September 19, 2024
Damaris Abraham
Assistant Community Development Director
CITY OF LAKE ELSINORE
130 S Main Street
Lake Elsinore, CA 92530

Subject: **Baker Street, Warehouse Project (PA-2020-103) Good Neighbor Policy Consistency Memo**

Dear Ms. Abraham:

Riverside Legacy IV Nichols Road, LLC is excited to be a member of the Lake Elsinore community. Please accept this letter as an outline of our proposed project and its consistency with the City's Good Neighbor Policy.

Project Summary

The proposed project ("Project") will consist of two new warehouse buildings totaling a combined 1,000,451 square feet ("SF") and a standalone trailer parking lot. Building 1 will be 212,028 SF, inclusive of 5,000 SF of ground floor office, 5,000 SF of mezzanine, and include 23 dock doors along the southwest side of the building. Building 2 will be 788,423 SF inclusive of 10,000 SF of ground floor office, 10,000 SF of mezzanine, and include 110 dock doors along the northeast side of the building. The Project proposes a parcel map to create three separate lots.

Typical operational characteristics include employees traveling to and from the site, delivery of materials and supplies, truck loading and unloading, and distribution, as well as some manufacturing and cold storage. The Project is assumed to operate 24 hours a day, 7 days per week. Once a tenant has been identified, a more detailed operational description will be provided.

The Project site encompasses 10 parcels totaling approximately 65.81 acres. The site is currently vacant and undeveloped with naturally occurring vegetation consisting of low lying shrubs and grasses. Southern California Edison's Valley-Ivy Glen & Alberhill Transmission power lines are located along the site's frontage of Baker Street. The site is not flat and contains a sloping topography associated with the hills south of the site.

The Project site has a General Plan Land Use designation of Limited Industrial and split zoning designations of Limited Manufacturing (M-1) and General Manufacturing (M-2) which are both compatible with the Land Use. The Limited Industrial Land Use was designed to provide "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses".

According to the City of Lake Elsinore's Municipal Code, the M-1 district is intended to "reserve appropriate locations consistent with the General Plan…from intrusion by residential, commercial, and other inharmonious uses" and should "generally be located in the more visible industrial areas of the City…as it is intended they will play a major role in establishing the

perceived identify of the City's industrial districts". According to the City of lake Elsinore's Municipal Code, the M-2 district is intended to "reserve appropriate locations consistent with the General Plan to accommodate a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and to increase employment opportunities".

To provide consistency and allow for the greatest flexibility of future tenants, the project proposes a zoning amendment to M-2 which will allow for manufacturing and warehousing uses.

Good Neighbor Policy Consistency

The City of Lake Elsinore ("City") adopted its Good Neighbor Policy ("GNP") on April 25, 2023. The policy was developed to provide "a framework for larger-scale warehousing, logistics and distribution projects to be designed and operated in order to mitigate negative impacts on sensitive receptors and the environment". Applicability to the GNP is for buildings over 250,000 SF. Building 1 totals 212,028 SF and Building 2 totals 788,423 SF. Therefore, the GNP is only applicable to Building 2. The below describes how Building 2 conforms with the policy standards:

Siting and Design

1. Warehousing, logistics, and distribution land uses with buildings that are 250,000 square feet in size or larger that are located within 1,000 feet of an existing or planned sensitive receptor shall provide detailed justification supporting a proposed separation of less than 1,000 feet as measured from the property line of the sensitive receptor to the nearest point of any proposed warehousing, logistics and distribution building. In no case shall the minimum setback from an existing sensitive receptor to truck bays, loading docks, active truck operations areas, outdoor storage areas, or any buildings be less than 300 feet to any property line of a sensitive receptor. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design. Projects with buildings located within 1,000 feet of a sensitive receptor may submit a Preliminary Application (PAR) for review by the City Council Executive Project Review Subcommittee and the City's Development Review Committee (DRC). The PAR review may include, but not limited to, identification of site-specific conditions, list of permitted uses within the setback area, and other relevant factors used for a proposed separation of less than 1,000 feet.
    - Building 2 totals 788,423 SF. Adjacent to Building 2 along Baker Street is a parcel containing a non-conforming single-family residence. The parcel has a General Plan Land Use of Light Industrial (LI) and a zoning designation of General Manufacturing (M-2). Per the GNP, sensitive uses "located in Industrial zoning designations" are excluded from the GNP. Therefore, this residence is not a sensitive receptor, and the Project is in conformance with the standard.

      Another property is located to the northwest of Building 2, which includes two separate freestanding structures and a large outdoor storage area, positioned along Pierce Street. The parcel has a General Plan Land Use of Low-Medium Residential and a zoning designation of Single-Family Residential (R1). Per Public Records Request #2024-076, no building permits were identified in association with the subject buildings and as such, the property is believed to be considered illegal, conforming. Historical images suggest the prior use of the property was a junk yard. The property

is presently vacant and is being marketed as an industrial redevelopment opportunity. While the Building 2 truck court faces in the opposite direction from the residence, ancillary truck parking is located within 300 feet of the residence. Activity in this parking area will be limited to truck parking (loading and unloading activities – the primary source of noise – will be confined to the truck court). Considering the characteristics of the property and given the existing residence is unpermitted per City records, the GNP should not apply to this residence.

2. Warehousing, logistics and distribution land uses shall be designed to provide adequate onsite parking for commercial trucks and passenger vehicles and shall provide for adequate onsite queuing for trucks that is located away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public right-of-way or nearby residential areas.
    - The City mandates a parking ratio of 1 space per 1,000 square feet for industrial/warehouse uses. However, the code does not outline a specific parking rate for the high-cube industrial intended for the Project. To address this discrepancy, the Project underwent a Parking Study which analyzed other jurisdiction parking standards and operating facilities of similar size and use in the area which the City approved. The Parking Study determined that a parking requirement of 1 space per 1,000 SF of floor area for the first 40,000 SF, 1 space for each 4,000 SF of GFA for the portion over 40,000 SF, and 1 space for each facility vehicle would be sufficient for the site. This parking rate would require 83 parking stalls for Building 1 and 227 parking stalls for Building 2; 310 parking stalls in total across the site. The Project exceeds this requirement and would provide 172 parking stalls for Building 1, 294 parking stalls for Building 2; 466 parking stalls in total, ensuring that there is no need for on-street parking by passenger vehicles.

      Building 2 is designed to effectively address any on-street truck queuing, idling, or parking issues. The building will feature two driveways along Baker Street, located on the east and west sides, each equipped with three lanes (two for ingress, one for egress) to accommodate on-site queuing. Additionally, the building plans to include 360 truck trailer parking stalls, ensuring ample off-street parking options.

3. Entry gates into loading dock(s)/truck court area(s) shall be positioned at a minimum of 140 feet inside the property line. The stacking distance shall be increased by 70 feet for every 20 loading docks beyond 40 docks. The distance requirement may be reduced if the project design includes double truck stacking lanes. Queuing, or circling of vehicles, on public streets immediately pre- or post-entry to a warehousing, logistics and distribution facility is strictly prohibited. Applicants shall submit to the Engineering Department, and obtain approval of, all turning templates to verify truck turning movements at entrance and exit driveways and street intersections adjacent to said warehousing, logistics and distribution buildings prior to entitlement approval.
    - Building 2 features two driveways, each equipped with three lanes strategically positioned to facilitate off-street queuing to and from the dock(s)/truck court area(s). Two lanes are designed for ingress, while one lane is designed for egress. The proposed design includes a total of 110 loading docks. Spacing per the GNP, each driveway is required to maintain a minimum distance of 385 feet inside the property line. Considering both driveways have two lanes for ingress, the west drive is situated 676 feet 6 inches from the property line, while the east drive is positioned 483 feet

4 inches from the property line. A truck turning exhibit is included with the entitlement set showcasing that the site has been designed to allow for sufficient truck turning movements both with trucks turning into the site and trucks turning within the site. The Project will be in conformance with the standard.

4. Sites shall be fully screened with perimeter landscaping and masonry screening walls along all bordering streets and adjacent to the property lines of sensitive receptors. Perimeter screening shall measure a minimum of 15 feet in width and shall include, but not be limited to, a continuous vegetative screen of overstory trees that measure a minimum of 25 feet in height within ten (10) years of planting and a solid masonry wall of at least six (6) feet in height. Trees shall be provided at a ratio of one (1) 24" box tree per 20 linear feet. Plans for the perimeter landscape buffer shall be prepared by a landscape architect licensed to do business in the State of California and shall incorporate adequate access points for routine maintenance and meet the City's Water Efficient Landscape Requirements (LEMC Chapter 19.08). Developments located within a Very High Fire Hazard Severity Zone shall prepare a Fuel Modification Plan that includes, but not limited to, fire-resistive, native plant species in landscaping. Landscape plans in for developments located in a Very High Fire Hazard Severity Zone shall be reviewed by the City Fire Marshal. The property owner will be responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan and shall be responsible to ensure that the landscaping is maintained in a healthy, living condition, to include the replacement of dead, diseased, or dying plant materials as soon as practicable.
    - Building 2 features a generous landscaping setback of at least 24 feet along Baker Street which exceeds the GNP's mandated minimum of 15 feet. This setback is adorned with a variety of trees including California Sycamore (36" box), Afghan Pine (24" box), Mondell Pine (24" call), and California Live Oak (36" box), complemented by an assortment of shrubs, grasses, and groundcovers. Spaced 20 feet apart in alignment with GNP guidelines, they will form a lush green barrier. Following the vegetation, a combination wall (10-foot retaining and 10-foot screen) will line the truck court, featuring pilasters to add architectural interest and effectively mitigate its mass. This wall surpasses the GNP's stipulated minimum height of 6 feet, ensuring adequate screening for the building, as illustrated in the accompanying renderings and landscape plans submitted with the entitlement submittal. A Southern California Edison (SCE) easement runs within this landscape setback which limits the maximum height of vegetation to 15 feet. Therefore, while the Project will conform with the requested density of trees and the screen wall height, the Project cannot conform to the requested 25-foot tree height due to SCE's limitations superseding the GNP. However, the Project is open to ideas of how to alternatively meet this standard. Aside from the tree height, the project is consistent with this standard.

      The southeastern hill associated with Building 2 will be planted with California Sycamore, California Live Oak, and a blend of native grasses. This area is naturally shielded from the neighboring properties due to the down sloping towards Building 2 and would not be visible to adjacent properties.

      The site is classified as a High and Very High Fire Hazard Zone as shown on Figure 3.1 of the City's General Plan. A Fuel Modification Plan and Report were prepared for the site and are in ongoing reviews by the Fire Marshall. Per the Fuel Modification Plan, the landscape plan included in the entitlement set reflects consistency with the

findings of the plan as shown in the *Defensible Zone Legend* section. Therefore, the project will be consistent with this standard.

5. Building planes visible from public view shall be articulated by changes in exterior building materials, color, decorative accents, and/or articulated features. Modulation and variation of building masses between adjacent buildings visible from public streets shall be provided. Pedestrian and ground-level building entries accessible to visitors should be designed using recessed entries, covered entries, projections, or roofs to provide shade and visual relief at a pedestrian scale.
    - The project aims to integrate a natural color scheme to ensure the building harmonizes with its surroundings rather than standing out. The facades will feature a range of light and medium shades of beige and brown, complemented by stone accents to break up its visual mass. Reflecting the natural palette, the windows will incorporate light tinted reflective glazing. Pedestrians will primarily encounter lush vegetation followed by screen walls, which will echo the building's color palette and offer visual interest through stone pilasters. Office entries, distinguished by stone siding, recessed glass doors, and metal canopies, will guide visitors and employees, ensuring consistency with the overall design standard.

<u>Construction and Operation</u>

6. All construction and grading related activities shall comply with the South Coast Air Quality Management District (SCAQMD) Regulations in effect at the time work commences.
    - Acknowledged; in association with the Environmental Impact Report being prepared for the Project, an Air Quality Analysis will be completed to confirm compliance with the regulations of SCAQMD. The Project will be in conformance with the standard.

7. The following environmentally responsible practices shall be required during construction:

a) The applicant shall use reasonable best efforts, as determined by the Community Development Director, or designee, to deploy the highest rated California Air Resources Board (CARB) Tier technology that is available at the time of construction. Prior to permit issuance, the construction contractor shall submit an equipment list confirming equipment used is compliant with the highest CARB Tier at the time of construction.

b) Equipment proposed for use that does not meet the highest CARB Tier in effect at the time of construction, shall only be approved for use at the discretion of the Community Development Director, or designee.

c) Use of electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors.

d) Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge if the utility provider can provide temporary power for this purpose.

e) Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location.
    - Acknowledged; requirements associated with construction will be a Condition of

Approval for the Project while operational requirements associated with be Conditions of Approval specific to Building 2. The Project will be in conformance with the standard.

8. A Property Maintenance Program shall be submitted for review and approval by the Community Development Director or designee prior to the issuance of building permits. The program shall provide for the regular maintenance of building structures, landscaping, and paved surfaces in good physical condition, and appearance. The methods and maximum intervals for maintenance of each component shall be specified in the program.
    - Acknowledged; this requirement will be a Condition of Approval for Building 2. The Project is in conformance with the standard.

9. Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
    - Acknowledged; this requirement will be a Condition of Approval for Building 2. The Project is in conformance with the standard.

10. Provisions of the City's Noise Ordinance (LEMC Chapter 17.176) shall be satisfied during all site preparation and construction activity. Site preparation activity and construction shall not commence before 7:00 AM and shall cease no later than 5:00 PM, Monday through Friday. Only finish work and similar interior construction may be conducted on Saturdays and may commence no earlier than 8:00 am and shall cease no later than 4:00 p.m. Construction activity shall not take place on Sunday, or any Legal Holidays. Concrete Pouring activity shall be exempt from the construction days and hours operation identified above (concrete pouring shall not include other construction activities such as framing work). The applicant shall place a weatherproof 3' X 3' sign at the entrance to the project site identifying the approved days and hours of construction activity. The sign shall identify the name and phone number of the development manager to address any complaints.
    - Per Section 17.176.080 Prohibited Acts Part F, of the City's Municipal Code, the Project will abide by construction hours of operation restrictions. Construction activity will occur from 7:00 AM to 7:00 PM on weekdays and prohibit construction on weekends and major holidays, except in emergency situations, to prevent noise disturbance across a residential or commercial real property line. This GNP is not applicable, and the Project will be in conformance with the standard.

11. Facility hours of business operation for projects with buildings located within 1,000 feet of a sensitive receptor shall be reviewed on a project-by-project basis. A Preliminary Application (PAR) for such projects may be submitted for review by the City Council Executive Project Review Subcommittee and the City's Development Review Committee (DRC). Facility hours of business operations shall be limited to Monday through Friday 7:00 a.m. to 7:00 p.m. and no work shall occur on weekends or Legal Holidays adjacent to sensitive receptors, except when the operator demonstrates through site design and mitigation measures to adequately shield and reduce noise impacts to the sensitive receptors. At no time shall refrigerated trucks parked outdoors run and/or idle outside of the facility hours of operation. Changes to the hours of operation shall be reviewed on a project-by-project basis and shall be included in the Conditions of Approval for the project.
    - Acknowledged; there are no sensitive receptors within 1,000 feet of Building 2 as the residence along Baker Street is non-conforming and the residence along Pierce is vacant and being marketed as an industrial rezone opportunity. The Project is in

conformance with the standard and seeks the flexibility to operate 24/7 Monday – Sunday.

12. At no time during normal business hours shall the noise generated from the adjacent industrial operation exceed 65 dba as measured from the closest property line of a sensitive receptor.
    - Acknowledged; in association with the Environmental Impact Report being prepared for the Project, a Noise Impact Analysis will be completed to confirm operational noise levels don't exceed 65 dba measured from the closest property line of any nearby sensitive receptors. The Project will be in conformance with the standard.

13. A City representative shall conduct periodic on-site inspections during and after construction to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities.
    - Acknowledged; grading, construction and operational activities will be coordinated through the City. The Project will be in conformance with the standard.

Respectfully,

Riverside Legacy IV Nichols Road, LLC

GATE STACKING CALCULATION: (NORTH GATE)

STACKING DISTANCE REQUIRMENTS PER GNP:
140'-0" BASE REQUIRED
+70'-0" PER EVERY 40 DOORS OVER 400 DOORS

NUMBER OF BUILDING DOCK DOORS:
110

STACKING DISTANCE REQUIRED AT GATE
140'-0"
+140'-0" (110 DOORS - 40)/40)=1.40'-0" EXTRA
280'-0" REQUIRED AT THIS GATE

STACKING DISTANCE PROVIDED
250'-0"
+268'-0"
518'-0"

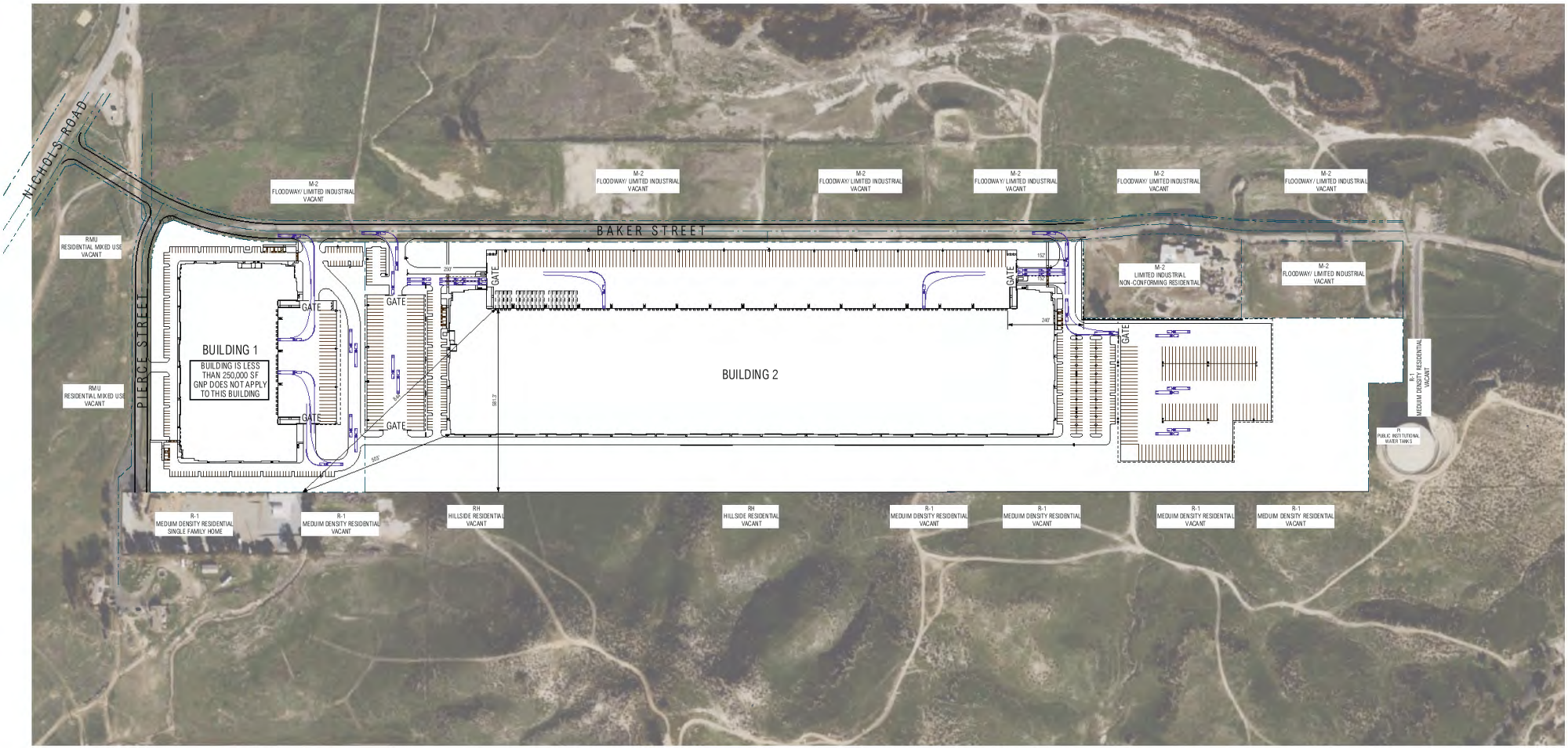
GATE STACKING CALCULATION: (SOUTH GATE)

STACKING DISTANCE REQUIRMENTS PER GNP:
140'-0" BASE REQUIRED
+70'-0" PER EVERY 40 DOORS OVER 400 DOORS

NUMBER OF BUILDING DOCK DOORS:
110

STACKING DISTANCE REQUIRED AT GATE
140'-0"
+140'-0"/(110 DOORS - 40)/40)=1.40'-0" EXTRA
280'-0" REQUIRED AT THIS GATE

STACKING DISTANCE PROVIDED
152'-0"
+152'-0"
304'-0"



PROJECT NORTH

TRUE NORTH

GOOD NEIGHBOR EXHIBIT

SCALE: 1" = 120'-0"