hard surfaces sport courts, a playground, walking paths, and other amenities. Roadway frontage improvements also would occur. The General Plan land use designation of the warehouse site is proposed to change from CD-CR and RC-VLDR to CD-LI and the zoning classification would change from R-R-1/2 and A-1-1 to I-P. The General Plan designation of the proposed public park site would change from RC-VLDR to OS-R and the zoning would remain A-1-1. TPM 38601 seeks to consolidate and change the configuration of lot lines and designate public right-of-way for conveyance to the County for public streets.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

The Draft EIR shall address the following environmental subject areas: Aesthetics; Agriculture and Forest Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Paleontological Resources; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Mitigation measures, if required, will be identified by the forthcoming EIR.

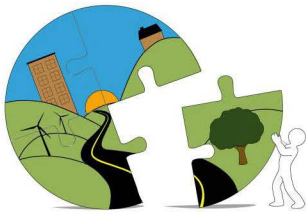
If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

There are no known areas of controversy regarding the Project at this time.

Provide a list of the responsible or trustee agencies for the project.

Santa Ana Regional Water Quality Control Board
South Coast Air Quality Management District
Riverside County Flood Control and Water Conservation District
South Coast Air Quality Management District
Eastern Municipal Water District

Additional responsible agencies, if any, will be identified as part of the forthcoming EIR.



John Hildebrand
Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Public Notice of Preparation of a Draft Environmental Impact Report

DATE: June 29, 2023

TO: Interested Parties

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Mead Valley Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Mead Valley Commerce Center. PLOT PLAN NO. 220050, CHANGE OF ZONE NO. 220062, TENTATIVE PARCEL MAP NO. 38601 and a FOUNDATION GENERAL PLAN AMENDMENT (GPA NO. Pending).

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for PPT 220050, CZ 220062, TPM 38601 and a Foundation GPA (case number is pending). The applications seek to entitle one industrial warehouse building and a public park within the Mead Valley community of unincorporated Riverside County. The industrial warehouse building would be located at the southwest corner of Seaton Avenue and Cajalco Expressway, between Seaton Avenue and Decker Road. The public park would be located south of the industrial warehouse building on Decker Road. The industrial warehouse building is proposed with 1,003,510 square feet (s.f.) of total building area on ± 44.74 net acres. The building is designed to be up to 50 feet tall with 76 loading dock doors positioned on the building's northern façade and 76 loading dock doors positioned on the building's southern façade. No loading dock doors would face Seaton Avenue or Decker Road. The public park would occur on ± 13.35 net acres and is conceptually designed to include play fields, hard surfaces sport courts, a playground, walking paths, and other amenities. Roadway frontage improvements would occur to Cajalco Expressway, Seaton Avenue, and Decker Road. The General Plan land use designation of the industrial warehouse site is proposed to change from Community Development - Commercial Retail (CD-CR) and Rural Community - Very Low Density Residential (RC-VLDL) to Community Development - Light Industrial (LI) and the existing zoning classification is proposed to change from R-R-1/2 (Residential, half-acre lots) and A-1-1 (Light Agriculture) to I-P (Industrial Park). The General Plan designation of the proposed public park site would change from its existing designation of Rural Community - Very Low Density Residential (RC-VLDL) to Open Space-Recreation (OS-R) and the zoning designation would remain A-1-1 (Light Agriculture). TPM 38601 seeks to consolidate and change the configuration of lot lines and designate public right-of-way for conveyance to the County for public streets. The approvals sought of Riverside County include:

1. Adoption by resolution of Plot Plan No. 220050
2. Adoption by resolution of Tentative Parcel Map No. 38601
3. Adoption by ordinance of Change of Zone No. 220062
4. Adoption by resolution of a General Plan Amendment (No. is pending)

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Russell Brady, Project Planner

PROJECT SPONSOR:

Applicant: Industrial VI Enterprises LLC
Attn: John Grace
Address: 901 Via Piemonte, Unit 175
Ontario, CA 91764

Riverside Office · 4080 Lemon Street, 12th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-1811

Desert Office · 77-588 El Duna Court, Suite H
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit input from the public as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

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

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30 p.m. or as soon as possible thereafter

DATE OF SCOPING SESSION: July 24, 2023

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org, or go to the County Planning Department's Planning Commission agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Russell Brady, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

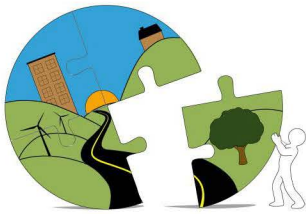
If you have any questions, please contact Russell Brady, Project Planner at (951) 955-3025.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Russell Brady, Project Planner for John Hildebrand, Planning Director



John Hildebrand
Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Agency Notice of Preparation of a Draft Environmental Impact Report

DATE: June 29, 2023

TO: Responsible/Trustee Agencies

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LEAD AGENCY:

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4080 Lemon Street, 12th Floor
P.O. Box 1409
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Attn: Russell Brady, Project Planner

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Applicant: Industrial VI Enterprises LLC
Attn: John Grace
Address: 901 Via Piemonte, Unit 175
Ontario, CA 91764

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RIVERSIDE COUNTY PLANNING DEPARTMENT

John Hildebrand
Director

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- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
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Sincerely,

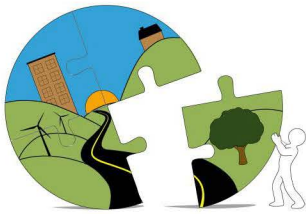
RIVERSIDE COUNTY PLANNING DEPARTMENT

A handwritten signature in black ink, appearing to read 'Russell Brady', is written over a horizontal line.

Russell Brady, Project Planner for John Hildebrand, Planning Director

Exhibits Attached:

1. Location Map
2. USGS Map
3. Aerial Photograph
4. Proposed Mead Valley Commerce Center Project



John Hildebrand
Director

RIVERSIDE COUNTY PLANNING DEPARTMENT

Applicant's Notice of Preparation of a Draft Environmental Impact Report

DATE: June 29, 2023

TO: Industrial VI Enterprises LLC
Attn. John Grace
901 Via Piemonte, Suite 175
City of Ontario, CA 91764

PROJECT CASE NO./TITLE: Mead Valley Commerce Center. PLOT PLAN NO. 220050, CHANGE OF ZONE NO. 220062, TENTATIVE PARCEL MAP NO. 38601 and a FOUNDATION GENERAL PLAN AMENDMENT (GPA NO. Pending).

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3. Adoption by ordinance of Change of Zone No. 220062
4. Adoption by resolution of a General Plan Amendment (No. is pending)

Pursuant to the Riverside County Rules to Implement the California Environmental Quality Act of 1970, it has been determined that the above referenced project may have a significant effect on the environment and an Environmental Impact Report (EIR) is required.

OPTION TO REVISE PROJECT:

Upon receipt of this notice, the Project sponsor may revise the project to avoid or mitigate any adverse impact. If the potential adverse effects are substantially mitigated by the revised project, an EIR shall not be required and a Mitigated Negative Declaration or a Negative Declaration (statement of no significant effect) shall be prepared.

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APPEAL:

The staff requirement to prepare an EIR may be appealed to the Planning Commission within ten (10) days of receipt of this notice. The appeal must be made in writing and contain brief discussion of how the project will avoid the environmental effects listed on the attachment. The appeal must be accompanied by: (1) adhesive labels containing the names and addresses of all property owners within a minimum of 600 feet of the project boundaries that total at least 25 different property owners; and (2) the appropriate filing fee. (Refer to the Current Riverside County Planning Department Fee Schedule).

PREPARATION OF THE DRAFT EIR: The Draft EIR shall address the following environmental subject areas:

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

The Draft EIR must meet the form and content requirements of the Planning Department. The sponsor should advise the consultant to meet with the staff on a regular basis to ensure an adequate document is prepared in a timely fashion. A preliminary draft shall be submitted for review and if determined acceptable, the consultant will be notified of the appropriate number of final draft copies to be provided for distribution to State and local agencies and interested parties.

The Draft EIR must be submitted within 120 days of this Notice unless an extension of not more than thirty (30) days is received and granted by the Department.

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30 p.m. or as soon as possible thereafter

DATE OF SCOPING SESSION: July 24, 2023

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org, or go to the County Planning Department's Planning Commission agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

EIR FEES: The appropriate fee for an EIR (Refer to the Current Riverside County Planning Department Fee Schedule) must be submitted to the Planning Department within thirty (30) days of this Notice.

PROJECT PRESUMED ABANDONED: Unless the EIR fee and the Draft EIR are submitted within the time periods specified above, the project will be presumed abandoned, and there will be no further processing of the development application(s) by the County of Riverside, and no refund of previously paid filing fees.

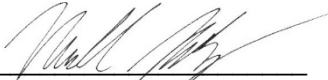
Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Russell Brady, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions please contact Russell Brady, Project Planner at (951) 955-3025.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT

A handwritten signature in dark ink, appearing to read 'Russell Brady', is written over a horizontal line.

Russell Brady, Project Planner for John Hildebrand, Planning Director

Notice of Preparation

Notice of Preparation

To: _____ From: _____

(Address)

(Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☐ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to _____ at the address shown above. We will need the name for a contact person in your agency.

Project Title: _____

Project Applicant, if any: _____

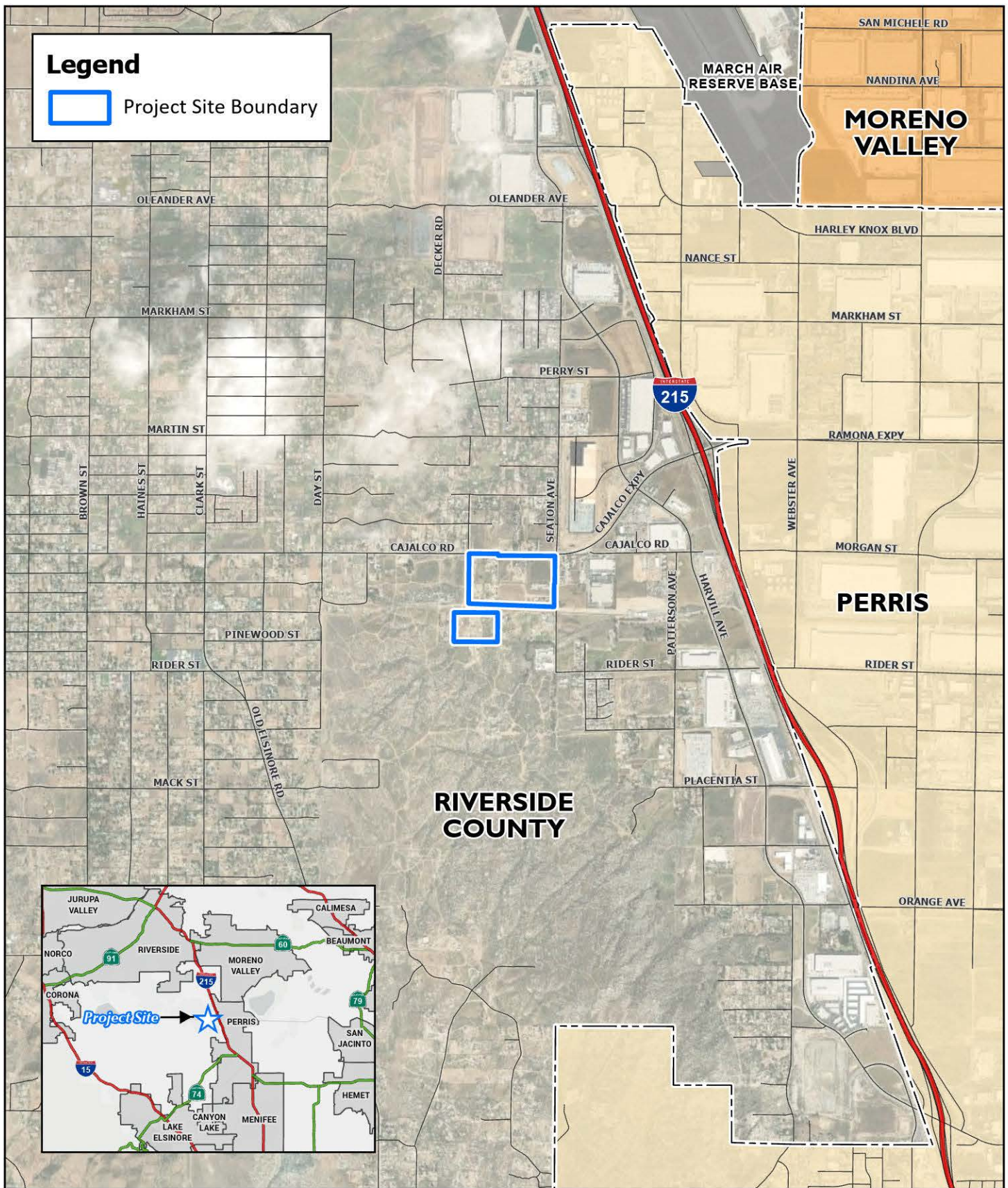
Date _____

Signature _____

Title _____

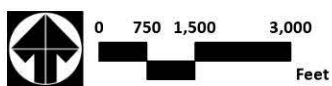
Telephone _____

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

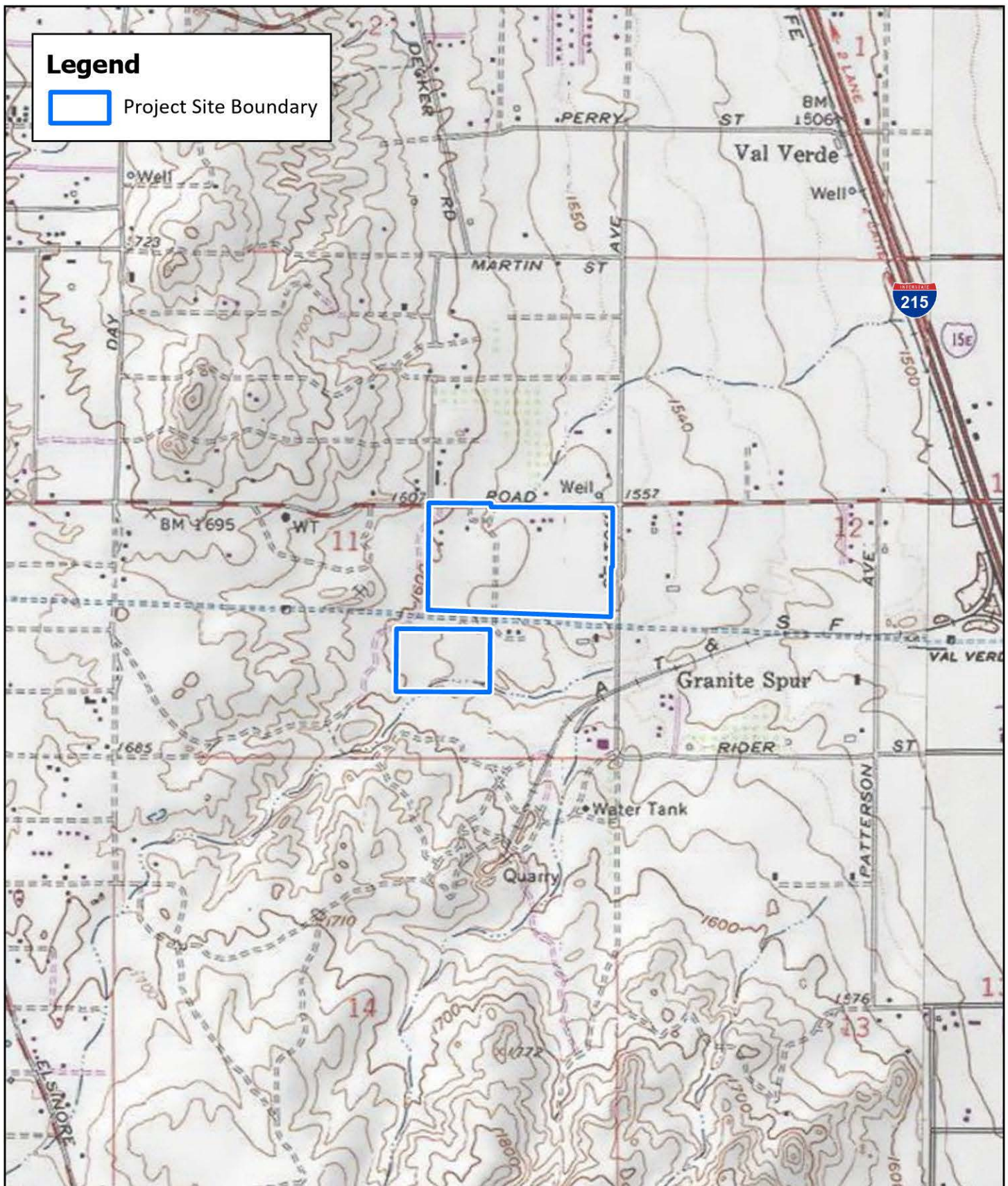


Source(s): Esri, Nearmap Imagery (2023)
 Boundary: Webb Associates (03-13-2023)

Figure 1

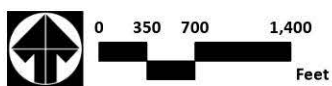


Location Map



Source(s): Esri, Nearmap Imagery (2023)
 Boundary: Webb Associates (03-13-2023)

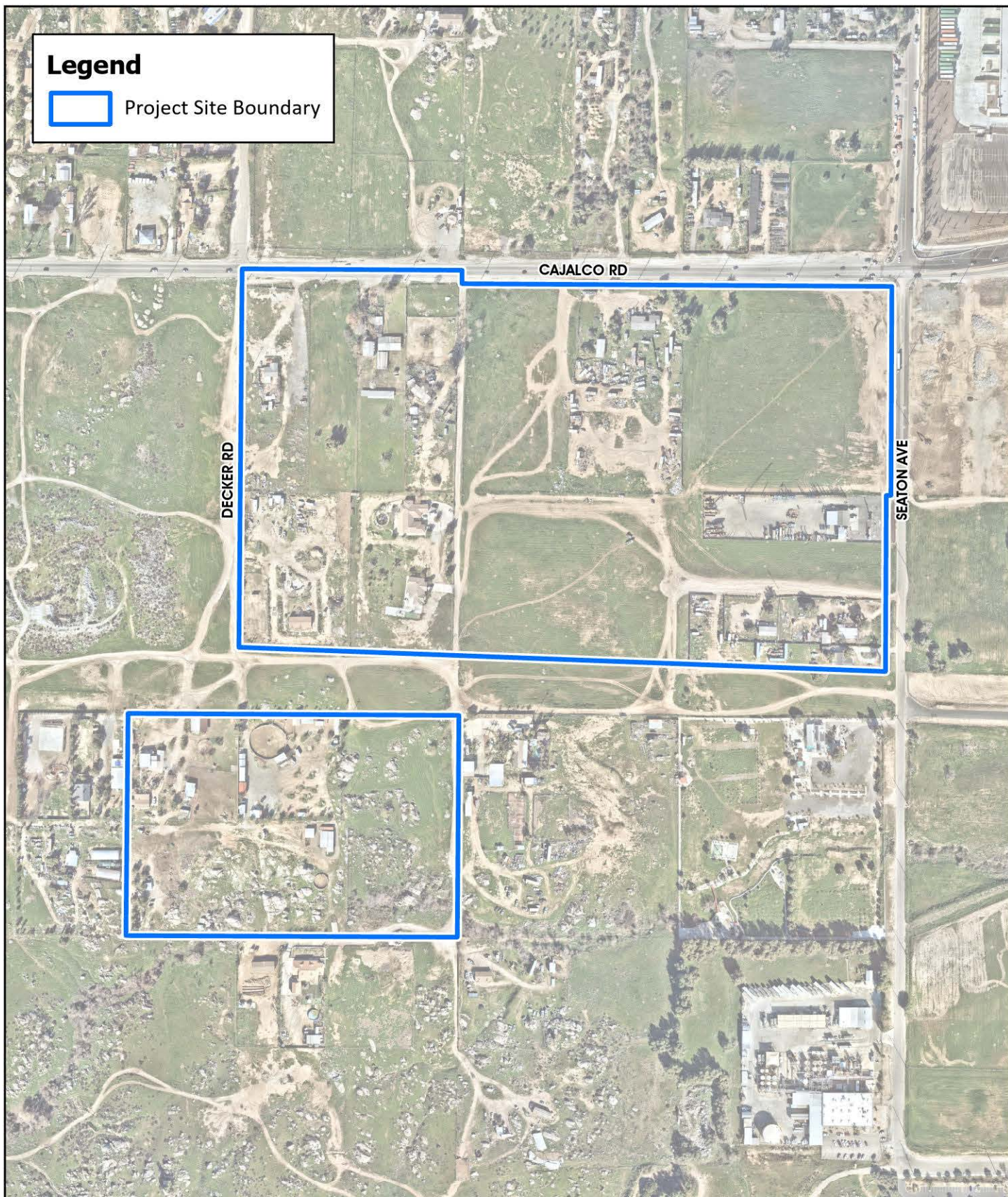
Figure 2



USGS Map

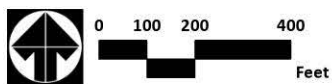
Mead Valley Commerce Center

JN: 941-008
 Date: June 2023

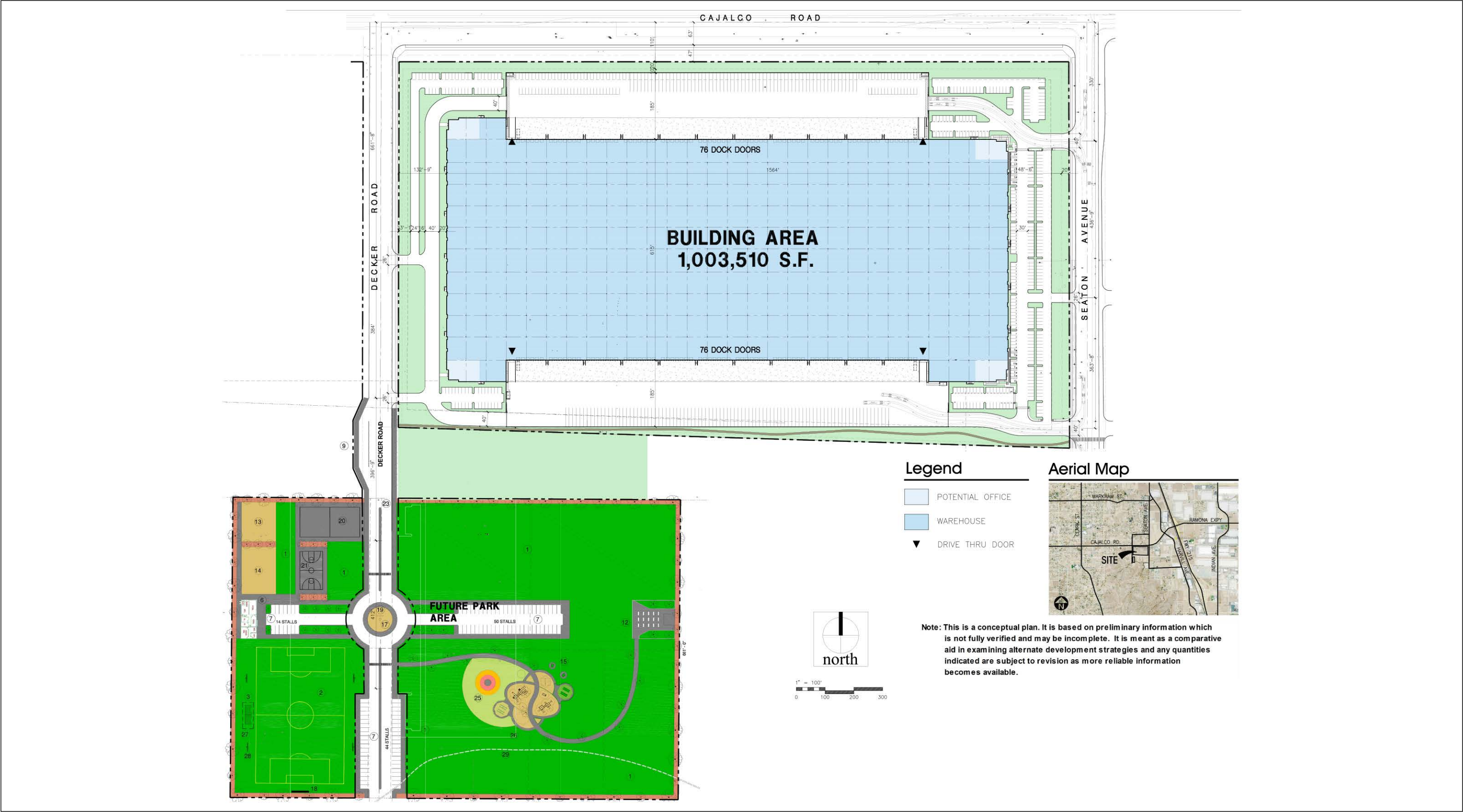


Source(s): Esri, Nearmap Imagery (2023)
 Boundary: Webb Associates (03-13-2023)

Figure 3

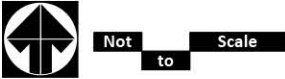


Aerial Photo



Source(s): HPA (04-19-2023)

Figure 4





Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY

rbrady@rivco.org

July 6, 2023

Russell Brady, Project Planner
Riverside County Planning Department (County)
4080 Lemon St.
P.O. Box 1409
Riverside, CA 92502

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Mead Valley Commerce Center. PLOT PLAN NO. 220050, CHANGE OF ZONE NO. 2200062, TENTATIVE PARCEL MAP NO. 38601 and a FOUNDATION GENERAL PLAN AMENDMENT (GPA NO. Pending).

Dear Mr. Brady:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Mead Valley Commerce Center Project (Project). The Project includes various applications to allow for the entitlement of one industrial warehouse building and a public park within the Mead Valley community of unincorporated Riverside County. The industrial warehouse building is proposed with 1,003,510 square feet of total building area on approximately 44.74 net acres. The public park would occur on approximately 13.35 net acres and is conceptually designed to include play fields, hard surfaces sport courts, a playground, walking paths, and other amenities. The RCDWR offers the following comments for your consideration while preparing the Project's EIR:

1. Construction of the Project may generate a substantial quantity of construction and demolition (C&D) waste. Should a large quantity of C&D waste, that is unable to be recycled, be brought to a County landfill for disposal, it could exceed the landfill's daily permitted capacity, thus a violation of state regulations.¹ To assess waste impacts, the DEIR should consider quantitatively analyzing this potential solid waste impact and discuss feasible mitigation programs/regulatory compliance.

Note: CalRecycle's website may be helpful to determine the Project's waste generation:
<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

2. The following information can be useful in the analysis of the solid waste impacts:
 - a) Solid waste generated within the Project area is collected by WMI, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTs) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.

¹ Title 40, Vol. 41 C.F.R § 243.203 *et seq.* (1976).

- b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Descriptions of the local landfills are provided below:

El Sobrante Landfill:

The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2021 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 50.1 million tons.² In 2022, the El Sobrante Landfill accepted a daily average of 10,646 tons with a period total of approximately 3,278,846 tons. The landfill is expected to reach capacity in approximately 2057.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons.³ As of January 1, 2023 (beginning of day), the landfill has a total remaining capacity of approximately 7.3 million tons.⁴ The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.⁵ From January 2022 to December 2022, the Lamb Canyon Landfill accepted a daily average of 1,969 tons with a period total of approximately 606,481 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill

² 2021 El Sobrante Landfill Annual Report- Based on 125,193,774 tons remaining capacity (40% for in-county waste).

³ GASB 18_2022 – Engineering Estimate for total landfill capacity

⁴ GASB 18_2022 & SiteInfo

⁵ SWFP # 33-AA-0007

expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increased from 278 acres to 811 acres, and the refuse disposal area increased from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 82.3 million tons.⁶ As of January 1, 2023 (beginning of day), the landfill had a total remaining disposal capacity of approximately 3.5 million tons.⁷ Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059.⁸ From January 2022 to December 2022, the Badlands Landfill accepted a daily average of 2,660 tons with a period total of approximately 819,166 tons.

3. Additionally, the following measures may help to reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling⁹:

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.
- To address solid waste impacts and help the County comply with AB 939 (Integrated Waste Management Act) and the California Green Building Standards, through diverting solid waste from landfill disposal, a Waste Recycling Plan (WRP) shall be submitted to the Riverside County Department of Waste Resources for review and approval prior to construction. At a minimum, the WRP must identify the materials (i.e., concrete, asphalt, wood, etc.) that will be generated by construction and development, the projected amounts, the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials, the facilities and/or haulers that will be utilized, and the targeted recycling or reduction rate. During project construction, the project site shall have, at a minimum, two (2) bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials. Accurate record-keeping (receipts) for recycling of C&D recyclable materials and solid waste disposal must be kept. After the project is

⁶ SWFP # 33-AA-0006

⁷ GASB_18_2022 & SiteInfo

⁸ SWFP # 33-AA-0006

⁹ A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

completed, a Waste Reporting Form and evidence (i.e., receipts or other types of verification) shall be submitted demonstrating project compliance with the approved WRP.

- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.⁹ This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

Thank you for allowing us the opportunity to comment on the NOP. Please continue to provide us with Project updates and any CEQA documentation, as the Project progresses. Please email me at Kaavila@rivco.org if you have any questions regarding the above comments.

Sincerely,



Katherine Avila
Urban/Regional Planner I

Cc: Kinika Hesterly, RCDWR

DM# 316243

⁹ S.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

Jer Harding

From: Deborah Bryant
Sent: Thursday, July 6, 2023 9:43 AM
To: Jer Harding
Subject: FW: Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)

FYI

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From: Mauricio Alvarez <malvarez@riversidetransit.com>
Sent: Thursday, July 6, 2023 9:26 AM
To: Deborah Bryant <dbryant@tbplanning.com>
Subject: FW: Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)

Good Morning Deborah,

Hope all is well.

Thank you for including Riverside Transit Agency in the development review of the Mead Valley Commerce Center project on the southwest parcel of Cajalco & Seaton. Back in March, I received the initial plans for this proposed project and recommended an ADA compliant bus turnout on Cajalco & Decker Rd (southeast corner). After reviewing the plans now, I would like to recommend again an ADA compliant bus turnout on the southeast corner of Cajalco & Decker Rd. In addition, it would be beneficial to also incorporate a traffic signal and crosswalk at this intersection to ensure that people can safely cross the street, especially on Cajalco, to connect to public transit and the warehouse/park.

For future development reviews, please add me (malvarez@riversidetransit.com) to your distribution list and if you can, please remove Kristin Warsinski. I am the point of contact for all development reviews for the agency. I appreciate it!

Thank you,

Mauricio Alvarez, MBA

Planning Analyst
Riverside Transit Agency
p: 951.565.5260 | e: malvarez@riversidetransit.com
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)
1825 Third Street, Riverside, CA 92507

From: Deborah Bryant <dbryant@tbplanning.com>
Sent: Friday, June 30, 2023 8:57:56 AM
To: Jer Harding <jharding@tbplanning.com>

Subject: Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)

Dear Interested Parties:

The Riverside County Planning Department is currently reviewing a development application (herein, "Project") in the Mead Valley Area Plan of Riverside County. The Project is subject to compliance with the California Environmental Quality Act (CEQA). This notice is to inform public agencies and the general public that an Environmental Impact Report (EIR) will be prepared for the Project, and to solicit guidance as to the scope and content of the required EIR.

PROJECT CASE NO./TITLE: Mead Valley Commerce Center. PLOT PLAN NO. 220050, CHANGE OF ZONE NO. 2200062, TENTATIVE PARCEL MAP NO. 38601 and a FOUNDATION GENERAL PLAN AMENDMENT (GPA NO. Pending).

PROJECT LOCATION AND DESCRIPTION: The proposed Project consists of applications for PPT 220050, CZ 2200062, TPM 38601 and a Foundation GPA (case number is pending). The applications seek to entitle one industrial warehouse building and a public park within the Mead Valley community of unincorporated Riverside County. The industrial warehouse building would be located at the southwest corner of Seaton Avenue and Cajalco Expressway, between Seaton Avenue and Decker Road. The public park would be located south of the industrial warehouse building on Decker Road. The industrial warehouse building is proposed with 1,003,510 square feet (s.f.) of total building area on ± 44.74 net acres. The building is designed to be up to 50 feet tall with 76 loading dock doors positioned on the building's northern façade and 76 loading dock doors positioned on the building's southern façade. No loading dock doors would face Seaton Avenue or Decker Road. The public park would occur on ± 13.35 net acres and is conceptually designed to include play fields, hard surfaces sport courts, a playground, walking paths, and other amenities. Roadway frontage improvements would occur to Cajalco Expressway, Seaton Avenue, and Decker Road. The General Plan land use designation of the industrial warehouse site is proposed to change from Community Development - Commercial Retail (CD-CR) and Rural Community - Very Low Density Residential (RC-VLDL) to Community Development - Light Industrial (LI) and the existing zoning classification is proposed to change from R-R-1/2 (Residential, half-acre lots) and A-1-1 (Light Agriculture) to I-P (Industrial Park). The General Plan designation of the proposed public park site would change from its existing designation of Rural Community - Very Low Density Residential (RC-VLDL) to Open Space-Recreation (OS-R) and the zoning designation would remain A-1-1 (Light Agriculture). TPM 38601 seeks to consolidate and change the configuration of lot lines and designate public right-of-way for conveyance to the County for public streets. The approvals sought of Riverside County include:

1. Adoption by resolution of Plot Plan No. 220050
2. Adoption by resolution of Tentative Parcel Map No. 38601
3. Adoption by ordinance of Change of Zone No. 220062
4. Adoption by resolution of a General Plan Amendment (No. is pending)

LEAD AGENCY:

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Russell Brady, Project Planner

PROJECT SPONSOR:

Applicant: Industrial VI Enterprises, LLC
Attn: John Grace
Address: 901 Via Piemonte, Unit 175
Ontario, CA 91764

Pursuant to the California Environmental Quality Act, notice is given to responsible and interested agencies, that the Riverside County Planning Department plans to oversee the preparation on an Environmental Impact Report for the above-described project. The purpose of this notice is to solicit guidance from your agency as to the scope and content of the environmental information to be included in the EIR. Information in that regard should be submitted to this office as soon as possible, but **not later than thirty (30) days** after receiving this notice.

SCOPE OF ANALYSIS: It is anticipated that the proposed Project would have the potential to result in significant impacts under the following issue areas. A detailed analysis of the following issue areas will be included in the forthcoming EIR:

- Aesthetics
- Agriculture & Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Mineral Resources
- Noise
- Paleontological Resources
- Population / Housing
- Public Services
- Recreation

- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire
- Mandatory Findings of Significance

PUBLIC SCOPING MEETING: A Scoping Session has been scheduled in order to bring together and resolve the concerns of affected federal, State and local agencies, the proponent of the proposed Project, and other interested persons; as well as inform the public of the nature and extent of the proposed project, and to provide an opportunity to identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR and help eliminate from detailed study issues found not to be important. The Scoping Session is not a public hearing on the merit of the proposed project and NO DECISION on the Project will be made. Public testimony is limited to identifying issues regarding the project and potential environmental impacts. The Project proponent will not be required to provide an immediate response to any concerns raised. The Project proponent will be requested to address any concerns expressed at the Scoping Session, through revisions to the proposed Project and/or completion of a Final Environmental Impact Report, prior to the formal public hearing on the proposed Project. Mailed notice of the public hearing will be provided to anyone requesting such notification.

TIME OF SCOPING SESSION: 1:30 p.m. or as soon as possible thereafter
DATE OF SCOPING SESSION: July 24, 2023

Information on how to participate in the hearing will be available on the Planning Department website at: <https://planning.rctlma.org/>. For further information regarding this project please contact Project Planner Russell Brady at (951) 955-3025 or email at rbrady@rivco.org, or go to the County Planning Department's Planning Commission agenda web page at <http://planning.rctlma.org/PublicHearings.aspx>.

Please send all written correspondence to:

RIVERSIDE COUNTY PLANNING DEPARTMENT
Attn: Russell Brady, Project Planner
P.O. Box 1409, Riverside, CA 92502-1409

If you have any questions, please contact Russell Brady, Project Planner at (951) 955-3025.

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This email has been scanned by the Riverside Transit Agency Email Security System.



July 19, 2023

Russel Brady, Contract Planner
Riverside County Planning Dept.
P.O. Box 1409
Riverside, CA 92502-1409

RE: Mead Valley Commerce Center, SCH #2023060799

Dear Mr. Brady:

Thank you for the opportunity to provide comments on the Notice of Preparation for the Mead Valley Commerce Center. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

copy of this document to this letter, and it is also available online.³ We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,



CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

³ <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.



Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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V.	Air Quality and Greenhouse Gas Emissions Analysis and Mitigation	7
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VII.	Traffic Impacts Analysis and Mitigation	11
VIII.	Other Significant Environmental Impacts Analysis and Mitigation	12
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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)¹ regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.² This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.³ It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.⁴ While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.⁵ California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.⁶ The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.⁷ Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.⁸ This trend has only accelerated, with e-commerce growing to

¹ <https://oag.ca.gov/environment/justice>.

² <https://oag.ca.gov/environment/ceqa>; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

³ This September 2022 version revises and replaces the prior March 2021 version of this document.

⁴ Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

⁵ As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.

⁶ Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), <https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/> (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).

⁷ U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at <https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm> (last accessed September 18, 2022).

⁸ South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.⁹ The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.¹⁰

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.¹² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California’s environmental justice screening tool, which measures overall pollution and demographic vulnerability.¹³ That

⁹ U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), available at <https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report> (last accessed September 18, 2022).

¹⁰ CBRE Research, *supra* note 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), available at <https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html>.

¹¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (last accessed September 18, 2022) (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts> (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (last accessed September 18, 2022) (DPM).

¹² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

¹³ South Coast Air Quality Management District, “Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305” (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.¹⁴ Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.¹⁵

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors¹⁶ can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

¹⁴ *Id.* at 5-7.

¹⁵ Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported “riskiness” of loaning to their residents. In California cities where such “redlining” maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded “red,” signifying the least desirable areas where investment was to be avoided. See University of Richmond Digital Scholarship Lab, Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca> (Los Angeles), <https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca> (San Diego), <https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca> (Oakland), <https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca> (Stockton), <https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca> (Fresno) (all last accessed September 18, 2022).

¹⁶ In this document, “sensitive receptors” refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.¹⁷

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.¹⁸ Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.¹⁹

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

¹⁷ For more information about SB 1000, see <https://oag.ca.gov/environment/sb1000>.

¹⁸ <https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf> (last accessed September 18, 2022).

¹⁹ For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf> (last accessed September 18, 2022) (Riverside County); <http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=> (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.²⁰
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

²⁰ CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), available at https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.²¹
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

²¹ CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California’s Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage²² to or from the project site to be zero-emission beginning in 2030.

²² “Drayage” refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

- trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

From: [Brady, Russell](#)
To: [Jer Harding](#)
Subject: FW: City of Riverside - Comment on Notice of Preparation of a DEIR for Mead Valley Commerce Center
Date: Monday, July 24, 2023 12:31:38 PM

NOP comment from the City of Riverside.

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



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From: Palafox, Daniel <DPalafox@riversideca.gov>
Sent: Thursday, July 20, 2023 4:36 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: Taylor, Matthew <MTaylor@riversideca.gov>; Patel, Vital <VPatel@riversideca.gov>; Nitollama, Philip <PNitollama@riversideca.gov>; Watson, Scott <SWatson@riversideca.gov>
Subject: City of Riverside - Comment on Notice of Preparation of a DEIR for Mead Valley Commerce Center

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Good afternoon Russell,

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Mead Valley Commerce Center project. After reviewing the project scope, the City has the following comment:

- The Public Works - Traffic Engineering Division requests additional information on truck restrictions implemented as part of the project to eliminate cut-thru traffic along Cajalco Road and La Sierra Avenue.

We appreciate your consideration of this comment. Feel free to reach out if you have any questions; I've also copied our City Traffic team (Vital & Philip).

Daniel Palafox | Assistant Planner
City of Riverside | [Planning Division](#)

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[County of Riverside California](#)

From: [Brady, Russell](#)
To: [Jer Harding](#)
Subject: FW: The traffic impacts from PPT 220050, an over 1,000,000 Sqft of total building area on 44.74 net acres
Date: Monday, July 24, 2023 12:38:06 PM
Attachments: [image1.png](#)
[image1.png](#)

We will consider these NOP comments

Russell Brady
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From: Patrick Chinglung Hsu <pnwnslc@gmail.com>
Sent: Monday, July 24, 2023 12:12 PM
To: Brady, Russell <rbrady@rivco.org>
Cc: Patrick Hsu <pnwnslc@gmail.com>
Subject: Fwd: The traffic impacts from PPT 220050, an over 1,000,000 Sqft of total building area on 44.74 net acres

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Try again, Russell.

Patrick

Sent from my iPhone

Begin forwarded message:

From: Patrick Chinglung Hsu <pnwnslc@gmail.com>
Date: July 20, 2023 at 11:44:55 AM PDT
To: rbrady@rivco.org
Cc: Patrick Hsu <pnwnslc@gmail.com>
Subject: The traffic impacts from PPT 220050, an over 1,000,000 Sqft of total building area on 44.74 net acres

Mr. Brady
Project Planner

Glad to have a brief discussion with you yesterday regarding this Plot Plan application and concerns from communities.

The previous 1.2 millions sqft warehouse, Home Depot distribution center, had set an excellent model that traffic circulation for both eastbound and westbound are essential to keep this major corridor in the project limit of less than 0.5 mile flowing well.

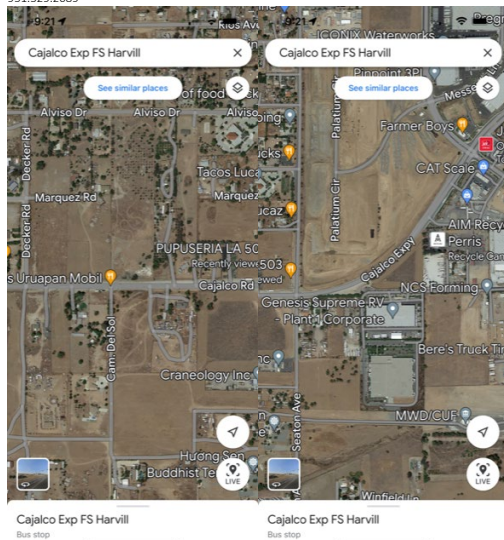
Now, the subject project is moving into residential area to make the traffic circulation better or a total disaster for 2,000 feet of Cajalco road.
It's impossible to have Westbound roadway remained as one lane as usual due to 44.74 acres development only occurred at south side of Cajalco road.

Per Dat Nguyen, P.E, project engineer for Cajalco road widening, the right of way acquisition for westbound to meet ultimate road widening is limited to less than half acre to have ultimate Cajalco Road widening accomplished from Fwy215/Cajalco till Decker/Cajalco intersection.

In the project scoping session to address the need of ultimate widening of Cajalco Road is the utmost essential element in the traffic analysis.

I'll appreciate your consideration in advance.

Patrick Hsu
951.329.2089



Hi Keturah,

Below are the distances between the existing R/W and proposed R/W based on the preliminary design from Decker to Seaton. Some of the dimensions vary since the area to be acquired isn't a constant offset but I think Patrick is looking for the offset from the existing R/W along Cajalco so I've provided those distances in parenthesis for the parcels with the varying dimensions.

North side of Cajalco:

APN [317-050-025](#): Varies 0' - 30.9' (along Cajalco 18.7')

APN [317-050-052](#): 3.7'

APN [317-050-053](#): 3.7'

APN [317-050-045](#): 3.7'

APN [317-050-028](#): 18.7'

APN [317-050-029](#): 18.7'

APN [317-050-040](#): Varies 3.7' - 4.3' (these are along Cajalco)

APN [317-050-039](#): Varies 0' - 29' (along Cajalco 4.3' - 31.7')

South side of Cajalco:

APN [317-080-003](#): No R/W acquisition

APN [317-080-004](#): No R/W acquisition

APN [317-080-005](#): No R/W acquisition

APN [317-080-006](#): No R/W acquisition

APN [317-080-007](#): No R/W acquisition

APN [317-080-008](#): No R/W acquisition

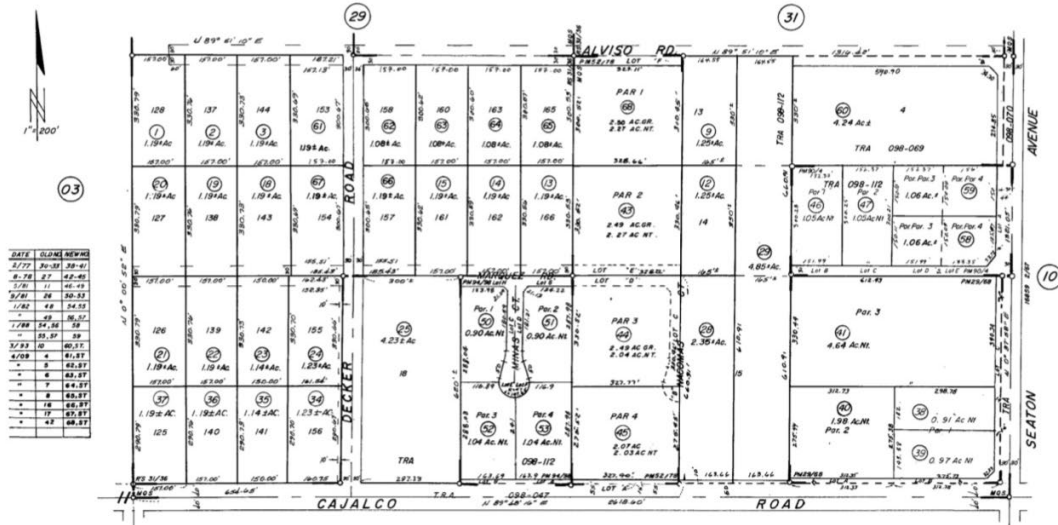
APN [317-080-023](#): Varies 0' - 39.7' (along Cajalco 0' - 9.3')

Let me know if you have any questions.

Thanks,

Dat Nguyen, P.E.
Project Engineer
C 626.825.6905

THIS MAP IS FOR
ASSESSMENT PURPOSES ONLY



MB 15/746 SD Mrs. Quinton's Subdivision DATA: PM 32/78
RS 31/34,35,36 M 110601 5/85
PM. 29/68 Parcel Map 7889 PM. 94/98 Parcel Map No.15618
PM.52/78 " " 10,955
PM. 90/4 " " 15795

ASSESSOR'S MAP BK. 317 PG. 05
RIVERSIDE COUNTY, CALIF.

Sent from my iPhone

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County of Riverside California



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COMMISSIONER
Vacant

COMMISSIONER
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Vacant

EXECUTIVE SECRETARY
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Miwok, Nisenan

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NAHC.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION

July 20, 2023

Governor's Office of Planning & Research

Russell Brady
County of Riverside
P.O. Box 1409
Riverside, CA 92502

July 24 2023

STATE CLEARINGHOUSE

Re: 2023060799, Mead Valley Commerce Center, Riverside County

Dear Mr. Brady:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From: [Brady, Russell](#)
To: [Jer Harding](#)
Subject: FW: Opposition to Plot plan No. 20050 Mead valley
Date: Monday, July 24, 2023 12:32:31 PM

NOP Comments

Russell Brady

Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: 74218 <shanowadelacruz@gmail.com>
Sent: Saturday, July 22, 2023 7:22 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Subject: Opposition to Plot plan No. 20050 Mead valley

CAUTION: This email originated externally from the Riverside County email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Good Evening Mr. Brady,

As of today July 22nd 2023 my wife and I have yet to receive our notice of preparation for the change of zone or plot plan 220050. We are directly affected due to the plan for a residential park to be built directly in front of our property. I have attached a photo of the proposed plan with our property highlighted.

We officially OPPOSE this plan. We were not notified of any of these proposed changes to our rural community. Our neighbors informed us to these plans and we have reached out to the broker incharge. Lee and Associates.

Our family choose to live here to be away from public parks and giant warehouses to live quietly with our close knit community. Now we are told (by billboard) and our own research a residential park will take the place of our neighbor directly to the north of us. We find this utterly unacceptable. On top of that our views to cajalco rd will be obstructed by a giant warehouse. We bought this home to give our family peace and quiet. Now we will have neither because of big corporation has decided we are not important and them earning money overthrows everything else.

I hope the city will take into consideration their residents well being over a giant corporation. As a Disabled Veteran of the United States Army I hope you take our pleas to heart.

Thank you for your time,

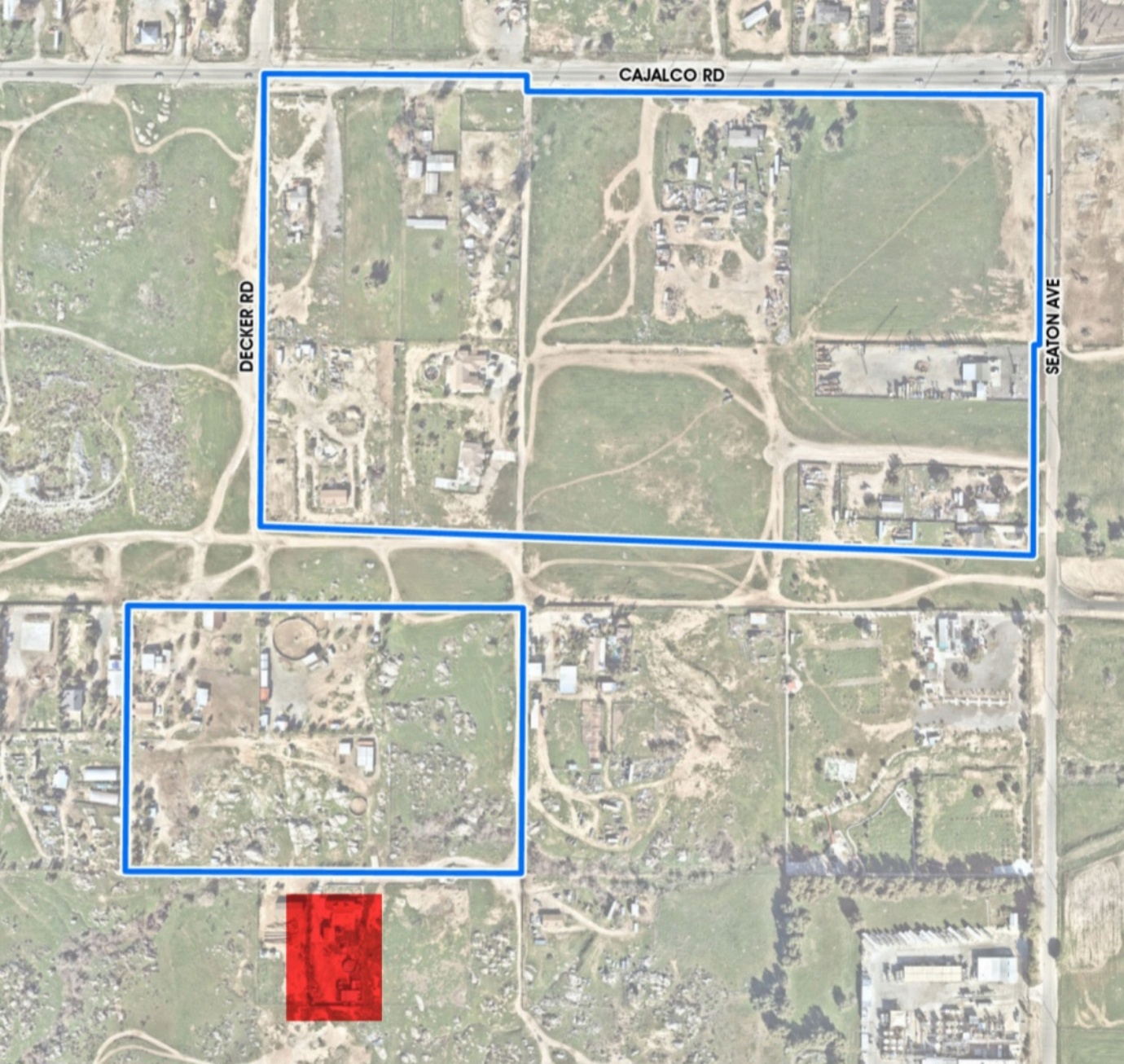
Shanowa & Ashley De La Cruz
909-801-0127

Address : 22683 Cajalco rd
Perris 92570

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[County of Riverside California](#)



CAJALCO RD

DECKER RD

SEATON AVE

RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

July 22, 2023

Riverside County Planning Director Hearing
Russell Brady, Project Planner
P.O. Box 1409
Riverside, CA 92502-1409
rbrady@rivco.org

Riverside County Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

Re: Agenda Item 4.1 22583 SCOPING SESSION FOR ENVIRONMENTAL IMPACT REPORT FOR PLOT PLAN NO. 220050, CHANGE OF ZONE NO. 220062, AND TENTATIVE PARCEL MAP NO.38601

Greetings Director,

On behalf of concerned area residents, The Residents Association of Greater Lake Mathews (RAGLM) and the Rural Association of Mead Valley (RAMV), please accept these comments in opposition to PPT 220050, CHANGE OF ZONE NO. 220062, Tentative parcel Map 38601. **This project should not go forward until a GPA number is assigned. The public has a right to now before a project is presented for public hearing.**

This Project requires a Foundation General Plan Amendment. It is located outside of the Industrial Corridor – Requires a General Plan Foundation GPA Initiation – 2024 which takes 12 month. FGPA is not approved for this Project.

A Sports Park is part of the Project – Sensitive Receptor – Not allowed. Creates a new road (Decker Road) that will be used by hundreds of logistics trucks and residents using the park. This is unhealthy and not safe.

The industrial warehouse building is proposed with 1,003,510 square feet (s.f.) of total building area on ±44.74 net acres. The building is designed to be up to 50 feet tall with 76 loading dock doors positioned on the building's northern façade **and 76 loading dock doors positioned on the building's southern façade. 76 Doc doors facing the sports park.**

The Project includes cold storage which creates substantially increased greenhouse cases, increased idling time, increased need for electrical hook ups, increased noise and parking along residential streets. The Mead Valley area warehouses are already in need of electricity which is short supply from SCE. Adding cold storage and not putting in solar will increase brown outs for the surrounding community. The Project must eliminate cold storage and add solar.

No signal light is proposed at Decker and Cajalco. The current signal light at Seaton and Cajalco is inadequate for Commercial Industrial logistics warehouses. This signal light and the Decker signal light must be improved to full width with right and left turn lanes wide enough for a 70 foot truck. Only the south side of Cajalco will be improved. What provisions will be made for trucks turning left onto Decker

Road from Cajalco? Cajalco has a steep grade going east from Day to Seaton. This increases the truck traffic safety concerns for this warehouse.

This Project requires a number of homes to be removed within the rural residential zoned community. The state of California has required that keeping homes is a priority.

Violates the vision of the Riverside County General Plan and Mead Valley Community Plan.

This massive 1 million + warehouse is feet from hundreds of homes to the north across Cajalco Road and to the south.



The California Aqueduct is between the Proposed Park and the industrial building (175 Feet). Trucks will

be entering the warehouse just north of the park entrance. 76 doc doors face the park. The driveway and truck parking are along the south boundary of the industrial building.

This Project does not provide the required findings necessary to change from rural and agriculture land uses to Industrial land use.

**I. FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN
AMENDMENT CANNOT BE MADE**

No. 220003 should not be approved as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. Zone change 220003 does not allow for a Foundation Component General Plan Amendment that is required by this Project. Foundation General Plan Amendments are subject to an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5.

- (1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;
- (2) That the modifications do not conflict with the overall Riverside County Vision, and
- (3) That they would not create an internal inconsistency among the elements of the General Plan.

These findings cannot be made for the site.

A. No New Conditions or Circumstances Justify Modifying the General Plan

There is no support for the first required finding for approving a Foundation Component Amendment to the General Plan as there is no evidence of new circumstances or conditions relative to this site. The Foundation or any GPA should not be initiated.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan, and General Plan

According to the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal-keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Along these lines, the Very Low Density Residential land use designation provides for the development of detached single-family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal-keeping uses.

Hence, the area targeted for land use change is an area intended to act as a gradual transition between Community Development and Rural Foundation components of the General Plan. This would diminish Rural Community Foundation Component of the General Plan and degrade its application in this area. Zone Change 220003 would also permit Light Industrial uses to encroach further west to develop adjacent to higher density residential uses. In this way, this conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project conflicts with the following County Vision statements and Vision concepts:

- *"Balances stability in the landscape with the dynamism and flexibility to adapt to changing future circumstances."* As discussed above, there are no changing "future circumstances" applicable to this site justifying disrupting General Plan stability.

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Zone Change 220003 site (and entire Project site) are not being protected by this proposed amendment. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* Zone Change 220003 would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Preserve crucial open space and transportation corridors, resulting in more compact and efficient development than would otherwise happen."* Zone Change 220003 would promote further sprawl west away from the I-215 transportation corridor.
- *"Provide a range of community design options to respond to varied lifestyle choices."* Zone Change 220003 would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"Put a focus on high quality, efficient growth that uses land resources efficiently."* Zone Change 220003 would promote further sprawl and inefficient growth.
- *"Provide a process for adjustment through General Plan reviews, in accordance with state law, at regular intervals or when triggered by key events."* No "new" condition or event has occurred justifying adjustment at this site.
- *"Corridors and areas are preserved for distinctive purposes: ...economic development, including agriculture; residences..."* Zone Change 220003 would blur distinct lines and fail to preserve residential and agricultural purposes. Furthermore, if agricultural uses would occur in areas zoned for agriculture near the site, County Ordinance 625.1 (right-to-farm ordinance) would not protect such uses unless they were in operation for at least 3 years before the proposed project is developed, potentially precluding agricultural activities on surrounding properties with agricultural zoning.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* Zone Change 220003 would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."* Zone Change 220003 promotes growth of industrial warehouse uses outside the designated transportation corridor, to where such growth was planned to be limited.

- *“The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP.”* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *“Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities.”* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *“Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes.”* Zone Change 220003 and the Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.
- *“Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan’s performance.”* Zone Change 220003 would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *“Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations.”* Zone change 220003 would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *“Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights.”* Approval of Zone Change 220003 would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

A GPA and zone change from rural to Industrial for this Project conflicts with the General Plan Vision, any Foundation GPA should not be initiated.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES

The “Project” necessitating zone change 220003 is a proposal to develop a industrial high-cube warehouse/ distribution centers totaling over 1 million square feet.

This Foundation Component General Plan Amendment application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project which is

completely contrary to adopted General Plan and Zoning designations..

The Commission has the opportunity to encourage upholding the General Plan by recommending this environmentally harmful and inconsistent Project not move forward as planned. Thorough consideration should be given to the following potentially significant environment impacts that will be caused by allowing the Project to move forward:

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating zone change 220003 and the proposed Project are of particular concern and provide a strong reason to deny initiation of zone change 220003. Because of the cancer risk and other impacts of diesel emissions on human health, SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors. (“Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District,” May 6, 2005, “Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities,” WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes is inconsistent with this clear guidance.

The scope and breadth of health effects of diesel PM emissions are the subject of ongoing study. At present, diesel PM is known to cause cancer; immune system effects; reproductive, developmental, and endocrine effects; nervous system effects; and lung health problems, as recognized by the County in the General Plan. Immune system effects include increased allergic inflammatory responses and suppression of infection fighting ability. Diesel PM’s reproductive effects include decreased sperm production, changes in fetal development, low birth weight and other harms. Diesel PM exposure may also cause impairment to the central nervous system. (See, *The Health Effects of Air Pollution on Children*, Michael T. Kleinman, Ph.D, Fall 2000, <<http://www.aqmd.gov/docs/default-source/students/health-effects.pdf> >¹; *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf>, “*Dirty Air Triggers More Heart Attacks than Cocaine*,” Kate Kelland, Reuters 2011, and “*Air Pollution Worse than Cocaine for Triggering Heart Attacks, says study*,” Press Association 2011.)

¹ Please consider electronic citations as though they were set forth in full herein. We are happy to provide hard copies of any document upon request.

SCAQMD has stated with regards to the health effects from diesel PM:

“Diesel particles consist mainly of elemental carbon and other carbon-containing compounds... Diesel particles are microscopic...Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.

In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans...

Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.

Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation.” (*The Health Effects of Air Pollution on Children, supra.*)

Furthermore, infants, children, and the elderly are more susceptible to diesel PM and its associated health impacts. (“Studies Link Fine Particulate Exposure to Children’s and Seniors’ Health,” July/August 2015 < <http://www.aqmd.gov/docs/default-source/publications/aqmd-advisor/july-advisor-2015.pdf?sfvrsn=6> >) Recent studies have linked exposure to childhood allergies, aging of the brain, and higher death rates, among other things. (*Id.*) Other recognized effects of diesel PM on children include slowed lung function and growth, increased emergency room visits, increased incidences of asthma and bronchitis, crib death, asthma respiratory infections, allergic symptoms, and asthma hospitalizations. (*Diesel and Health in America: the Lingering Threat, supra.*) Importantly, this exposure to high pollutant levels in children occurs while their lungs are still developing, and therefore has more severe impacts on this sensitive group. (*The Health Effects of Air Pollution on Children, supra.*)

This increased susceptibility to air pollutant emissions for children has resulted in the California EPA Office of Environmental Health Hazard Assessment (“OEHHA”) weighting cancer risk by a factor of 10 for exposures to carcinogens from birth to two years old, and by a factor of 3 for exposures from 2 years old to 15 years old. (*Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*, California EPA OEHHA Air Toxicology and Epidemiology Branch, April 2009, p. 3. <http://oehha.ca.gov/media/downloads/crnrtsd/cancerpotency.pdf>)

This Project is proposed to be developed directly adjacent to residential uses in total disregard of good neighbor policies for land use siting and appropriate residential setbacks.

C. GHG Emissions

The proposed zone change intensifies the use of the site from very low density residential to light industrial. Increased intensity of site development from potentially 2 homes (1 acre minimum for VLDR) as currently planned to an additional 152 truck loading bays if zone change 220003 is approved (not even considering the whole Project) will significantly increase mobile GHG emissions.

D. Noise

The County's General Plan recognizes that mobile noise sources may be the most annoying noise producers in the community. (*See General Plan Noise Element*) Noise from traffic and truck trips will increase noise to adjacent residences with increased trip generation and truck use. (U.S. Department of Housing and Urban Development. (March 1985) *The Noise Guidebook*. <https://.hudexchange.info/resource/313/hud-noise-guidebook/>. [Noise level a function of distance, among other factors].) The reduced setback achieved by Zone Change 220003 of residential uses from industrial uses will significantly impact noise experienced by residents.

The health impacts of noise to area residents from this Project may also be significant. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) *Noise and Its Effects*. <http://www.northfriends.org/images/WLCcomments/Johnson%20and%20Sedlack%20Attachment%203.pdf>.)

E. Traffic/ Transportation

The Project would significantly increase local traffic in a residential area. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a

40-ton truck does as much damage to the road as 9,600 passenger cars. (*"Overweight trucks damage infrastructure"* April Castro, USA Today, 2007

http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. Denial is especially deserved as little to no benefit to County citizens would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (See, e.g., The Press Enterprise, Jack Katzanek (February 1, 2012) *"Moreno Valley: Sketchers' warehouse has caused net job loss,"* <http://www.pe.com/business/business-headlines/20120201-moreno-valley-skechers-warehouse-has-caused-net-job-loss.ece>.)

This warehouse Project is building a large sports park within the Project. Hundreds of logistics trucks will be traveling and parking next to this Sports Park. Building a sensitive receptor (sports park) "warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities".

Warehouses within 1000 feet of a sports park or school significantly harms people living near warehouses, children who may be using this proposed sports park, harming their environmental and quality of life and harming the entire community. **This will bring thousands of children to a place that causes serious harm such as asthma, lung and heart disease.**

The Riverside County General Plan is required and must protect the children under its jurisdiction. Forcing Mead Valley children to use this park because you have failed to build your own park is a disgrace to everyone who lives in Riverside County. Mead Valley is an Environmental Justice community and one of the poorest communities in the County. Mead Valley receives millions of dollars in EJ funding every year, but instead of building a nice park, money was spent on hundreds of trees. With the cost of water who can afford water for those trees. **What real benefit is this to the community? A real sports park closer to the local schools would be beneficial to the residents of our community.**

The State of California Attorney General's office.

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. (<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>)

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.¹⁴
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan and General Plan

According to the General Plan, “The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area.”

Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal- keeping uses.

AIR QUALITY, ENERGY, GREENHOUSE GAS EMISSIONS AND HEALTH RISK ASSESSMENT IMPACT ANALYSIS.

In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

General Plan

The County of Riverside General Plan, prepared December 2015, provides the following air quality-related goals and policies that are applicable to the proposed project.

Multi-jurisdictional Cooperation Policy AQ-1.4: Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

Policy AQ-1.5: Establish and implement air quality, land use and circulation measures that improve not only the County’s environment, but the entire region.

Sensitive Receptors

Policy AQ-2.1: The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

Policy AQ-2.2: Require site plan designs to protect people and land uses sensitive to air pollution with barriers and/or distance from emissions sources when possible.

Policy AQ-2.3: Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

Mobile Pollution Sources

Policy AQ-3.2: Seek new cooperative relationships between employers and employees to reduce vehicle miles.

Policy AQ-3.3: Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

Policy AQ-3.4: Encourage employee rideshares and transit incentives for employers with more than 25 employees at a single location

The Environmental Justice Element of the General Plan:

Policies:

HC 14.1 When feasible, avoid siting homes and other sensitive receptors near known or anticipated sources of air pollution.

HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Health Risk Reduction

This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and encourages safe and sanitary homes and an environment conducive to engaging in physical activity.

Pollution Exposure Policies:

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort.

HC 16.2 Pursue funding and other opportunities from state, federal, and local government and non-government sources and allocate county general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 Assist communities in seeking funding for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 Pursue funding to connect low-income residents and communities to municipal water and wastewater services. In the interim, seek financial assistance for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5* Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.

HC 16.6* When developing and siting large scale logistics, warehouse and distribution projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.7 Evaluate public and private facilities for health hazards or major sources of contamination, identify, and implement alternatives for removal of contamination.

HC 16.8 Evaluate creating a cap or threshold on the number of pollution sources within EJ communities and make recommendations thereon.

HC 16.9 Explore the feasibility of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.

HC 16.10* Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.

HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel based transportation and pursue funding to implement mobility plans and projects.

HC 16.12 Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross

through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same or similar design features.

HC 16.13 Provide buffer spaces and vegetative barriers between high-volume roadways/ transportation and train track corridors and sensitive land uses.

HC 16.14* Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.

HC 16.15* Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.22* Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum County of Riverside General Plan.

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 16.24* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

HC 18.7* Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.8* Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.

HC 18.9* Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

Riverside County General Plan Vision statements and concepts

CHANGE OF ZONE NO. 2200062 would permit Light Industrial uses to encroach west into the established rural residential developed community. In this way, this Project conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project also conflicts with the following County Vision statements and Vision concepts:

- *“Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed.”* Again, no new “future circumstances” justify undermining GP stability.
- *“Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so.”* Private property rights surrounding, and

environmental resources on and surrounding, the Project site are not being protected by this proposed zone change. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.

- *“Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others.”* The project would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.

- *“Provide a range of community design options to respond to varied lifestyle choices.”* The Project would delete the adopted range of design options seeking to maintain rural uses in this area of the County.

- *“The rich diversity of Riverside County’s environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations.”* The Project would not preserve blue line streams or rural uses at the site.

- *“New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas.”*

“The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP.” The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.

- *“Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities.”* The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.

- *“Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes.”* The Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.

- *“Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan’s performance.”*

The Project would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.

- *“Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations.”* The Project would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.

- *“Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights.”* **Change of Zone no. 2200062** (would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

The Mead Valley Community Plan requires that this type of Project create an EIR to thoroughly mitigate all environmental elements for this type of industrial development.

General Plan Environmental Justice Element cannot be met with a Foundation GPA. A massive warehouse directly adjacent to hundreds ranch homes, which are north and south of the Project site.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES AND A BUDDHIST TEMPLE.

This Project application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project, which is completely contrary to adopted General Plan and Zoning designations.

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating this Project and the proposed Project are of particular concern and provide a strong reason to deny this zone change. Because of the cancer risk and other impacts of diesel emissions on human health, **SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors.** ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes and a Buddhist Church. This is inconsistent with this clear guidance. This warehouse is proposed directly across the street from numerous homes. SCAQMD recommends all warehouses be sited 1000 feet from sensitive receptors.

E. Traffic/ Transportation

The Project would significantly increase local traffic in our rural community. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach. It would also increase traffic substantially on Cajalco Road that is already rated a transportation F and used by numerous Harvill and gridlocked most of the day.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007

http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. The Project does not meet the requirements for Environmental Justice, or a Zone Change. Denial is especially deserved as little to no benefit to County citizens would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (See, e.g., The Press

Enterprise, Jack Katzanek (February 1, 2012) *"Moreno Valley: Sketchers' warehouse has caused net job loss,"*

[http://www.pe.com/business/business-headlines/20120201-moreno-valley-skecherswarehouse-has-caused-net-job-loss.ece.](http://www.pe.com/business/business-headlines/20120201-moreno-valley-skecherswarehouse-has-caused-net-job-loss.ece))

A vote recommending approval of this zone change would prefer the wants of one developer over the expressed preference of the people and the well-being of area residents. For this reason and each of these reasons detailed herein, I respectfully ask the Planning Director to deny this Project.

Thank you for your consideration of these comments.

Debbie Walsh

RAMV

From: [Brady, Russell](#)
To: [Jer Harding](#)
Subject: FW: Public comments on NOP for Mead Valley Commerce Center - Plot Plan 220050 etc.
Date: Monday, July 24, 2023 3:06:50 PM
Attachments: [Warehouse_List.xlsx](#)
[NOP_comments.pdf](#)

See below and attached for NOP comments

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025



How are we doing? [Click the Link and tell us](#)

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Monday, July 24, 2023 2:50 PM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: abilene149@gmail.com
Subject: Public comments on NOP for Mead Valley Commerce Center - Plot Plan 220050 etc.

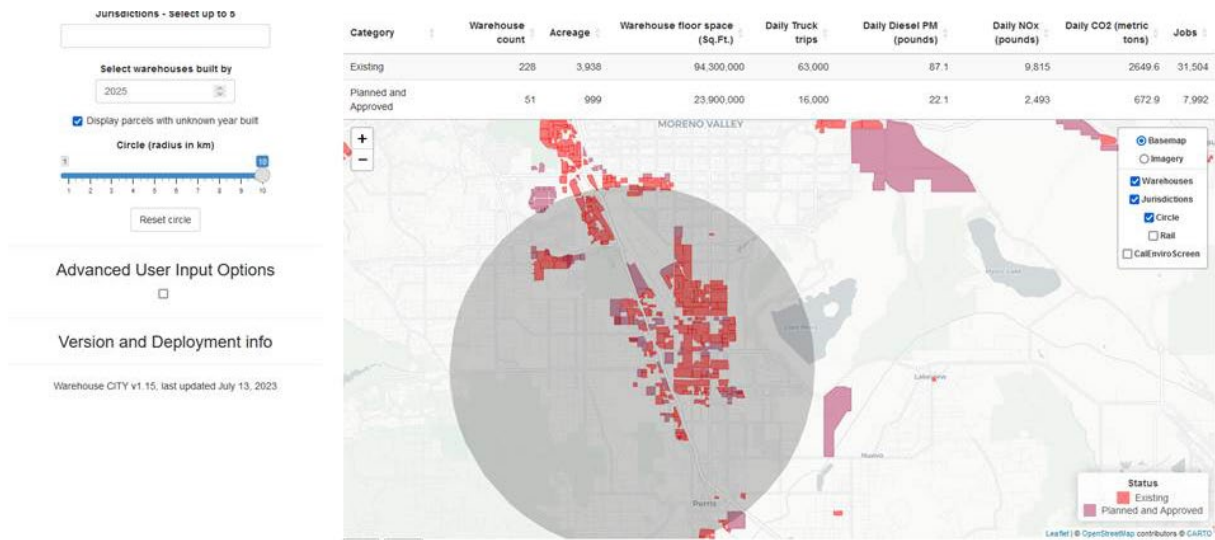
CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Brady,

It was nice meeting you today. Attached please find my written comments on the NOP for the Mead Valley Commerce Center along with a spreadsheet of warehouse projects that I request be considered as part of all regional cumulative impacts analyses for housing, jobs, traffic, regional air quality issues, and greenhouse gas emissions.

The Warehouse CITY dashboard is here: <https://radicalresearch.shinyapps.io/WarehouseCITY/>
The Attorney General's letter to the Inland Valley Development Agency is available here:
<https://oag.ca.gov/system/files/attachments/press-docs/AGSP%20Comment%20Letter%20Final%20%28Corrected%29.pdf>

Screenshot of the project cumulative impacts list within 6 miles is shown here.



Mike McCarthy
Riverside Neighbors Opposing Warehouses
92508



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[County of Riverside California](#)

July 24, 2023

Dear Planning Directors,

My name is Mike McCarthy and I am a member of a grassroots community group called Riverside Neighbors Opposing Warehouses (RNOW). RNOW is most opposed to a warehouse complex project adjacent to our homes in Orangecrest and Mission Grove neighborhoods, but are broadly concerned about the regional oversaturation of warehouses in the 215/60 corridor degrading our quality of life.

For the Mead Valley Commerce Center, I have four areas of concern that I would like addressed: Environmental Justice, Residential Displacement, Cumulative Impact, and Traffic analysis.

There is no mention of Environmental Justice – the Board of Supervisor’s Riverside County EJ app designates this community as an EJ community and the census tracts in this local zone are 06065042010 and 06065042904 which rank in the 79th and 81st percentile for CalEnviroScreen cumulative impact scores, respectively. It is also an SB 535 disadvantaged community. Please address why this warehouse should specifically go in this community that is already disproportionately burdened with environmental impacts and socioeconomically disadvantaged.

Please address the removal of residential zoning, specifically pursuant to Attorney General Bonta’s recent letter on the Airport Gateway Specific Plan¹. Specifically address the California Fair Employment and Housing Act and federal Fair Housing Act because the area targets for displacement a section of Mead Valley that is predominantly Hispanic (81 and 86%, respectively). Moreover, address SB 330 Housing Crisis Act requirements to re-zone replacement housing to ensure no net loss of housing capacity. This project also potentially violates the county’s duty to affirmatively further fair housing under CA code 8899.50 that includes combating discrimination and addressing significant disparities in housing needs. By displacing overburdened residents and imposing significant environmental impacts, the project would do the opposite.

I’d also like to request that the project specifically address cumulative impacts by examining the Warehouse CITY tool v1.15² to get estimates of local warehouse projects along the 215/60 corridor. I built this tool to assess cumulative impacts. Within 6 miles of the project, there are currently 229 warehouses totalling 93M sq.ft. generating about 60,000 truck trips. There are another 51 approve or in the planning phases that would another 24M sq.ft. and 16,000 more truck trips. This excludes the West Campus Upper Plateau (4.7M sq.ft.), World Logistics Center (40M sq.ft.), and Stoneridge Commerce Center (9.5M sq.ft.). Please address all regional issues (traffic, air quality, housing, jobs) to include the entirety of the regional footprint of warehouses cumulatively on each of these issues. A spreadsheet attachment accompanies this comment letter that provides project names and APN identifiers for the projects I would consider important to assess in a proper cumulative impact analysis.

Finally, I’d like to request that the traffic impact analysis include the 215 freeway if more than 50% of truck trips will be using the 215 freeway. The existing traffic on the 215/60 interchange is unacceptable,

¹ <https://oag.ca.gov/system/files/attachments/press-docs/AGSP%20Comment%20Letter%20Final%20%28Corrected%29.pdf>

² <https://radicalresearch.shinyapps.io/WarehouseCITY/>

and there is a doubling of the warehouse footprint already approved in the region. What is the cumulative impact of all these projects on the proposed capacity of the 215/60 interchange?

I respectfully request that this project address each of these issues in its EIR.

Thank you for your consideration of addressing inequities in obnoxious warehouse land-uses in our region.

Mike McCarthy, PhD

Riverside Neighbors Opposing Warehouses

92508



Category	Assessor parcel number	
Planned and Approved	World Logistics Center	
Planned and Approved	Legacy Highlands Phase II Specific Plan	
Planned and Approved	Stoneridge Commerce Center	
Planned and Approved	Beaumont Pointe	
Planned and Approved	West Campus Upper Plateau	
Planned and Approved	Veteran's Industrial Park	
Existing		312250043
Planned and Approved	Oleander Business Park	
Existing		302050035
Existing		303040001
Existing		302080033
Existing		303110001
Existing		294670004
Existing		303030019
Existing		316020046
Existing		316211028
Existing		316100060
Existing		303070016
Existing		294640034
Existing		312250046
Existing		303090035
Existing		303050004
Planned and Approved	Meridian D1 Gateway Aviation Project	
Existing		316211002
Existing		294110010
Existing		316020050
Planned and Approved	Ramona Gateway	
Existing		302120024
Existing		294070025
Planned and Approved	Heacock Commerce Center	
Existing		294110011
Existing		302030012
Existing		305020031
Existing		314160032
Planned and Approved	OLC3 Warehouse	
Planned and Approved	Rider and Patterson Business Center	
Existing		314180030
Existing		303080019
Existing		316170027
Existing		294100045
Existing		302070020
Existing		316180013
Existing		295310069
Planned and Approved	Knox Business Park Bldg. D	
Existing		314170019
Existing		297110046

Existing		312250059
Existing		316100047
Existing		317240001
Existing		295310054
Existing		302070031
Existing		294180052
Existing		303130040
Existing		297232004
Existing		312250049
Existing		294070038
Existing		314310019
Existing		297230031
Planned and Approved	Sycamore Hills Distribution Center	
Planned and Approved	First March Logistics Project	
Existing		302170017
Existing		294180055
Planned and Approved	Duke Warehouse	
Existing		302150030
Existing		294050080
Existing		302110040
Existing		297160005
Existing		294210060
Planned and Approved	South Campus Reg3	
Existing		294100020
Existing		316211001
Existing		314110075
Planned and Approved	Knox Business Park Bldg. E	
Existing		314180022
Existing		314020025
Existing		302160032
Planned and Approved	South Campus Reg4	
Existing		317230052
Planned and Approved	Harvill at Water Industrial	
Existing		295310081
Existing		316200034
Existing		316211018
Existing		316170026
Existing		303120012
Existing		485230036
Existing		303060022
Existing		312270036
Existing		316190047
Existing		316180015
Existing		314040004
Existing		316100045
Existing		294640001
Existing		316211026

Existing		316180016
Existing		316211027
Existing		312250058
Existing		305020029
Existing		316170025
Planned and Approved	Majestic Freeway Business Park 14	
Planned and Approved	Harvill and Rider	
Existing		312270035
Planned and Approved	Majestic Freeway Business Park 13	
Planned and Approved	Redlands Ave West Industrial Project	
Existing		302050040
Existing		305100066
Planned and Approved	Seaton and Cajalco Industrial Project	
Existing		297231006
Existing		295310056
Existing		300250017
Existing		300210030
Existing		316190050
Existing		300170009
Planned and Approved	Patterson Commerce Center	
Planned and Approved	South Campus Reg 1	
Planned and Approved	Perris Valley Commerce Center	
Planned and Approved	Muranaka Warehouse Project	
Planned and Approved	South Campus Bldg. F and G	
Existing		316211004
Existing		305090060
Planned and Approved	Ramona Indian Warehouse Project	
Planned and Approved	Majestic Freeway Business Park 17	
Existing		303020047
Existing		294170003
Planned and Approved	Perris Morgan Industrial Park Project	
Planned and Approved	Majestic Freeway Business Park 18	
Planned and Approved	South Campus Bldg. H and I	
Existing		303080015
Existing		294650002
Existing		302090051
Existing		305170035
Existing		316211020
Existing		316200038
Existing		305040059
Planned and Approved	Redlands Ave East Industrial Project	
Existing		317140054
Existing		303120026
Existing		316020051
Existing		302120009
Existing		294100058
Existing		302100013

Existing		302120001
Planned and Approved	Placentia Logistics Project	
Existing		302130042
Planned and Approved	Core5 Rider Project	
Existing		316190053
Existing		294120051
Existing		297231016
Existing		305170057
Existing		317240015
Existing		310110048
Existing		294070031
Planned and Approved	Wilson Avenue Project	
Existing		314170004
Existing		316211034
Existing		314091005
Existing		300170008
Existing		317110079
Existing		305030058
Existing		294100063
Existing		317170047
Existing		312270038
Existing		317090029
Existing		317230048
Existing		316200033
Planned and Approved	First Industrial Logistics at Wilson	
Existing		302030001
Existing		302080006
Existing		294070043
Existing		302030009
Planned and Approved	Seaton Tech Center	
Existing		294220019
Existing		316200043
Existing		297231015
Planned and Approved	BCI IV Harvill Industrial Center	
Existing		305030017
Existing		294640033
Existing		294040038
Existing		316100051
Existing		302160030
Existing		305090047
Planned and Approved	First Harley Knox Industrial	
Existing		316200042
Existing		294040035
Planned and Approved	Seaton and Perry Industrial Project	
Planned and Approved	South Campus Bldg 1	
Existing		305060039
Existing		295310058

Existing		305040034
Existing		297200004
Existing		302020051
Existing		302120025
Existing		297170086
Existing		305030057
Existing		294690002
Planned and Approved	Ramona and Brennan Warehouse Project	
Planned and Approved	Operon HKI	
Planned and Approved	Harley Knox Industrial Project	
Existing		317140052
Existing		316100061
Existing		305170032
Existing		294650003
Existing		302110041
Existing		294040037
Existing		317270018
Existing		316100063
Planned and Approved	Harley Knox Commerce Center	
Planned and Approved	Chartwell Warehouse	
Existing		294050081
Existing		305100063
Planned and Approved	Redlands and Placentia Project	
Existing		305030025
Planned and Approved	Heacock and Krameria	
Existing		294100059
Existing		317160021
Existing		312270012
Existing		317110076
Existing		303080013
Existing		297232005
Existing		297230026
Existing		305030056
Planned and Approved	South Campus Bldg 2	
Existing		294100062
Existing		294190080
Existing		294650001
Existing		310160063
Existing		317100067
Existing		294210014
Existing		316211035
Existing		294100060
Existing		305030002
Existing		294690006
Existing		294120054
Existing		294190038
Planned and Approved	Phelan Warehouse	

Existing		294190050
Existing		302020030
Existing		317270002
Existing		316211006
Existing		302020031
Planned and Approved	Westport Perris Industrial Project	
Existing		294180033
Existing		310032016
Existing		317140009
Existing		294180031
Existing		294190049
Existing		314091004
Existing		294180034
Existing		305080088
Existing		314091006
Existing		317110075
Existing		317110072
Existing		316211019
Existing		305030021
Existing		302080034
Existing		302020032
Planned and Approved	Markham Street Warehouse	
Existing		297230025
Existing		314100086
Existing		294100061
Existing		305040066
Existing		317240043
Existing		486170026
Existing		317110066
Existing		294220013
Existing		294640011
Existing		302090047
Existing		297231014
Existing		297231009
Existing		302060030
Existing		297231008
Planned and Approved	South Campus Bldg 3	
Existing		297231012
Existing		297231013
Existing		305170049
Existing		302060026
Existing		302060011
Existing		305170045
Existing		294640005
Existing		305170050
Existing		294070040
Existing		305170051

Existing
Existing
Existing
Existing

294070041
302150029
305170046
302170016

Building classification	Year built	Acres	Building sq.ft.
TBD	2025	2650	63479000
TBD	2025	1386	33196000
TBD	2025	606	14518000
TBD	2025	370	8875000
TBD	2025	303	4700000
TBD	2025	130	3112000
warehouse/dry storage	2004	91	2178000
TBD	2025	85	2037000
warehouse/dry storage	1980	83	1995000
warehouse/dry storage	2004	80	1924000
warehouse/dry storage	2021	80	1911000
warehouse/dry storage	1980	80	1911000
light industrial	2020	78	1877000
warehouse/dry storage	2000	74	1767000
light industrial	2014	72	1735000
warehouse/dry storage	2018	71	1707000
warehouse/mega	2019	63	1504000
warehouse/dry storage	2009	60	1438000
ct-warehouse/cold storage	2019	59	1421000
warehouse/dry storage	2005	57	1375000
warehouse/dry storage	2018	57	1372000
warehouse/mega	2022	55	1324000
TBD	2025	53	1274000
warehouse/mega	2018	49	1178000
warehouse/dry storage	2017	48	1154000
warehouse/dry storage	2016	48	1147000
TBD	2025	47	1124000
warehouse/mega	2020	47	1123000
ct-warehouse/dry storage	2013	45	1079000
TBD	2025	44	1053000
light industrial	2018	44	1042000
warehouse/dry storage	2017	43	1025000
light industrial	2000	42	1013000
light industrial	2018	42	1007000
TBD	2025	42	998000
TBD	2025	37	897000
warehouse/mega	2019	37	896000
warehouse/dry storage	2016	37	891000
warehouse/dry storage	2014	36	870000
warehouse/mega	2021	36	857000
warehouse/dry storage	2012	36	857000
light industrial	2012	35	838000
warehouse/dry storage	2019	35	834000
TBD	2025	33	796000
warehouse/mega	2018	33	785000
warehouse/mega	2019	32	779000

light industrial	2018	32	769000
warehouse/dry storage	2006	32	764000
warehouse/mega	2021	32	758000
warehouse/dry storage	2013	31	739000
light industrial	2020	30	728000
warehouse/dry storage	1980	30	726000
warehouse/mega	2020	29	705000
ct-warehouse/dry storage	2006	29	705000
light industrial	1980	29	687000
warehouse/dry storage	2018	27	645000
light industrial	2019	27	642000
warehouse/dry storage	2013	27	641000
TBD	2025	31	600000
TBD	2025	26	618000
warehouse/dry storage	2017	26	614000
warehouse/mega	2021	26	612000
TBD	2025	25	601000
warehouse/dry storage	1980	25	597000
warehouse/dry storage	2016	25	589000
warehouse/dry storage	2017	24	580000
warehouse/mega	2021	24	571000
warehouse/mega	2018	23	560000
TBD	2025	23	556000
warehouse/mega	2020	23	546000
warehouse/mega	2018	22	535000
light industrial	1980	22	528000
TBD	2025	22	525000
light industrial	2018	22	522000
warehouse/mega	2022	21	512000
warehouse/dry storage	2017	21	497000
TBD	2025	21	497000
warehouse/mega	2019	20	479000
TBD	2025	20	477000
light industrial	1980	20	476000
warehouse/dry storage	2012	20	473000
warehouse/mega	2019	20	468000
vacant commercial land	1980	19	466000
light industrial	1986	19	461000
warehouse/dry storage	2018	19	458000
warehouse/dry storage	2014	19	455000
warehouse/dry storage	2006	19	455000
warehouse/dry storage	2007	19	454000
warehouse/dry storage	2018	19	450000
warehouse/mega	2022	19	450000
light industrial	1998	19	448000
light industrial	1980	19	446000
light industrial	1996	18	442000

warehouse/dry storage	2018	18	438000
warehouse/dry storage	2007	18	436000
warehouse/mega	2018	18	430000
light industrial	2000	18	430000
vacant commercial land	1980	18	429000
TBD	2025	18	420000
TBD	2025	17	412000
warehouse/dry storage	1991	17	409000
TBD	2025	17	408000
TBD	2025	17	404000
warehouse/mega	2022	17	399000
warehouse/dry storage	2021	17	398000
TBD	2025	17	397000
light industrial	1994	17	396000
warehouse/dry storage	2013	16	393000
warehouse/mega	2019	16	391000
light industrial	1980	16	388000
warehouse/dry storage	2014	16	377000
light industrial	2021	16	374000
TBD	2025	15	369000
TBD	2025	15	364000
TBD	2025	15	357000
TBD	2025	15	354000
TBD	2025	14	347000
warehouse/mega	2019	14	345000
light industrial	1982	14	342000
TBD	2025	14	340000
TBD	2025	14	337000
light industrial	1984	14	333000
vacant residential lot	1980	14	333000
TBD	2025	14	326000
TBD	2025	14	326000
TBD	2025	14	324000
light industrial	2000	13	322000
warehouse/dry storage	2019	13	318000
warehouse/dry storage	2014	13	318000
warehouse/dry storage	2008	13	311000
warehouse/dry storage	2007	13	303000
light industrial	1980	13	303000
light industrial	1989	12	299000
TBD	2025	12	284000
light industrial	2004	12	281000
light industrial	1989	12	278000
warehouse/dry storage	2016	11	275000
warehouse/mega	2018	11	269000
warehouse/mega	2022	11	268000
warehouse/dry storage	2020	11	268000

warehouse/mega	2018	11	268000
TBD	2025	11	267000
warehouse/dry storage	2019	11	264000
TBD	2025	11	264000
warehouse/mega	2019	11	260000
warehouse/mega	2022	11	259000
light industrial	2006	11	257000
light industrial	2021	11	257000
light industrial	2019	10	239000
warehouse/dry storage	1993	10	238000
light industrial	2017	10	237000
TBD	2025	10	237000
light industrial	1980	10	236000
light industrial	1980	10	235000
light industrial	2022	10	235000
light industrial	2002	10	232000
warehouse/mega	2020	10	230000
light industrial	1980	10	230000
light industrial	1980	10	228000
light industrial	2020	9	226000
commercial land / misc imps	1980	9	226000
light industrial	1980	9	224000
light industrial	1989	9	224000
warehouse/dry storage	2012	9	223000
TBD	2025	9	222000
warehouse/mega	2022	9	218000
warehouse/dry storage	2020	9	218000
light industrial	2018	9	218000
light industrial	1988	9	217000
TBD	2025	9	216000
light industrial	1980	9	215000
light industrial	1980	9	213000
light industrial	2006	9	211000
TBD	2025	9	211000
light industrial	1980	9	210000
ct-light industrial	2008	9	208000
warehouse/dry storage	2020	9	205000
light industrial	2022	9	205000
warehouse/dry storage	2017	9	204000
light industrial	1980	9	204000
TBD	2025	8	204000
warehouse/dry storage	1980	8	203000
warehouse/dry storage	2020	8	202000
TBD	2025	8	201000
TBD	2025	8	200000
light industrial	1980	8	197000
warehouse/dry storage	2017	8	196000

light industrial	1987	8	195000
warehouse/mega	2021	8	194000
light industrial	1980	8	191000
warehouse/dry storage	2020	8	190000
light industrial	1980	8	182000
warehouse/dry storage	2004	7	179000
light industrial	1980	7	177000
TBD	2025	7	177000
TBD	2025	7	177000
TBD	2025	7	172000
light industrial	2007	7	167000
vacant industrial land	1980	7	167000
warehouse/dry storage	2008	7	164000
ct-light industrial	2008	7	164000
warehouse/dry storage	2017	7	163000
warehouse/dry storage	2020	7	160000
light industrial	2022	7	159000
commercial parking lot	1980	7	158000
TBD	2025	6	156000
TBD	2025	6	155000
light industrial	2020	6	153000
light industrial	1980	6	151000
TBD	2025	6	151000
light industrial	1984	6	149000
TBD	2025	6	147000
light industrial	2021	6	146000
light industrial	1980	6	145000
warehouse/dry storage	2003	6	141000
light industrial	2021	6	137000
light industrial	2000	6	136000
light industrial	1980	6	134000
light industrial	1980	6	132000
light industrial	2005	5	128000
TBD	2025	5	127000
light industrial	2021	5	123000
light industrial	2009	5	123000
warehouse/dry storage	2019	5	120000
light industrial	2000	5	120000
warehouse/mega	2021	5	117000
light industrial	1982	5	116000
light industrial	1980	5	115000
light industrial	2021	5	115000
light industrial	1982	5	115000
commercial land / misc imps	1980	5	115000
warehouse/mega	2022	5	113000
light industrial	2018	5	113000
TBD	2025	5	113000

light industrial	1989	5	110000
warehouse/dry storage	2017	5	109000
light industrial	1980	5	109000
light industrial	2021	5	109000
light industrial	2017	5	109000
TBD	2025	5	109000
light industrial	1980	5	108000
light industrial	1980	4	106000
light industrial	2000	4	106000
light industrial	1982	4	106000
light industrial	1989	4	106000
light industrial	1980	4	104000
light industrial	1982	4	104000
light industrial	1980	4	104000
light industrial	1980	4	103000
light industrial	2020	4	103000
light industrial	2002	4	102000
warehouse/dry storage	2007	4	101000
light industrial	1984	4	100000
warehouse/dry storage	2019	4	99000
light industrial	2007	4	99000
TBD	2025	4	98000
light industrial	2008	4	97000
light industrial	2021	4	96000
light industrial	2020	4	95000
warehouse/dry storage	1994	4	91000
light industrial	2003	4	89000
light industrial	1980	4	88000
light industrial	2020	4	88000
light industrial	1980	4	88000
commercial land / misc imps	1980	4	87000
light industrial	2007	4	86000
light industrial	2006	3	78000
light industrial	2006	3	74000
warehouse/dry storage	2022	3	68000
light industrial	1980	3	67000
TBD	2025	2	58000
light industrial	2006	2	57000
light industrial	2006	2	47000
warehouse/dry storage	2010	2	45000
warehouse/dry storage	2022	2	44000
warehouse/dry storage	2022	2	39000
warehouse/dry storage	2010	2	38000
commercial land / misc imps	1980	2	38000
warehouse/dry storage	2010	1	35000
warehouse/dry storage	2019	1	34000
warehouse/dry storage	2010	1	34000

warehouse/dry storage	2019	1	31000
warehouse/dry storage	1980	1	27000
warehouse/dry storage	2010	1	27000
warehouse/dry storage	1980	1	26000

July 24, 2023

Dear Planning Directors,

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Please address the removal of residential zoning, specifically pursuant to Attorney General Bonta’s recent letter on the Airport Gateway Specific Plan¹. Specifically address the California Fair Employment and Housing Act and federal Fair Housing Act because the area targets for displacement a section of Mead Valley that is predominantly Hispanic (81 and 86%, respectively). Moreover, address SB 330 Housing Crisis Act requirements to re-zone replacement housing to ensure no net loss of housing capacity. This project also potentially violates the county’s duty to affirmatively further fair housing under CA code 8899.50 that includes combating discrimination and addressing significant disparities in housing needs. By displacing overburdened residents and imposing significant environmental impacts, the project would do the opposite.

I’d also like to request that the project specifically address cumulative impacts by examining the Warehouse CITY tool v1.15² to get estimates of local warehouse projects along the 215/60 corridor. I built this tool to assess cumulative impacts. Within 6 miles of the project, there are currently 229 warehouses totalling 93M sq.ft. generating about 60,000 truck trips. There are another 51 approve or in the planning phases that would another 24M sq.ft. and 16,000 more truck trips. This excludes the West Campus Upper Plateau (4.7M sq.ft.), World Logistics Center (40M sq.ft.), and Stoneridge Commerce Center (9.5M sq.ft.). Please address all regional issues (traffic, air quality, housing, jobs) to include the entirety of the regional footprint of warehouses cumulatively on each of these issues. A spreadsheet attachment accompanies this comment letter that provides project names and APN identifiers for the projects I would consider important to assess in a proper cumulative impact analysis.

Finally, I’d like to request that the traffic impact analysis include the 215 freeway if more than 50% of truck trips will be using the 215 freeway. The existing traffic on the 215/60 interchange is unacceptable,

¹ <https://oag.ca.gov/system/files/attachments/press-docs/AGSP%20Comment%20Letter%20Final%20%28Corrected%29.pdf>

² <https://radicalresearch.shinyapps.io/WarehouseCITY/>

and there is a doubling of the warehouse footprint already approved in the region. What is the cumulative impact of all these projects on the proposed capacity of the 215/60 interchange?

I respectfully request that this project address each of these issues in its EIR.

Thank you for your consideration of addressing inequities in obnoxious warehouse land-uses in our region.

Mike McCarthy, PhD

Riverside Neighbors Opposing Warehouses

92508





South Coast Air Quality Management District

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SENT VIA E-MAIL:

July 27, 2023

rbrady@rivco.org

Russell Brady, Project Planner
Riverside County Planning Department
P.O. Box 1409
Riverside, CA 92502-1409

**Notice of Preparation of a Draft Environmental Impact Report for the
Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)
(Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD, as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses, electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment.⁵

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

South Coast AQMD staff is concerned about the potential public health impacts of siting warehouses within proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions.⁶ According to the MATES V Carcinogenic Risk Interactive Map, the area surrounding the Proposed Project has an estimated cancer risk of over 293 in one million.⁷ The operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

⁷ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://arcgis.com).

to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁸ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,⁹ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹⁰

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹¹ and the Heavy-Duty Low NOx Omnibus Regulation,¹² ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹³ that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the

⁸ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

⁹ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹⁰ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹¹ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹² CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹³ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light-colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt-in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated

with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 1,003,510-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation.¹⁴ South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹⁵

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

RVC230712-02

Control Number

¹⁴ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹⁵ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.



State of California – Natural Resources Agency
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Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



July 28, 2023
Sent via email

Russell Brady, Contract Planner
County of Riverside
P.O. Box 1409
Riverside, CA 92502

Subject: Notice of Preparation of a Draft Environmental Impact Report
Mead Valley Commerce Center Project
State Clearinghouse No. 2023060799

Dear Mr. Brady:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the County of Riverside (County) for the Mead Valley Commerce Center Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT LOCATION

The proposed Project is located south of Cajalco Road, west of Seaton Avenue, east of Decker Road, and north of Rider Street. The site is located within the U.S. Geological Survey (USGS) 7.5- Steele Peak quadrangle; Township 4 South, Range 4 West, Section 11 of the San Bernardino Base and Meridian (SBBM).

PROJECT DESCRIPTION SUMMARY

The Project would consist of a General Plan Amendment, a Zone Change, and Tentative Parcel Map (on approximately 44.74 acres), to allow for the development of 1,003,510 square foot (s.f.) industrial warehouse. In addition, the proposed Project would include an approximately 13.35-acre public park and is conceptually designed to include play fields, hard surface sport courts, playground, walking paths, and other amenities. Roadway frontage improvements would also occur to Cajalco Expressway, Seaton Avenue, and Decker Road.

The Project is in Criteria Cell 2334, in Subunit 1 (Motte/Rimrock) of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County of Riverside in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed Project with respect to the Project's consistency with the MSHCP.

CDFW recommends that the forthcoming DEIR address the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To

enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009²). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or CNDDDB@wildlife.ca.gov or <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed Project.

CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific/MSHCP surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018³).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all open space and mitigation/conservation lands within and adjacent to the Project.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian

³ CDFW, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency, Department of Fish and Wildlife: March 20, 2018 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

3. An evaluation of impacts to on-site and adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Alternatives Analysis

CDFW recommends the DEIR describe and analyze a range of reasonable alternatives to the Project that are potentially feasible, would "feasibly attain most of the basic objectives of the Project," and would avoid or substantially lessen any of the Project's significant effects (CEQA Guidelines § 15126.6[a]). The alternatives analysis should also evaluate a "no project" alternative (CEQA Guidelines § 15126.6[e]).

Objectives

Section 15124(b) of the CEQA Guidelines requires that the project description contain a clear statement of the project objectives. CDFW recommends that the DEIR should include an objective to demonstrate consistency with the MSHCP, including the biological issues and considerations for Subunit 1 (Motte/Rimrock; page 3-456 of the MSHCP). These objectives include, but are not limited to, conservation of existing coastal sage scrub habitat for existing populations of the coastal California gnatcatcher as well as habitat for small key population of Stephens' kangaroo rat within Proposed Noncontiguous Habitat Block 4.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Lead Agency should assess all direct, indirect, and cumulative impacts that are expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
3. *California Species of Special Concern (CSSC)*: CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process. CSSC that have the potential or have been documented to occur within or adjacent to the Project area, including, but not limited to: Bell's sparrow, burrowing owl, California glossy snake, coast horned lizard, California horned lark, coastal California gnatcatcher, coastal whiptail, least Bell's vireo, Los Angeles pocket mouse, orange-throated whiptail, smooth tarplant, Parish's brittlescale, loggerhead shrike, red-diamond rattlesnake, Southern California legless lizard, Stephen's kangaroo rat, western mastiff bat, western spadefoot toad, western yellow bat, and white cuckoo bee.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on

access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. County of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, in order for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of Project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components

as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

CDFW recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

7. *Moving out of Harm's Way*: To avoid direct mortality, CDFW recommends that the lead agency condition the DEIR to require that a CDFW-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., CDFW does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss.
8. *Translocation of Species*: CDFW generally does not support the use of relocation,

salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (California Fish and Game Code Section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Western Riverside County Multiple Species Habitat Conservation Plan

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <https://www.wrc-rca.org/>.

The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The County of Riverside is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the

MSHCP, as part of the CEQA review, the County shall ensure the Project implements the following:

1. Pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP.
2. Demonstrates compliance with the HANS process (MSHCP Section 6.1.1) or equivalent process to ensure application of the Criteria and thus, satisfaction of the local acquisition obligation.
3. Demonstrates compliance with the policies for 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, set forth in Section 6.1.2 of the MSHCP; 2) compliance with the Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4 of the MSHCP; 3) the policies set forth in Section 6.3.2 and associated vegetation survey requirements identified in Section 6.3.1; and 4) compliance with the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

Following this sequential identification of the relationship of the Project to the MSHCP the DEIR should then include an in-depth discussion of the Project in the context of these aforementioned elements, and as mentioned, examine how the Project might contribute to, or conflict with, the conservation criteria of the MSHCP.

The Project is located within the MSHCP Criteria Area and therefore, pursuant to the Implementing Agreement public and private projects are expected to be designed and implemented in accordance with the Criteria for each Area Plan and all other MSHCP requirements as set forth in the MSHCP and in Section 13.0 of the Implementing Agreement. Section 13.2 of the Implementing Agreement identifies that the County's obligations under the MSHCP and the Implementing Agreement include, but are not limited to: as necessary, and the amendment of general plans as appropriate, to implement the requirements and to fulfill the purposes of the Permits, the MSHCP, and the Implementing Agreement for private and public development projects (including siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP); and taking all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of the project approvals for public and private projects, including compliance with the MSHCP, the Permits, and the Implementing Agreement. The County is also obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process (JPR) set forth in Section 6.6.2 of the MSHCP or proposed discretionary Projects within the Criteria Area and participate in any further requirements imposed by MSHCP Section 6.6.2.

The County is also obligated to notify the Western Riverside County Regional Conservation Authority (RCA), through the Joint Project/Acquisition Review Process (JPR) set forth in Section 6.6.2 of the MSHCP or proposed discretionary Projects within

the Criteria Area and participate in any further requirements imposed by MSHCP Section 6.6.2.

To examine how the Project might contribute to, or conflict with, assembly of the MSHCP Conservation Area consistent with the reserve configuration requirements, CDFW recommends that the DEIR identify the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project, further discussed below. The DEIR should also discuss the specific Criteria for Cells within which the Project is located and identify the associated Core(s) and/or Linkage(s) (Proposed Noncontiguous Habitat Block 4). Next, the DEIR should identify the vegetation communities toward which conservation should be directed along with the connectivity requirements. Finally, the DEIR should examine the Project with respect to the percentage conservation portion within Criteria Cell 2334.

Covered Activities

CDFW also recommends that the County demonstrate how the Project is consistent with Covered Activities/Allowable Uses (Section 7.0) of the MSHCP.

Roads

For projects proposed inside the MSHCP Criteria Area, the DEIR should include a discussion of the Project and its consistency with Covered Activities (Section 7.3 of the MSHCP) and specifically Existing Roads Within the Criteria Area (Section 7.3.4) and Planned Roads Within the Criteria Area (7.3.5). Where maintenance of existing roads within the Criteria Area is proposed, CDFW recommends that the Lead Agency reference MSHCP Section 7.3.4 and Table 7-3, which provides a summary of the existing roads permitted to remain in the MSHCP Criteria Area. Planned roads within the MSHCP Criteria Area are discussed in MSHCP Section 7.3.5 and identified on Figure 7-1. Please note that roadways other than those identified in Section 7.3.5 of the MSHCP are not covered without an amendment to the MSHCP in accordance with the procedures described in MSHCP Section 6.10. CDFW recommends that the County review MSHCP Section 7.3.5 and include in the DEIR information that demonstrates that Project-related roads are MSHCP covered activities. The DEIR should also discuss design and siting information for all proposed roads to ensure that the roads are sited, designed, and constructed in a manner consistent with MSHCP conservation objectives.

Allowable Uses in MSHCP Conservation Areas - Trails

CDFW recommends that the DEIR also include a discussion of the Project and MSHCP Allowable Uses (Section 7.4) and Conditionally Compatible Uses (Section 7.4.2) in MSHCP Conservation Area such as trails. For example, if trails are proposed as part of the Project, the DEIR should discuss any trails proposed, and provide details regarding

trail construction (siting and design), and operations and maintenance that demonstrate that the proposed trail is consistent with MSHCP Section 7.4.

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

The procedures described in Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP area. Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the biologically equivalent or superior determination findings associated with the Protection of Wetland Habitats and Species policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11). As required by MSHCP, completion of the DBESP process prior to adoption of the environmental document ensures that the project is consistent with the MSHCP and provides public disclosure and transparency during the CEQA process by identifying the project impacts and mitigation for wetland habitat, a requirement of CEQA Guidelines, §§ 15071, subds.(a)-(e).

The MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools. The assessment shall consider species composition, topography/ hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife Habitat, and aquatic Habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP conservation area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the Lead Agency). Further, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the Determination of Biologically Equivalent or Superior Preservation (DBESP). The County

is required to ensure the Applicant completes the DBESP process prior to completion of the DEIR to demonstrate implementation of MSHCP requirements in the CEQA documentation.

Within the Project site, the following MSHCP requirements apply for the Additional Survey Needs and Procedures (MSHCP Section 6.3.2):

Burrowing Owl (*Athene cunicularia*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for burrowing owl. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.”

CDFW recommends that the Lead Agency follow the survey instructions in the “Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area”⁴. The Survey Instructions specify that first a habitat assessment is conducted. If suitable habitat is not found on site, simply reporting the site is disturbed or under agricultural/dairy use is not acceptable. A written report must be provided detailing results of the habitat assessment with photographs and indicating whether or not the project site contains suitable burrowing owl habitat. If suitable habitat is found, then focused surveys at the appropriate time of year (March 1 to August 31), time of day, and weather conditions must be completed. Surveys will not be accepted if they are conducted during rain, high winds (> 20 mph), dense fog, or temperatures over 90 °F. The surveys must include focused burrow surveys and burrowing owl surveys. For the focused burrow surveys, the location of all suitable burrowing owl habitat, potential owl burrows, burrowing owl sign, and any owls observed should be recorded and mapped, including GPS coordinates in the report. The focused burrowing owl surveys include site visits on four separate days. CDFW recommends that the site visits are conducted at least a week apart to avoid missing owls that may be using the site. Finally, CDFW recommends the report also include an impact assessment evaluating the extent to which burrowing owls and their habitat may be impacted, directly or indirectly by Project activities. A final report discussing the survey methodology, transect width, duration, conditions, and results of the Survey shall be submitted to the RCA and the County.

Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact

4 https://www.wrc-rca.org/species/survey_protocols/burrowing_owl_survey_instructions.pdf

assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

Additionally, CDFW recommends that the County review and follow requirements for burrowing owl outlined in the MSHCP, specifically Section 6.3.2 (Additional Survey Needs and Procedures) and Appendix E (Summary of Species Survey Requirements). Appendix E of the MSHCP outlines survey requirements, actions to be taken if survey results are positive, and species-specific conservation objectives, among other relevant information.

Urban/ Wildlands Interface Guidelines, MSHCP Section 6.1.4:

As the MSHCP Conservation Area is assembled, boundaries are established between development and MSHCP Conservation Areas. Development near the MSHCP Conservation Area may result in edge effects that will adversely affect biological resources within the MSHCP Conservation Area. To minimize edge effects and maintain conservation values within the Conservation Areas, the County is required to implement the Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4) to minimize harmful effects from drainage, toxics, lighting, noise, invasives, barriers, and grading/land development. The MSHCP identifies that Project review and impact mitigation be provided through the CEQA process to address the Urban/Wildland Interface guidelines.

CDFW recommends that the DEIR include an analysis of edge effects related to project construction and operation, such as noise, lighting, trespass, and toxics and that Project specific mitigation measures to avoid and minimize any effects be included in the DEIR. Avoidance and minimization measures can include, but are not limited to:

1. *Lighting Plan:* A Lighting Plan that identifies existing ambient lighting conditions, analyzes the Project lighting impacts on the adjacent Conservation Area, and demonstrates that the proposed lighting plan will not significantly increase the lighting on the Conservation Area. The Lighting Plan should identify measures that address light and glare from interior and exterior building lighting, safety and security lighting, and vehicular traffic accessing the site at a minimum.
2. *Noise Plan:* A Noise Plan to avoid and minimize noise impacts based on an assessment of Project noise impacts on adjacent conservation areas during construction and post development. The MSHCP identifies that Project noise impacts do not exceed the residential standards within the Conservation Areas.
3. *Landscaping Plan:* A Landscaping plan that includes the use of native plant material on the Project site and avoids the use of invasive plant species identified in Table 6-2 of the MSHCP.

4. *Fencing Plan*: A Barrier and Fencing plan that provides specific details designed to minimize unauthorized public access, domestic animal predation, illegal trespass, and dumping in the MSHCP Conservation Area (such as block walls along areas directly adjacent to potential conservation areas) and
5. *Best Management Practices*: The DEIR should incorporate the guidance in MSHCP Section 7.0 and Appendix C of the MSHCP for addressing Best Management Practices.

Stephens' Kangaroo Rat Habitat Conservation Plan

The Project occurs within the Stephens' kangaroo rat (*Dipodomys stephensi*) Habitat Conservation Plan (SKR HCP) fee area boundary, SKR HCP plan area map available here: <https://rchca.us/DocumentCenter/View/200/SKR-Plan-Area>. State and federal authorizations associated with the SKR HCP provide take authorization for Stephens' kangaroo rat within its boundaries, and the MSHCP provides Take Authorization for Stephens' kangaroo rat outside of the boundaries of the SKR HCP, but within the MSHCP area boundaries. The DEIR should identify if any portion of the Project will occur on SKR HCP lands, or on Stephens' kangaroo rat habitat lands outside of the SKR HCP, but within the MSHCP. Note that the SKR HCP allows for encroachment into the Stephens' kangaroo rat Core Reserve for public projects, however, there are no provisions for encroachment into the Core Reserve for privately owned projects. If impacts to Stephens' kangaroo rat habitat will occur from the proposed Project, the DEIR should specifically identify the total number of permanent impacts to Stephens' kangaroo rat core habitat and the appropriate mitigation to compensate for those impacts.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP, drainage features may traverse some of the parcels within the Project's scope. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream, or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources.

CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, please go to <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>.

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Native Landscaping

To ameliorate the water demands of this Project, CDFW recommends incorporation of water-wise concepts in Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants, more information on native plants suitable for the Project location and nearby nurseries is available at CALSCAPE: <https://calscape.org/>. Local water agencies/districts and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <https://saveourwater.com/>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Information can be submitted online or via completion of the CNDDDB field survey form at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

Russell Brady, Contract Planner
County of Riverside
July 28, 2023
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The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Mead Valley Commerce Center Project (SCH No. 2023060799) and recommends that the County of Riverside address CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter or further coordination should be directed Katrina Rehrer, Environmental Scientist, at Katrina.rehrer@wildlife.ca.gov.

Sincerely,

DocuSigned by:

84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

ec:

Carly Beck, Senior Environmental Scientist Supervisor
Inland Deserts Region
Carly.Beck@wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Tricia Campbell (Western Riverside County Regional Conservation Authority)
Director of Reserve Management and Monitoring
tcampbell@rctc.org



*THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA*

July 28, 2023

Via Email

Mr. Russell Brady, Project Planner
Riverside County Planning Department
P.O. Box 1409
Riverside, California 92502-1409

Dear Mr. Brady:

Notice of Preparation for the Mead Valley Commerce Center Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation and associated exhibits for the Mead Valley Commerce Center Project. The project includes the following applications to entitle one industrial building and one public park in the Mead Valley community of unincorporated Riverside County: Plot Plan No. PPT 220050, Change of Zone No. CZ 2200062, Tentative Parcel Map No. TPM 38601, and Foundation GPA. The proposed 50-foot tall, 1,003,510 square foot industrial building will be located on the southwest corner of Seaton Avenue and Cajalco Expressway on approximately 44.74 net acres. The proposed approximately 13.35-acre park would occur south of the warehouse building and include play fields, sports courts, walking paths and other amenities. The project also includes roadway frontage improvements to Cajalco Expressway, Seaton Avenue, and Decker Road.

Metropolitan owns and operates the Colorado River Aqueduct (CRA), an approximately 138-inch inside-diameter pipeline, located along Decker Rd within the Metropolitan fee-owned property within the Project boundary. Metropolitan is concerned with potential impacts to this facility and rights-of-way that may result from implementation of the proposed Project.

Metropolitan must be allowed to maintain its rights-of-way and access to its facilities and properties at all times, in order to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipes to excessive vehicle, impact or vibratory loads. Any future design plans associated with this Project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the Project should be contingent on Metropolitan's approval of design plans for portions of the proposed Project that could impact its facilities.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwadh2o.com. To assist Riverside County in preparing plans that are compatible with Metropolitan's facilities and

Mr. Russell Brady, Project Planner
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rights-of-way, enclosed is a copy of the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way." Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

Metropolitan requests that Riverside County avoid any potential impacts that may occur to the CRA due to implementation of the proposed Project or where applicable, propose mitigation measures to offset any potential impacts. It will also be necessary for Riverside County to consider Metropolitan's CRA in its project planning.

Additionally, appropriate property rights must be obtained from Metropolitan for any project activities within Metropolitan's property, such as the granting of a road easement or license. The granting of property rights may be subject to Metropolitan's Board of Director's approval. No work must be done including potholing or any studies within Metropolitan's property prior to the execution of an appropriate agreement. Please contact Metropolitan's Real Property Group regarding the process for obtaining access or property rights at RealEstateServices@mwdh2o.com. Metropolitan recommends that the Environmental Impact Report include reference to Metropolitan's property and granting of an agreement, and also acknowledge Metropolitan as a potential responsible agency "expected to use the Environmental Impact Report in their decision-making" per CEQA Guidelines Section 15124(d)(A).

Metropolitan encourages projects within its service area to include water conservation measures. While Metropolitan continues to build new supplies and develop means for more efficient use of current resources, projected population and economic growth will increase demands on the current system. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed Project.

We appreciate the opportunity to provide input to your planning process and look forward to receiving future plans and documentation for this Project. If we can be of further assistance, please contact Jolene Ditmar at jditmar@mwdh2o.com.

Very truly yours,

Sean Carlson
Team Manager, Environmental Planning Section

JD: rdl

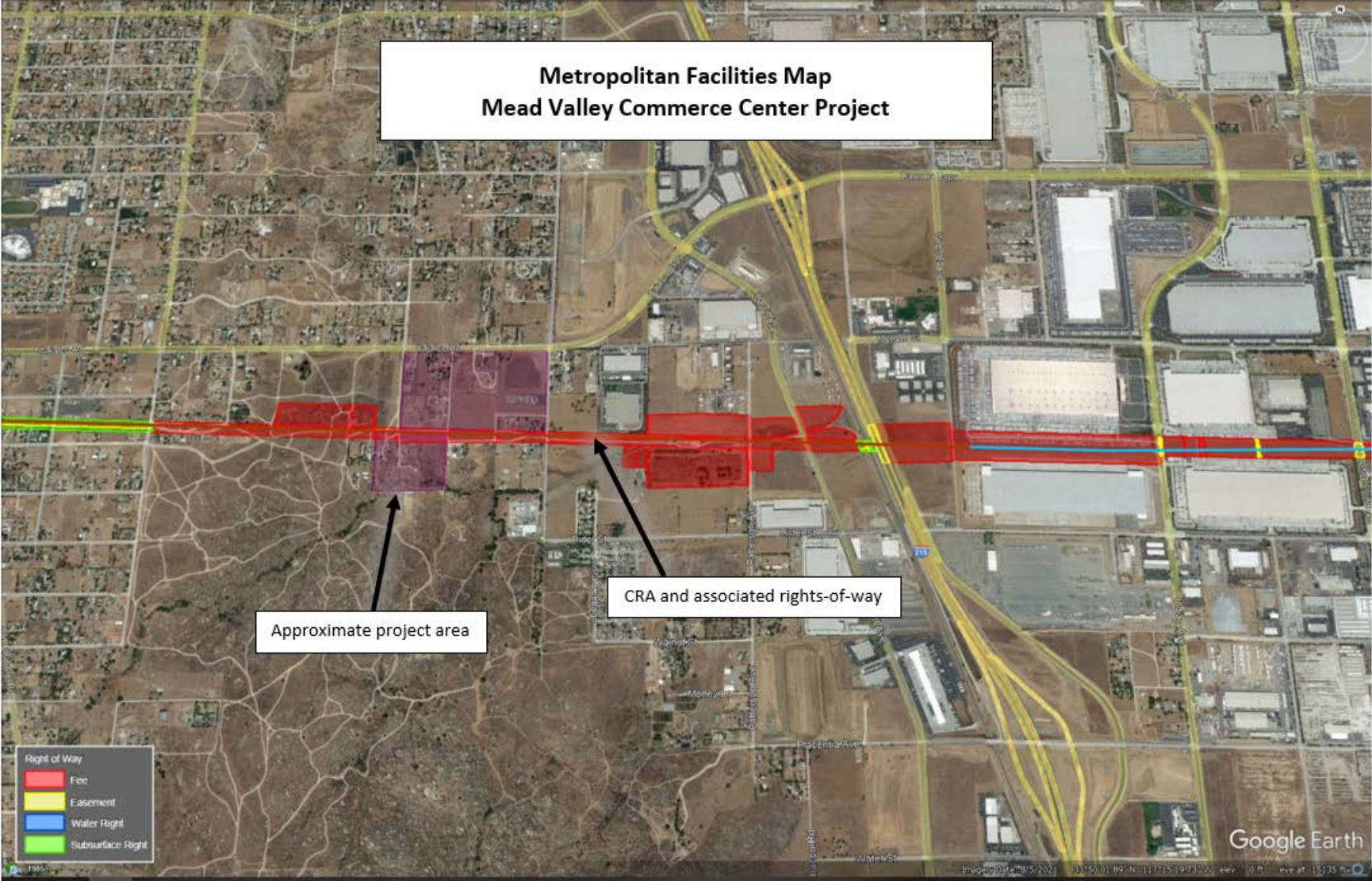
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Enclosures:

- 1) Location Map of Metropolitan's CRA within the Project Limits
- 2) Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

Metropolitan Facilities Map Mead Valley Commerce Center Project



Approximate project area

CRA and associated rights-of-way

- Right of Way
- Red
 - Yellow
 - Blue
 - Green
- Fee
Easement
Water Right
Subsurface Right

**Guidelines for
Improvements and Construction Projects Proposed
in the Area of
Metropolitan's Facilities and Rights-of-Way**



July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

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Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

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1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: P.O. Box 54153
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

- A. All applicable plans
- B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

- A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.
- B. Footings must not impose any additional loading on Metropolitan's facilities.
- C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's [Waterworks Standards Main Separation Alternative Request Checklist](#).

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

- A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)
- B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)
- C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)
- D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines
- E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

- A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.
- B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

- A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.
- B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.
- C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

- A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.
- B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.
- C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.
- D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.
- E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

- A. Support drawings must include detailed procedures for the installation and removal of the support system.
- B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.
- C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.
- D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.
- E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

- A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.
- B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.
- C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.
- D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.
- E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.
- F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

- A. The concrete must be designed to meet the requirements of AASHTO
- B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.
- C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com, or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

- A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).
- B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).
- C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.
- D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.
- E. Confirmation of the purpose of the land use.
- F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).
- G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

- A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)
- B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.
- C. California Fish and Game Code Sections 2050-2069 (California ESA)
- D. California Fish and Game Code Section 1602
- E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)
- F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712
- G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

- H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.
- I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline¹ and Sanitary Sewer² or Hazardous Fluid Pipeline³

<u>Pipeline Crossings</u>	<p>Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) and secondary containment⁴. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing.</p> <p>These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.</p>
<u>Parallel Pipeline</u>	<p>Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) and secondary containment⁴.</p>
<u>Sewer Manhole</u>	<p>Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment⁵.</p>

Notes:

¹ Separation distances are measured from the outer edges of each pipe.

² Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less). Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

³ Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.

⁴ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

⁵ Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline¹ and Storm Drain and/or Disinfected Tertiary Recycled Water²

<u>Pipeline Crossings</u>	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment ³ within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
<u>Parallel Pipeline</u>	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment ³ are required.
<u>Storm Drain Manhole</u>	Permanent utility structures (e.g., manhole, catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment ⁴ .

Notes:

¹ Separation distances are measured from the outer edges of each pipe.

² Disinfected tertiary recycled water as defined in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

³ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

⁴ Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.

Table 3: General Guidelines for Pipeline Separation¹ between Metropolitan's Pipeline and Recycled Water^{2,4} Irrigations

Pressurized recycled irrigation mainlines	<ul style="list-style-type: none"> • Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment³ within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	<ul style="list-style-type: none"> • Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment³. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment³.
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	<p>Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities.</p> <p>Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.</p>

Notes:

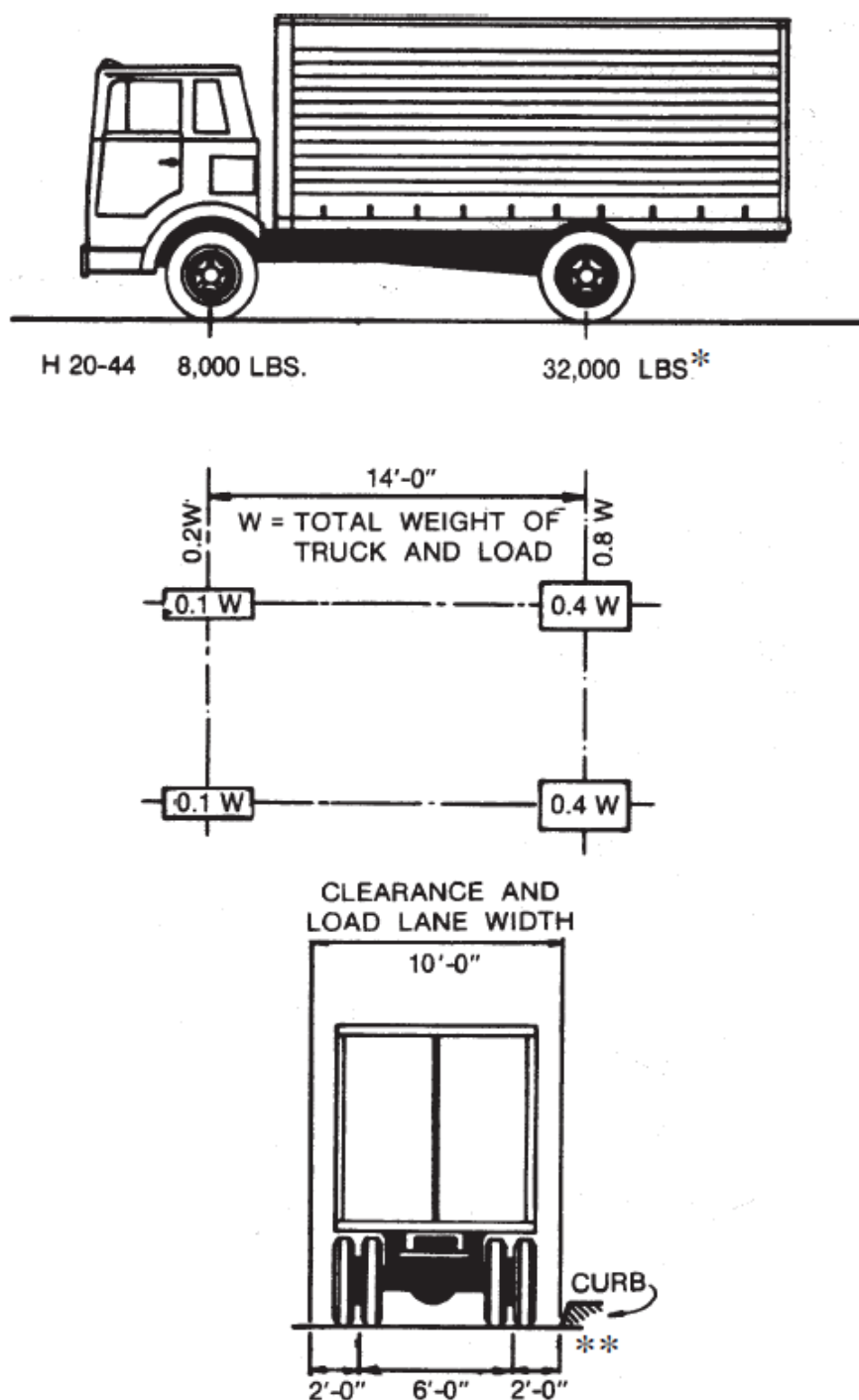
¹ Separation distances are measured from the outer edges of each pipe.

² Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses. Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

³ Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.

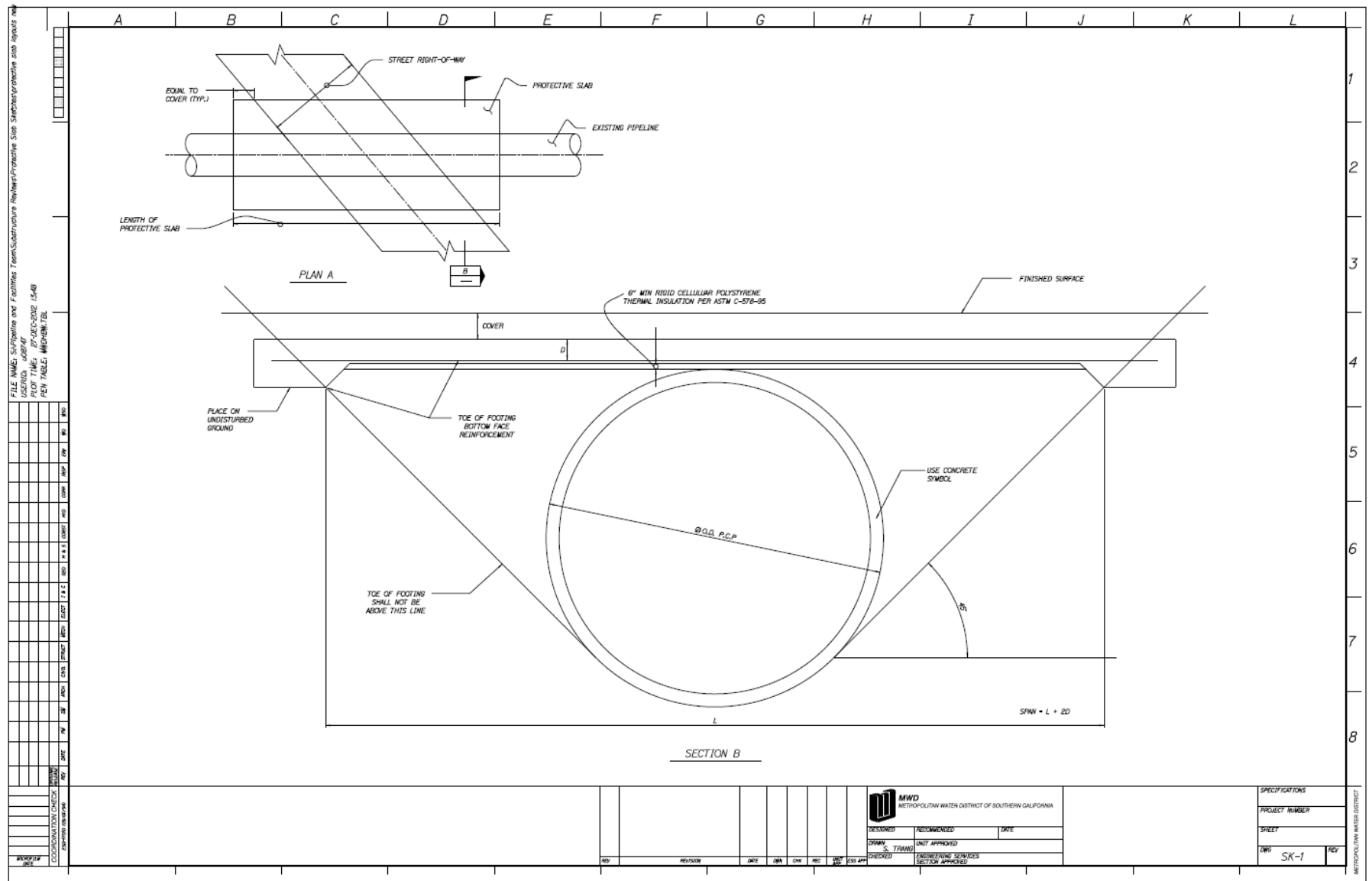
⁴ Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated “H” followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



RAMV
Debbie Walsh
PO Box 2244
Perris, CA 92572

July 30, 2023

Riverside County Planning
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Russell Brady
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Riverside, CA 92501

**Re: NOP for ENVIRONMENTAL IMPACT REPORT FOR PLOT PLAN NO.
220050, CHANGE OF ZONE NO. 220062, AND TENTATIVE PARCEL MAP NO.38601**

Russell Brady,

There are a number of environmental concerns with this project.

1. Environmental Justice. Mead Valley is an Environmental Justice Community in the 95% percentage.
2. There is a major blue line stream across the proposed park. This stream includes riparian habitat.
- 3 The project will build Decker Road where hundreds of trucks will enter and exit onto Cajalco Road.
4. Cajalco is a narrow two lane road. The north side of Cajalco is residential and will not be expanded for a number of years.
5. Cajalco Road has a major grade from Day to Seaton Ave.
6. The Project proposes to build a road across the California Aqueduct a major source of drinking water for Southern California. Hundreds of trucks will be entering the warehouse every day. The southern portion of the project will have the doc doors and driveway just feet from the California Aqueduct. Metropolitan Water District is concerned about truck traffic from this Project impacting the aqueduct that they own and maintain.
7. The proposed park is at the terminus of Decker Road to the south. It is part of the Project. Parents will be taking their children to the park using Decker Road. This is a million square foot warehouse. Similar warehouses have one thousand truck trips per day. The 70' logistics trucks will be entering the warehouse while parents with children will be traveling to the park. This is not safe.
8. The south side of Cajalco must be expanded for this Project. This is still not sufficient to allow for trucks to enter and exit this project.

The Project removes numerous homes from the Project site. There is a shortage of homes in California. There is no shortage of warehouses. State laws are in place to preserve and encourage existing and new homes.

This Project requires a Foundation General Plan Amendment. It is located outside of the Industrial Corridor – Requires a General Plan Foundation GPA Initiation – 2024 which takes 12 month. FGPA is not approved for this Project.

A Sports Park is part of the Project – Sensitive Receptor – Not allowed. Creates a new road (Decker Road) that will be used by hundreds of logistics trucks and residents using the park. This is unhealthy and not safe.

The industrial warehouse building is proposed with 1,003,510 square feet (s.f.) of total building area on ±44.74 net acres. The building is designed to be up to 50 feet tall with 76 loading dock doors positioned on the building's northern façade and 76 loading dock doors positioned on the building's southern façade. 76 Doc doors facing the sports park.

The Project includes cold storage which creates substantially increased greenhouse cases, increased idling time, increased need for electrical hook ups, increased noise and parking along residential streets. The Mead Valley area warehouses are already in need of electricity which is short supply from SCE. Adding cold storage and not putting in solar will increase brown outs for the surrounding community. The Project must eliminate cold storage and add solar.

No signal light is proposed at Decker and Cajalco. The current signal light at Seaton and Cajalco is inadequate for Commercial Industrial logistics warehouses. This signal light and the Decker signal light must be improved to full width with right and left turn lanes wide enough for a 70 foot truck. Only the south side of Cajalco will be improved. What provisions will be made for trucks turning left onto Decker Road from Cajalco? Cajalco has a steep grade going east from Day to Seaton. This increases the truck traffic safety concerns for this warehouse.

This Project requires a number of homes to be removed within the rural residential zoned community. The state of California has required that keeping homes is a priority.

Violates the vision of the Riverside County General Plan and Mead Valley Community Plan.

This massive 1 million + warehouse is feet from hundreds of homes to the north across Cajalco Road and to the south.



The California Aqueduct is between the Proposed Park and the industrial building (175 Feet). Trucks will be entering the warehouse just north of the park entrance. 76 doc doors face the park. The driveway and truck parking are along the south boundary of the industrial building.

This Project does not provide the required findings necessary to change from rural and agriculture land uses to Industrial land use.

**I. FINDINGS FOR FOUNDATION COMPONENT GENERAL PLAN
AMENDMENT CANNOT BE MADE**

No. 220003 should not be approved as the required findings for approving such an amendment are unsupported by substantial evidence and cannot be made. Zone change 220003 does not allow for a Foundation Component General Plan Amendment that is required by this Project. Foundation General Plan Amendments are subject to an eight-year approval cycle. (Ord. 348 § 2.5 (B).) Pursuant to Ordinance 348 Section 2.5.

- (1) That new conditions or circumstances disclosed during the review process justify modifying the General Plan;
- (2) That the modifications do not conflict with the overall Riverside County Vision, and
- (3) That they would not create an internal inconsistency among the elements of the General Plan.

These findings cannot be made for the site.

A. No New Conditions or Circumstances Justify Modifying the General Plan

There is no support for the first required finding for approving a Foundation Component Amendment to the General Plan as there is no evidence of new circumstances or conditions relative to this site. The Foundation or any GPA should not be initiated.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan, and General Plan

According to the General Plan, "The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area."

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal-keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Along these lines, the Very Low Density Residential land use designation provides for the development of detached single-family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal-keeping uses.

Hence, the area targeted for land use change is an area intended to act as a gradual transition between Community Development and Rural Foundation components of the General Plan. This would diminish Rural Community Foundation Component of the General Plan and degrade its application in this area. Zone Change 220003 would also permit Light Industrial uses to encroach further west to develop adjacent to higher density residential uses. In this way, this conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project conflicts with the following County Vision statements and Vision concepts:

- *"Balances stability in the landscape with the dynamism and flexibility to adapt to changing future circumstances."* As discussed above, there are no changing "future circumstances" applicable to this site justifying disrupting General Plan stability.

- *"Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed."* Again, no new "future circumstances" justify undermining GP stability.
- *"Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so."* Private property rights surrounding, and environmental resources on and surrounding, the Zone Change 220003 site (and entire Project site) are not being protected by this proposed amendment. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.
- *"Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others."* Zone Change 220003 would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.
- *"Preserve crucial open space and transportation corridors, resulting in more compact and efficient development than would otherwise happen."* Zone Change 220003 would promote further sprawl west away from the I-215 transportation corridor.
- *"Provide a range of community design options to respond to varied lifestyle choices."* Zone Change 220003 would delete the adopted range of design options seeking to maintain rural uses in this area of the County.
- *"Put a focus on high quality, efficient growth that uses land resources efficiently."* Zone Change 220003 would promote further sprawl and inefficient growth.
- *"Provide a process for adjustment through General Plan reviews, in accordance with state law, at regular intervals or when triggered by key events."* No "new" condition or event has occurred justifying adjustment at this site.
- *"Corridors and areas are preserved for distinctive purposes: ...economic development, including agriculture; residences..."* Zone Change 220003 would blur distinct lines and fail to preserve residential and agricultural purposes. Furthermore, if agricultural uses would occur in areas zoned for agriculture near the site, County Ordinance 625.1 (right-to-farm ordinance) would not protect such uses unless they were in operation for at least 3 years before the proposed project is developed, potentially precluding agricultural activities on surrounding properties with agricultural zoning.
- *"The rich diversity of Riverside County's environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations."* Zone Change 220003 would not preserve blue line streams or rural uses at the site.
- *"New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas."* Zone Change 220003 promotes growth of industrial warehouse uses outside the designated transportation corridor, to where such growth was planned to be limited.

- *“The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP.”* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *“Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities.”* Zone Change 220003 would permit industrial development to encroach upon rural living areas and agricultural zoning.
- *“Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes.”* Zone Change 220003 and the Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.
- *“Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan’s performance.”* Zone Change 220003 would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.
- *“Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations.”* Zone change 220003 would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.
- *“Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights.”* Approval of Zone Change 220003 would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

A GPA and zone change from rural to Industrial for this Project conflicts with the General Plan Vision, any Foundation GPA should not be initiated.

II. THE PROJECT SHOULD BE DENIED WHERE IT WILL RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS, INCLUDING SIGNIFICANT HEALTH RISKS FROM DEVELOPING DISTRIBUTION WAREHOUSES ADJACENT TO RESIDENTIAL USES

The “Project” necessitating zone change 220003 is a proposal to develop a industrial high-cube warehouse/ distribution centers totaling over 1 million square feet.

This Foundation Component General Plan Amendment application is thus just one part of a larger proposal to decimate land use planning in this area, and to develop a project which is

completely contrary to adopted General Plan and Zoning designations.

The Commission has the opportunity to encourage upholding the General Plan by recommending this environmentally harmful and inconsistent Project not move forward as planned. Thorough consideration should be given to the following potentially significant environment impacts that will be caused by allowing the Project to move forward:

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating zone change 220003 and the proposed Project are of particular concern and provide a strong reason to deny initiation of zone change 220003. Because of the cancer risk and other impacts of diesel emissions on human health, SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors. (“Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District,” May 6, 2005, “Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities,” WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes is inconsistent with this clear guidance.

The scope and breadth of health effects of diesel PM emissions are the subject of ongoing study. At present, diesel PM is known to cause cancer; immune system effects; reproductive, developmental, and endocrine effects; nervous system effects; and lung health problems, as recognized by the County in the General Plan. Immune system effects include increased allergic inflammatory responses and suppression of infection fighting ability. Diesel PM’s reproductive effects include decreased sperm production, changes in fetal development, low birth weight and other harms. Diesel PM exposure may also cause impairment to the central nervous system. (See, *The Health Effects of Air Pollution on Children*, Michael T. Kleinman, Ph.D, Fall 2000, <<http://www.aqmd.gov/docs/default-source/students/health-effects.pdf> >¹; *Diesel and Health in America: the Lingering Threat*, Clean Air Task Force, February 2005, <http://www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf>, “*Dirty Air Triggers More Heart Attacks than Cocaine*,” Kate Kelland, Reuters 2011, and “*Air Pollution Worse than Cocaine for Triggering Heart Attacks, says study*,” Press Association 2011.)

¹ Please consider electronic citations as though they were set forth in full herein. We are happy to provide hard copies of any document upon request.

SCAQMD has stated with regards to the health effects from diesel PM:

“Diesel particles consist mainly of elemental carbon and other carbon-containing compounds... Diesel particles are microscopic...Due to their minute size, diesel particles can penetrate deeply into the lung. There is evidence that once in the lung, diesel particles may stay there for a long time.

In addition to particles, diesel exhaust contains several gaseous compounds including carbon monoxide, nitrogen oxides, sulfur dioxide and organic vapors, for example formaldehyde and 1,3-butadiene. Formaldehyde and 1,3-butadiene have been classified as toxic and hazardous air pollutants. Both have been shown to cause tumors in animal studies and there is evidence that exposure to high levels of 1,3-butadiene can cause cancer in humans...

Diesel emissions may also be a problem for asthmatics. Some studies suggest that children with asthma who live near roadways with high amounts of diesel truck traffic have more asthma attacks and use more asthma medication.

Some human volunteers, exposed to diesel exhaust in carefully controlled laboratory studies, reported symptoms such as eye and throat irritation, coughing, phlegm production, difficulty breathing, headache, lightheadedness, nausea and perception of unpleasant odors. Another laboratory study, in which volunteers were exposed to relatively high levels of diesel particles for about an hour, showed that such exposures could cause lung inflammation.” (*The Health Effects of Air Pollution on Children, supra.*)

Furthermore, infants, children, and the elderly are more susceptible to diesel PM and its associated health impacts. (“Studies Link Fine Particulate Exposure to Children’s and Seniors’ Health,” July/August 2015 < <http://www.aqmd.gov/docs/default-source/publications/aqmd-advisor/july-advisor-2015.pdf?sfvrsn=6> >) Recent studies have linked exposure to childhood allergies, aging of the brain, and higher death rates, among other things. (*Id.*) Other recognized effects of diesel PM on children include slowed lung function and growth, increased emergency room visits, increased incidences of asthma and bronchitis, crib death, asthma respiratory infections, allergic symptoms, and asthma hospitalizations. (*Diesel and Health in America: the Lingering Threat, supra.*) Importantly, this exposure to high pollutant levels in children occurs while their lungs are still developing, and therefore has more severe impacts on this sensitive group. (*The Health Effects of Air Pollution on Children, supra.*)

This increased susceptibility to air pollutant emissions for children has resulted in the California EPA Office of Environmental Health Hazard Assessment (“OEHHA”) weighting cancer risk by a factor of 10 for exposures to carcinogens from birth to two years old, and by a factor of 3 for exposures from 2 years old to 15 years old. (*Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*, California EPA OEHHA Air Toxicology and Epidemiology Branch, April 2009, p. 3. <http://oehha.ca.gov/media/downloads/crnrtsd/cancerpotency.pdf>)

This Project is proposed to be developed directly adjacent to residential uses in total disregard of good neighbor policies for land use siting and appropriate residential setbacks.

C. GHG Emissions

The proposed zone change intensifies the use of the site from very low density residential to light industrial. Increased intensity of site development from potentially 2 homes (1 acre minimum for VLDR) as currently planned to an additional 152 truck loading bays if zone change 220003 is approved (not even considering the whole Project) will significantly increase mobile GHG emissions.

D. Noise

The County's General Plan recognizes that mobile noise sources may be the most annoying noise producers in the community. (*See General Plan Noise Element*) Noise from traffic and truck trips will increase noise to adjacent residences with increased trip generation and truck use. (U.S. Department of Housing and Urban Development. (March 1985) *The Noise Guidebook*. <https://.hudexchange.info/resource/313/hud-noise-guidebook/>. [Noise level a function of distance, among other factors].) The reduced setback achieved by Zone Change 220003 of residential uses from industrial uses will significantly impact noise experienced by residents.

The health impacts of noise to area residents from this Project may also be significant. Suter, Dr. Alice H., Administrative Conference of the United States. (November 1991) *Noise and Its Effects*. <http://www.northfriends.org/images/WLCcomments/Johnson%20and%20Sedlack%20Attachment%203.pdf>.)

E. Traffic/ Transportation

The Project would significantly increase local traffic in a residential area. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. (*"Overweight trucks damage infrastructure"* April Castro, USA Today, 2007 http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

III. CONCLUSION

When taken as a whole, the significant environmental and human costs of considering approval of the proposed Project warrant its immediate denial. Denial is especially deserved as little to no benefit to County citizens would result-- distribution warehouse projects are notorious for under-delivering on job promises, particularly as automation of such facilities occurs. (See, e.g., The Press Enterprise, Jack Katzanek (February 1, 2012) *"Moreno Valley: Sketchers' warehouse has caused net job loss,"* <http://www.pe.com/business/business-headlines/20120201-moreno-valley-skechers-warehouse-has-caused-net-job-loss.ece>.)

This warehouse Project is building a large sports park within the Project. Hundreds of logistics trucks will be traveling and parking next to this Sports Park. Building a sensitive receptor (sports park) "warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities".

Warehouses within 1000 feet of a sports park or school significantly harms people living near warehouses, children who may be using this proposed sports park, harming their environmental and quality of life and harming the entire community. **This will bring thousands of children to a place that causes serious harm such as asthma, lung and heart disease.**

The Riverside County General Plan is required and must protect the children under its jurisdiction. Forcing Mead Valley children to use this park because you have failed to build your own park is a disgrace to everyone who lives in Riverside County. Mead Valley is an Environmental Justice community and one of the poorest communities in the County. Mead Valley receives millions of dollars in EJ funding every year, but instead of building a nice park, money was spent on hundreds of trees. With the cost of water who can afford water for those trees. **What real benefit is this to the community? A real sports park closer to the local schools would be beneficial to the residents of our community.**

The State of California Attorney General's office.

warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. (<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>)

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.¹⁴
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

B. The Modifications Conflict with the Overall Riverside County Vision, Mead Valley Area Plan and General Plan

According to the General Plan, “The Mead Valley land use plan provides for a predominantly rural community character with an equestrian focus. This is reflected by the Very Low Density Residential and Low Density Residential land use designations within the Rural Community Foundation Component and Rural Residential designation within the Rural Foundation Component that dominate the planning area.”

Along these lines, the Very Low Density Residential land use designation provides for the development of detached single- family residential dwelling units and ancillary structures on large parcels, and the Rural Community Foundation Component encourages equestrian and other animal- keeping uses.

AIR QUALITY, ENERGY, GREENHOUSE GAS EMISSIONS AND HEALTH RISK ASSESSMENT IMPACT ANALYSIS.

In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

General Plan

The County of Riverside General Plan, prepared December 2015, provides the following air quality-related goals and policies that are applicable to the proposed project.

Multi-jurisdictional Cooperation Policy AQ-1.4: Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.

Policy AQ-1.5: Establish and implement air quality, land use and circulation measures that improve not only the County’s environment, but the entire region.

Sensitive Receptors

Policy AQ-2.1: The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.

Policy AQ-2.2: Require site plan designs to protect people and land uses sensitive to air pollution with barriers and/or distance from emissions sources when possible.

Policy AQ-2.3: Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

Mobile Pollution Sources

Policy AQ-3.2: Seek new cooperative relationships between employers and employees to reduce vehicle miles.

Policy AQ-3.3: Encourage large employers and commercial/industrial complexes to create Transportation Management Associations.

Policy AQ-3.4: Encourage employee rideshares and transit incentives for employers with more than 25 employees at a single location

The Environmental Justice Element of the General Plan:

Policies:

HC 14.1 When feasible, avoid siting homes and other sensitive receptors near known or anticipated sources of air pollution.

HC 14.2 When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors.

Health Risk Reduction

This category includes policies that work towards reducing unique and compounded health risks. The following policies address pollution exposure and access to food and encourages safe and sanitary homes and an environment conducive to engaging in physical activity.

Pollution Exposure Policies:

HC 16.1 In cooperation with affected federal state, local agencies, county departments, and impacted community residents, monitor changes to the Salton Sea and other bodies of water that impact air quality and water quality and seek and pursue opportunities to address impacts to the maximum extent possible, and make public the data and other information related to the status of the effort.

HC 16.2 Pursue funding and other opportunities from state, federal, and local government and non-government sources and allocate county general funds to improve public health and limit pollution exposure and promote efforts to ameliorate environmental justice constraints in environmental justice communities.

HC 16.3 Assist communities in seeking funding for community initiated clean air projects including the installation of on-site air monitoring equipment in areas of high exposure to air contaminants.

HC 16.4 Pursue funding to connect low-income residents and communities to municipal water and wastewater services. In the interim, seek financial assistance for septic system repair in order to limit groundwater contamination by poorly maintained septic systems or to provide for connections to wastewater systems as a viable alternative if such systems can be made readily available.

HC 16.5* Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.

HC 16.6* When developing and siting large scale logistics, warehouse and distribution projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.7 Evaluate public and private facilities for health hazards or major sources of contamination, identify, and implement alternatives for removal of contamination.

HC 16.8 Evaluate creating a cap or threshold on the number of pollution sources within EJ communities and make recommendations thereon.

HC 16.9 Explore the feasibility of creating a partnership with the South Coast Air Quality Management District (SCAQMD) to establish a mitigation program to reduce the impact of air pollution as well as assist with the implementation of air quality programs.

HC 16.10* Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.

HC 16.11 Implement development of bicycle and pedestrian facilities to reduce dependency on fossil fuel based transportation and pursue funding to implement mobility plans and projects.

HC 16.12 Plan and implement complete streets which include sidewalks, greenbelts, and trails to facilitate use by pedestrians and bicyclists where such facilities are well separated from parallel or cross

through traffic to ensure pedestrian and cyclist safety and rehabilitate/expand existing to achieve same or similar design features.

HC 16.13 Provide buffer spaces and vegetative barriers between high-volume roadways/ transportation and train track corridors and sensitive land uses.

HC 16.14* Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.

HC 16.15* Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.22* Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum County of Riverside General Plan.

HC 16.23* Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 16.24* Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.

HC 18.7* Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.8* Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.

HC 18.9* Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

Riverside County General Plan Vision statements and concepts

CHANGE OF ZONE NO. 2200062 would permit Light Industrial uses to encroach west into the established rural residential developed community. In this way, this Project conflicts with the overall purpose of these Foundation Components and the General Plan.

This Project also conflicts with the following County Vision statements and Vision concepts:

- *“Is flexible so that it can be adjusted to accommodate future circumstances, yet provides a solid foundation of stability so that basic ingredients in the plan are not sacrificed.”* Again, no new “future circumstances” justify undermining GP stability.
- *“Protects high-value environmental resources and private property rights - and develops the complex tools needed to do so.”* Private property rights surrounding, and

environmental resources on and surrounding, the Project site are not being protected by this proposed zone change. Residences nearby the site will be harmed by intensified land uses, increased air pollutant emissions, traffic, noise, aesthetic, and other impacts that will harm both the environment and property values.

- *“Provides a long-term means for economic stability to be achieved through investment by a variety of interests: residential, agricultural, property owner, environmental, institutional, business community, labor, and others.”* The project would prefer the interests of the property owner over neighboring residential uses and agricultural zoning.

- *“Provide a range of community design options to respond to varied lifestyle choices.”* The Project would delete the adopted range of design options seeking to maintain rural uses in this area of the County.

- *“The rich diversity of Riverside County’s environmental resources; even those modified by human activities; is preserved and enhanced for the enjoyment of present and future generations.”* The Project would not preserve blue line streams or rural uses at the site.

- *“New growth patterns no longer reflect a pattern of random sprawl. Rather, they follow a framework of transportation and open space corridors, with concentrations of development that fit into that framework. In other words, important open space and transportation corridors define growth areas.”*

“The extensive heritage of rural living conditions continues to be accommodated in areas committed to that lifestyle and its sustainability is reinforced by the strong open space and urban development commitments provide for elsewhere in the RCIP.” The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.

- *“Each of our rural areas and communities has a special character that distinguishes them from urban areas and from each other. They benefit from some conveniences such as small-scale local commercial services and all-weather access roads, yet maintain an unhurried, uncrowded life style. Rural residents accept the fact that they must travel some distance for more complete services and facilities.”* The Project would permit industrial development to encroach upon rural living areas and agricultural zoning.

- *“Land use and transportation decisions are made with an understanding of their impact on the health of Riverside County residents; achieved through partnerships with project sponsors and evaluation of land use and transportation decisions from the perspective of health outcomes.”* The Project proposed would locate high cube warehouses adjacent to low density and very low density residential uses without concern for the health and safety of residents, as discussed further below.

- *“Air quality is viewed as such an important factor in quality of life that its measurements are used as a major factor in evaluating the Plan’s performance.”* The Project would permit the locating of significant additional diesel trucks and associated localized diesel PM emissions adjacent to residences.

- *“Measures that reduce carbon emissions and increase energy efficiency are now routinely included in all areas of growth within Riverside County - new development, retrofitting of existing structures, as well as new and ongoing operations.”* The Project would permit further westerly sprawl and development intensity away from infrastructure, increasing carbon emissions and reducing energy efficiency.

- *“Along with its emphasis on achieving community desires, Riverside County remains highly respected for its sensitivity to private property rights.”* **Change of Zone no. 2200062** (would be insensitive to the private property rights of neighboring residents who relied on the GP stability, absent important changed circumstances, when deciding to invest in their properties.

The Mead Valley Community Plan requires that this type of Project create an EIR to thoroughly mitigate all environmental elements for this type of industrial development.

General Plan Environmental Justice Element cannot be met with a Foundation GPA. A massive warehouse directly adjacent to hundreds ranch homes, which are north and south of the Project site.

The Project is adjacent to homes.

A. Health Risk Impacts from Light Industrial Land Use adjacent to Residential Uses.

The health risk impacts from initiating this Project and the proposed Project are of particular concern and provide a strong reason to deny this zone change. Because of the cancer risk and other impacts of diesel emissions on human health, **SCAQMD, CARB, WRCOG, and others have recommending siting warehouses at least 1000 feet from residences and other sensitive receptors.** ("Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning: a Reference for Local Governments within the South Coast Air Quality Management District," May 6, 2005, "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities," WRCOG Regional Air Quality Task Force, September 12, 2005.) This Project proposes to site warehouses adjacent to homes and a Buddhist Church. This is inconsistent with this clear guidance. This warehouse is proposed directly across the street from numerous homes. SCAQMD recommends all warehouses be sited 1000 feet from sensitive receptors.

E. Traffic/ Transportation

The Project would significantly increase local traffic in our rural community. The Project would also increase regional traffic on area freeways including I-215, SR-60, etc. where distribution warehouses in the Inland Empire regularly travel to/ from the ports of Los Angeles and Long Beach. It would also increase traffic substantially on Cajalco Road that is already rated a transportation F and used by numerous Harvill and gridlocked most of the day.

In addition, the conversion of minimal passenger vehicle trips to passenger vehicle and heavy-duty truck trips adds significantly to the need and cost of road repair. According to one study, a 40-ton truck does as much damage to the road as 9,600 passenger cars. ("*Overweight trucks damage infrastructure*" April Castro, USA Today, 2007

http://usatoday30.usatoday.com/news/nation/2007-09-10-3878428638_x.htm) Impacts to transportation infrastructure will be significantly increased by this Project.

Thank you for your consideration of these comments.

Debbie Walsh

RAMV



07/31/2023

VIA EMAIL ONLY

Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon Street, 12th Floor
Riverside, CA 92501
rbrady@rivco.org

RE: NOP Comments for Mead Valley Commerce Center Project

Dear Mr. Brady,

The comments are submitted on behalf of Californians Allied for a Responsible Economy ("CARE CA") regarding the Notice of Preparation ("NOP") for the Mead Valley Commerce Center (the "Project") Draft Environmental Impact Report (DEIR). The proposed Project would include the construction and operation of a 1,003,510 square foot industrial warehouse building located at the southwest corner of Seaton Avenue and Cajalco Expressway, between Seaton Avenue and Decker Road in Riverside County.

The goal of an EIR is to provide decisionmakers and the public with detailed information about the effects of a proposed project on the environment, how significant impacts will be minimized and alternatives to the project (Pub. Res. Code § 21002.2). Therefore, CARE CA respectfully requests a complete analysis of all impacts under CEQA, imposition of all feasible mitigation and study of a reasonable range of alternatives, including at least two environmentally superior alternatives to the Project. In addition, the County should take into consideration the following comments:

1) The DEIR should clearly articulate assumptions regarding the type and mix of warehouse uses that will occupy the warehouse space to ensure that the unique impacts of each use (i.e., both truck and vehicular trips, air quality, GHG emissions, public health risk and other environmental effects) are comprehensively evaluated and mitigated. If the Project will not include cold storage, then the DEIR must include California Air Resources Board (CARB) recommended design measures in the Mitigation Monitoring and Reporting Program (MMRP). CARB recommends requiring contractual language in tenant lease agreements or restrictive covenant over parcels to prohibit use of transport refrigeration units (TRUs). Simply put, the

DEIR analysis should provide details of any and all proposed future uses of the Project, clearly articulated and quantified. The details should not be deferred to a later date.

2) People living near the project site would face environmental impacts from the cumulative effects of the Project and other surrounding industrial developments in the region. The EIR must thoroughly analyze and mitigate this cumulative impact.

3) Assuming industry standard 24 hours a day, 7 days a week operation, the Project would undoubtably contribute to air pollution. The County must make all efforts to minimize air quality effects to the greatest extent possible. Therefore, the Air Quality analysis should be based on actual emissions data from existing similar sized warehouse projects rather than computer generated estimates. In addition, a mobile source Health Risk Assessment must be prepared as part of the DEIR. The HRA should include both construction and operational diesel PM emissions and cancer risk assessment, and also account for other emission sources such as backup generators, and forklifts. Failure to take these measures will result in a DEIR that is deficient in its informational discussion of air quality impacts as they connect to adverse human health effects.

4) To determine the significance of the Project's GHG emissions, the DEIR should adopt a quantitative analysis with numeric thresholds. In addition to the thresholds adopted by South Coast Air Quality Management District (SCAQMD), the DEIR should also use robust thresholds such as Earthjustice group's net zero emission model. Using such a model will enable the County to require effective measures that reduce GHGs or even achieve net zero emissions. Any measures to address climate change threats must be considered. In case the DEIR adopts a qualitative analysis, we expect a detailed explanation why numeric thresholds adopted by various air districts were not used in the analysis.

Aside from identifying an appropriate threshold backed with substantial evidence, we expect a detailed discussion on the Applicant's plan to offset the Project's GHG emissions, including use of white paint to cool the building and reduce the need for planet warming internal air conditioning.

Thank you for the opportunity to submit NOP comments. CARE CA respectfully urges the County to take this opportunity to protect the environment and the community, especially sensitive receptors, to the maximum extent feasible. We look forward to reviewing and commenting on subsequent environmental review documents when these documents are released for public review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Modrzejewski', with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director

July 31, 2023

Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409
Attn: Russell Brady, Project Planner
Submitted via email to rbrady@rivco.org.

Re: Mead Valley Commerce Center Notice of Preparation (SCH #2023060799)

Dear Russell Brady,

This letter is to respond to the Notice of Preparation for the proposed Mead Valley Commerce Center which was made available for review and comments. Based on the information provided, there are some concerns which we hope can be studied and addressed as part of the EIR process. We understand that the EIR will study a range of topics to include air quality and GHGs. It is important that this study include an accurate account of the cumulative impacts which the proposed Project would contribute to advancing. Additionally, it is of particular importance to identify how the Project would ensure that truck traffic is directed away from the entrance to the proposed park.

Another area of study which cannot be overlooked is the provision of safe bike and pedestrian infrastructure. It is not precisely clear what is proposed for infrastructure for those two modes, but it is crucial to note that the WRCOG Active Transportation Plan identifies a Corona-Perris connection with both its 5A | East Corona - Lake Perris via El Sobrante and its 5B | East Corona - Lake Perris (via Cajalco Road) options passing by the Project site. As such, it is expected that the Project would include the construction of the portion of that connection in the same way that any other transportation improvements are conditioned to be built. Furthermore, it is vital that the infrastructure built by this Project not create hazards by design and instead is built with the appropriate bike facilities based on traffic speeds and volumes (see Figure 1), including the use of bike-specific traffic signals where necessary. And while LOS has been removed as a CEQA impact, it is often still used based on other local requirements. If that is the case for this Project, then it should be tabulated for all users, including bicyclists, transit, and pedestrians, not just automobiles.

Thank you for taking the time to receive these comments. Please contact us with any questions.

Sincerely,

Marven E. Norman, Policy Coordinator
Center for Community Action and Environmental Justice

cc:

Inland Empire Biking Alliance
WRCOG

Attachment A

Caltrans Contextual Guidance for Preferred Bicycle Facilities**						
Place Type and Surrounding Land-Use ¹		Posted Speed				
		15-20	25-30	35-45	> 45	
Urban Areas & Suburban Main Streets	Design Year ADT	<2,500	Standard Shoulder or	Standard Shoulder or	Class II or Class IV	Class IV
		2,500-5,000	Shared Lane	Shared Lane	Class IV	
		5,000-10,000	Class II or Class IV	Class II or Class IV		
		>10,000	Class IV	Class IV		
Rural Areas (Developing Corridors)			15-20	25-30	35-45	> 45
		<2,500	Standard Shoulder (may be designated as a Class III facility) ²			
		2,500-5,000				
		5,000-10,000				
	>10,000					
Rural Main Streets		15-20	25-30	35-45	> 45	
	<2,500	Standard Shoulder or	Class II	Class II	Class I or IV	
	2,500-5,000	Shared Lane		Class II		
	5,000-10,000	Class II		Class I, II, or IV		
	>10,000					

¹ Highway Design Manual (HDM) Index 81.3

² HDM, Tables 302.1 and 307.2

** Chart is not a replacement for engineering judgement. Intended for planning purposes, to identify minimum preferred bikeway facility under different place type, volume and speed conditions.

Figure 1: Caltrans Contextual Guidance for Preferred Bicycle Facilities.¹

¹ Flournoy, M. (2020). Contextual Guidance for Bike Facilities. State of California Department of Transportation. Found online at <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/planning-contextual-guidance-memo-03-11-20-a11y.pdf>.

From: [Jer Harding](#)
To: [Emily Golubow](#)
Subject: FW: Notice of Preparation of EIR for the Mead Valley Commerce Center
Date: Monday, August 14, 2023 9:20:19 AM

Hi Emilie:

Please include the e-mail at the bottom in the comment letters for MVCC, and please add to 1.0.

Thanks,

Jerrica Harding, Senior Associate

T&B PLANNING, INC.
4909 Murphy Canyon Rd., Suite 405. San Diego, CA 92123
Mobile: 760.484.6784
jharding@tbplanning.com
www.tbplanning.com

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

From: Brady, Russell <rbrady@RIVCO.ORG>
Sent: Friday, August 11, 2023 4:24 PM
To: Jer Harding <jharding@tbplanning.com>
Subject: FW: Notice of Preparation of EIR for the Mead Valley Commerce Center

NOP comments

Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501
951-955-3025

How are we doing? Click the Link and tell us

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

From: Franco Pacheco <franco.pacheco@yahoo.com>
Sent: Friday, August 11, 2023 10:43 AM
To: Brady, Russell <rbrady@RIVCO.ORG>
Cc: Winstead, Hashish <HWinstead@RIVCO.ORG>
Subject: Notice of Preparation of EIR for the Mead Valley Commerce Center

CAUTION: This email originated externally from the Riverside County email system. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Hello my name is Franco Pacheco. I am emailing you today to comment on this proposed warehouse in my community. I read the notice of preparation and this is a terrible idea. There is absolutely no reason why we need another warehouse in such a compacted area and rural community. The park that is being proposed is a great idea and can benefit the community but the question is why does the warehouse need to come with it? This proposed

warehouse is set to be 45 acres while the park will be less than half of that at 13 acres and only 1000 feet from the warehouse . So while residents who live in a rural community want to walk along the trails of this proposed park, they will be breathing in fumes and stuck in traffic just to get there from the giant trucks that are already causing pollution and will only be exacerbated by the trucks that will also be coming in and out of this warehouse. We do not want it here. We do not need it and we do not deserve for our concerns to be dismissed in order to deepen developers pockets. Our county is in charge of protecting and ensuring public health and this is contributing to the negative effects of warehouse development on our health. We have over 10 percent of the nations warehouses just here in riverside county. We do not need anymore. Enough is enough! At this point the county is knowingly neglecting the communities best interest as well as the health of the community.

Sent from my iPhone
Confidentiality Disclaimer

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. The information contained in this message may be privileged and confidential and protected from disclosure. If you are not the author's intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please delete all copies, both electronic and printed, and contact the author immediately.

County of Riverside California <<http://www.countyofriverside.us/>>